

## Peckham and Nunhead Area Action Plan

Development Plan Document

CD5 - Consultation Report - Appendix P  
Preferred Option comments and officer responses

March 2013

**Fairer future** ✓  
Delivering our promises



# Future Peckham



## **Peckham and Nunhead Area Action Plan Publication/Submission version**

### **Consultation Report: Appendix P**

**Comments received and officer responses  
at the 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 P** of the Consultation Report and it sets out all of the response received at the **Preferred Option** stage and our officer comments on these representations.

Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
1	789	Nunhead Surgery	Policy 6			STRONGLY SUPPORTED BY THE NUNHEAD SURGERY	Support noted.
3	790				12	A maximum of 3 storeys would be more appropriate to the current surrounding. Only two buildings have 4 storeys. One is a Victorian terrace but with a lower ground floor, thus it appears as if it was a 3 storey building. The other building is a modern, pretty ugly house next to the Nun's Head pub. It doesn't fit at all to the historical character of Nunhead Green and is an example of what should be avoided by all means.	Our view is that development of up to a maximum of 4 storeys is appropriate on this site. When a planning application come forward on this site then the detail regarding appropriate heights will be determined through the planning application process
4	790		Policy 33			It needs to be assured that existing attempts of improving the street furniture are continued and completed. New lighting with a historical look which fits well to the Victorian terraces in Nunhead was implemented south of Evelina Road in Nunhead but not in the north of Evelina Road. See photos attached.	Policy 23: Public realm requires new development to consider the existing context and local historic environment.
5	790		Policy 23			Shopping frontages: the current refurbishment of some shop frontages was done in a very cheap looking design in Nunhead East of the station entrance.	Policy 25: Built form, sets out guidance for the design of shop fronts. Work has already taken place through the Improving Local Retail Environments (ILRE) scheme to improve shop fronts on Gibbon Road and this will continue through funding secured in 2012 as part of the Mayor's Outer London Fund.
6	790		Policy 4			I welcome the restriction of Nunhead's high street to not more than 5% of shops being takeaways, however I have a feeling that level has already been passed.	Support noted. We have updated the AAP to set out the existing levels of hot food takeaways.
7	149			2.1.8		Section 2 2.1.8 Journeys from PR station to Victoria take about 15 minutes.	This section of the AAP has been updated.
8	149					Section 4.2 Enterprise P33. Policy 1 Peckham town centre box * Here and throughout the report Copeland Industrial Park (CIP) is called Copeland Road	We have changed the proposal site name to Copeland Industrial Park and 1-27 Bournemouth Road throughout the AAP for consistency.



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						<p>Industrial Park. This is incorrect and can be confused with the Copeland Road car park. Hope it can be corrected. * This section says the policy is to *strengthen the existing retail parades ... by promoting and maintaining a vibrant balance of uses ...* But this is not happening now as there continues to be a proliferation of the same kinds of retail offers. What we need is to avoid this leading to the too narrow a range of retail and monopoly of a few. This includes betting shops that are not the kind of retail likely to breathe new life into the town centre. Now we have seen another one just proposed in the brand new retail units at the corner of Bournemouth Road and Rye Lane. How will the Council's PNAAP policies make a difference on this? * 'Support the setting up of new markets and street trading areas' - The experience of street markets in the town centre is not always positive. What can the PNAAP say on how these will be appropriate for the town centre revival, and how local people concerned about the town centre developments will be consulted in time to make a contribution to the thinking on their location and type?</p>	<p>The saved Southwark Plan Policy 1.9 requires a minimum of 50% of the protected shopping frontage to remain in A1 retail use. This policy helps to ensure a mix of services is maintained. The General Permitted Development Order (GPDO) 1995 (as amended) allows a change of use between various use classes without requiring planning permission; for example, a change from A3, A4 or A5 (restaurants, bars and hot food takeaways) to A2 financial or professional services is permitted. As betting shops are classified within the A2 use class, this means that any restaurant or takeaway can become a betting shop without permission. Also, a bank, building society, estate agent, employment agency, solicitors or other professional or financial service would be able to change within the same use class (A2) to a betting shop. The Council does not have control over this change.</p> <p>The government is committed to deregulation of the planning system and have recently undertaken a wider review of how change of use is handled in the planning system. An issues paper was published for consultation at the end of 2011, which invited views and evidence from a range of organisations and individuals. A further consultation was undertaken in the summer 2012 and sought views on whether there is scope to change elements of the current planning framework for change of use, contained in the Use Classes Order (2007) (UCO) and the General Permitted Development Order 1995 (GPDO) setting out a few proposals for consideration. We submitted a response to this consultation and raised concern in relation to the retail (A class) uses, particularly the issue on the proliferation of</p>

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							<p>betting shops on our high streets. We suggested that betting offices should be reclassified as sui generis uses which would put them into a class of their own and require planning permission.</p> <p>Support for the provision of street markets in town centre locations is set out in both the NPPF and the London Plan. PNAAP policy 5 recognises that markets in the Peckham action area can increase the variety of retail provision, provide self-employment opportunities with low entry-costs and fulfil a valuable role in the local economy. The policy is supported by the Southwark Street Trading and Markets Strategy (2010). The strategy includes recommendations for developing and improving the borough's street trading and markets infrastructure. Section 3.10 sets out a range of proposed actions which includes implementing action plans for individual market sites and consulting with other council departments and stakeholders on how new markets can contribute positively to an area. We will work with the street trading and markets team to ensure that consultation on options for improved or new markets in the town centre is undertaken.</p>
9	149		Policy 1	4.2.8		P34. 4.2.8 vacant upper floors above shops. Can the PNAAP say something to encourage *meanwhile* uses of these?	We have removed this part of the policy because our current borough-wide adopted policies are able to adequately assess any scheme which comes forward on the upper floors of shop units. It is worth noting that the General Permitted Development Order 1995 (GPDO) allows the change of use of the space above a shop (A1 or A2 use) to be converted into a single flat without the need for planning permission, provided the space is not in a separate planning use from the shop and that there is no change to the outside of the building. The government has also recently resolved to

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							increase this allowance to two flats, and will be consulting on a revision to the GPDO.
10	149					P35. Fact box – town centre uses We are desperately short of suitable places for meetings – community meetings, workshops, seminars and conferences. These need to be in the town centre for accessibility by public transport. The only one so far existing is in Cator Street and relatively inaccessible and in any case scheduled for closure making it even more important that we encourage replacements. Can these be mentioned here as town centre uses? They could be part of the uses of the vacant upper floors. They would also be suitable in any hotels.	<p>We have amended the 'Town Centre Uses' fact box in Policy 1 to be consistent with the National Planning Policy Framework (NPPF) definition of main town centre uses. This includes the following: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities). This definition includes conference facilities.</p> <p>We have identified in Policy 7: 'Community Facilities', that we will locate facilities in accessible locations – with priority in the core action area. The definition of Community Facilities covers space for community groups, and space for education provision.</p>
11	149		Policy 2			P35. Policy 2 – arts, culture, leisure and entertainment * The current focus for town centre cultural events is now around Copeland quarter and Blenheim Grove. In this box it says Peckham Square will be promoted as the focus. This seems to go against the grain of what is now happening naturally around Blenheim Grove, the Bussey building and the Copeland quarter. How do these two cultural areas of the town centre fit together? * Can this section include support for new community and educational workshop, seminar, conference spaces as above?	Policy 2 promotes Peckham Square as the focus for cultural events, and we have also acknowledged that we need to continue to build upon the many creative activities taking place in and around the Copeland Industrial Park and Peckham Rye Station to ensure that the two areas can co-exist together. We have set out in the supporting text to the policy that we will work with landowners and developers to identify and secure occupants for new art, cultural, leisure and entertainment space. Fostering partnerships between the local arts organisations and community groups will help to broaden access to, participation in and understanding of

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							<p>the arts within the wider community, as the area physically develops.</p> <p>Policy 7: 'Community Facilities' sets out that we will locate facilities in accessible locations – with priority in the core action area. The definition of Community Facilities covers space for community groups, and space for education provision and also arts and cultural facilities.</p>
12	149		Policy 2	4.2.12		<p>P36. 4.2.12 &amp; fact box Evening &amp; Night Time Economy this section refers to encouraging and promoting the night time economy in the town centre. In exchanges I had with cllr Fiona Colley last November 2011 she agreed that the PNAAP would not encourage the night time economy as distinct from the evening economy. The night time economy is too disruptive for the tightly linked residential area in and adjacent to the town centre. Why has it appeared in this version? It is not that there should never be night time events, but they should be the exception rather than the rule, and certainly not encouraged.</p>	<p>The town centre is not well used in the evenings and night-time, contributing to safety and security concerns. Different but complementary uses, during the day, evening and night time, can reinforce each other, making town centres more attractive to local residents, shoppers and visitors. The development of the evening and night-time economy will help keep the town centre lively and safe at different times of the day and provide more leisure opportunities for local people, visitors and people working in Peckham and Nunhead. It will also boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. Careful consideration needs to be given to mitigate any potential negative impacts associated with evening economy uses to protect the amenity of nearby residents. The criteria set out in the policy will be used to assess whether a proposed use will cause harm to nearby businesses or residents.</p> <p>Our strategy is supported by London Plan Policy 4.6 which states that boroughs should identify, manage and co-ordinate strategic and more local clusters of evening and night time entertainment activities to address need.</p>



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13	149		Policy 3			P39. Fig 7 shopping parades This map does not show the shopping frontages on the southern part of Rye Lane and opposite at the Peckham Rye shopping parade just south of Nigel Road as protected. Please can they be included here? They are very important locally and need to be protected frontages.	We have amended this figure and extended the protected shopping frontage to cover the southern part of Rye Lane.
14	149		Policy 6	4.2.2 5		4.2.25 this refers to light industrial uses in the arches along the Thames link railway. Where is this and can it be shown on a map somewhere?	We have amended the supporting text to Policy 6 to make the description clearer. The railway arches are located along the Inner South London railway line running through Peckham town centre, and accommodate B2, B8, light industrial and sui-generis uses
15	149		Policy 7			Section 4.3 Community Wellbeing P43. Policy 7 – community facilities There is a great shortage of decent meeting spaces for community and educational uses. These get overlooked in the use of the phrase ‘community facilities’ which focus on a different kind of provision eg sports, health and schools eg as listed in the Fact Box on ‘community facilities’ on page 45. This is why I have made this comment also in the section on Policy 2 as the provision of meeting spaces may be better, or at least as well as, viewed in the same category as a business activity as part of the culture, arts, leisure and entertainment sector, as a town centre use rather than as, or just as, a local ‘community’ facility. This kind of provision is really deficient in the Peckham area. The only provision that is any good is the Cator Street former educational building which is due to disappear and is anyway too far out of town to be adequately accessible for that purpose. Would it be possible to link it also to hotel provision as often there are good meeting and seminar places available in hotel? Maybe it could go in both	<p>Community facilities, education, religious premises and training uses all fall under the same use class. We cannot deliver these facilities directly through the AAP, but we can create conditions that make it easier for these sorts of uses to become established.</p> <p>Core Strategy policy 4 sets out our overall approach regarding the provision of community facilities. It states that our aspiration is to provide a network of facilities that meet a range of local needs. In our site specific guidance, many of the sites in the core action area include D class use as being acceptable, or in some cases required. Ultimately, the precise nature of any floorspace would need to be negotiated when a planning application is submitted. In addition, Peckham Library is identified in the infrastructure plan as a priority for improvement. This will allow the library to better respond to anticipated increased activity as house building takes place. A new community centre will also be delivered adjacent to Nunhead Green.</p> <p>Given that religious premises are within the same use class</p>

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						that box and also Community facilities fact box? This facility would be a good addition to the town centre offer as it is so close to central London and with the ELL also to the business district in East London. P45. Religious premises. I can see a reference to religious premises only in the Fact box on community facilities here. As there is such a noticeable and growing predominance of religious premises taking over places in the town centre and into surrounding residential streets, can we have something in the PNAAP which gives indications / guidance on constraints and how this will be handled to maintain a proper balance with the other uses in the town centre so that they do not crowd out commercial and other town centre uses, and local community uses?	as many other community facilities, it can be difficult to distinguish between them in planning terms. There is considerable scope in the core action area to introduce other town centre uses and we have also added some text to policy 13 to note that we will carefully consider the traffic impacts and trip generation of new developments.
16	149		Policy 14			Section 4.4 Transport & Traffic P53. Policy 14 Parking for shoppers & visitors I am glad to see that Choumert car park will not now be scheduled for redevelopment. Is there anything that can be said in the PNAAP to encourage a good plan for its amenity aspects - ie landscaping etc as it is in a prime part of the town centre and the residential area? P55. Fig 10 town centre car parks. The size of the box denoting PNAAP 2 multi storey car park looks too small. Is it incorrect? P56. Policy 15 Residential parking Our experience is that, in proposals for change of use to churches in the residential streets near the town centre, transport plans are submitted depending on utilising the local streets for car parking, and with surveys saying that there is sufficient space. All our experience as residents within the area of the PNAAP is that there is not enough spare space to accommodate more street	Support for the retention of Choumert Grove car park is welcomed.  Policy 23 sets out that we seek to provide and improve high quality public realm throughout the action area, but specifically requiring improved landscaping of the car park is too detailed an issue for the AAP.  We have updated the town centre car parks figure, including the box denoting PNAAP2. This is now shown in figure 13. The supporting text to policy 13 has been amended to highlight that trip generation and associated parking demands will be considered as new development takes place. We would expect applicants to demonstrate this as part of their transport assessment. Further detail on the requirements is set out in our Sustainable Transport SPD.

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						car parking of visitors to church premises. Can the PNAAP say that because the residential streets are already near saturation parking with residents cars, there will be no extra street car parking acceptable as change of use for religious purposes?	
17	149		Policy 19			Section 4.6 Natural Environment P66. Policy 19 Open Space Can this policy box include a new bullet point on the lines of: 'Encouraging meanwhile uses of land for food growing or wildflower growing, where this is feasible.' This is to avoid repetition of wasted opportunities, and to get temporary uses thought of as the default position rather than not thought of at all. Examples - Flaxyard which has been vacant and unused for years; and Wooddene where a CGS proposal for wildflower seeding was made as soon as the buildings were demolished but was rejected. We could have had several years of attractive landscape instead of utter dereliction as well as a significant temporary habitat for wildlife insects and birds. Getting this idea of 'meanwhile' uses for food growing and wildlife into the PNAAP for sites of all sizes, whether PNAAP designated development sites or other small sites, would encourage a new habit of thinking like this. It is really needed now and increasingly so in the next 15 years that the PNAAP covers.	This is a borough-wide issue. We have set out our approach to protecting and improving open spaces, including support for interim uses in the Open Space Strategy which will be taken to Cabinet for adoption later this year.
18	149		Policy 23			Section 4.7 Design & heritage P75. Policy 23 Public Realm Good to see this new section. I can't find anywhere in the PNAAP which emphasises the importance of good maintenance of public realm, and the policies on making sure that happens as well as these points collected here. Can we have another bullet point something on the lines of: 'Secure good	In Policy 23: Public realm, we set out policies to ensure that new public realm will be of high quality and should consider improvements to the public realm such as creating new and enhancing existing links for pedestrians and cyclists and ensuring public realm is safe, secure and accessible. We also set out policies for active travel (Policy 11), car parking (Policy 14 and 15) and open spaces and strategic green

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						<p>maintenance of the public realm through the integrated operation of Council responsibilities with those of private landowners and businesses?</p>	<p>routes (Policy 19). Where more detail is required for a specific policy for each character area, this information is set out in Section 5. Appendix C: Schedule of proposal sites also sets out site specific design guidance for the main development sites and indicates potential for new and improved links and public spaces.</p> <p>We have also received a Stage 1 pass for funding from the Townscape Heritage Initiative programme that will, in conjunction with support from local community groups, will help deliver building repairs, conservation and improvements to the Rye Lane Conservation area. A management plan for the conservation area will be prepared, which will include consideration of public realm improvements along Rye Lane.</p>
19	149		Policy 24			<p>P77. Policy 24 Built Form * Should there be a reference here to the Conservation Areas? * It is good to include the policies on design for shop fronts. We have suggested before that this needs to be backed up by some encouragement of traders and shop owners to make it easier for them to learn about good simple shop front design. We suggest that what is needed are: - a simple guidance note to bring together the guidance that already exists but in more than one place; and - an informal panel of local experts in design etc so that anyone thinking of making shopfront changes could seek easily accessible and either free or very cheap advice before they start on any ideas themselves. Could there be some mention of these methods as ways of implementing this part of the guidance? We would like to discuss with appropriate officers how we could help this to come into operation and how to make it work in conjunction with the</p>	<p>We have included reference to the consideration of local historic environment in Policy 25: Built form. We have also received a Stage 1 pass for funding from the Townscape Heritage Initiative programme that will, in conjunction with support from local community groups, will help deliver building repairs, conservation and improvements to the Rye Lane Conservation area. A management plan for the conservation area will be prepared, which will include consideration of shop fronts.</p>

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						Council. This could form part of the 'Mary Portas' type of team work that we would like to develop for the town centre.	
20	149		Policy 26			P80. 4.7.15 I support the local listing. I haven't commented on the details as I understand that there will be a separate consultation on the buildings to be listed. I would be glad to know what the details of that will be so I can make a (small) contribution to the design of the consultation process and fit it into my local news information service.	Our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013. Once adopted we will include this local list as part of our Local Plan.
21	149		Policy 26			Protection of views I can't find any references to the protection of important views in Peckham. There are three that I suggest are included for protection: * the view from the area of Sumner House across to the Jones & Higgins clock tower. In the winter especially, this view can be quite magical as the cluster of buildings in the skyline is revealed through the bare trees. * the view towards central London from the town square towards the Shard – currently an uninterrupted view and needs to remain so. * the view towards the north and central London from any elevated place in the town centre. This is a striking view which considerably enhances the image and the experience from certain places in the town centre. It is already frequently mentioned now in reviews and media reports as a Peckham attraction as a result of the events that local enterprises are creating. So, in addition to enhancing the personal experience and adding to well-being, it also has a commercial value in promoting the idea of and for the town centre.	We have included the need for development to consider views in the supporting text for Policy 24: Heritage, highlighting how views help understand the character and history of an area. More information on views is set out in the Peckham and Nunhead action area urban design background paper, conservation area appraisals and the Peckham and Nunhead characterisation study.
22	149		Policy			Section 5 Character Areas Section 5.2 Peckham core	The boundary is correct and confirmed with Network Rail.



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			29			<p>action area P91 Policy 29 Built environment Public realm: Does the boundary line of PNAAP 4 include the 3 Network Rail properties between the rail tracks and 133 Rye Lane? If so does that cover adequately the idea of the possibility of a new small square at that point leading from Rye Lane into the Copeland site, without any further mention? Built form: * can there be an additional bullet point here which seeks an integrated and positive urban design plan, with particular focus on the pedestrian experience, for the area including the junction of Rye Lane / High Street, and the town square, and providing an important context for the development of Eagle Wharf, the Aylesham Centre and the Burger King / Lidl sites? Or at least linking the Rye Lane/High St/town square urban design plan in some way with each of those major developments, and strengthening what is said in this section here about urban design. One of the ideas we have discussed in the Community Council traffic subgroup discussions over the last few years is redesigning the pedestrian movements at this junction and removing a lot of the street furniture as for example at Oxford Circus. Can we get something into the PNAAP to encourage that thinking as directly relevant to the good urban design of this part of the town centre which has a concentration of major development sites? * the references in this section to guidance on shop front design would be included in the note I suggest above under Policy 24, pulling together the guidance in an accessible simple guidance note backed up by the town centre design panel. * this following comment is also relevant to the</p>	<p>Currently there is no proposal for removal of the buildings between 127 to 131 (odd) Rye Lane, which are identified for potential improvements as part of the Townscape Heritage Initiative. In Policy 23: Public realm, we set out policies to ensure that new public realm will be of high quality and should consider improvements to the public realm such as creating new and enhancing existing links for pedestrians and cyclists and ensuring public realm is safe, secure and accessible. We also set out policies for active travel (Policy 11), car parking (Policy 14 and 15) and open spaces and strategic green routes (Policy 19). Where more detail is required for a specific policy for each character area, this information is set out in Section 5. Appendix C: Schedule of proposal sites also sets out site specific design guidance for the main development sites and indicates potential for new and improved links and public spaces.</p> <p>We have also received a Stage 1 pass for funding from the Townscape Heritage Initiative programme that will, in conjunction with support from local community groups, will help deliver building repairs, conservation and improvements to the Rye Lane Conservation area. A management plan for the conservation area will be prepared, which will include consideration of public realm improvements along Rye Lane.</p>

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						section on enterprise as well as the built form. This is that the major developments that are being encouraged need to take into account the current emerging cultural uses and small enterprises so that they don't choke off the life that is enabling this new vision of the town centre to come alive. This comment relates to the creation and design of the spaces that need to be retained, and enabled for such uses, and also to the fact that they need to remain at rent levels that are affordable so they can become rooted in Peckham as a way of life and not just a transitional phase. Where can this point be accommodated in the PNAAP? Can something be included here and / or in the enterprise section, and also perhaps in relation to some of the specific sites?	
23	149		Policy 34			Section 5.3 ... Peckham Rye ... P93. Policy 34 Natural Environment I am taking this box to be about the changes needed to figure 13 to make it correct with the Peckham Rye Common boundary. Is that right?	Yes. The supporting document "schedule of proposed changes to the adopted policies map" illustrates the detail of this change to include two small sections of open space towards the south-west corner of the Rye and to distinguish the boundaries of the common. Once the AAP is adopted, the adopted policies map (previously known as the proposals map) will be updated to reflect these changes.
24	149					Section 5.4 Peckham South P100. Name. I note that this naming moves us away from the one we have used in the Bellenden Residents' Group for the last 10 years following the Council's designating it at that time as Lane West. We then used that but a bit more meaningfully as Rye Lane West. See here <a href="http://www.bellenden.net/neighbourhood-pictures">http://www.bellenden.net/neighbourhood-pictures</a> How secure is this new Peckham South name designation? Will it be the one now used for the life of the PNAAP for all Council purposes or just planning policy? P101	Core strategy policy 12 sets out many places in Southwark have their own unique character and that new development in the borough will need to add to this in a positive way. The Peckham and Nunhead AAP boundary was established as part of the preparation of the Core Strategy and the current boundary is supported by our characterisation study, consideration of public transport accessibility levels (PTAL) and by opportunities for growth.  The character area boundaries are for planning purposes,

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						<p>Fig 18 boundary The line for Peckham South follows the boundary between The Lane ward (streets included) and the South Camberwell ward (streets excluded), a boundary which was established only in the last 10 years and which divides our neighbourhood for electoral purposes. So following this boundary, set for electoral administrative purposes, excludes the streets in the south west half of the Bellenden area, to the south or west of part of Adys Rd, Maxted Rd, Bellenden Road, and Avondale Rise up to East Dulwich Rd and Grove Vale. They are all however in the SE15 postcode area and are part of the same Character Area that is being called Peckham South. Many boundary lines for administrative purposes are inevitably arbitrary as they are in this case. But the point about the designation of Peckham South as a sub-area is its shared nature as a Character Area to provide a coherent picture of what the neighbourhood is like for planning purposes. There is therefore a strong case for designating all of the SE15 streets west of Rye Lane as part of 'Peckham South Character Area' for planning purposes. I appreciate that the reason for this boundary is the Community Council/ward boundary for the PNAAP. But this doesn't need to and should not get in the way of the important planning land use character area designation. So can we have a reference in the PNAAP acknowledging the ward and Community Council boundaries, but pointing out that they divide the neighbourhood where the character area spans the ward boundaries? This is because of the similarities between the South Camberwell ward part</p>	<p>they have been agreed by Cabinet and will be agreed by Council Assembly.</p> <p>We will also be preparing further supplementary planning guidance for Dulwich and Camberwell, both documents will also refer to local character.</p>

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						<p>and The Lane ward part in terms of neighbourhood character, and so all the Bellenden area up to East Dulwich Rd and Grove Vale should be included in this character area of Peckham South. Figs 16 &amp; 18 These two maps show different boundary lines on the west of Rye Lane. Fig 16 shows Choumert Sq in Peckham South and fig 18 shows Choumert Sq in the town centre core action area. You have confirmed that it is in fact still in the Holly Grove CA which is fully in Peckham South. But the boundaries in these two figs need to be consistent. P102. 5.4.3. This paragraph mentions Warwick Gardens as the only Open Space, ignoring Goose Green open space because that is just outside The Lane ward – in fact Goose Green itself is divided by this character area boundary, as the Goose Green Playground is included while the open space is excluded. Goose Green is an essential part of the character area covered by Peckham South and needs to be mentioned, albeit even though it is for electoral administrative purposes in the South Camberwell ward and so technically outside the PNAAP. Or maybe this is a case I now need to put for changing the boundary of the PNAAP to include all of the Bellenden area as an integral part of the Peckham South character area? This Preferred Options version is the first time this boundary has become an issue because of the (welcome) inclusion now of planning character areas. * I would like to mention two passageways which are a feature of this Character Area. They are Copleston Passage between Copleston Road and Ivanhoe Road across the rail tracks, and Rye Passage leading from Nutbrook St to Peckham Rye. In each case they are</p>	

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						<p>exits / entrances to the character area and share a character of being a peaceful pedestrian oasis with a pleasant environment. Both are well used pedestrian routes. Can they be mentioned as part of the character area, and worthy of protection and ensuring that their amenity is maintained? I personally have had to put a huge effort into this for Rye Passage with the aid of CGS but it has been a long struggle over several years not yet completed because of the divided ownership of the land, even though the major part of the freehold is owned by the Council. It would be helpful if their value was noted in the PNAAP character area. P102. 5.4.5 Infill developments. This correctly draws attention to the fact that developments are likely to be small scale. But one of the significant planning issues that preoccupies residents from is not mentioned and this is the poor design of infill developments. There are a number of examples see <a href="http://www.bellenden.net/category/theme/-fill-developments">http://www.bellenden.net/category/theme/-fill-developments</a> As you will see from that web link we have been collecting for some time examples of aspects of design that fit and those that don't, as well as a number of other aspects relating to the character of our area. We would like the PNAAP to make some reference to the need for the design of any small developments and infill developments to be in tune with the nature of the surrounding buildings and the character of the area. We also would like the PNAAP to draw attention to the residents' neighbourhood profile when we have completed it. Is this section the right place to ask to refer to it? The reference could be a generic one to any neighbourhood profile produced</p>	



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						by a neighbourhood and lodged with the Council for information relevant for their own policies and also to give to developers etc as useful information.	
25	149		Policy 35			P103 Policy 35, Land use * Development of back land sites: If the criteria listed here had been available as agreed policy when residents were objecting unsuccessfully to the development between the backs of Adys and Maxted, and objecting successfully to the change of use between Nutbrook and Howden, they would have been very helpful and life much less stressful. In other words the criteria seem to reflect well the case residents developed for objecting in both cases. * It is very good that the Print Village Industrial Estate on Chadwick Road now has some protection.	Support noted.
26	149		Policy 36			P104 Policy 36 Transport and movement We strongly support the review of the operation of the two one way systems in the Bellenden area and the restrictions on access to Rye Lane. One of these systems causes significant problems by the car park behind what used to be Netto's and now Asda supermarket. This needs to be noted as a serious issue still in relation to the operation and possible further development of site PNAAP 22.	Support noted.  The review of the Bellenden one way systems is set to be implemented in 2013/14, but it is not certain that we are able to address restricted access to Rye Lane. Site specific guidance for PNAAP 22: Asda supermarket highlights that access and servicing will be important considerations should the site be redeveloped.
27	149					P110 Peckham East Recent work by the Peckham Society has shown a good case for considering a Conservation Area for Asylum Road and the adjoining Queens Road station and environs. The latter is just undergoing consultation for proposed improvements and the consultation has shown the value of the historic assets in the station buildings and also the surrounding buildings opposite across Asylum Road.	The AAP does not recommend the designation of a new conservation area as the feeling at the moment is that there is not sufficient evidence to meet the criteria to be designated as a conservation area. We will continue to review this, and future conservation areas can be designated outside of the AAP process. Any suggestions for designation of a new conservation area would need to be explored by our design and conservation team and need to meet the

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						This area is divided by the boundary between Peckham East and the town centre core action area. There is some merit in the PNAAP including comment on their nature as a potential sub character area spanning the boundaries with a potential as a Conservation area.	requirements for designation as set out in NPPF paragraph 127. We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.
28	149					Section 6 Sites P116 Table 3. Site 71P text includes the bus garage. Is this an error as it is not included on the map in fig 21?	The bus garage is not included in the new PNAAP 4 designation. The PNAAP 4 boundary covers Copeland Industrial Park and 1-27 Bournemouth Road. The table has been updated to make this clearer.
29	149				3	P136 PNAAP 3 land between rail arches east of Rye Lane As this is not scheduled for development before 2016-2020 can something be done in the meantime to replace the very unsightly corrugated iron visible from Rye Lane with some more temporary pleasing structure? This might be able to be accommodated in the station square project as it is Network Rail land and also an eyesore for the new square.	The area action plan set out our vision for change in the Peckham core action area and identifies the site as having development potential. The site specific guidance in Appendix C highlights potential improvements for the design of the site.
30	149				4	P138 PNAAP 4 * This should be named Copeland Industrial Park without the 'road' in its name. This wrong description is used in most references in the report. * Could the site specific guidance include the following points:? - careful investigation of how much remains of the Holdron's arcade leading from Rye Lane under Khan's into the CIP site at the back, as it is now part of the Rye Lane Conservation Area. - the potential of an open small square between 133 Rye Lane entrance and the rail tracks opening up the CIP site to Rye Lane in sight of the new station square.	Name amended throughout the AAP.  We have included reference in Appendix C PNAAP 4: Copeland Industrial Park and 1-27 Bournemouth Road to improvements to links east west through to Rye Lane, which could include the enhancement of the link through the Holdron arcade. The buildings of 127 to 131 Rye Lane (odds) are identified for potential improvements as part of the Townscape Heritage Initiative.
31	149				6	P142 PNAAP 6 Station & public toilets * One of the great deficiencies of the town centre is the absence of	Saved Southwark Plan policy 1.7 - Development within town and local centres, already requires developments to consider

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						decent public toilets. Recent work that we have carried out at the station has revealed the former public toilets under the rail tracks to the north of the station building which are a potential place for public toilets. Can this be mentioned as a facility that needs to be considered in the station developments? * in addition the serious issue of the lack of public toilets needs to be mentioned somewhere in the PNAAP as a critical part of the facilities needed for a well functioning town centre. Another proposal that was aired over recent years but seems to have come to nothing yet is for an agreement with certain businesses to make their toilets available. That idea needs to be resurrected and explored. Is it something that can be mentioned in the PNAAP? At the very least for major new developments to be required to provide public toilets access?	such facilities. Southwark Plan policy 1.7 sets out a number of criteria that need to be met for the local planning authority to grant planning permission. Factor ix sets out "The proposal provides amenities for users of the site such as public toilets, where appropriate." With regards to the guidance for PNAAP 6, work is currently being carried out to look at the options for redeveloping this important site. It is too early to say whether it is possible to reopen some of the former toilets until this work has been completed. We propose to update the AAP if appropriate before we submit the AAP to the Secretary of State in December 2012 to reflect any factual information on this site following the work currently being undertaken.
32	149					P155 PNAAP 13 The vacant site is situated in Peckham North not Peckham South. P158 PNAAP 17 There is a recent planning application for a new religious building on this site which does not conform with this required use of residential, and is an ugly building in wrong proportions on a very visible site. Can the site specific guidance include something on the kind of design that is appropriate in such a visibly prominent place on the entry and exit from Peckham? P160 PNAAP 22 ASDA supermarket Can the site specific guidance for this site include something about the fact that the access to the car park causes serious problems for the traffic flows and the residential area, and needs to be resolved in any development?	PNAAP 13: Amended. PNAAP 17: The site guidance requires an active ground floor frontage due to its prominent position on Peckham Road. Design policies with the Core Strategy and saved Southwark Plan, as well as the emerging policies in the AAP require high quality design on all sites. PNAAP22: The site guidance has been updated to set out that: "Any proposals for this site should look at the impact of access to the car park on the local surrounding streets as well as ensuring that a new development can be adequately and safely serviced."

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33	792	Peckham Society				<p>Encouraged by Sally Crew, I thought I would send you this work that we have put together for the Queens Road Station piazza consultation. It sheds some light on the heritage of this corner of the PNAAP and represents our hopes for the conservation led regeneration of the Queens Road station, the key transport node in east Peckham. The more I dug in, the more I found an interesting story that connected these buildings. We should all act together to preserve what remains of this 19th century station and if possible, the handsome Victorian railway pub opposite. Discussing these studies further with my Peckham Society colleagues in recent days, we think there might be a possibility to help protect these buildings by creating an Asylum Road conservation area? As you know, there is a series of fine historic buildings close together on this road, lovely Victorian villas, Clifton Crescent and the Caroline Gardens Conservation Area. From our perspective it would be good to tie these into one larger conservation area, that would extend up to Queens Road and help save the quality historic buildings there. While central Peckham began to urbanize in the late Georgian times, Asylum Road and adjacent streets were built in the mid-19th century and have a different, but coherent character. With the great sweep of Clifton Crescent and the sturdy Italianate villas at the south end of the road, one admires the ambition of the Victorian builders of the Asylum Road area. Sometimes on maps you see it called 'Peckham New Town'. The Queens Road station is an important part of this story. I have been also told that Asylum is an</p>	<p>The AAP does not recommend the designation of a new conservation area as the feeling at the moment is that there is not sufficient evidence to meet the criteria to be designated as a conservation area. We will continue to review this, and future conservation areas can be designated outside of the AAP process. Any suggestions for designation of a new conservation area would need to be explored by our design and conservation team and need to meet the requirements for designation as set out in NPPF paragraph 127. We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.</p>

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						<p>old Roman Road off the Old Kent Road. Archaeology too! I formed our response to the Queens Road Station Piazza proposal into a survey of the existing historic structures and a sketch design showing how we could make the best use of this potentially handsome Victorian Railway building, the urban setting and our local heritage I formed our response to the Queens Road Station Piazza proposal into a survey of the existing historic structures and a sketch design showing how we could make the best use of this potentially handsome Victorian Railway building, the urban setting and our local heritage. The design/response has three main themes: 1. There is enough surviving decorative brick and stone work to re-create the appearance of the cheerful station we once had there. There are considerable remains of the Victorian polychrome masonry work in 5 out of the 8 arches I looked at. There appears to be two types of decorative infilling of the arches, window triplets in polychrome brickwork and a limestone detailed 'special' bay, to the south, that used to be the station entrance. This appears to be well preserved, but blocked up behind the advertising sign on the east side. Not only would it be exciting to restore these handsome Victorian historic bays, conserving the existing work in-situ, but these bays also have striking similarity with Charles Henry Driver's arches along St. Thomas Street in Bermondsey which has been recently listed by English Heritage. Some of those arches are wholly intact, so a study of the detailing there could inform the restoration of the arches here on Queens Road in Peckham. 2. To animate and add</p>	



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						<p>local significance to the proposed station entrance and piazza on the west side I am suggesting that we campaign to get the excellent George Livesey Statue out of storage and place it in the new piazza. It is now parked, and largely forgotten, behind the closed Livesey Museum. Placed in the centre of this new piazza, the Livesey statue would make a handsome and interesting landmark. This new piazza would be close to Livesey's South Metropolitan Gas Works on the other end of Asylum Road. The statue is really good, beautifully modelled by one of Britain's best Edwardian sculptors, Frederick Pomeroy RA. 3. The third theme we thought worth pursuing would be to try to save the run-down London and Brighton Pub opposite this proposed station piazza. It is a lovely building, and if you look closely at it, you can see that the pub was built in two phases. The first part, to the west, is a lower early Victorian shop or pub. When the Queens Road Station was built by the London Brighton and South Coast Railway in 1865, this pub, just opposite was enlarged and turned into a hotel. Presumably that is when it received its name the 'London and Brighton'. This taller new part was built in the decorative Italianate style then fashionable, it also has a red, black and buff decorative brick treatment. This surely links it to the new station opposite. Could the pub have been taken over and enlarged by the LBSCR? This excellent current Southwark initiative might be our only chance left to save this pub which has been consented for demolition to make way for flats. When you have a moment take a look at the four info / design sheets I have produced. They are laid out</p>	

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						to be printed at A3. I would be interested in your comments.	
34	209	NHS Southwark	Policy 12			P.17 Section 2.1.7 It would be helpful if the PTAL coding was explained here. Presumably it is distance from a transport hub. Could also be more precise on car ownership. 34% of households in Peckham and 36% of households in Nunhead and Peckham Rye have at least one car (39% of households in Southwark overall) – (Housing Requirements Study 2009)	PTALs are determined based on distance to transport hubs and the frequency of services at those hubs. We have inserted an explanation of PTALs within our infrastructure background report. Current levels of car ownership are referred to in the supporting text of policy 15 to help clarify our approach to residential parking standards.
36	209	NHS Southwark	Policy 17			P.20 Section 2.1.16 The phrase 'private sector ownership' is a bit unclear. Presumably what it means is private sector rented accommodation and this should be stated. L3 contain should read contains L5 there are should read there is	Corrections noted. We have reviewed and update this section. This sentence in Para 2.1.16 has been amended to read: "Peckham and Livesey wards are 65% social rented, 23% is private rented and only 11% us owned outright or with a mortgage. Within the Nunhead, The Lane and Peckham Rye wards, 40% of homes are social rented, 25% are privately rented and around 33% are owned outright or with a mortgage and private sector ownership". The other corrections have also been updated.
37	209	NHS Southwark				Section 2.1.17 Update on key out-of-work benefits August 2011 – A slight increase in numbers on the May 2011 data due to the continuing economic downturn Ward No % Southwark Peckham 1,985 20.4% 14.6% Nunhead 1970 22.7% 14.6% Peckham Rye 1,200 12.8% 14.6% The Lane 1,810 17% 14.6% As well as dealing with deprivation, some indication of household income in the area is useful. The 2009 Housing Requirements Study provided income data for Peckham and Nunhead and Peckham Rye revealing high levels of poverty. At that time, in Peckham, 52% of households had an income below £15,000 pa. The	We have updated the data to correlate with February 2012 figures.

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						corresponding figure for Nunhead and Peckham Rye was 48%. (More detail in Appendix)	
38	690	Southwark Cyclists	Policy 11			<p>1. General. 1. We are pleased with the emphasis given to sustainable modes of transport, namely walking and cycling. We support the response by Southwark Living Streets. 2. To put our comments into perspective, we quote our Guiding Principles and Objectives (publicly available on our website, having been arrived at by fully transparent processes of democratic discussion amongst our 800+ members living in Southwark). Southwark Cyclists' guiding principles and objectives for cycling in Southwark: ● Safe cycling on main roads, whether Transport for London's roads or borough roads, by wherever possible, segregated and protected bicycle lanes which are at least 2 metres wide (or wider); where not possible, because of road widths or other factors, maximum traffic speeds of 20mph, well enforced by speed cameras or otherwise, or other safety features endorsed by a reliable road safety audit; and bicycle friendly junctions - the northern roundabout at the Elephant &amp; Castle has no place in a civilised society. As example, we support continental style designs for roundabouts and tight radii at other junctions. ● A safe, convenient and continuous network of traffic-free or lightly trafficked routes which make use of green routes, filtered permeability and well enforced 20mph maximum speed limits. ● Strong action against danger from all motor vehicles, especially heavy goods vehicles, by the Council incorporating binding conditions on HGV safety and driver training in supply contracts and planning consents, and major businesses doing the</p>	<p>Policy 11 and the supporting text captures a number of these principles, whilst ensuring that we have enough flexibility to tailor specific interventions depending on what is appropriate to the route, area or site in question. We have amended the supporting text to policy 11 to refer to the Transport Plan commitment of becoming a 20mph borough.</p> <p>The detailed design of cycle parking is currently referred to in the Sustainable Transport SPD and is considered too detailed an issue for the AAP.</p>

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						<p>same for supply contracts. • Adequate cycle parking throughout the borough, including secure residential parking on estates and increased availability around local shops. Distance between stands: at least 1200mm recommended for two sided parking but 1000mm acceptable where space is limited. • Campaign with RoadPeace for improved traffic law enforcement, collision investigation and criminal prosecution. • Build and develop constructive relationships with Southwark Council and Transport for London while standing up strongly for cyclists' interests. • Promotion of responsible cycling, cycle training and theft prevention. • Respect the needs of pedestrians and work closely with Southwark Living Streets. • Support London Cycling Campaign's campaigns and priorities alongside our own. • Open, honest and democratic communication, internally and externally. We hope that these principles can help inform your final version of the AAP</p>	
39	690	Southwark Cyclists	Policy 11			<p>2. 20mph Recent research on behalf of the Department for Transport has confirmed the major contribution which well enforced 20mph zones and limits can make to road safety. We propose that the following is included in the AAP concerning 20mph in the Peckham and Nunhead area. "Owing to the presence of a number of high-collision through routes alongside low levels of car ownership, local residents, employers and retailers gain little to offset the high levels of road danger in the area. 20mph has a particularly important role to play in reducing road danger and promoting walking and cycling as low cost, efficient and healthy forms of travel." We suggest the</p>	<p>We have amended the supporting text to policy 11 to refer to the Transport Plan commitment of becoming a 20mph borough. The revised text states that we will aim to reduce vehicle speeds on roads that are controlled by the council through a range of initiatives, as appropriate to the road/area in question. We also state that we will continue to work with Transport to London to address vehicle speeds on roads for which they are the responsible body.</p>

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						adoption of the language (that was recently included in the E&C SPD amended slightly) as follows: "Our Transport Plan 2011 commits to making Southwark a 20mph borough. Our core approach to reducing road danger is to reduce vehicle speeds. This has been pursued through the introduction of 20mph zones and limits across the borough. The intention is that Southwark be a 20mph borough, so the default maximum traffic speed in the borough would be 20mph, with any streets with a higher maximum speed limit being the exception to this rule. We will look at all options to achieve this throughout the Peckham and Nunhead Area Action Plan area, such as physical traffic calming, limits, and average speed cameras (once these become more widely available)."	
40	690	Southwark Cyclists	Policy 11			3. A Network of Cycling Routes Whilst we understand that an AAP may not be able to prescribe precise routes, we believe that it is important to outline more clearly the role for cycling in the AAP area. Given the strategy to encourage cycling in two principal ways in Southwark: a) to make main roads safer for regular and more confident cyclists; and b) to create a traffic-free or low trafficked network for occasional and potential cyclists we propose the following for inclusion in the AAP document: "To support safe main road cycling in the area, (a) we are adopting 20mph speed limits on borough roads and encouraging TfL to introduce 20mph limits on those roads in the area with high cyclists and pedestrian usage; and (b) we will create protected cycle lanes where carriageway capacity allows on main roads. We will identify and create traffic-free or low trafficked routes to encourage	<p>Core Strategy policy 2 establishes that we will seek to improve opportunities for cycling throughout the borough. This is reflected in policy 11 of the AAP. The policy states that we will provide and promote linkages that are safe, attractive, direct and convenient. Whilst this captures the key issues, it provides sufficient flexibility for us to design specific interventions depending on what is appropriate to the route, area or site in question. This may include the creation or improvement of green routes. This approach is also supported by core strategy policy 10 and further detail is set out in our open spaces strategy.</p> <p>We have amended the supporting text to policy 11 to refer to the commitment to pursue 20mph speeds on roads controlled by the council. The policy refers to prioritising improvements on routes between key destinations in the action area, such as the town centre, schools and stations,</p>

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						<p>less confident cyclists to make journeys between Peckham and: • Nunhead • Bermondsey (and on to Rotherhithe) • Camberwell • East Dulwich • Walworth (already done) The routes would be created from a combination of Green Routes (for definition see below), routes through parks and open spaces (where possible) and streets which had been calmed using principles of filtered permeability to reduce access by motor vehicles. As well as having benefits for cyclists, there would also be clear improvements for local residents, children walking and cycling to school, and pedestrians. In summary the character of the network would be: 1) traffic free or with very few motorised vehicles; 2) 20 mph speed limits; 3) trees and greenery; 4) including paths through parks and other public open spaces, designed to minimise conflicts with pedestrians; 5) providing corridors for wildlife: 6) including signal controlled toucan crossings of any main roads on the routes.” We suggest that, for clarity, a definition of green links and green routes is included. The definition recently adopted in the E&amp;C SPD (page 53 - 4.6.5a) reads as follows: “Green routes can have a variety of different functions and characteristics depending on their size and location. These can include: Green links which connect one green space to another by extending the amount of green between the two. These can form pedestrian pathways and woodland edges. These links can improve biodiversity by providing habitats and enabling wildlife to move between open spaces. Quiet Green Routes which are lightly trafficked roads and streets used by cyclists with trees and other planting designed to slow car traffic</p>	<p>which are likely to generate more trips.</p> <p>As a result of a number of consultation comments we have also included a map showing indicative cycle links. This highlights that we will pursue improved linkages across the action area and into surrounding areas.</p>

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						<p>and to improve and green the overall environment. Creating them can involve widening or building out pavements and planting more trees and other forms of greenery. Greened Main Roads are often already heavily planted with mature trees. In many cases this planting is part of the historic townscape which contributes significantly to their character and reinforces the perception of them as pleasant and attractive routes." We suggest that the potential for an off-road cycle and walking path on the eastern edge of Peckham Rye Common should be kept under review. This would provide safe routes between the Harris Academy and its main student catchment areas in Peckham, thus encouraging active travel to and from school. The volume and speeds of traffic on Peckham Rye East make cycling dangerous and, added to the narrow footway on the western side of the road, make walking unattractive. The layout of Peckham Rye between Dewar Street and Stenhall Road results in a traffic dominated and dangerous environment for cyclists and unused space on a large central island. We suggest future consideration of altering this layout to make the carriageway on the east of the central island two way and using the carriageway on the west of the island and the island itself as a calm pedestrian and cycle friendly space and an improved retail environment. Cycle parking. We suggest that in Policy 11 (on page 49) the third of the second set of four bulleted points should make clear that convenient, secure cycle parking is to be provided in or for residential accommodation as well as for destinations such as shops, educational and leisure facilities and</p>	



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						transport hubs. Where this cycle parking is on-street it should, wherever possible, be on the carriageway, not on the footway, where it may hinder the active mode of walking. We suggest setting out in a map: 1) The network of origins and destinations (point 1 above). 2) The main roads that are likely to see high levels of cycling (the A202 and CS5, Peckham Rye, Rye Lane, Southampton Way and Cheltenham Road and possibly Sumner Road as per the original map – Figure 20 on page 68 of the May 2011 AAP document) and which are particularly important to ensure have safe 20mph speed limits and protection for cyclists. 3) Indications of the routes (Peckham to Nunhead, Bermondsey (and on to Rotherhithe), Camberwell, East Dulwich and Walworth) that would be served by the traffic free/traffic light cycle network.	
41	791	Lambeth PCT	Policy 4			I write as one of the eight Clinical Commissioners for Southwark and wish to express my support for the initiative to restrict Fast Food Takeaways in the Peckham and Nunhead areas. As a practicing GP, I know the toll that obesity (both adult and childhood) takes on people's health in the Borough. I would strongly support anything which is designed to promote healthier living and to reduce easy access to unhealthy lifestyle choices	Support noted
42	209	NHS Southwark				P22 Section 2.1.21 L2 remove particularly	Text amended to reflect comment.
44	793					I read the new document with great interest. There are many exciting aspects, but I found one aspect a little disappointing, namely, that only tangential mention	The importance of local faith communities is now highlighted in paragraph 2.1.22.

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						was made of the possibility of partnerships with faith communities. You mention use of their premises but little of how their wider resources can be used.	As part of our consultation we have engaged with a range of local faith organisations and their comments have informed the preparation of the AAP. Further information is set out in our consultation report.
45	153	English Heritage	Policy 26			Peckham and Nunhead AAP - Main comments The comments provided take into account the points raised in our previous letter to the May 2011 version of the AAP. With this in mind we have the following comments to make: In terms of the overarching policies further emphasis should be given to the importance of the historic environment as part of improving the character of an area. For example the policies relating to housing density (para 4.5.6-4.5.7), public realm (Policy 23), open spaces (Policy 19) and built form (Policy 24) could benefit from a stronger link to the need for change to consider and utilise the historic environment. In addition the supporting text of these policies should reference the recently undertaken Peckham and Nunhead Characterisation Study (March 2012). This Study provides a useful baseline in which to understand the broad characteristics of the AAP plan area. The overarching heritage policy (Policy 26) could benefit from being further developed so that it reflects the distinctiveness of Peckham and Nunhead's historic environment. At present the policy is limited in reflecting the unique characteristics of the area and the direction of its management. In addition the details of the Character Areas could also be developed further so that they each contain a heritage policy that defines its local specific heritage management issues and opportunities. The Peckham and Nunhead	<p>We have updated Policy 23: Public Realm, Policy 24: Heritage, Policy 25: Built form and Policy 26: Building heights to emphasise the consideration of the historic environment and the importance of heritage assets which are buildings and structures as well as open spaces. More detail is considered under each character area in Section 5. We have also updated the site diagrams in Appendix C: Schedule of proposal site to show heritage assets. We have included reference to the characterisation study in the supporting text and included more text to emphasise the individual and distinctive character of Peckham and Nunhead. The Peckham and Nunhead action area urban design background paper sets out the evidence base which informs Policy 26: Building heights.</p> <p>The adopted policies map shows the extent of our local conservation areas. Due to the amount of heritage assets in the borough these could not be included on the adopted policies map. These heritage assets are able to viewed on the Southwark Maps online at:  <a href="http://www.southwark.gov.uk/info/200212/egovernment/1370/southwark_maps/1">http://www.southwark.gov.uk/info/200212/egovernment/1370/southwark_maps/1</a></p>

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						Characterisation Study (March 2012) is welcomed, but it is not clear how this work has influenced the management of tall buildings in Peckham and Nunhead. The AAP identifies through its building heights policy (Policy 25) named sites where taller buildings/elements could be introduced. However it is not sufficiently clear why taller features would be appropriate at these locations and how they will fit in with the wider townscape or avoid causing harm to the significance of heritage assets. In reviewing the Proposals Map associated with the AAP, we would seek to ensure that all relevant heritage assets are highlighted and crossed reference to the heritage policies.	
46	209	NHS Southwark	Policy 19			P.24 Natural Environment Does the Biodiversity Strategy need to be mentioned in this context as providing more detailed treatment of how biodiversity will be enhanced? L.8 qualities should read quality L.9 improvements should read improved. Also does the Open Space Strategy need to be mentioned, particularly with reference to sub area strategies for the PNAAP area?	It is too detailed to refer to the biodiversity action plan in this section of the document. A reference to the biodiversity action plan has been included in paragraph 4.6.7. This section has been amended to reflect these changes. It is too detailed to refer to the open space strategy in this section of the document. A reference to the open space strategy has been included in paragraphs 4.6.4 to 4.6.6.
47	209	NHS Southwark	Policy 7			P.36 Section 4.2.12 Whilst supporting some development of the night time economy, we would want to ensure that there was no loss of amenity to local residents, that any developments benefitted local people as well as attracting visitors, and that there was no net cost to the public purse in terms of additional cleaning up, policing etc.	<p>Policy 2 acknowledges that careful consideration will need to be given to mitigate any potential negative impacts associated with evening economy uses to protect the amenity of nearby residents.</p> <p>Our saved Southwark Plan policy 1.7 will also be used to assess the appropriateness of new town centre uses and their contribution to the vitality and viability of the centre. We have also acknowledged that such development can also boost the local economy by generating additional spending</p>

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							and inward investment in other businesses and providing an increased number of employment opportunities.
48	153	English Heritage				In terms of the Sustainability Appraisal many of the points raised in our previous lettered dated 4th October 2011, appear not to have been addressed. For example; the summary baseline information on the historic environment is still incomplete; the details of the sustainability issues is still weak and does not consider neither the value of the assets or the need to enhance them (e.g. Nunhead Cemetery – Grade II* - identified on English Heritage’s Heritage at Risk Register 2011); and a lack of justification for the scoring of ‘uncertain’ when considering impacts upon the historic environment and mitigating them through design management.	<p>We have amended the baseline information to include further reference to the historic environment. We have amended the sustainability issues in para 5.1.2 to consider the value of heritage assets and the need to enhance them. In some cases uncertain impacts have been identified in relation to heritage. Where the policy covers more general topics the impact on heritage remains uncertain.</p> <p>However, 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 character area policies and the conservation area appraisals.</p> <p>Potential negative or uncertain impacts on heritage assets and the historic environment will be mitigated through the detailed policies of the AAP, including policy 23 public realm, policy 24 heritage, policy 25 built form and policy 26 building heights. The character areas scored positively in terms of SDO 12 to conserve and enhance the historic environment and cultural assets. The vision in the AAP also sets out how the overall impact of the policies will celebrate the heritage of Peckham and we will use this to stimulate regeneration. The policies will also protect the special character of Nunhead.</p> <p>We have set out further detail in the proposals site guidance to reflect the importance of heritage assets in and around the sites.</p>
49	209	NHS Southwark	Policy 12			P.50 Section 4.4.5 Linked to the problems of accessibility outside the core area is the fact that the Housing Requirement Study found that a number of	The policies in the transport and traffic section aim to collectively improve travel choice and improve accessibility throughout the action area. By locating important local

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						households in the PNAAP area reported problems in accessing key facilities. 14% of households in Nunhead and Peckham Rye reported difficulties (either very or fairly difficult) in accessing cultural and recreational facilities such as cinemas. Over 10% of households reported difficulties with accessing their place of work and health, sport and leisure facilities. 13% of households in Peckham reported difficulties (either very or fairly difficult) in accessing cultural and recreational facilities such as the cinema. On top of those more than 10% of households had difficulties accessing childcare facilities and health sport and leisure facilities, as well as more than 9% in accessing their General Practitioner and their place of work.	facilities in Peckham town centre, Nunhead local centre or other accessible locations, we aim to ensure that they are accessible to as many people as possible.
50	794	Friends of Burgess Park	Policy 19			Theme 5 natural development The Friends of Burgess Park support the overall direction of the strategic approach which recognises the importance of the natural environment and the linked importance of improving the quality of green spaces as natural habitat for a wide range of species of plants and insects.	Support noted.
51	209	NHS Southwar k	Policy 17			P.59 Policy 17 Affordable and Private Homes Section 4.5.10 Add: 42% of those living in Nunhead and Peckham Rye can only afford social rented housing.	This section has been updated. The sentence now reads: "69% of the households in Peckham and Livesey wards who want or need to move can only afford social rented housing." This figure better reflects the significant issue of affordability in the centre of the AAP area.
52	794	Friends of Burgess Park	Policy 11			Traffic and Transport improved connections Green spaces are delightful for encouraging walking for short journeys however it must be made clear in green spaces the pedestrian has priority over the cyclist. As cycling numbers are expected to rise substantially in	Comment noted.  Whilst policy 11 focuses on improving opportunities for active travel in Peckham in Nunhead, it should be noted that the council's Transport Plan also contains a road user hierarchy.

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						<p>future years this will place greater pressure on pedestrian routes; informal or formally shared with cyclists. Consistent signage must set out the quiet/slow route and the alternative fast cycle route away from green spaces. This is a problem with the route 22 through the Surrey Canal Walk which we are addressing with the Council and Southwark Cyclists. We note that you will still continue to lobby for the cross river tram. We consider that the impact of the tram through the park will be substantial. Therefore we wish to propose that a new approach is developed for all of the roads around and through the park to be considered as "green routes through a park". This will require the development of a new approach which takes into account pedestrian crossing, speed of traffic, treatment of paths roads and fencing etc to make it clear that the roads are in the park not separate.</p>	<p>This acts as a guide to balance the needs of different groups of road users and places pedestrians at the top. Conflicts between pedestrians and cyclists will be addressed on a case-by-case basis as routes are planned or improved. The issue is too detailed for the AAP.</p> <p>Whilst we continue to support the cross river tram, or a high quality alternative, there is currently no identified funding to deliver the scheme. This is consistent with the approach set out in our Core Strategy, through which we also safeguarded a potential route for the tram or its alternative. This is set out on our adopted policies map. Should the scheme proceed, a range of issues would be considered in detail, including those raised.</p>
53	794	Friends of Burgess Park				<p>Character area – Central Peckham - Policy 29 Built environment –Peckham Square We would expect to see improvement in the landscaping between the end of Surrey Canal Walk and Peckham Square to provide a more interesting entrance way and bring the landscaping into the square. This would need to be considered for any S106 funds arising from the Area 10 site.</p>	<p>The site guidance has been updated to make it more clear that there is the opportunity to improve Surrey Canal Walk and integrate it into the development of Eagle Wharf. Section 7 of the AAP sets out more detail on the Community Infrastructure Levy (CIL) and section 106.</p>
54	209	NHS Southwark	Policy 19			<p>P.66 Natural environment Again is any updating needed re the Biodiversity and Open Space Strategies? Given the shortage of open space in the north of the area, can more attention be given to the enhancement and improved management of amenity space attached to housing? Developing open space in</p>	<p>A reference to the biodiversity action plan has been included in paragraph 4.6.7. Further reference to the open space strategy has been included in paragraphs 4.6.4 to 4.6.6.</p>

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						the northern part, especially as that is where the higher density housing will be, needs to be more of an expressed priority.	
55	617		Policy 2			Enterprise I hope that there will a restriction on the number of art galleries and such premises that do nothing for much of the local people and are lead by trendy London and hence transitory.	Policy 2 encourages a mix of complementary arts, cultural, leisure and entertainment uses in Peckham town centre to help contribute to supporting a lively and vibrant centre. Different but complementary uses, during the day and in the evening, can reinforce each other, making town centres more attractive to local residents, shoppers and visitors. Our saved Southwark Plan policy 1.7 will also be used to assess the appropriateness of new town centre uses and their contribution to the vitality and viability of the centre.
56	617		Policy 8			Well-Being I don't want to see Metropolitan land encroached upon any more than now. I refer to the nursery to be built on Peckham Rye and the permissions Harris Academy has for using the Rye. Plans for schools should be passed if they include their own separate playing fields etc., which can then be part of extended day facilities and used by the community outside of school hours and holidays.	There is a general presumption against development on Metropolitan Open Land (MOL). Southwark Plan policy 3.25 sets out the circumstances under which planning permission would be granted.
57	617		Policy 12			Transport The redevelopment of Queens Rd Station by Network Rail needs to be passed by planning in the light of restoration of the historic station and plans submitted by the Peckham Society.	Further detail has been added to section 7 of the AAP to reflect proposed investment and redevelopment at Queens Road station. An application has recently been approved that includes the creation of a new public square adjacent to the station, hard and soft landscaping and new lighting (ref: 12/AP/1694).
58	617		Policy 17			Housing I think that there should be far more homes for social rent in the mix. The Council can generate income from this stock. I think that there should be at least 70% of homes to have 3 bedrooms since much building in the recent past has been for flats. Further	The current mix and tenure of new affordable homes is set out in policy 4.4 of the saved Southwark Plan 2007 as 30% social rented and 70% intermediate. The Peckham and Nunhead AAP changes this policy to require a split of 50% social rented and 50% intermediate. This is to reflect the fact



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						<p>more I think that building plans should make a real balcony mandatory in flats. Each family needs an area of out door space .Further more , this should apply to all schemes, not just those of 10 units or more . Each development considered should be considered on its on merits.</p>	<p>that Peckham and Nunhead already has a large concentration of social rented housing (up to 65% in some areas covered by the AAP) and we would like a range of housing types to meet the many housing needs.</p> <p>The council is aiming to create a mixed and balanced community as well as providing a range of types of housing for people who need access to non-social rented housing. The policy requirement for 20% family homes in the urban zone and 30% in the suburban zone follows the approach in Core Strategy strategic policy 7. This approach aims to meet the need for new family sized homes, as well as smaller homes whilst taking the character of the area into consideration. Areas which can accommodate denser development tend to have less potential for family homes due to the requirements for amenity space.</p> <p>All new homes are required to provide some form of outdoor amenity space; this is a minimum of 10sqm of private amenity space for family sized homes (3 bedroom plus). Whilst this is not a requirement for smaller flats, we strongly encourage the provision of private amenity space, but where this is not possible we do allow the space to be provided communally, as set out in our Residential Design Standards supplementary planning document (2011). A balcony must be a minimum of 3sqm to contribute to the private amenity requirement. This approach aims to seek a balance between allowing for higher density schemes and ensuring that all new homes have access to a minimum level amenity space, with the priority for family homes.</p>
59	617		Policy 19			Natural Environment If existing trees are on a site then within reason they should be built around. My call for	Policy 22 sets out our approach to protecting existing trees and promoting more planting through new development. Our

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						balconies in the previous building regulations section would allow for house units to be able to grow vegetables/ plants /general greening in their own space. Trees should not be cut so often. The ones in my area have been reduced twice in the last two three years which is ridiculous. There are plenty of tree free sites for fussy home owners to choose to live to without their complaints ruining the neighbourhood for its other residents.	residential design standards SPD sets out how we will require new developments to provide amenity space.
60	617		Policy 26		5	Design & heritage I don't think it's always necessary to have ground floor public use to all buildings. There are enough existing shop fronts which are competing with the increase in on line shopping. The site for Wood Dene doesn't need a high tower, that's ridiculous! There existing high buildings to the level of the rail in Peckham Town Centre and the Elephant but Wood Dene is in a low rise area and hopefully East Peckham will be able to become a listed area so preventing this unworthy ambition. That site and area needs family sized homes with 3 plus bedrooms as stated in previous sections. The oldest hose in Peckham is in Woods Rd opposite Wood Dene site. I would like east Peckham to become a heritage listed area similar to Rye Lane and Peckham Hill Street and Peckham High Street . It is worthy of that status and has some beautiful buildings worth restoring and treasuring, this historical aspect contrasting with other new build area of the borough like the rebuild of the North Peckham Estate site.	<p>Policy 26: Building heights sets out the locations where tall buildings could be located in the action area. The evidence that informs this policy is set out in the Peckham and Nunhead Action Area urban design background paper and Peckham and Nunhead characterisation study.</p> <p>Any suggestions for designation of a new conservation area would need to be explored by our design and conservation team and need to meet the requirements for designation as set out in NPPF paragraph 127. The AAP does not recommend the designation of a new conservation area as the feeling at the moment is that there is not sufficient evidence to meet the criteria to be designated as a conservation area. We will continue to review this, and future conservation areas can be designated outside of the AAP process.</p> <p>We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.</p>
61	617				1	Core Action Area The Aylesham site could be redeveloped. All buildings that could be listed should	The guidance for PNAAP 1, the Aylesham Centre supports redevelopment of this site. Our design and conservation

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						be. Nunhead, Peckham Rye, Honor Oak All potential historic sites / buildings should be listed.	team are currently preparing a borough-wide list of local listed buildings. There will be a separate consultation on this list in Spring 2013.
62	617		Policy 26			Peckham South All buildings that could be listed should be. Peckham North All potential historic buildings and sites be listed Peckham East All the potential buildings that could be listed should be. Queens Rd Station should be listed as it is with the arches and brickwork , not as reconfigured Network rail change of use destroying the exterior unnecessary in the process. A central lane without a barrier might be useful on Queens Rd length. I think recognition of the areas historic architectural footprint be consolidated in a Heritage Protected Area.	<p>The AAP does not recommend the designation of a new conservation area as the feeling at the moment is that there is not sufficient evidence to meet the criteria to be designated as a conservation area. We will continue to review this, and future conservation areas can be designated outside of the AAP process. Any suggestions for designation of a new conservation area would need to be explored by our design and conservation team and need to meet the requirements for designation as set out in NPPF paragraph 127.</p> <p>We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.</p>
63	617				1	SITES Aylesham The indoor shopping centre and Morrisons could be redeveloped and possibly a higher build retaining the car space surrounding.	The guidance for PNAAP 1, the Aylesham Centre supports redevelopment of this site. The AAP also identifies the site as suitable for a taller building up to 20 storeys.
64	617					Appropriate Assessment I would hope that you take into account the Character Studies and input from the Peckham Society as well as individuals who all have the best interests of the area at heart. All potential listed buildings should be listed. What a wonderful heritage this borough has and it should be celebrated. Evidence The listing of the conservation areas of Rye Lane and Peckham Hill Street have afforded great opportunities in terms of listed status, Lottery Funding for townscape heritage, Mayoral and GLA monies for	<p>Noted, but no change required to the appropriate assessment, which considers whether or not the AAP will have significant impacts on ecological sites that are of European significance.</p> <p>Policies 24 and 25 highlight the importance of heritage and built form and these policies are supported by specific guidance in the character area sections. We are always seeking new funding opportunities.</p>

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						Peckham Rye Station and that's just the start. I want to see the same for the East Peckham !!	
65	217					Section 2: Challenges and Opportunities: We agree with you in principle to the Council trying to increase the variety of stores within the Peckham Town Centre, however we must always bear in mind that the proliferation of warehouse-style retail outlets on or in close proximity to the Action Plan area.	Noted.
66	209	NHS Southwar k	Policy 19			P.67 Section 4.6.4 and 4.6.12 In the first of these, there is said to be 1.18 ha/1000 people. In the second, the figure seems to be given as 2.06ha. Seems to be a conflict.	The figure in paragraph 4.6.4 refers to public parks whereas the figure in paragraph 4.6.12 refers to all open space in the area that is of biodiversity value regardless of whether it is publically accessible. We have amended the wording in the publication/submission version AAP to clarify this.
67	217		Policy 19	4.6.20		Section 4: 4.6: Theme 5 We are very pleased to see Open Spaces appear to have been given greater priority in current documents and we believe the inclusion of enhancing, increasing and protecting is a positive sign.	Support noted.
68	801		Policy 11			I've just seen the revised plan dated February 2012 (preferred option) and there are no provisions for pedal cyclists as were present in the previous versions Why have these been removed	Comment noted. We have added a map to show indicative cycle links within the AAP area and to surrounding areas. This is figure 11 in the AAP.
69	209	NHS Southwar k	Policy 19			P.67 Section 4.6.3 Open space is also of significance to the area as so many of the homes (76% in Peckham and 62% in Nunhead/Peckham Rye) are flats Section 4.6.7 There may also be concerns around personal safety etc. It is a pity that more reasons for the dissatisfaction could be elucidated.	Further information on the impact of housing type on the need for open space is set out in the Open Space Strategy which will be taken to Cabinet for adoption later this year. The detailed results of the resident's survey are also set out in the Open Space Strategy.
70	209	NHS Southwar k				P.74 Policy 22 Trees This policy is welcomed, however it appears to be couched solely in terms of	We have amended the wording of this policy in the publication/submission version of the AAP to reflect the fact

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		k				street trees. It would be good to see a commitment to planting in parks and open spaces as well, including planting larger trees for growth over the long term. A substantial number of Southwark's trees are situated on housing estates and so these areas should also be considered in the PNAAP. Trees may be important in helping to develop some of the lower quality open spaces into more appealing and welcoming habitats for humans and wildlife.	that the policy aims to increase provision of street trees and trees within development sites.
71	209	NHS Southwark	Policy 22			P.74 Section 4.6.5 L.3 has some typos. Should read: are an integral part of the historic townscape. L5. where ever should read wherever	Corrected.
72	209	NHS Southwark	Policy 23			P.76 Policy 23 This policy is strongly supported. Environmental improvements provide tangible evidence to local residents of the benefits of a holistic programme: a 'cared for' environment is more likely to discourage ASB and criminal activity. It is also a way of sharing the benefits of regeneration for those who do not gain directly from it (e.g. in terms of better housing) Poor quality public spaces tend to be used only for strictly necessary activities and transit, while a far more diverse range of optional activities - from active recreation to quiet relaxation - takes place in high quality environments. The intention to use high quality and durable materials is also welcomed as projects have to be considered not only in terms of their implementation, but their future maintenance and care. Design and maintenance need to be considered together if the streetscape environment is to add value to the image and perception of the area. Ad hoc and sporadic maintenance initiatives have a very depressing effect on the public realm.	Support noted.  Detailed matters such as landscaping will be considered as part of the planning application process. In line with policy 12 of the Core Strategy, we will require a design and access statement to be submitted with all development proposals. In order to meet the guidance set out in our Design and Access Statements SPD, the design and access statement should include an explanation of the commitment to maintaining the landscaping. Policy 23 sets out our approach to promoting a high quality public realm and further details is set out in the character area built environment policies.

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73	802		Policy 37			<p>I should like to comment on the Peckham South proposals. I am delighted to see that the emphasis is on conserving the historic and residential character of this area. I should like to see more of its buildings locally listed to help prevent inappropriate changes and development and possibly the extension of the Holly Grove conservation area. I should like the council to do all it can to discourage the replacement of traditional sash windows with plastic ones, using the evidence now available that traditional sash windows, properly repaired, can be just as energy efficient and are much more environmentally friendly.</p> <p><a href="http://www.english-heritage.org.uk/your-property/saving-energy/carrying-out-the-work/sash-windows/">http://www.english-heritage.org.uk/your-property/saving-energy/carrying-out-the-work/sash-windows/</a> In terms of the streetscape and public space, please adopt a "less is more" approach and remove street clutter such as unnecessary bollards, barriers and road markings. While improving trees along the streets, please do not add any planters. These are usually unnecessary and can be ugly modern intrusions in this historic area. The ones at the bottom end of Chadwick road are enormous, bulbous concrete monstrosities!</p>	<p>The AAP does not recommend the designation of an extension to the Holly Grove conservation area as the feeling at the moment is that there is not sufficient evidence to meet the criteria to be designated as a conservation area. We will continue to review this, and future conservation areas can be designated outside of the AAP process. Any suggestions for designation of a new conservation area would need to be explored by our design and conservation team and need to meet the requirements for designation as set out in NPPF paragraph 127.</p> <p>We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.</p> <p>Policy 24: Heritage and Policy 25: Built environment which require development to consider the existing character and materials particularly where there is heritage value. The saved Southwark Plan policy 3.16 - Conservation areas, also sets policy regarding use of other materials in windows and doors. Policy 23: Public realm sets out guidance for design of public realm including consideration of street furniture such as planters.</p>
74	209	NHS Southwark				<p>P106 Peckham North No mention of Willowbrook (the former canal master's house) presumably a listed building belonging to LBS and used by a number of voluntary groups. Are there any proposals for it to benefit from regeneration initiatives/money in any way as part of helping create a good community infrastructure?</p>	<p>The building is Grade II listed and is also within the Peckham Hill Street conservation area. The building is in council ownership but we are not aware of any current proposals to invest in or regenerate the building.</p>

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75	209	NHS Southwar k				P118 This section needs to mention how disruption/loss of amenity/inconvenience/loss of retail income to people living and working in Peckham will be prevented/mitigated during building and redevelopment. (E.G. use of construction management plans. ) See the appendix for income data	This is too detailed for the AAP to cover and is already covered under existing guidance in the Southwark Plan and supplementary planning documents, such as saved Southwark Plan policy 3.2- Protection of amenity.
76	803				1	Good to meet you at the CC meeting last Thursday, and thanks for your leadership in our discussion! I found it very interesting listening to you explaining the various possible options for the action plan, and since you asked for comments here are a few! On Rye Lane itself, as I understood it, you explained that there is really nothing much which can be done to improve/change the shops along the southern section. They are all I imagine doing fairly well and therefore the demand for their products and services will remain. In addition the shops themselves are small and will not generally provide the necessary floor space for different sorts of (perhaps more up-market, if that may be said) retailers to take on. I suppose though that the council might in time be able to persuade some shopkeepers to put more windows in, particularly where at present meat and fish displays are exposed to all weathers, but that is more cosmetic in nature. I was heartened though by what you said about persuading bigger and differing retailers to come in by offering them larger areas of floor space in one or two particular areas at - or towards - the northern end of the Lane. That is, the Bournemouth Road rebuild and in particular perhaps a redevelopment of the Aylesham Centre, which does not look as if it is pulling its weight in the present retailing climate (a special bugbear of	Support noted.  We have set out site guidance for the Copeland Industrial Park and 1-27 Bournemouth Road (site PNAAP 4) , which contains the Bussey Building. We have identified the building in our Local list which identifies buildings and structures with local value which make a positive contribution to character or appearance due to their architectural, cultural or historic interest, or because they form part of an interesting group. We are currently preparing our borough wide local list and will be consulting on this in Spring 2013. Following consultation the list will be adopted and set out the definitive local list of buildings in the borough.



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						<p>mine being the utterly vile Chinese restaurant there)! It is a shoddy-looking place, let down as well by the blocking of what could be a more elegant entrance hall/foyer by a host of carts selling trash. It badly needs a new look, even to raise it to the standards of the useful if unexceptionable shops surrounding it on the Lane. You mentioned building a second storey. This would be a great idea - perhaps attached to Peckham's first escalator for many years? I also liked the idea of relocating PeckhamPlex, possibly to become part of what might turn into a Cultural Quarter centred on the Library. This might then permit the monstrous car park to be levelled at last, allowing Eileen Conn to die a happy woman, followed by some development, perhaps allied to a smaller car park. I know parking is important if we wish to attract a better-heeled visitor! Unlike Eileen however I am not a fan of the Bussey Building, an ugly pile which, uncomfortable to use as it currently is, should in my view be measured and photographed for posterity and then demolished. This would then provide a very large area for the Council's planners to get their teeth into. Anything arty currently located in the building could be moved to the Cultural Quarter. I'm also a fan of suggestions that the railway arches at the back of - indeed around - the station could be smartened up and used for retail. Better lighting of these areas is also I think important, but this is a comparatively minor matter (although expensive I'm sure). And as for the station itself, of course, all now seems set fair, and it will undoubtedly become the newest jewel in Peckham's crown!</p>	

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77	804		Policy 8			As local residents (56 Dunoon Road, SE23 3TF) we wish to let you know of our support for the re development of the ground for the use of the football club and for the use of local residents wishing to play sports and use facilities in a purpose built environment for sporting activities. A re development of the Homestall playing fields, to include amongst other things, facilities for changing and new toilets and all weather pitch(es) would, in our opinion, greatly benefit the local community. It would provide a much needed area for sporting activities to take place regularly without the disruptions of dog walkers or impacting on local nature. Local nature reserves allotments and parks already abound, thankfully, in our local area whereas places for our children and peers to take regular and specifically organised outdoor exercise as well as to come together as a community are still not as plentiful as they could be. The playing fields are a wonderful green space in their current state but would benefit the health, cohesion and focus of the local community if a new club house with up to date facilities were to be built on site. New facilities would encourage activity by people from all walks of local life to keep fit and get involved in neighbourhood teams and groups. We hope that the re development work will be approved and go ahead in the very near future.	Support noted.
79	808					Vision It's a pretty vague vision, but seems to say the right things Objectives i don't see objectives	Comments on the vision noted. The objectives are set out on the pages following the overall vision for Peckham and Nunhead, section 3 of the AAP.
80	805					I am a resident of Bellenden Road living between the junctions with Avondale Rise and Soames Street. People living on our section of Bellenden Road use	Core strategy policy 12 sets out many places in Southwark have their own unique character and that new development in the borough will need to add to this in a positive way. The

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						<p>Peckham Rye Station, shop on Bellenden Road, and eat and drink at the pubs and restaurants on Bellenden Road and Choumert Road. The pull on the population in our corner of SE15 is towards Peckham rather than towards East Dulwich. I therefore read with interest the PNAAP consultation document and I am supportive of its aims and objectives. I was disappointed to find that the south section of Bellenden Road where I live as well as the streets south of Avondale Rise have been excluded from the Peckham South character area. This appears to leave us in a no-man's land between Peckham, Camberwell and East Dulwich. I see from the PNAAP there are no specific plans for Peckham South however, as a designated character area Peckham South ought to include relevant areas of a similar character within Peckham and cutting off a section of Bellenden Road and other roads within SE15 does not appear to be logical or desirable. I understand that the boundary line for Peckham South follows the boundary between The Lane ward and the South Camberwell ward. The boundary of the South Camberwell Ward was established only in the last 10 years to divide our neighbourhood for electoral purposes. When it comes to promoting a coherent planning policy and long term improvements to the character of our area arbitrary electoral boundaries which are subject to politically motivated change should not form part of the decision process for drawing the boundaries. Instead consideration should be given to the fact that the full length of Bellenden Road and the surrounding streets are a single, coherent "character " area as described</p>	<p>Peckham and Nunhead AAP boundary was established as part of the preparation of the core strategy and the current boundary is supported by our characterisation study, consideration of public transport accessibility levels (PTAL) and by opportunities for growth.</p> <p>The character area boundaries are purely for planning purposes, they have been agreed by Cabinet and will be agreed by Council Assembly.</p> <p>We will also be preparing further supplementary planning guidance for Dulwich and Camberwell, both documents will also refer to local character..</p>

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						in the PNAAP. It is a residential area formed mostly of Victorian terraced houses and as such this area should be included within Peckham South in order to protect and enhance its character. This would also benefit the areas currently within Peckham South as there is currently no logical geographical or character related boundary. Development of the currently excluded section along different planning guidelines would have a potentially detrimental effect to the Peckham South being as they are geographically close and functionally related. I would like to see the boundary line for Peckham South redrawn to include the full length of the south section of Bellenden Road and the surrounding roads up to East Dulwich Road and Grove Vale.	
81	808		Policy 1			Enterprise I would support the market if there was a suitable level of quality control. I believe that it is likely however that the market will look like many others in poorer parts of London selling junk/stolen goods/fruit/£1 shop stuff like toiletries and I would not like this	The Southwark Street Trading and Markets Strategy (2010). includes recommendations for developing and improving the borough's street trading and markets infrastructure. Section 3.10 sets out a range of proposed actions which includes implementing action plans for individual market sites and consulting with other council departments and stakeholders on how new markets can contribute positively to an area. We will work with the street trading and markets team to ensure that consultation on options for improved or new markets in the town centre is undertaken.
82	806					This looks a well thought out document as far as my area is concerned, which is Peckham South. I haven't been able to go through all the other areas in great detail, so will confine comments mainly to Peckham South & surrounding area. I have lived in Peckham South since 1998 and have seen it change over the years, though it still retains much of its quiet residential	Comments noted.  The Cinema / multi-storey car park site is identified as a site for potential development. Appendix C sets out site specific guidance for sites such as the Peckham Plex, PNAAP 2: Cinema / multi-storey car park site and identify where there is opportunity improvement of public realm and pedestrian

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						<p>character. There have been a number of infill developments, which have led to a more crowded feeling, and it is important, for the sake of the character of the area not to impinge further on open spaces. McDermott Gardens is a good example of how cultivating a plot which might have been used for development into an open space instead can enhance the lives of families living in the area. It is also beneficial for the wild life of the area - birds, small animals, insects etc. I am glad that Future Peckham understands the need for space, though it has come too late for the residents of Choumert Square who have been encroached upon by development on two sides, including the recent erection of an inappropriately high block overlooking the residents' communal walled garden. The Peckham Core Action Area will benefit when the station is developed. But there are other areas which can be improved as a general communal area, such as the space in front of the Peckham Plex, which at present doesn't encourage people to visit the cinema. I have to end now, to get this email in before cut off time of 5pm, but would like to register my interest in being apprised of PNAAP's progress.</p>	links.
83	538	Church of Pentecost	Policy 7			<p>I wish to make comments on behalf of my clients the Church of Pentecost in response to the current consultation on the Preferred Option Peckham &amp; Nunhead Area Action Plan (AAP). We support Policy 7's approach to community facilities in terms of locating facilities in the Peckham core action area and directing facilities outside the core area, where there is a need, to accessible locations.</p>	Support noted.

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84	808					Housing i don't understand why local government has to stipulate this level of detail.	The level of detail is appropriate for an area action plan, in accordance with guidance and policies from national and regional government. Evidence within our strategic housing market assessment (2010) and our housing requirements study (2009) both demonstrate the need to provide more homes to meet the needs of local people and those wanting to live in the borough. The Mayor of London also sets a target for each borough to deliver a certain number of homes each year. In order to ensure that these homes are the right size, type, affordability and standard, the council sets out local planning policies to control new development. Without the type of detailed policies that are set out in the Core Strategy and the Peckham and Nunhead AAP new homes would not meet the range of needs and issues that are present in Southwark.
85	538	Church of Pentecost			17	PNAAP17, Land to the West of Lister Health Centre, has been identified as a Southwark Proposal Site. The allocation sets out the "required land use" as residential with "other land uses that would be acceptable" including business, community and retail uses. My clients are owners of this site and a planning application is being considered by the Council at present which proposes the construction of a new church on the site (LPA ref 11/AP/4318). We previously made representations on the Issues & Options AAP, where we observed that the proposed church accorded with the land use options of "housing otherwise community or business use" for the site. The proposal also accords with the Preferred Option AAP but given the site's appropriateness for a new church we consider that "community use" should be included in the "required land use" box. The proposed	<p>The site guidance for PNAAP 17 has been updated to propose that the "required land use" is residential (Class C3) or community (Class D).</p> <p>We have added your details onto our mailing list.</p>

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						community use of the site is as equally appropriate as residential development, particularly given that the AAP directs community uses towards the core action area. I would be grateful if you could notify me of further progress on the AAP.	
86	807	The Charter School	Policy 4			<p>The following representation has been made by the pupils of Year 7 Charter School. The numbers relate to the number of pupils who felt the issue was most/least important or a suggestion for improvement. MOST IMPORTANT ISSUE</p> <ul style="list-style-type: none"> <li>*Hot food takeaway x 2</li> <li>*Peckham town centre x 2</li> <li>*More shops needed x 2</li> <li>*Business space</li> </ul> <p>LEAST IMPORTANT ISSUE</p> <ul style="list-style-type: none"> <li>*Peckham town centre</li> <li>*Hot food takeaway x 4</li> <li>*Markets x 2</li> </ul> <p>SUGGESTIONS FOR IMPROVEMENT</p> <ul style="list-style-type: none"> <li>*Putting in More Restaurants and Shopping x 2</li> <li>*More Entertainment x 3</li> <li>*More business spaces x 2</li> </ul>	<p>We have considered all of the consultation responses and these have informed the final draft AAP.</p> <p>Policies 1, 4 and 6 address the town centre, hot food takeaways and business floorspace and we have set out how we can make improvements in these areas.</p> <p>Policy 1 sets out our strategy to encourage more shopping floorspace which will help local people have access to a better range of shops and services and help reduce the need to make trips to other town centres outside the borough such as Croydon and Lewisham. We are also encouraging more cafes and restaurants which can make Peckham more attractive for shoppers and help boost the local economy.</p> <p>Policy 4 restricts the number of hot food takeaways in the area. The policy will help to ensure there is a mix of different shop types in the town centre. Lots of takeaway shops located together can cause harmful impacts such as increases in litter, smells, crime, noise, parking and traffic problems. Controlling the number of takeaways will also help people live a healthier lifestyle.</p> <p>Policy 6 promotes more business floorspace in the town centre because it will help create more jobs for local people.</p>
87	808		Policy 30			Natural Environment Policy 19 seems nice but there are way bigger problems than this to deal with.	Noted.



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88	808					CHARACTER AREAS Nunhead, Peckham Rye, Honor Oak Im really keen on a cleanup of Rye lane, starting with Peckham rye station. Rye lane and some side streets are disgusting at present. We should enforce cleanliness on shop owners so we don't have clumps of hair, chunks of food and piles of garbage and awful smells all along it. Its embarrassing.	<p>We have secured funding to improve the area around Peckham Rye station and the removal of the existing forecourt buildings between the station and Rye Lane will allow the creation of a new public space which will open up this area to Rye Lane, providing better visual and pedestrian connections for commuters and local residents.</p> <p>We have also received a Stage 1 pass for funding from the Townscape Heritage Initiative programme that will, in conjunction with support from local community groups, will help deliver building repairs, conservation and improvements to the Rye Lane Conservation area. This will also assist in improving the quality of the streetscape.</p>
89	808					CIL don't understand	We have included additional guidance on s106 planning obligations and CIL in section 7 of the AAP.
90	807	The Charter School	Policy 10			The following representation has been made by the pupils of Year 7 Charter School. The numbers relate to the number of pupils who felt the issue was most/least important or a suggestion for improvement. MOST IMPORTANT ISSUE *Schools x 2 *Health Facilities x 4 *Sports Facilities LEAST IMPORTANT ISSUE *Community Facilities x 5 *Sports Facilities x 2 SUGGESTIONS FOR IMPROVEMENT *Putting in more Hospitals x 2 *Putting in more community facilities x 2 *More Neat and Tidy streets *More Schools x 2	<p>These issues are largely covered in the community well-being section.</p> <p>A range of improvements to schools in the action area are underway. These are set out in policy 8. We will work closely with NHS Southwark to ensure that health facilities in the action area meet the needs of local people. Sports, leisure and community facilities all play an important role in creating sustainable communities. Our current priorities for new and improved facilities are set out in the infrastructure plan in section 7. This will be updated over the lifetime of the strategy as new priorities emerge and additional funding is available.</p>
91	807	The Charter School	Policy 11			The following representation has been made by the pupils of Year 7 Charter School. The numbers relate to the number of pupils who felt the issue was most/least	<p>Support for active travel is welcomed.</p> <p>We are committed to improving opportunities for active</p>

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						important or a suggestion for improvement. MOST IMPORTANT ISSUE *Active travel x 2 *Road Networks x 2 *Bike lanes and easy access *More Public transport *Parking for Shops LEAST IMPORTANT ISSUE *Residential parking x 4 *Parking for shopping x 3 SUGGESTIONS FOR IMPROVEMENT *More parking spaces x 2 *Less roadwork's (Do it right the first time) *Better bike lanes *Less cars	<p>travel, by influencing new developments and by funding improvements to the wider environment in Peckham and Nunhead. We will continue to work with Transport for London and transport operators to improve transport opportunities, services and connections in Peckham and Nunhead.</p> <p>In terms of car parking, we are proposing that the Cinema multi-storey car park and Copeland Road are redeveloped, but that others are retained to support shopping and other town centre activities. We will monitor demand for parking as new development takes place so that there are enough spaces to support local shops and businesses..</p>
92	807	The Charter School	Policy 16			The following representation has been made by the pupils of Year 7 Charter School. The numbers relate to the number of pupils who felt the issue was most/least important or a suggestion for improvement. MOST IMPORTANT ISSUE *Mix and Design x 4 *Affordable and Private *New homes x 2 LEAST IMPORTANT ISSUE *Mix and Design x 2 *Not Having more Flats x 2 *Affordable and private homes x3 SUGGESTIONS FOR IMPROVEMENT *Mix and Design *More homes for the Olympics *More affordable houses x 5	<p>Comments noted.</p> <p>The housing policies in then AAP set out an approach to provide high quality homes that meet the range of needs of people wanting to live in Peckham and Nunhead.</p>
93	807	The Charter School	Policy 19			The following representation has been made by the pupils of Year 7 Charter School. The numbers relate to the number of pupils who felt the issue was most/least important or a suggestion for improvement. MOST IMPORTANT ISSUE *Energy x 3 *More open spaces *Greenery (Trees) x 3 LEAST IMPORTANT ISSUE *Trees *Waste Water x 2 *Open Spaces x 2 *Energy x 2 SUGGESTIONS FOR IMPROVEMENT *Less cutting down trees x 6 *More bike lanes	<p>Policies 19 and 20 in the Peckham and Nunhead AAP seek to protect and improve the quality of open spaces and increase the number of trees. Policy 21 seeks to reduce the energy use of new developments and support the provision of an efficient energy network. Policy 23 of the seeks to ensure development meets high environmental standards in line with Core Strategy policy 13.</p>

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94	807	The Charter School	Policy 24			The following representation has been made by the pupils of Year 7 Charter School. The numbers relate to the number of pupils who felt the issue was most/least important or a suggestion for improvement. MOST IMPORTANT ISSUE *Public Realm x 3 *Building Heights x 4 LEAST IMPORTANT ISSUE *Building Heights x 2 *Making all buildings to scale *Heritage x 2 *Built Form x 2 SUGGESTIONS FOR IMPROVEMENT *Get more money *Build more public places x 4 *Keep the old but build new too x 2	<p>We set out policies for the design of new development which include public realm (Policy 23), heritage (Policy 24), built form (Policy 25) and building heights (Policy 26). We also include more detail for each policy in the character area policies in Section 5.</p> <p>In Appendix C: Schedule of proposal sites, we identify the sites where there are opportunities for new public space or improvements to existing public realm.</p>
95	810	on behalf of Nunhead Residents	Policy 12			Further to the Regen Scrutiny, discussion with local residents and postings on the Southeastcentral.co.uk Nunhead section, I would like to raise the following about the AAP. Two issues in terms of Nunhead and transport. Firstly, Nunhead residents have raised that having a second entrance to Nunhead Station on Evelina RD would enhance and assist businesses on the high street, and make it easier for residents living south of the station to access it. The preferred option for the Bakerloo line extension should be the route that includes Camberwell, Peckham and Nunhead rather than one that bypasses Nunhead. Nunhead has been left out of the ELL extension (and from the tram plan, if this ever goes ahead)and could be better served by public transport (at the last count 2k people use Nunhead station each day).	<p>The installation of a new entrance to Nunhead station from Evelina road is not currently under consideration.</p> <p>Discussions on the Bakerloo line extension are still at a very early stage. At this time, whilst it is important to highlight our support for the proposal, we are not in a position to specify a particular route. Further detail will be available over the lifetime of the AAP and the precise route subject to its own consultation.</p>
96	809				6	I have had a brief look at the Preferred Option document on the internet, and congratulate you on so readable a text. I was disappointed, however, that the proposals for the improvement of Peckham Rye railway station (PNAAP 6)make no mention of providing access for disabled people. The present	The Department for Transport's Access for All programme is the national programme to fund and deliver platform to ticket entrance access improvements. Through this programme lifts are currently being installed at Denmark Hill and planned for both Queens Road Peckham and Peckham Rye Station.

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						arrangements are dreadful. I have attached a short piece from my March News Briefing. I tried to obtain a hard copy of the Plan at Peckham Library, to allow an easier read, but drew a blank (in more ways than one). This an extract from a news bulletin(attached to email) IMPROVING ACCESS AT RAILWAY STATIONS Both train station operators and those campaigning for local improvements should be aware that the Department of Transport has published an updated Code of Practice to represent and protect the interests of disabled rail passengers. This third version has replaced all previous versions and has been valid since November 2011. More at <a href="http://tinyurl.com/Accessible-train-station">http://tinyurl.com/Accessible-train-station</a> . The latest funding programme, Access for All, is committing £37.5 million of government money to improving access for disabled passengers, older travellers and people with young children. The work will include passenger lifts, ramps, raised platforms and accessible toilets. More at <a href="http://tinyurl.com/DfT-Access-improvements">http://tinyurl.com/DfT-Access-improvements</a> . From CAE's 'Access by Design'	
97	809		Policy 23			4.7.4, line 3: amend to read 'obstructs movement and obscures views'	Amended.
98	809		Policy 24			Policy 24 (if open to amendment): last of the first seven bullet points: suggest addition of 'access' after 'promotes'	Amended.
99	809					5.2.2: the Aylesham centre is surely to the east of Rye Lane.	The wording has been made clearer in the site guidance to refer to the Aylesham Centre being located at the north of Rye Lane.
100	809					5.4.2, line 1: insert 'Edwardian and' before 'Victorian'.	Amended.

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101	809					Appendix C: It might be helpful to include listed buildings with a suitable reference. It is odd that street numbers are not listed in numerical order. A normal sequence (as used for St. Mary's Road) would avoid duplication (e.g. 41 Chadwick Road and 2 & 4 Linden Grove)	We have removed this list, as our Design and Conservation team will be consulting separately on a local list in Spring 2013.
103	811					I think the proposals for the area are great and I can not wait to see the transformation in the area. I have added a couple of comments which I hope will benefit the proposals. Cllr Dolezal is right in the security by design idea for the new developments, this alone will have a huge impact in the area and is vastly important. Our recent burglary problem was hugely affected by bad and outdated design. However with the opening up of Peckham Rye train station and a projected increase in footfall due to the increase in local residents and consumers are likely to see an increase robberies and dippings in the area - has there been consideration for CCTV cameras at the station and side streets been included within the budget? I feel it is critical to have this as part of the proposal as a proactive and preventative measure not as a reactive one once the problem has been allowed to establish.	Theme 6: Design and heritage: Attractive places full of character, sets out policies for the built environment and public realm and requires designs to follow Secured by Design principles and may include proposals obtaining Secured by Design certification to reduce risk of crime occurring. We also have save Southwark Plan policy 3.14 Designing out crime, which sets out ways in which the public and private realm can be designed to improve community safety and crime prevention.
104	811		Policy 4			I fully support the limit to new takeaway venues - is it possible to consider a similar approach to new 'off license' venues?	Support noted.  We have inserted a fact box into the supporting text of policy 1 to explain the different types of uses which fall within the use class A - Shops. Shops fall within A1 Shops class, meaning that we cannot differentiate between shops selling different types of goods. Hot food takeaways fall within their own use class - Class A5 - Hot food takeaways. Within the planning system we cannot restrict shops from selling

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							alcohol unless we restrict all A1 uses, which is not what we want to do as we want to encourage more shopping in our town and local centres.
105	811		Policy 12			Finally - with a strong emphasis on public transport, cycling and footfall is it possible to review the bus stop locations on Rye Lane?? I feel that some of them could be moved a matter of metres which would prove safer, less congestion on the narrow pavements therefore more aesthetic - the stop outside Iceland is on the narrowest part of the pavement under the archway which is likely to become more congested one the station is re-vamped?!!	The location of bus stops immediately in front of the station will be considered as part of the development proposals for the station (see PNAAP site 6).
107	797					In support of the PNAAP consultation, we are residents of the newly named 'Peckham South' area, which closely adjoins the Peckham core area. We support many of the policies outlined in your plan for development and regeneration of Peckham's centre. We however would urgently like to see far greater consideration given to the problems of anti social behaviour occurring between Peckham core area and the residential areas abutting it, most particularly our own. Throughout the streets running alongside Rye Lane (Highshore Rd, Elm Grove, Holly Grove, Blenheim, Choumert) we have extensive experience of problem behaviours, most especially people urinating in the street. The end of Highshore road is a particular problem spot, but it is not at all unusual for us to find men, women and children openly urinating in the street all along Highshore Road, at all times of day and night, and I believe this problem is shared along the other adjoining street.	<p>Support noted.</p> <p>Saved Southwark Plan policy 1.7 sets out in town centres a range of development will be permitted as long as a number of criteria are met. Factor ix sets out that "The proposal provides amenities for users of the site such as public toilets, where appropriate."</p> <p>Work is currently being carried out to look at the options for redeveloping the square outside Peckham Rye Station. It is too early to say whether it is possible to reopen some of the former toilets until this work has been completed. We propose to update the AAP if appropriate before we submit the AAP to the Secretary of State in December 2012 to reflect any factual information on this site following the work currently being undertaken.</p>

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108	797		Policy 7			I believe action is needed to provide adequate public toilets - there are none that I know of in the town centre - and also to attempt to discourage this, through deterrents such as signage threatening legal action and also perhaps more positively through public art and other interventions which encourage greater respect and visibility in these areas. I would like to see a plan for action on this point as part of your plan. The regeneration of the square in front of the station is perhaps an opportunity for this very fundamental provision of a public service.	<p>Saved Southwark Plan policy 1.7 sets out in town centres a range of development will be permitted as long as a number of criteria are met. Factor ix sets out that "The proposal provides amenities for users of the site such as public toilets, where appropriate."</p> <p>Work is currently being carried out to look at the options for redeveloping the square outside Peckham Rye Station. It is too early to say whether it is possible to reopen some of the former toilets until this work has been completed. We propose to update the AAP if appropriate before we submit the AAP to the Secretary of State in December 2012 to reflect any factual information on this site following the work currently being undertaken.</p>
109	799		Policy 4			My problems with this is: 1. This would potentially require existing businesses to move, or prevent new businesses from establishing themselves in otherwise suitable areas. 2. blaming takeaways for child obesity, is looking in the wrong place. The fact that children are allowed to leave the school grounds during the school day is the problem - like here in Scotland, it is a relic of a past where children went home for lunch. I suspect a minority, if any, actually go home for lunch. My suggestion is: 1. Ensure the health, safety and wellbeing of school-age children by enabling schools, in whose care parents entrust their precious children, by banning pupils from leaving school grounds until the end of their school day. This puts children squarely within the confines of healthy eating options, as provided by packed lunches or the school canteen. Apart from healthy eating, anything (accidents or worse) could happen to children outside the regulated	<p>We have acknowledged in the supporting text to Policy 4 that hot food takeaway shops can support the local economy and provide employment opportunities. However, both the proliferation of A5 uses and their clustering together can dominate the local retail food offer and an overconcentration can affect the viability and vitality of a retail centre, undermining its predominantly retail function and collectively impacting upon the amenity of the surrounding area.</p> <p>Also, in the interests of the health of residents, particularly teenagers and children, the proliferation of A5 uses needs to be carefully controlled. Spatial planning has the ability to create physical environments which promote healthy lifestyles through measures such as restricting hot food takeaways. The issue of controlling school children from leaving the school grounds is not within the remit of planning policy. One of the most popular times for purchasing food from shops is after school.</p>



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						<p>environment of schools, and schools should be held accountable during school hours for the safety of children (might help this issue along). Whilst some would argue this violates the rights of the child, I would argue that the rights of children to be safe from irresponsible motorists, predatory paedophiles as well as the (more likely) consequences of their unhealthy predilection for sweet and fatty foods. This would create a level playing field for all children, and should not be left to the discretion of each school (this obviously has a resource implication, since the school would have to supervise its exits for pupils leaving school grounds without permission. Such a framework would be similar to what I experienced growing up in Denmark (only older pupils were allowed ex-school grounds), and later in high school in the US. Not that the US high school canteen was a paragon of healthy eating, but the rights of parents to feel certain their children were at school were rated higher than the rights of children (some of whom were of adult age). I hope this is useful, and can find it's way into the consultation somehow.</p>	<p>The policy will be one of a range of measures the council is implementing to reduce the risk of obesity amongst the borough's population and in particularly children.</p>
111	617					<p>In addition to the form I've submitted reference number 134471 I'd like to add/ make perfectly clear that the Conservation area I suggested around Queens Rd Station should run from the Peckham High Street Conservation area along from Peckham High Street conservation area along Queens Rd to Pomeroy Street. This would include the spinal area from Peckham High Street? Rye lane and East Peckham.</p>	<p>The AAP does not recommend the designation of a new conservation area as the feeling at the moment is that there is not sufficient evidence to meet the criteria to be designated as a conservation area. We will continue to review this, and future conservation areas can be designated outside of the AAP process. Any suggestions for designation of a new conservation area would need to be explored by our design and conservation team and need to meet the requirements for designation as set out in NPPF paragraph 127.</p>

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							We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.
112	798					Objectives: Secondary education and access to family housing is key	Noted and covered in policies.
113	512				12	My previous Reference 313 152 Re: PNAAP 11 Nunhead Housing Site (previously Nunhead Community Centre) I would comment that the proposed site outline falls far too close to the existing Citron Terrace flats 11 and 12 at the shop end of the Citron Terrace block, as shown on your diagram pg 154 of documentation. This block placed so close to flats 11 and 12 will obscure all light from their patio gardens and all suburban outlook currently there. The original plans had a 3 storey block placed on Nunhead Lane adjacent to flats 11 and 12 at the end of the Citron block but the block did not extend round the corner and cut across the patio gardens as shown on the diagram. The 'inside block' ie on the site of the old Community centre was originally a separate block, not joined and would have been set back behind the trees in the CC area. Please look again at the proximity of the current flats 11 and 12 of Citron to the extended new build - this closeness is not acceptable in the Nunhead Conservation area and will obscure all light from the Citron flats 9 and 10 and 11 and 12. For your information the road near to your vehicular entrance is called Candle Close, not Bassoweed Close. Basswood Close is the name of the twin block of flats to Citron Terrace, situated at right angles to Citron along Linden	The AAP sets out the appropriate uses for this site as residential, setting out site guidance for a maximum of 3 storeys on this site. At the time of preparing this stage of the AAP, the detail of the scheme is yet to be worked up. The site is owned by Southwark Council, and the council will consult on the detail of the scheme at a later date. We have corrected the street name on Figure 35 from Basswood Close to Candle Grove.

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						Grove. Thank you. As this email did not come until late Thursday there has been little time but I urge you to re-consider the positioning of the new housing at the back of Citron Terrace. Re spelling errors, should read 'Basswood' not 'Bassoweed'. Apologies for this and other 'typos'	
114	798		Policy 4			Support for local businesses and discouraging too many high-street franchises and takeaways is excellent	Support noted
115	798		Policy 6			Would welcome more markets (esp food market in Nunhead)	Support noted
116	798		Policy 8			I would be very interested in using facilities at Breedinghurst school and would like more access to Harris girls school gym out of hours as it is very restricted	Noted, although this is not an issue we can address directly through the AAP.
117	798		Policy 11			Please bring cycle hire scheme to this part of London. As a non-driver the bus routes are currently far too congested along rye lane and to Camberwell	Policy 11 states that we will continue to lobby Transport for London to expand the cycle hire scheme to Peckham and Nunhead. However, TfL have set out through their comments on the AAP that this is currently not one of their priorities.
118	798					I would consider staying in this area if there were more options houses with 3+ bedrooms and garden space for growing families	The Core Strategy and the AAP have clear policies to ensure that all new development includes a proportion of new homes which are suitable for families (3 or more bedrooms) with directly accessible private amenity space, as well as communal space in flatted developments. The AAP also sets minimum dwelling sizes for all new development Our Residential Design Standards SPD sets out further guidance on how this amenity space (both private and communal) should be provided including requiring a minimum of 10sqm of private amenity space for family dwellings.

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120	798					more allotment space as lists are so oversubscribed wait times are about 4+ years	In order to help address this shortage, Policy 19 sets out a requirement for all major developments to provide opportunities for food growing. However, the provision of allotments is a borough-wide issue. Further detail on the location and number of allotment pitches in the borough is set out in the Open Space Strategy that will be taken to Cabinet for adoption later this year.
121	798					Core Action Area more varied shops, better transport links and safer cycling paths are key for me. as a local resident I do not shop there. I would like to have a choice of restaurants and cafes/ bars that i would like to go to	Noted. These aspirations are set out in the AAP policies.
122	798					Nunhead Peckham Rye Honor Oak would like to see improvements to the lower end of Peckham rye common that is broken up by east Dulwich road. I would like to have a safer station at Nunhead that is better lit and that I can use a lift at as I have mobility problems. Peckham Rye and Honor Oak stations are also terrible with stairs and for taking a buggy to the platforms. please make them more accessible!	The Department for Transport's Access for All programme is the national programme to fund and deliver platform to ticket entrance access improvements. Through this programme lifts are currently being installed at Denmark Hill and planned for both Queens Road Peckham and Peckham Rye Station. The stations are nominated by the train operating company with the criteria for this programme based around station usage, usage by those with mobility issues (such as Kings College Hospital), third party funding and deliverability. At present, it is considered unlikely that Nunhead Station would meet the minimum criteria to be considered, given the usage of the station and the pressures on the funding stream.
123	813		Policy 4			I am a GP at The Gardens, just off Peckham Rye. I would like to support the councils plans for hopefully limiting the number of Fast food outlets. As a GP I am aware of the dire statistics about obesity levels in our children. What a sad testimony for Southwark that the highest majority of 11 year olds are obese in the whole country. I see day by day the problems stored up for	Support noted. We have set out the restrictions to hot food takeaway use in policy 4

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						adulthood:- Hypertension , Diabetes, heart and renal disease,. Inc maternal and subsequent perinatal mortality. Today I have heard that the government are addressing this agenda by increasing VAT on Take aways. It's good to keep them away from schools. Another thing that you could do is stop the opening of more or at least checking what types of food would be available.	
124	798					Peckham North please improve the green area behind Peckham library which has good potential and make the surrey canal walk safer for pedestrians and cyclists	The area behind the library has been included in the Eagle Wharf site allocation (PNAAP 10) so that it is considered as part of the development of that site. We have highlighted that there is an opportunity to provide new/improved public space here.
125	798				1	Aylesham: needs updating and a selection of good quality shops and restaurants. is too dated now	The site guidance for this site refers to wanting to increase the range of shops. Similarly policy 1 seeks to provide a range of different shops in the town centre.
126	798				2	Cinema Wonderful views of the city that could be utilised better	Noted. Proposals site PNAAP 2 sets out guidance for the redevelopment of this site.
127	798				12	Nunhead Community Centre Welcome the community centre being based here and bringing a focus to the community	Support noted.
128	798				32	Bredinghurst Would like to see family housing here	Noted. The Core Strategy and this AAP require a minimum of 30% family housing on developments of 10 or more units within the suburban density zone. The site at Bredinghurst falls within the suburban zone.
129	813		Policy 4			We know from the Schools weighing programme that our school children are the most obese in the country. It is a huge public health problem now and for the future, when the children of today have heart disease, diabetes, kidney disease and immobility due to arthritis, as adults. We must try everything we can to	Support noted.

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						try to reduce childhood obesity. I think it is an excellent idea to keep Fast food outlets away from schools and reduce their numbers. I wish there was a way to make the food that they fast food outlets sell more healthy. Where new outlets are allowed to open, there should be a close look at the food that they plan to serve. Childhood obesity is a problem for the whole community, health services , schools, the Benefits agency and through that housing. It must be addressed everyway possible	
131	814					Dear Alison Squires, Rumi Bose and Michael Glasgow, I have just seen a copy of the Action Plan and note that comments have to be in by 5pm on the 24th of April 2012, which is today. I am extremely perturbed and very puzzled at the listings of houses and buildings included in the section for possible locally listed buildings. In the section on Chadwick Road I note that almost every building is listed with the glaring exception of the two terraces of tall buildings in the lower part of the road. I refer specifically to the two handsome terraces, one of four houses, numbers 26 to 42, and one of two houses, numbers 44 and 46. Admittedly some of the houses have had unfortunate changes made in the 1970s but overall the buildings are of historic interest, were built around 1875, and certainly are an important aspect of the general architecture and social history of this pretty road. The houses have various types of ownership. There are two housing association houses, one council, two privately owned, including ours, and one half-way house or bail hostel. We live in number 42, one of the buildings with a 1970s front window which is far too	English Heritage have prepared a Good practice guidance for local listing which sets out criteria that should be considered for identifying buildings and structures on a local list. Our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.

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						expensive for us to replace with the original bay window. However, apart from that, the terraces should definitely be considered for listing. It seems a glaring omission on your list. They are classic tall London terraced villas. Could you please explain why they have been left off your list and please amend your list and add them to your overall plan for possible listing. Many thanks,	
132	815		Policy 4			Dear Sir/ Madam I would just like to add my voice in support of a policy to limit further increases in the number of hot foot takeaways in Southwark. As a GP working in the borough I feel that we are fighting a losing battle with childhood obesity. The implications of this for the health of our population really do not bear thinking about. I am sure everyone is by now well aware of the medical complications associated with obesity including diabetes and heart disease – both already significant causes of morbidity and mortality in Southwark. In my practice, which is situated just opposite MacDonalds, we struggle to engage families in the importance of healthy eating and greater levels of activity for the future health of their children. It feels as though all of our hard work is being undone by the overwhelming number of shops selling cheap, poor quality fast food locally. It is just too easy for children to pick up a bag of chips or a burger on their way back from school and with the busy lives and financial pressures many of their parents have it is easy to see why they fall back on fast food to feed the family. On the Walworth Road we have 3 main types of shop – betting shops, money lenders and fast food outlets. Anything that you can do to help ensure that the	Support noted.



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						environment my patients live in is more conducive to their health and wellbeing would be incredibly valuable and this should start, in my opinion, with a greater availability of low cost healthy food and an increase in opportunities for physical activity. I support the proposed changes to restrict further takeaways in some parts of the borough and would encourage you to ensure that this policy is adopted. Yours faithfully	
133	816		Policy 21			I read with interest the above document and the Council's intentions on the development of the Peckham area. I was pleased to see the words 'conservation', 'enhancement of the area' 'protect the character of the area' appearing frequently, and I am wholeheartedly in agreement with the aims. I order to complete these aims successfully, may I suggest that a recent blight on the whole borough needs addressing? I'm referring to the arrangements for waste collection. I congratulate Southwark for wanting to increase the amount of recycling in the borough, but at what cost? Please could there be a concerted effort to rationalize the system which doesn't include each house/block of flats bristling with assorted boxes and variously coloured and sized bins? Perhaps Veolia & the council could instigate a campaign to help people understand how recycling can really work for all of us, financially and environmentally, and how to do it, so we get the feeling it matters. If we get it right- shouldn't there be less waste and fewer bins? A survey of the types of housing and areas for storage, for example, would ensure that containers fit for purpose would be distributed, instead of a 'one size fits all' we have at present. Perhaps in some cases 1 larger recycling bin	AAP policy 22 requires development to include adequate provision of recycling, composting and residual waste disposal, collection and storage. Our Sustainable Design and Construction SPD sets out how we will require new development to provide enough space on-site to securely and safely store waste and recycling bins. The council will continue to work with Veolia to educate residents on the benefits and means of recycling. Further information is set out in our Sustainable Design and Construction SPD.

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						at the end of streets ( as can be seen in some European cities) with limited storage areas, would also help the bin collectors too, for whom the 101 types of container must create problems. Maybe investigating good practice in other boroughs would help? How can we conserve and protect the historic character of an area and improve our environment, without tackling this issue?	
136	817		Policy 23			Having read through the proposed Area Action Plan for Peckham and Nunhead, it appears to be a very helpful and constructive document. However, there is an issue that has not been covered (although the general principles outlined in The Plan would seem to support it) and i wondered if there was an opportunity to include it? Namely that the large number of phone booths in the Peckham Core Action Area are unnecessary, causing congestion on the footpaths and providing an opportunity for antisocial behaviour. For example, within 30 seconds walk from the intersection of Rye Lane and Highshore Rd there are ten public phone booths (mostly operated by BT). These are very rarely used to make calls, in fact two do not even have phones in them, but they cause congestion on Rye Lane and Hanover Park especially as there are a large number of people with pushchairs and wheeled shopping trolleys who use these footpaths. Even more of a concern is the opportunity the booths provide for antisocial behaviour. The ones on Hanover Park and Highshore Roads in particular smell horrendous as they are regularly used as urinals, and they make waiting at the bus stop or sitting on the nearby benches extremely unpleasant at times. This is a pity	As a statutory authority phone companies have the ability to erect a phone booth without the need for a planning application and therefore outside of the scope of this document.  Policy 23: Public realm also sets out policy for the design of new public realm and spaces including consideration of street furniture.

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						<p>as now that the market stalls have gone from the end of Highshore Rd the benches there are being used more and more by people stopping and chatting. There is an opportunity to make this a really lovely little public space (a small 'oasis' beside the busy Rye Lane), but it is currently blighted by the two phone booths situated there. I walk through this area often in the evening and the phone booths create dark corners that are sheltered from public view and consequently make it feel like an unsafe place. The proposed Area Action Plan includes the principles to "ensure public spaces are well lit, overlooked with active ground floor uses and which feel safe at different times of the day and in the evening" and to "follow the principles of Secured by Design". One of the primary principles of Secured by design is to eliminate the sorts of spaces that are created by these phone booths, especially as their walls are made opaque by the advertising stickers placed on them. The proposed plan also states that the public realm should "provide... pedestrian routes that... are free from clutter, including street furniture and advertising boards" and "ensure inclusive design which promotes and protects mobility...". While a useful public service is provided by one or two public phones being available, I suspect that as mobile phones have now become so widely used, these booths are valued by their owners as advertising boards, and as such i can see no reason to have ten in such a small area and would argue that it would improve the area greatly to have the majority of them removed. I am hoping that the aim to have unnecessary phone booths removed can be made a</p>	

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						specific part of the Plan. I would welcome the opportunity to discuss this matter with you, or a member of your team in more detail,	
138	818					Design and Heritage Safeguard the decorative brickwork in the arches near Queens Road Peckham Station. Retain the public house building on Asylum Road opposite Queens Road Peckham Station.	We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.
140	795	Sport England	Policy 8			Section 4 – Area-wide strategies and guidance – Theme 4 – High quality homes: Providing more and better homes – Policy 16: New homes The Area Action Plan sets out required housing provision of around 2,000 new dwellings to be delivered across the PNAAP area by 2026. It is essential that adequate provision is made for indoor and outdoor community sport as part of the overall plan, in order to meet the needs of both new and existing communities.	Noted, policy 10 of the AAP seeks to ensure that improvements to sports facilities in the area are provided to meet the needs of an increasing population.
141	795	Sport England				Section 3 – Vision and objectives – 3.2 Objectives – Theme 2 Community wellbeing: improving individual life chances and Section 4 – Area-wide strategies and guidance and Theme 2 Community wellbeing: improving individual life chances Sport England support the identification of promoting a network of high quality and easy to access open spaces that serves a range of functions including sports facilities.	Support noted.
142	795	Sport England	Policy 9			Theme 2 Community wellbeing: improving individual life chances – Fact box: Community facilities Sport England support the identification of sport, leisure and recreational facilities as community facilities.	Support noted
143	795	Sport England	Policy 10			Section 4 – 4.3 Theme 2 Community wellbeing: improving individual life chances – Policy 10: Sports facilities Sport England support the identification of the	Support noted

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						<p>need for improvements to sports facilities in the area to meet the needs of an increasing population. This section covers two distinct policy areas and the relevant Sport England Planning Policies in relation to these are outlined below: Planning new places for sport Planning Policy 7 within Sport England's Spatial Planning for Sport and Active Recreation: Development Control Guidance Note (2009) Appendix (<a href="http://www.sportengland.org/facilities__planning/developing_policies_for_sport.aspx">http://www.sportengland.org/facilities__planning/developing_policies_for_sport.aspx</a>), aims to support the development of new facilities, the enhancement of existing facilities and the provision and/or improvement of access to the natural environment which will secure opportunities to take part in sport and which can be achieved in a way which meets sustainable development objectives. Shared use sites Planning Policy 9 aims to promote the wider use of existing and new sports facilities to serve more than one group of users. Sport England will encourage potential providers to consider opportunities for joint provision and dual use of facilities in appropriate locations.</p>	
144	795	Sport England				<p>Section 4 – 4.3 Theme 2 Community wellbeing: improving individual life chances – Figure 8: Existing leisure and sports facilities Protecting existing places for sport Planning Policy 2 aims to prevent the loss of existing sports facilities. Sport England opposes the redevelopment of such facilities, unless equivalent or better replacement facilities are provided (in terms of quantity, quality and accessibility) in a suitable location. The only exception to this policy is where it can be proved that the facility is genuinely redundant and there is no demand for a replacement based on a</p>	<p>Comments noted.</p> <p>We will continue to protect sports facilities where they meet a local need, in line with the approach set out in the National Planning Policy Framework and in saved Southwark Plan policy 2.1.</p>

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						thorough local assessment. Sport England's policy is consistent with that of the Government's set out in paragraphs 10-15 of PPG17. Furthermore, Sport England evidence, based on outputs from the Facilities Planning Model (FPM), shows certain provision issues in relation to strategic built community sports facilities such as synthetic turf pitches, sports halls and particularly swimming pools. It is therefore essential that the above Planning Policy is applied.	
145	795	Sport England	Policy 34			Section 4 – 4.3 Theme 2 Community wellbeing: improving individual life chances – Policy 34: Natural environment Sport England support the protection of Buchan Hall sports pitches on Buchan Road, although this should be expanded to cover all sports pitch sites within the PNAAP boundary. Protection of playing fields for sport Planning Policy 6 aims to ensure that there is no further reduction in the supply of conveniently located, quality playing fields for sport to satisfy current and likely future demand. Sport England will normally oppose development that would lead to the loss of, or prejudice the use of, all or part of a playing field, without meeting at least one of the specific exception criteria identified in Sport England's policy 'A Sporting Future for the Playing Fields of England' (1997), a copy of which can be downloaded from our website at <a href="http://www.sportengland.org/facilities__planning/putting_policy_into_practice/playing_fields.aspx">http://www.sportengland.org/facilities__planning/putting_policy_into_practice/playing_fields.aspx</a> .	Our approach to sports facilities is set out in Policy 10 of the AAP which states that we improve the play and sports facilities in Peckham Rye, Homestall Road Playing Field, Bells Gardens and the Damilola Taylor Centre.
146	795	Sport England				Sport England would be happy to provide further advice on how Southwark Council can strategically plan for sports facilities. There are a number of tools and guidance documents available, which can be	Noted.

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						found on Sport England's website at: <a href="http://www.sportengland.org/facilities__planning/developing_policies_for_sport.aspx">http://www.sportengland.org/facilities__planning/developing_policies_for_sport.aspx</a> . In addition, Sport England has a web based toolkit which aims to assist local authorities in delivering tailor-made approaches to strategic planning for sport. This can be found on Sport England's website at: <a href="http://www.sportengland.org/facilities__planning/planning_tools_and_guidance.aspx">http://www.sportengland.org/facilities__planning/planning_tools_and_guidance.aspx</a> . The toolkit focuses on built facilities for sport and recreation, setting out how planners can make the best use of sport-specific planning tools in following the PPG17 good practice principles and approach to determining local facility needs.	
147	185		Policy 11			The map of proposed cycle routes in the draft area action plan needs to be re-inserted into the area action plan. All contributions at the transport consultation on the draft plan supported their inclusion. No resident asked for their deletion. So why have they been removed?	Comment noted.  Figure 11 has been inserted to show the indicative cycle routes throughout the action area and the links to surrounding areas.
148	185		Policy 11			In line with the leader of the council and the cabinet member for the environment's commitments, the wording on nebulous wording on "linkages" needs to be changed to "We will provide traffic-free cycle-paths when developing the proposed cycle-linkages.	The wording in the AAP reflects the need for flexibility in carrying out improvements to the cycling environment. A combination of interventions will be required to improve connectivity and cyclist safety depending on the specific route or location in question. This is in line with the approach set out in our Transport Plan.
149	185		Policy 11			We will require space for and the installation of traffic-free cycle –paths to be included in developments along existing cycle routes in any new developments along them, including developments along the mayoral superhighways and on other through-roads. Entrances	Policy 11 states that we will work with a range of organisations to deliver a high quality network to support active travel throughout Peckham and Nunhead. The policy states that linkages will be designed to be safe, attractive, direct and convenient. This wording captures the key issues



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						to traffic-free sections of cycle paths and cycle routes will be designed in conjunction with the best cycle-path expert safety advice. Any proposals for one-way streets will include safe traffic-free contra-flows for cyclists. Whenever the opportunity arises for example when roads along which existing cycle routes pass are being refurbished, we will include safer traffic-free cycle-path, as was done along Southwark Park Road. Any traffic-calming measures such as road build-outs will allow safe protected through-flow for cyclists and we will stop using build-outs that force cyclists into line of traffic. When refurbishing any junctions, cycling and pedestrian safety will be made a priority, including provision for physical protection for cyclists on left-hand turns and cyclists will be allowed left-hand turns at red-lights, but with pedestrian priority. Where cycle-paths cross main-roads, pelican crossings will be installed, with fast push-button operation which prioritise cyclists over drivers, so that children from age of 8 can use the cycle-paths safely. We will paint cycle-paths a different colour from adjacent traffic and pedestrian spaces. The new Rye lane cycle path needs to be painted green to prevent unnecessary conflict between cyclists and pedestrians, as most pedestrians do not understand the new cycle path which is the same colour and height as the footpath.	in improving the cycle network, whilst providing the flexibility to design specific interventions according to the specific route or location in question. This is in line with the approach set out in our Transport Plan.
150	185		Policy 24			We will require creation of home zones in any new residential developments to facilitate safe street play for children and design for cycling and oppose through-traffic routes in residential developments.	Policy 19 states that we will require new development to provide adequate play facilities for children and young people. Further guidance on the precise requirements are set out in the Mayor's provision for children's play and informal recreation SPG.

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							Whilst home zones may be appropriate in some cases, a prescriptive approach applying to all new residential development would be too inflexible. The introduction to home zones will be considered on a site-by-site basis.
151	185		Policy 11			As well as linkages (cycle paths/routes) between Nunhead to Peckham, there should also be routes between Camberwell and Peckham, Camberwell/Nunhead, Peckham/Bermondsey, Peckham/Walworth.	Our Transport Plan sets out that we will improve the cycling environment throughout the borough. Figure 11 in the AAP highlights that we will pursue broad connections between the areas mentioned. This will be through a combination of committed schemes, such as the cycle superhighways, and more local improvements. A range of specific improvements will be delivered, in consultation with local people and interest groups, as funding becomes available over the lifetime of the AAP. Work to identify potential schemes is currently underway.
152	185		Policy 40			The plan should include creation of link from Peckham Road to the cycle-path along the Surrey Canal Walk, through the Canal Head Peckham Square, which currently is designed to bring cyclists and pedestrians into conflict, as they cross from Rye Lane cycle-path.	<p>Policy 11 and the associated map of indicative cycle links show our broad priorities for improving routes for active travel, but we have not identified specific routes in the AAP. This is largely because individual schemes can be conceived and implemented in a relatively quick timescale, so the AAP would quickly become out-of-date. Also, individual schemes will be subject to their own bespoke consultation as they are designed.</p> <p>Work is currently underway to improve cycle permeability in the areas that will link to the cycle superhighway along Queens Road and Peckham Road (A202). Further improvements will be identified over the lifetime of the AAP.</p>
153	819					Vision I agree with the vision although for Nunhead I do not think it is being consistently delivered.	<p>Support noted.</p> <p>The AAP expands on the existing Core Strategy vision for Peckham and Nunhead.</p>

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154	185		Policy 28			When refurbishing the square in front of Peckham Railway Station, the existing partial bus/cycle-path should be extended all the way up the rest of Rye-lane to facilitate access to the proposed cycle-hub at the station. The cycle-hub should be the hub for a series of traffic-free cycle paths radiating out into the community, to facilities integrated eco-friendly transport system.	<p>The proposed refurbishment of the square in front of the station is still at a very early stage. We are currently working with architects to investigate what is feasible and to consider some initial options for the site. PNAAP site 6 provides some context and basic principles for the site, but it is too early to add more detailed guidance.</p> <p>Policy 11 does establish that improving links to key destinations, such as stations, will be amongst our priorities in terms of improvements to walking and cycling routes.</p>
155	819					Enterprise It's great to see the new deli on Evelina Lane in Nunhead. We'd like to continue to see a range of shops and businesses as we're keen to support our local community.	Support noted. Our policy 3 and also saved Southwark Plan policies maintain the status of our shopping parades in providing a vibrant mix of retail uses
156	185		Policy 14			As the council has laid out its plans for specific exact locations for car-parking in the plan, then it must lay out locations for new cycle parking to be provided and the numbers that can be accommodated. The council will replace any cycle parking lost through its current programme of railing removal with the same or more number of cycle parking spaces, on the same street. Any proposed new car-parks must include safe, easily accessed, secure (by CCTV coverage if possible) cycle-parking	<p>Car parks are identified due to the fact that some of our proposals sites are currently car parks. As set out in the AAP, Copeland Road car park and the multi-storey car park are both identified as development sites, which will lead to a reduction in town centre car parks. Choumert Grove car park is to be maintained as a car park. No new car parking for town centre uses is specifically proposed through the AAP.</p> <p>New cycle parking will be provided as part of new developments, in line with the minimum standards set out in the saved Southwark Plan. The issue of railing removal and the consequent effect on cycle parking is too detailed an issue for the AAP but, as set out in the Transport Plan, additional cycle parking may be provided in areas of high demand, subject to the availability of funding.</p>
157	185		Policy 23			Any street furniture installations, tree planting or foot-path upgrades along designated cycle-routes or	Any new schemes look at current needs of the area as well as future needs, including those of pedestrians and cyclists.

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						through-traffic streets will be installed in consultation with cycle-path design experts to ensure that they are placed in correct location to avoid conflict with the planned largely traffic-free cycle network promised by the leader and cabinet member for environment.	We have Policy 11: Active travel and Policy 23: Public realm which identify the importance for considering improvements to existing routes or the provision of new links and policy for the design of new public realm and spaces. More information is set out for each character area in Section 5 with additional site specific guidance set out in Appendix C: schedule of proposal sites.
158	185		Policy 11			The entire area covered by the area action plan to be a 20mph zone.	We have amended the supporting text to policy 11 to refer to the Transport Plan commitment of becoming a 20mph borough. The revised text states that we will aim to reduce vehicle speeds on roads that are controlled by the council through a range of initiatives, as appropriate to the road/area in question. We also state that we will continue to work with Transport to London to address vehicle speeds on roads for which they are the responsible body.
159	819		Policy 31			Enterprise It's great to see the new deli on Evelina Lane in Nunhead. We'd like to continue to see a range of shops and businesses as we're keen to support our local community.	Support noted.
160	162	Highways Agency				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 of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the consultation and do not have any comment at this time	Noted
161	819		Policy 22			Natural Environment One of the street trees on Kimberley Avenue was removed but no new tree has been planted. It's not been made clear if a financial contribution has been made to replace this.	Policy 20 sets out our approach to protect, maintain and improve the provision of trees in Peckham and Nunhead. Further information on the replacements of trees is set out in the council's tree management strategy which is available to

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							view on the website at; <a href="http://www.southwark.gov.uk/info/505/trees/2016/tree_management_strategy">http://www.southwark.gov.uk/info/505/trees/2016/tree_management_strategy</a>
162	819					CHARACTER AREAS Nunhead, Peckham Rye, Honor Oak I would like to see better links between Evelina Road and the Nunhead train station and a lift would be very welcome.	The Department for Transport's Access for All programme is the national programme to fund and deliver platform to ticket entrance access improvements. Through this programme lifts are currently being installed at Denmark Hill and planned for both Queens Road Peckham and Peckham Rye Station. The stations are nominated by the train operating company with the criteria for this programme based around station usage, usage by those with mobility issues (such as Kings College Hospital), third party funding and deliverability. At present, it is considered unlikely that Nunhead Station would meet the minimum criteria to be considered, given the usage of the station and the pressures on the funding stream. Similarly, there are currently no plans to develop an alternative entrance to Nunhead station from Evelina Road.
163	137	Southwark Living Streets	Policy 13			We propose that the second paragraph of this section be amended to emphasise the Southwark Transport Plan Hierarchy and to read: ...and to improve accessibility and safety for all including pedestrians and cyclists as set out in the Southwark Transport Plan road user hierarchy.	The supporting text to policy 13 has been amended to refer to the road user hierarchy, as set out in the council's Transport Plan.
164	549	Notting Hill Housing Group			5	Dear Sirs PECKHAM AND NUNHEAD AREA ACTION PLAN – PREFERRED OPTION CONSULTATION REPRESENTATIONS MADE ON BEHALF OF NOTTING HILL HOUSING We set out below representations to the Peckham and Nunhead Area Action Plan (AAP) Preferred Option document, on behalf of Notting Hill Housing Group (NHH). These representations should be read in conjunction with the	The site guidance sets out an indicative capacity of 360 residential units. In accordance with the overarching Core Strategy housing policies and the housing policies within the draft AAP, the council has minimum housing targets which we seek to exceed. Core Strategy policy 5 and AAP policy 16 sets out our approach to density. The site falls within the core action area, meaning the maximum density range for the urban zone may be exceeded if an exemplary standard

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						<p>representations made on behalf of Notting Hill Housing to the Towards a Preferred Option version of the AAP in September 2011. Notting Hill Housing is currently working closely with the London Borough of Southwark (LBS) 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 Allocation: Former Wooddene Estate Notting Hill Housing has entered into an agreement with LBS to bring forward the Wooddene site for residential development and is currently in pre-application discussions with LBS in relation to the emerging proposals. This represents a significant opportunity to redevelop this vacant site by maximising the provision of residential accommodation in order to replace the residential floorspace previously at the site, which is a strategic London Plan and LBS policy requirement. NHH supports the allocation of the Wooddene site in the AAP, which recognises the potential for redevelopment and regeneration of this significant development site for residential use. It is considered that the site is appropriate for high density residential development, given its excellent level of public transport accessibility (PTAL of 6a) and location with the Peckham Town Centre, as defined on the LDF Proposals Map (April 2011). Recent initial feasibility studies presented to officers at LBS as part of pre-application discussions demonstrate that the site has the potential to meet and exceed the amount of residential floorspace previously at the site, which would meet key policy objectives for housing delivery.</p>	<p>of design is delivered. The figure of 360 is an indicative figure as set out in the introduction to appendix C, and the precise figure will be determined through a planning application.</p>

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						Furthermore, the principle of maximising the capacity of sites for residential development is supported in the recently published National Planning Policy Framework (March 2012), which seeks to encourage the effective reuse of brownfield land and states that the planning system should provide the supply of housing required to meet the needs of present and future generations. As such, it is requested that the site allocation is updated to make reference to a requirement to maximise the capacity of the site to deliver new homes having regard to the policy requirement for replacement of the residential floorspace previously at the site.	
165	137	Southwark Living Streets	Policy 11			We propose the adoption of the language (that was recently included in the E&C SPD amended slightly) as follows in relation to 20mph speed limit in the AAP area: "Our Transport Plan 2011 commits to making Southwark a 20mph borough. Our core approach to reducing road danger is to reduce vehicle speeds. This has been pursued through the introduction of 20mph zones and limits across the borough. The intention is that Southwark be a 20mph borough, so the default maximum traffic speed in the borough would be 20mph, with any streets with a higher maximum speed limit being the exception to this rule. We will look at all options to achieve this throughout the Peckham and Nunhead Area Action Plan area, such as physical traffic calming, limits, and average speed cameras (once these become more widely available)."	We have amended the supporting text to policy 11 to refer to the Transport Plan commitment of becoming a 20mph borough. The revised text states that we will aim to reduce vehicle speeds on roads that are controlled by the council through a range of initiatives, as appropriate to the road/area in question. We also state that we will continue to work with Transport to London to address vehicle speeds on roads for which they are the responsible body.
166	137	Southwark Living Streets	Policy 29			We propose the following addition: To address access to play spaces and open/green spaces, we will create HomeZones/PlayStreets on streets where car usage	Policy 19 states that we will require new development to provide adequate play facilities for children and young people. Further guidance on the precise requirements are



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						and/or parking levels are low.	set out in the Mayor's provision for children's play and informal recreation SPG. Whilst home zones may be appropriate in some cases, a prescriptive approach applying to all new residential development would be too inflexible. The introduction to home zones will be considered on a site-by-site basis.
167	137	Southwark Living Streets	Policy 29			We will work with TfL to improve the balance between motor traffic and the active travel modes along the length of the A202 (between Southampton Way and Queens Rd) by: - reducing vehicle speeds to create a safer environment - widening pavements and making carriageway widths more coherent and consistent - improving road crossing conditions especially in the town centre area - using greenery to improve the overall environment.	We have added some wording to the supporting text for policy 11 to highlight our commitment to reducing vehicle speeds to 20mph, as set out in the Transport Plan. We continue to pursue this with Transport for London for roads that they are responsible for, including Queens Road.
168	137	Southwark Living Streets	Policy 32			We propose that the following is added to Policy 31 (or wherever is felt to be most appropriate): We will investigate and promote the creation of a pedestrian entrance to Nunhead Railway Station from Evelina Rd owing to the significant effect this will have on personal safety and ease of access and usage of the station.	The installation of a new pedestrian entrance to Nunhead station from Evelina road is not currently under consideration.
169	137	Southwark Living Streets	Policy 11			Cycling. We support the comments in the submission by Southwark Cyclists. We feel that a map should appear in the AAP which outlines: 1) For cycling: The main roads that are likely to see high levels of cycling and which are particularly important to ensure safe 20mph speed limits, with benefits for both cyclists and pedestrians, and protection for cyclists. 2) Green routes for both walking and cycling: Indications of the routes (Peckham to Nunhead, Bermondsey (and on to Rotherhithe), Camberwell, East Dulwich and	Comment noted.  Figure 11 has been inserted to show the indicative cycle routes throughout the action area and the links to surrounding areas. Policy 11 makes clear that we will prioritise improvements to routes between key destination, such as schools and stations, that are likely to generate a greater number of trips. Core strategy policy 10 already states that we will protect and improve a range of green corridors and links. Further detail is set out in our open

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						Walworth) which would be served by the traffic free/traffic light routes network.	space strategy.
170	549	Notting Hill Housing Group	Policy 1			Peckham Town Centre Although the officer response to NHH's previous representations stated that the town centre boundary would be amended to accord with the LDF Proposals Map, it is noted that the Peckham Major Town Centre boundary, as shown at Figure 7, remains different to the boundary as set out on the LDF Proposals Map (April 2011), which previously included the Wooddene site and this requires further 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.	<p>The site of the former Wooddene estate has not been included in the town centre boundary because the surrounding area displays primarily residential characteristics. The town centre boundary includes the shopping frontages of Rye Lane and Peckham High Street, which is where we seek to focus the majority of new business and retail floorspace. The redrawing of the town centre focuses retail and business growth within a more defined town centre.</p> <p>The former Wooddene site is included in the Peckham core action area boundary which is where we recognise there will be most of the growth. Subsequently the site is included within the main area of growth, but not the predominantly retail dominant town centre. Policies in both the Core Strategy and the AAP encourage development within the core action area as well as the town centre, with the main difference being that less retail development is expected within the parts of the core action area which are outside of the town centre. For example, we state in Policy 16 that the maximum density of 700 habitable rooms per hectare may be exceeded where developments are of an exemplary standard of design within Peckham core action area.</p>
171	549	Notting Hill Housing Group	Policy 15			Residential Parking It is noted that Policy 15 encourages residential development within the Peckham Core Action Area to be car free and allows up to 0.3 spaces per unit where justified in a transport assessment. It is considered that the appropriate level of car parking for a development should be determined on a site-by-site basis having regard to other	<p>Our core strategy sets out that we will encourage walking, cycling and public transport as alternatives to private car use in the borough.</p> <p>The approach to residential car parking set out in policy 15 is based on a range of considerations including public transport accessibility, levels of car ownership and potential impacts</p>

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						<p>considerations such as existing parking provision, the extent of Controlled Parking Zones (CPZ) in the vicinity, highways impact and car ownership levels. The site at Wooddene is not located within a CPZ and therefore it will be important to ensure that sufficient off-street car parking can be provided in order not to place unnecessary pressure on the highways network. As such, we request that the wording of Policy 15 is amended as highlighted in bold below: "In Peckham core action area, we will encourage residential development to be car free, asides from the required provision of parking for disabled persons and car club spaces, except where the site is not located within a Controlled Parking Zone".</p>	<p>on local character. The potential impact on the road network is also an important concern and we would expect this to be addressed via a transport assessment. This approach is set out in our Sustainable transport SPD. By allowing up to 0.3 parking spaces per unit in the core action area there is sufficient flexibility to accommodate a range of schemes.</p>
172	549	Notting Hill Housing Group	Policy 17			<p>Affordable and Private Homes Policy 17 states that developments of 10 or more units must provide a minimum of 35% affordable housing across the whole action area. In order to conform with LBS Core Strategy Strategic Policy 6 and the NPPF, regard should be had to viability and site specific circumstances when determining the appropriate level of affordable housing for a site. It is noted that the definition of affordable housing refers to the affordable rent product but the AAP does not refer to policies for its provision. In order to be consistent with the NPPF and the London Plan, it is considered that the tenure split stated in Policy 17 should include the affordable rent product, as it has the potential to contribute to strategic policy objectives, such as the provision of a range of housing types to meet different housing needs and the creation of mixed and balanced communities. It is also considered that the tenure split</p>	<p>The issue of viability is already covered in existing policy guidance. The Affordable Housing SPD 2008 and the draft Affordable Housing SPD 2011 set out the requirement for a financial appraisal to be submitted to the satisfaction of the council where our affordable housing requirements cannot be met. The approach was endorsed by the Planning Inspector for the Core Strategy.</p> <p>Southwark's planning policies do not allow for affordable rent. This is consistent with the NPPF, which includes affordable rent within its definition of affordable housing, but does not require boroughs to have a policy allowing affordable rent. The NPPF refers to housing policies needing to be based on an evidence base, and our evidence base demonstrates the need to continue with our current approach to affordable housing. This is set out in a report on affordable housing, taken to planning committee on 20 December 2011. The report states that affordable rent does not meet housing</p>

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						should be applied flexibly in the context of site specific circumstances and scheme viability in order to ensure that development schemes are viable and deliverable.	need in Southwark, as evidenced by two key evidence base studies, and that we will continue to apply our Core Strategy and Southwark Plan policies i.e. requiring 35% affordable housing on schemes over 10 units – with a split between social rent and intermediate housing. Any proposal for affordable rent is classed as a departure from policy, and a financial viability appraisal can be submitted to discuss with the LPA whether an alternative provision is suitable. Link to planning committee report of affordable rent: <a href="http://www.southwark.gov.uk/downloads/download/2963/Affordable_rent_planning_committee_report">http://www.southwark.gov.uk/downloads/download/2963/Affordable_rent_planning_committee_report</a> In terms of tenure split, as set out in the Affordable Housing SPDs, the first step in looking at viability is to look at whether the tenure split between social rented and intermediate can be varied to make a suitable scheme.
173	800	Sumner Tenants and Residents Association	Policy 1			Small traders are struggling in the town centre due to rising rents and other costs. Important that as new development takes place existing traders are not priced out. Perhaps a need for a policy linked to providing affordable business/retail space	Policy 6 of the AAP sets out that new developments should support business start ups and growing SMEs. We require the provision of space that is flexible by design, suitable for a range of business types and sizes and allows growing businesses to remain in the area, as well as attracting new businesses to Peckham. At the moment, the Elephant and Castle SPD is the only document which defines affordable retail space and where there is a requirement for affordable retail space. This has been justified in the context of the large scale retail developments which may displace existing occupiers. There is no particular evidence that subsidised retail or business space is required at the moment in Peckham.
174	800	Sumner Tenants and Residents	Policy 4			Concern that although the restriction on hot food takeaways has merit, it will affect small, local businesses more than larger chains	We have acknowledged in the supporting text to Policy 4 that hot food takeaway shops can support the local economy and provide employment opportunities. However, both the proliferation of A5 uses and their clustering together can

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		Association					<p>dominate the local retail food offer and an overconcentration can affect the viability and vitality of a retail centre, undermining its predominantly retail function and collectively impacting upon the amenity of the surrounding area. In the interests of the health of residents, particularly children as well as ensuring a range of shop uses in our centres, the proliferation of A5 uses needs to be carefully controlled.</p> <p>Policy 6 of the AAP sets out that new developments should also support business start ups and growing SMEs. This will be achieved through the provision of space that is flexible by design, suitable for a range of business types and sizes and allows growing businesses to remain in the area, as well as attracting new businesses to Peckham.</p>
175	549	Notting Hill Housing Group	Policy 18			<p>Mix and Design of New Homes Policy 18 requires units with 3 or more bedrooms to provide 'direct access to private amenity space and should have sufficient play space for children and young people'. In accordance with the GLA Children and Young People's Play and Informal Recreation SPG (2008), clarification is sought that developments should provide communal play space as it would be overly restrictive to require development to provide private play space for each unit. In order to ensure that development schemes are viable and deliverable, it is also considered that the minimum dwelling standards referred to in Policy 18 should be applied flexibly having regard to site specific circumstances.</p>	<p>Policy 18 has been amended to make the requirements for play space clearer. An extra bullet point has been added and a cross reference to the Mayor's SPG.</p> <p>The council considers that the minimum dwelling standards that are set out in the Residential Design Standards SPD and in the AAP are reasonable and achievable, and based on evidence suggesting that there is a need for larger sized units in London. The space standards are flexible in that they allow for a range of occupants, providing the overall averages are met.</p> <p>Southwark's Strategic Housing Market Assessment and Housing Requirements Study demonstrate a need not only for more 3 and 4 bedroom dwellings but it also highlights that a significant proportion of this need arises from overcrowded homes. The standards are based on those in the London Plan, which is underpinned by evidence to demonstrate that</p>

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							London needs larger dwelling sizes and that these standards are deliverable.
176	800	Sumner Tenants and Residents Association	Policy 1			Support for policies that encourage a variety of shops, particularly some of the larger stores selling comparison goods that people need to head to Lewisham, Brixton, Oxford St to find at the moment Strong need for more cafes and restaurants in the town centre- there is nowhere to go to take friends and have a coffee and a cake etc	<p>Support noted.</p> <p>Policy 1 encourages new retail (Classes A1/A2/A3/A4) development in Peckham town centre to help maintain and enhance its status as a major town centre in the borough's retail hierarchy.</p> <p>Policy 4 sets out that we want to promote more cafes and restaurants in the town centre which will help to contribute to the day-time economy, supporting the predominately shop provision in the town centre. Different but complementary uses, during the day and in the evening, can reinforce each other, making town centres more attractive to local residents, shoppers and visitors.</p>
177	800	Sumner Tenants and Residents Association	Policy 12			Supportive of bringing the tram to Peckham, but concerned that Flaxyards is the wrong site for a terminus because of the disruption to local residents and narrow roads not suitable for tram, e.g Sumner Road and Jocelyn street. One resident asked why the site is not considered an open space.	<p>Support for the tram is welcomed.</p> <p>Whilst the scheme is currently unfunded, we continue to be supportive of the tram as one of a number of interventions to improve travel choice in Peckham and Nunhead. Although Flaxyards continues to be our preferred site, should the scheme be resurrected then it is likely to be subject to its own detailed consultation due to the amount of time that has lapsed since it was initially proposed.</p> <p>Throughout the preparation of the Area Action Plan, Flaxyards has been identified as a development site and this continues to be the case.</p>
178	800	Sumner Tenants			2	The cinema should stay where it is, not move to Eagle Wharf. It is a popular location in the heart of the town	Policy 2 makes clear that we support the continued provision of a cinema in Peckham town centre. The cinema will remain

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		and Residents Association				centre and well located for the train, bus and car parks (Choumert Grove even if the multi-storey is redeveloped)	at its current location unless an adequate replacement can be provided elsewhere when the existing site is redeveloped. Eagle Wharf (PNAAP site 10) or Copeland Industrial Park (PNAAP site 4) are identified as possible alternatives. Including this flexibility means that we can consider a wider range of development proposals for sites in Peckham town centre.
179	800	Sumner Tenants and Residents Association	Policy 14			Some of the car parks are underused and should be put to better uses. There is too much surface level car parking that takes up valuable space and better, more efficient techniques need to be considered (e.g. underground car parks)	The cinema multi-storey car park and Copeland road car park are both allocated as development sites. Other sites that contain car parking, such as the Aylesham Centre, may be remodelled with car parking retained. Further guidance on potential uses and site capacities is set out in Appendix C. This approach is supported by our town centre car parking and delivery study (2010). Demand for town centre car parking will be monitored as development takes place in the action area.
180	800	Sumner Tenants and Residents Association				Not enough for young people in the area. Not just in terms of leisure and recreation, but a concern that there is nowhere for young people to get skills and training opportunities that will help them find work. Need to make sure that the plans for the area somehow incorporate opportunities for young people to find employment	Policy 2 promotes the provision of new arts, cultural, entertainment and leisure space which will bring help bring additional value and opportunities to Peckham. A vibrant arts, leisure and cultural scene, will bring employment, engage students, local people and visitors, and create opportunities for training and learning. One of the priorities of the Council's Economic Development Strategy (2010) is to work with our partners to develop projects to improve the employment prospects of our priority groups, which includes younger people to develop skills and find employment. The strategy also prioritises the continued engagement with employers in the borough to develop work placements and apprenticeships for priority groups and embed local economic benefits into procurement. The Council's Local Economy team currently commission advice and support for businesses in the area.

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181	549	Notting Hill Housing Group	Policy 22			Policy 22 states that developments will be expected to retain and enhance trees and canopy wherever possible. In order not to unduly restrict the potential of sites to meet other strategic policy objectives, such as maximising the potential of sites to provide new homes, it is considered that this policy requirement should only relate to those trees which are demonstrated to be of a high quality and value.	The AAP recognises that all trees provide a contribution to the environment and the council's approach is to protect all trees unless they are dead, dying or dangerous. The policy should not just relate to those which are demonstrated to be of a high quality and value. Further information is set out in the council's tree management strategy which is available to view on the website at; <a href="http://www.southwark.gov.uk/info/505/trees/2016/tree_management_strategy">http://www.southwark.gov.uk/info/505/trees/2016/tree_management_strategy</a>
182	549	Notting Hill Housing Group	Policy 25			Policy 25: Building Heights The recognition in Policy 25 that sites at gateway locations, such as the Wooddene site, can accommodate a tall building is welcomed. It is noted however that this section of Policy 25 is inconsistent with the previous section of the policy, which requires development to be similar to existing heights. As demonstrated in the initial feasibility studies for the Wooddene site, significant development sites such as this, have the potential to establish their own character and building heights need not necessarily be similar to existing heights in order to be appropriate for the site context. As stated above, the precise heights across the site will be subject to assessment through the application process and the reference to building heights of 6-10 storeys should not be applied prescriptively or seen as an upper limit.	The wording of the Policy 26: Building heights has been reviewed to ensure that there is more clarity regarding the potential location and height of tall buildings in the action area. Any proposal would need to comply with the borough-wide policies for design and building heights, particularly Southwark Plan policy 3.20 and Core Strategy strategic policy 12. The evidence that informs this policy is set out in the Peckham and Nunhead Action Area urban design background paper and Peckham and Nunhead characterisation study.
183	549	Notting Hill Housing Group	Policy 29			Policy 29: Built Environment It is noted that Policy 29 requires the redevelopment of the Wooddene site to provide mixed uses and active frontages along parts of Queens Road. As stated above, it is considered that the provision of active frontages should include residential and should be subject to market demand	Appendix C: Schedule of proposal sites indicates that PNAAP 5: Site of the former Wooddene estate identifies the opportunity for active frontages along the Queens Road frontage where possible to improve the streetscape. Any detail consideration of the extent of active frontages would need to be discussed as part of a planning application.



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						and viability. We would be grateful for confirmation of receipt of these representations and would welcome the opportunity to further discuss any of the points raised. Please contact Neil Lawrence (020 7911 2189) or Martin Hall at this office.	
184	800	Sumner Tenants and Residents Association	Policy 7			Concern about the services available for older people; information services and day centres	<p>Peckham library is identified in the infrastructure plan as a priority for improvement so that it can meet the additional need created by house building in the action area. There is an existing day centre on Queens Road, close to the station. In addition a new community centre is set to be provided adjacent to Nunhead Green as part of the redevelopment of PNAAP site 12.</p> <p>The majority of proposals sites include community uses (class D) as acceptable uses (see appendix C), so there are opportunities for new facilities to be delivered on those sites if a clear, identified need arises.</p> <p>There is also potential for community facilities to be funded through the community infrastructure levy (CIL) if a clear need arises and a local group can present a clear, robust management plan for any such facility.</p>
185	800	Sumner Tenants and Residents Association	Policy 7			There should be scope for a community centre that could be a base for local TRAs and a range of community groups. Somewhere south of Commercial Way that could be a hub and could be available to host local events and meetings	<p>The majority of our proposals sites include community uses (class D) as acceptable uses, so there are opportunities for new facilities to be delivered on those sites if a clear, identified need arises (see appendix C).</p> <p>There is also potential for community facilities to be funded through the community infrastructure levy (CIL) if a clear need arises and a local group can present a clear, robust management plan for any such facility.</p>

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							No new facilities are identified at present in Peckham, but this position will be reviewed regularly over the lifetime of the plan. Peckham library is identified in the infrastructure plan as a priority for improvement so that it can meet the additional need created by house building in the action area.
187	820		Policy 26			Design and Heritage Please consider Queen's Road Railway Station together with Asylum Road for a potential conservation area. Please do not get lose the polychrome brickwork on the railway - it would be a real mistake. Perhaps the London Brighton Pub can also be spared and joined to the plaza envisaged for the railway station. We need more local distinctiveness not utilitarian mass-produced design. With a little imagination this could be a great project. Thank you	<p>The AAP does not recommend the designation of a new conservation area as the feeling at the moment is that there is not sufficient evidence to meet the criteria to be designated as a conservation area. We will continue to review this, and future conservation areas can be designated outside of the AAP process. Any suggestions for designation of a new conservation area would need to be explored by our design and conservation team and need to meet the requirements for designation as set out in NPPF paragraph 127.</p> <p>We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.</p>
189	821	Bywater Properties					
190	209	NHS Southwar k				Public health response to Peckham and Nunhead Area Action Plan In common with many other individuals and organisations we have welcomed the opportunity to comment on earlier versions of this document. The extensive consultation already undertaken has greatly strengthened this version of the document and helped set a positive framework for potential development. One question: Does the final	The publication/submission version AAP has been updated in light of the recent publication of the National Planning Policy Framework.

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						version need to be read in light of the new planning policy framework as it is clear that future spatial planning will be very dependent on the quality and specificity of local plans?	
191	209	NHS Southwark				P.19 Section 2.1.14 Given the down turn in the economy, it would be a good idea to update this. In 2009 the jobs density for Southwark had declined to 1.12 and for London it was 0.88	We have updated this section of the AAP.
192	127	Thames Water Utilities				Section 1.1.2 of the AAP sets out infrastructure needed to support growth but makes no reference to water or wastewater infrastructure. Reference should be made in the last bullet within section 1.1.2 to “utilities infrastructure” to cover the need for water and wastewater infrastructure and other utilities.	This is covered within section 7 of the AAP and the infrastructure plan. It is not appropriate to put this level of detail into the introduction section of the AAP.
193	127	Thames Water Utilities				In Sections 3.2.10 and 7.4 reference is made to key stakeholders under W4. However, there is no mention of Thames Water or other utility providers. Thames Water will be a key stakeholder in relation to ensuring that any necessary water or wastewater infrastructure needed to support development is delivered. In our previous comments we highlighted that there were sites within the AAP area that may potentially need upgrades to either the water and wastewater networks. We also set out that the AAP needs to take into account the timescales necessary to deliver network upgrades when considering the phasing of development and that additional text should be provided within the AAP to ensure that any necessary infrastructure upgrades are delivered ahead of development. The need for developers to demonstrate that any necessary water and wastewater upgrades	This has been amended in the publication/submission version AAP.

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						<p>required are delivered is highlighted in the supporting text of the Core Strategy where under Section 6.10 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." Within the officers response to our comments on the previous consultation it was stated that "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" Section 7 of the Preferred Options document makes reference to an Infrastructure Plan and sets out in Section 7.5.1 that "Existing infrastructure will need to be improved and new infrastructure provided to cope with the additional population and visitors." However, Policy 46 only relates to securing infrastructure through S106 agreements and the CIL. The provision of water and wastewater infrastructure upgrades cannot be secured through Section 106 agreements or the CIL.</p>	

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						Furthermore, the need for upgrades may not be determined until there is greater certainty over the scale and phasing of development and the point of connection to the existing networks. As such it is essential that developers demonstrate whether there is sufficient water and wastewater infrastructure capacity both on and off site to serve the development. Where upgrades are required the developer will need to demonstrate how these will be delivered.	
194	122	Natural England				Chapter 1: Introduction Improvements to open spaces as mentioned under paragraph 1.1.2 are welcomed and to be encouraged. Paragraph 1.3.3 refers to policies and legislation to be considered in respect of this Plan, reference and compliance should now been made to the National Planning Policy Framework (NPPF).	Noted.  The AAP has been updated to refer to the NPPF.
195	127	Thames Water Utilities	Policy 21			In order to ensure that developments are delivered alongside any necessary upgrades it is considered that Policy 21 should be revised so that an additional bullet point is included stating "Making sure that the necessary infrastructure, including utilities infrastructure, is delivered ahead of the occupation of development" Alternatively, additional text could be added to Policy 46 to state: "We will use section 106 planning obligations and/or CIL to ensure the delivery of key infrastructure and to mitigate the impact of development. Where infrastructure upgrades cannot be secured through S106 agreements or the CIL, developers will be required to demonstrate how any necessary infrastructure upgrades will be delivered ahead of the occupation of development." The following additional text should also be provided in	It is not considered appropriate to reference utilities infrastructure in Policy 21. We have set out an infrastructure plan in the publication/submission version which demonstrates how we will ensure the necessary infrastructure is provided to meet the needs of new development. Our approach is in line with the policies set out in the adopted Core Strategy which identified the scale and location of new development in the borough.

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						support of the requirements for water and wastewater infrastructure upgrades: "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. Where necessary conditions will be used to ensure that water or wastewater infrastructure upgrades are delivered ahead of the occupation of development"	
196	122	Natural England				Peckham & Nunhead Today – Challenges and Opportunities Challenges as mentioned under paragraph 2.2.2 should include reference to green infrastructure provision through new developments where appropriate. This would strengthen the document and link in with later references to Green Chains/Corridors	This has been amended in the publication/submission version AAP.
197	127	Thames Water Utilities				Site Specific Comments With respect to the proposals sites we have set out of most up to date comments regarding the proposed development sites. However, it should be noted that the need for upgrades can be affected by developments elsewhere within the catchments and the scale, phasing and point of connection of any developments that come forward.	Noted.
198	122	Natural England				Vision and Objectives Theme 5 refers to the Natural Environment and Sustainable Use of Resources;	The objectives have led to the development of Policy 19 which includes the proposed protection of additional open

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						Policies N1 to N3 refers. These policies can be welcomed and encouraged, though they do seem to be passive, seeking to protect and enhance existing "resources". As mentioned above Natural England would encourage the Council to seek the creation of new/open spaces, where possible, consider the use of Green Infrastructure and soft landscaping as part of new development proposals.	space. It is also a key objective of the AAP to protect, maintain and improve the quality and accessibility of open space.  Further detail is set out in the open space strategy. Further information on the provision of landscaping and amenity space as part of new development is also set out in our Design and Access Statements SPD and our Residential Design Standards SPD.
199	122	Natural England	Policy 19			Area Wide Strategies and Guidance Section 4.5: Theme 5: Natural Environment - Policy 19 Open Space and Sites of Interest to Nature Conservation (SINC's). This policy refers to green infrastructure and is welcomed. Reference to this elsewhere in the document would help to strengthen it provision further.	The approach set out in Policy 19 is reinforced in the natural environment policies in the character area sections, this includes the proposed protection of additional open space. It is also a key objective of the AAP to protect, maintain and improve the quality and accessibility of open space. Further detail is set out in the open space strategy.
200	122	Natural England	Policy 30			Character Areas in Peckham and Nunhead Peckham Core Area – Policy 30 Natural Environment The Policy refers to the potential for Green Chains/links/corridors and is welcomed; however, Natural England would refer to its previous comments in respect of Green Infrastructure, and its delivery as part of sustainable development, which will also link in to connectivity Minehead, Peckham Rye and Honor Park - Policy 34 Natural Environment See comments above. Peckham South – Policy 38 Natural Environment See comments above. Peckham North – Policy 41 Natural Environment See comments above. Peckham East – Policy 44 Natural Environment See comments above.	The approach set out in the character area sections reinforces Policy 19, this includes the proposed protection of additional open space. It is also a key objective of the AAP to protect, maintain and improve the quality and accessibility of open space which will promote a wider green infrastructure network. Further detail is set out in the open space strategy.
202	122	Natural England				Sites in Peckham and Nunhead Natural England has no substantive comments to make on the proposed sites at this time, however, we welcome the	Noted.

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						<p>opportunity to discuss and be consulted on sites and schemes as they are brought forward for development. Natural England would like to remind the Council and potential developers that where there is a reasonable likelihood of a protected species being present and affected by the proposed development, the LPA should request survey information from the applicant before determining the application (Paragraph 99 Circular 06/05) . Natural England has produced standing advice, which is available on our website Natural England Standing Advice to help the local planning authorities to better understand the impact of particular developments on protected or BAP species should they be identified as an issue. The standing advice also sets out when, following receipt of survey information, the local planning authority should undertake further consultation with Natural England.</p>	
203	122	Natural England				<p>Peckham and Nunhead Sustainability Appraisal The document lists seventeen Sustainable Development Objectives which can be broadly supported, and in particular the following; SDO 6 – Climate Change SDO 13 – Protect and improve open spaces, green corridors and biodiversity Overall the document covers the topics and issues that Natural England would wish to see considered by such a document and the approach and methodology is in line with advice that would be offered by Natural England.</p>	Support noted
204	122	Natural England				<p>Habitat Regulation Assessment Southwark have carried out an Appropriate Assessment screening opinion for the Area Action Plan, under the Habitats Regulation which is to be encouraged. Appropriate Assessment is a specific exercise that is triggered</p>	Support noted



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						<p>because it has been established that there are mechanisms for significant impact by Adopted plans or projects, and this Assessment is designed to ascertain whether there will be 'an adverse impact on the integrity' of the site. This distinction and definition which is separate from 'there is "not likely to be a significant effect"' is very important, especially if the Council does not wish to open itself to legal challenge. After careful consideration of the information provided it is our opinion that in this instance, Southwark do not require a full Habitats Regulations Assessment/Appropriate Assessment in respect of the Peckham and Nunhead Area Action Plan, as per section 8 of the screening report. If you disagree with our assessment of this proposal as low risk, or should the proposal be amended in a way which significantly affects its impact on the natural environment, then in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, please consult Natural England again.</p>	
206	822					<p>Vision It's a pretty vague vision, but seems to say the right things Objectives i don't see objectives</p>	<p>Noted re the vision.</p> <p>The objectives are set out in section 3, following the overarching Peckham and Nunhead vision.</p>
207	822					<p>Enterprise I would support the market if there was a suitable level of quality control. I believe that it is likely however that the market will look like many others in poorer parts of London selling junk/stolen goods/fruit/£1 shop stuff like toiletries and I would not like this</p>	<p>The Southwark Street Trading and Markets Strategy (2010). includes recommendations for developing and improving the borough's street trading and markets infrastructure. Section 3.10 sets out a range of proposed actions which includes implementing action plans for individual market sites and consulting with other council departments and stakeholders on how new markets can contribute positively to an area. We will work with the street trading and markets team to ensure</p>

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							that consultation on options for improved or new markets in the town centre is undertaken.
208	822					Housing i don't understand why local government has to stipulate this level of detail.	The level of detail is appropriate for an area action plan, in accordance with guidance and policies from national and regional government. Evidence within our strategic housing market assessment (2010) and our housing requirements study (2009) both demonstrate the need to provide more homes to meet the needs of local people and those wanting to live in the borough. The Mayor of London also sets a target for each borough to deliver a certain number of homes each year. In order to ensure that these homes are the right size, type, affordability and standard, the council sets out local planning policies to control new development. Without the type of detailed policies that are set out in the Core Strategy and the Peckham and Nunhead AAP new homes would not meet the range of needs and issues that are present in Southwark.
209	822		Policy 19			Natural Environment Policy 19 seems nice but there are way bigger problems than this to deal with.	Noted.
210	822					CHARACTER AREAS Nunhead, Peckham Rye, Honor Oak Im really keen on a cleanup of Rye lane, starting with Peckham rye station. Rye lane and some side streets are disgusting at present. We should enforce cleanliness on shop owners so we don't have clumps of hair, chunks of food and piles of garbage and awful smells all along it. Its embarrassing.	<p>The area action plan sets out policy and guidance and supports the need for improvements in Rye Lane and around Peckham Rye Station. We have secured funding to improve the area around Peckham Rye station and the removal of the existing forecourt buildings between the station and Rye Lane will allow the creation of a new public space which will open up this area to Rye Lane, providing better visual and pedestrian connections for commuters and local residents.</p> <p>We have also received a Stage 1 pass for funding from the Townscape Heritage Initiative programme that will, in conjunction with support from local community groups, will</p>

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							help deliver building repairs, conservation and improvements to the Rye Lane Conservation area. This will also assist in improving the quality of the streetscape.
211	822					CIL dont understand	We have included additional guidance on s106 planning obligations and CIL in section 7 of the AAP
212	127	Thames Water Utilities			31	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.
213	796					More work should go into identifying the knock-on impact between the development of the numerous sites assessed for potential development. Particularly in the Peckham Town Centre area, these sites are densely packed and, were all developments to go ahead, would result in profound impacts on the local community, which could make other elements of the plan inaccurate or obsolete. For example, improved transport links between Peckham and Nunhead, and a reinvigorated town centre providing a wider range of facilities and services, could have a negative impact on Nunhead's own centre. The assumption seems to be made throughout that all developments, and policies, will be complementary – this is not necessarily the case. Appendix B, the schedule of proposed sites, goes to reinforce this view of “standalone” developments without much	<p>The sustainability appraisal looks at the impact of all the policies, including the proposals site policy on a number of economic, environmental and social indicators. It also looks at the compatibility of the SA objectives to ensure that they are all compatible with each other.</p> <p>The schedule of proposals sites sets out likely timescales for each development site, which ensures that not all development comes forward at the same time. Section 7 of the AAP has been updated to include a lot of information on delivery, including information on section 106 and the community infrastructure levy (CIL) which will ensure that development has the necessary supporting infrastructure.</p> <p>Furthermore, our background evidence supports the approach to sites and development, for example through our Retail Capacity Study, which shows that there is scope for all</p>

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						consideration of either their wider impact or their interrelationships. There is an (understandable) focus throughout the plan on infrastructure development as a catalyst and means for regeneration. While this is obviously a point of view, more work needs to be done to identify how regeneration objectives can be achieved through other means, reflecting best practice.	the major town centres in Southwark (including Peckham) to expand its comparison offer without impacting on other centres.
214	796					I do not feel that the AAP as it currently stands reflects current pan-London transport plans and their impact on the Peckham and Nunhead area. There are several areas of concern, and opportunities arising, that are not covered: <ul style="list-style-type: none"> <li>• Parts of the plan seem to assume the likely, and reasonably imminent, progress of the Cross River Tram (CRT) project, although TfL cancelled any further work on this several years ago. Although Ken Livingstone has pledged, should he win the forthcoming Mayoral election, to progress plans for CRT, without a clear funding commitment it should not be considered a realistic possibility in the short to medium term;</li> <li>• Opportunities arising from the introduction of metro-frequency services through Phase 2 of the East London Line extension are noted, but not the knock-on impacts of the withdrawal of South London Line services;</li> <li>• The opportunity is not recognised to lobby TfL/DfT for the introduction of a skip-stop/stopping service from Victoria to Bellingham as part of the Southeastern franchise renewal in 2014. This is of particular importance given the strong arguments the Mayor is currently making to the Government about the devolution of rail franchising for suburban services to the GLA. The AAP also fails to</li> </ul>	<p>We acknowledge that the cross river tram is currently unfunded, but we still support the delivery of the scheme or a high quality alternative as part of a suite of measures that will improve travel choice in the action area. This approach is consistent with the approach set out in our Core Strategy, through which we also safeguarded a potential route for the cross river tram.</p> <p>Policy 12 notes that the council will continue to work with Transport for London and transport operators to improve travel choice in Peckham and Nunhead, but It is not the role of the AAP to debate specific operational changes. The council continues to discuss measures that will compensate for changes to the South London Line service and has recently responded to consultations on both the Thameslink and South Eastern franchises.</p> <p>The infrastructure background report summarises some of the known and potential service changes that could affect Peckham and Nunhead. These issues have informed the process of drafting the AAP transport policies and will continue to inform priority projects over the lifetime of the AAP.</p>

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						note service frequency changes to Nunhead arising from the Thameslink Programme; • The AAP does not take account of possible access improvements to Nunhead station (including direct access from Evelina Road, subject to a reclassification of the station by DfT), which have been a continuing feature of consultations and discussions, particularly in the context of the bid for regeneration funding from the GLA; • The plan does not analyse the knock-on impacts on these, and other, transport issues in the context of its wider development priorities. I will explore this issue below.	
215	796					While the plan as it stands sets out a coherent and compelling vision for the wards making up the action area, there may be more of a case for a risk analysis against which the key policies, and the targets sitting under them, can be judged. It may be that such an analysis has been carried out internally and not published alongside the draft plan. Were such a detailed assessment of risk to be undertaken, and published, the community would be in a position to help the council assess the viability and realism of the AAP's plans. Such a detailed risk analysis would also allow the council to address the issue of prioritisation. Prioritisation between proposals, and between different element of the plan, has not been clearly set out, making it difficult to identify where resources will be directed. The risk is that a lack of effective prioritisation will still lead to an ad hoc approach, reacting to short term opportunities as they arise. While an element of such flexibility is of course necessary, and a mechanistic approach to	<p>The publication/submission version of the AAP has included a section on risk within section 7 of the AAP.</p> <p>The sustainability appraisal has also tested all the policies against our sustainability objectives to ensure that the AAP has a positive impact: environmentally, socially and economically.</p>

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						prioritisation inadvisable, an approach which combined prioritisation with the risk analysis mentioned above could, I feel, manage the expectations both of the community, and of officers. The plan also makes a significant number of assumptions about the scale, scope and nature of future development, and the nature of future growth within the AAP area. It is not apparent that these have been tested. I will go into this further when discussing specific policies, and specific development objectives.	
216	796					The vision and objectives of the AAP broadly align with the views expressed by a number of residents during previous consultations. As a number of residents might be concerned about the areas (long-standing) designation as a growth area, it might be wise to place this assertion in the context of a recognition that any development must be carried out in a consensual manner, with local people. Certainly, I would expect that many of the major schemes set out in Appendix B would be subject to the same level of consultation and dialogue that has been applied to the development of the Nunhead EYC site.	Our Statement of Community Involvement (SCI) sets out the minimum consultation that we carry out on planning policy documents and planning applications. This is referred to throughout the AAP and other planning policy documents.
217	796					I do feel that the vision will need more detail in the next iteration of the plan. At the moment it sounds anodyne and lacks specificity. Securing funding, within Southwark and from pan-London bodies, and national agencies, will require an extremely robust and ambitious vision rooted in reality, that does not come across as a "catch-all" set of objectives, drafted as broadly as possible so as to encompass a range of otherwise unrelated actions. In particular, it would be useful if the vision would highlight half a dozen key	The AAP vision has been updated where appropriate to refer to projects where funding has been secured. It is not appropriate for the vision to go into detail about the precise funding mechanism and timescales for development and infrastructure, especially as some of this may change throughout the lifetime of the plan. Section 7 of the AAP has been updated to set out more detailed on implementation including what has happened so far, what is underway, and what is expected to happen in the future. Similarly the schedule of proposals sites set out in appendix C sets out

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						<p>actions that will help to support it. For the Nunhead portion, for example, the following could be used. The “targets” I have used are, by necessity, arbitrary and are intended for illustrative purposes only “We are working with the local community to protect the special character of Nunhead so that it continues to be a neighbourhood of low density housing with limited capacity for major development. We will work with local people to ensure that the retail areas along Evelina Road/Nunhead Lane and Gibbon Road thrive as a result of meeting the needs of local people, by:</p> <ul style="list-style-type: none"> <li>• Delivering streetscape improvements and other public realm works, initially further to a successful bid to the GLA Outer Boroughs fund and, in the longer term, by working with residents and partners to identify funding to maintain and supplement those improvements. This would involve the successful delivery of public realm infrastructure projects associated with the GLA bid, and the Nunhead Renewal Area, by the end of the municipal year 2013/14;</li> <li>• Putting in place, with a new Nunhead Traders’ Association, a realistic plan to build on and augment the existing retail offer, which will have at its centre a coherent plan by Southwark Property Services to bring back into use vacant council-owned shops, leading to a 20% increase in footfall by 2015;</li> <li>• The successful redevelopment of the Nunhead Early Years site to provide community facilities and housing, by early 2013. Scale and design of these developments will be subject to discussion with local people and lead to a development designed to reflect the prominence of this site;</li> <li>• St Thomas Apostle College and Bredinghurst School will be rebuilt</li> </ul>	<p>the likely timescales for the development of those sites.</p>

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						by 2014, providing new facilities available for community use outside school hours, that will complement facilities provided elsewhere in the local community; • Redundant parts of the Bredinghurst site will be developed for housing, including family housing, with the retention and reuse of the old Victorian buildings. This will be subject to developer interest but should be completed by 2014. “	
218	796					While the objectives and themes listed in section 3.2 of the AAP are in general sensible, more thought should be given as to the number of objectives, and it would be useful to know more about how they were tested to ensure that they would work together. More detail will be needed in subsequent sections to define exactly how the policies in the AAP will help to meet the objectives set out; at the moment, in some instances, the thread cannot easily be discerned.	<p>The sustainability appraisal tests the different objectives against each other, and demonstrates that they are all compatible.</p> <p>The introduction section to each of the area-wide policies sets out which key objectives the policies in each section is seeking to meet. The AAP also now includes a monitoring table, which links the objectives with the policies, helping to show clarity on how they link together.</p>
219	796		Policy 1			No significant comment on this policy, save to reiterate the point in the section above suggesting that the AAP needs to make much clearer how the impacts of the development of the various sites will intersect. Please also note comments in the section below on site PNAAP 6. We would suggest that, when examining use above existing ground floor units, the policy wording should be changed to, “the viability of ground floor units would not be affected”. A planning approach needs to be taken that recognises that a ‘critical mass’ of, for example, new residential provision on the upper storeys of houses on Rye Lane might affect the traditionally later trading hours of businesses on that road. These wider impacts need to be considered, rather than just the effect upon the nearest ground	Retail schemes which are submitted in the town centre will also be assessed against the criteria in Saved Southwark Plan Policy 1.7 which requires an applicant to demonstrate that the scale and nature of a proposal is appropriate to the character and function of the centre and its catchment area. This will ensure that the impacts on the vitality and viability of the town centre is fully assessed across all of the proposal sites. We have removed this part of the policy in the submission version AAP. It is considered that it would not have added anything to what our current borough-wide adopted policies already set out. Policy 1.7 of the Southwark Plan permits a range of uses in town centres subject to a range of criteria being met.



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						floor unit.	
220	796		Policy 2			Local authority documents often set out bold and ambitious visions on arts, culture and leisure, only to find that these aspirations cannot be delivered because it is difficult to plan them centrally. While it is noted that LBS plan to promote and support cultural development in Peckham town centre, there are significant risk factors – particularly in the context of the recession – that make this less likely, and that might demand a more innovative and dynamic approach than the one set out. Facilitating the opening of more “evening economy” businesses in Peckham, for example, will require clear commitments on A3/A5 licensing, as well as other premises licensing issues. It may require pump priming and/or an intelligent and creative use of land/property currently rented out by Southwark Property Services. In general, it may require that an approach be taken that may come into conflict with Southwark’s “best consideration” obligations on the disposal of land (particularly in respect of the major redevelopment sites). These risks must be fully taken into account in the final AAP.	Policy 2 encourages a mix of complementary arts, cultural, leisure and entertainment uses in Peckham town centre to help contribute to supporting a lively and vibrant centre. Our saved Southwark Plan policy 1.7 will be used to assess the appropriateness of new town centre uses and their contribution to the vitality and viability of the centre. It will also assess the impact of a proposal on the amenities of surrounding occupiers (amongst a range of other criteria). The Policy lists a number of proposal sites within the town centre where we will promote additional arts/cultural/leisure/entertainment floorspace. In doing so, we have set out our commitment to work with landowners and developers to identify and secure occupants for new art, cultural, leisure and entertainment space.
221	796		Policy 3			The AAP needs to make it clearer what concrete steps it proposes to take when protected shop fronts are threatened, beyond a planning response. Assistance to shopkeepers through trading associations and other help schemes must form an integral part of what is a wider issue relating to economic development. For example, sometimes a change of use class from A1 may be beneficial if there is no prospect of any demand for further A1 use in the near future	Saved Southwark Plan Policy 1.9 sets out that planning permission for a change of use from A1 Use Class (shops) will only be allowed in protected shopping frontages when certain criteria are met. The criteria includes (amongst others) that at least 50% of the shopping frontage must remain as A1 Use Class, the proposal would not harm the vitality or appearance of the shopping frontage and it can be demonstrated that the premises meets the criterion of being vacant for at least 12 months with demonstrated sufficient effort to let, or have not made a profit over a two year period.

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							This helps to ensure that these shopping frontages continue to provide shops and do not just provide other A use (such as cafes, takeaways and restaurants) and that unsuitable new development is not allowed within the protected frontage. We will continue to promote the provision of a mix of retail uses in these areas and promote improvements in the smaller parades through streetscape and shopfront schemes including the Improving Local Retail Environments programme (ILRE), area renewal funding and the Mayor's Outer London Fund.
222	796		Policy 4			Inevitably this is an issue that stirs controversy and the council's planning and licensing response has to balance vocal objectors with the health and vitality of local businesses. However, it is important to recognise two points: •In many parts of the area, A5 use has already reached saturation. This issue is not adequately addressed in the policy, with the limits of more than two adjacent A5 units, and/or fewer than two non-A5 uses between groups of A5 units seeming overly generous. While I do not necessarily advocate a 'nil' approach – particularly considering the number of businesses who might wish to provide an A3/A5 service – this policy needs to be more robustly worded to create a higher bar for such planning applications in future, reflecting practice adopted elsewhere in the capital, and the country; •While the national planning classifications do not make a distinction between different types of A5 use, I believe that there is a substantive difference which local planning policy can account for. A5 units that serve food in open packaging have a very different effect on local amenity than those who service food in closed packaging. The	<p>We have amended Policy 4 to also recognise that in those frontages which have already reached the 5% saturation, we will not allow any further A5 use.</p> <p>Our saved Southwark Plan policies 1.7, 1.9 and 1.10 set out criteria to assess developments for retail and other town centre uses inside and outside of the designated town and local centres. These policies include consideration of the impact of the proposed use on the vitality of the shopping frontage and whether it would have the potential to cause harm to the amenity of surrounding occupiers and residents in terms of noise, vibrations, odours, traffic disturbance, litter or hours of operation as a result of the proposed premises. Hot food takeaways have the potential to generate large amounts of litter in their immediate vicinity. It is the operators' responsibility to ensure litterbins within the premises are regularly maintained and emptied, and the surrounding area remains litter free.</p> <p>Where a litter problem is found to be directly linked to specific takeaway premises, the Council can issue a Street Litter Control Notice. Any operator seen to be non-</p>

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						first category includes fried chicken shops, kebab shops and (to an extent) fish and chip shops. The latter includes Indian, Chinese and other takeaways serving restaurant-style food in closed containers. The provision of food in open containers encourages the consumption of food on and immediately around the premises which can lead to an increase in littering, noise and other amenity disturbance and (occasionally) more anti-social behaviour (or perhaps in certain instances an increase in the perception of ASB). I believe that Policy 4 can and should be changed to take account of these nuances	compliance with such a notice, can incur a fine.
223	796		Policy 6			No detailed comments on this policy, save to note the potential tension between this policy and the stated intention elsewhere in the plan to protect large-area units in Peckham town centre. The pressure to subdivide clearly suggests that demand exceeds supply for certain B uses. The plan will need to make clearer exactly how small business space will be made available for businesses who will often not have the capital to fit-out and/or convert otherwise unsuitable premises, or where landlords may tend to wish to rent to more established businesses rather than new SMEs because of the financial risk involved. Inevitably, all this may involve the council needing to commit financial resource to achieving this aspiration. With a strong enough case and a detailed plan, as part of the AAP, it could be possible to secure such funding from external sources, or for a third party to be assisted to secure such funding. The AAP should explore these possibilities	<p>The PNAAP Policies 1 and 6 both promote a range of unit sizes to be developed to accommodate new retail and business floorspace for business start ups and growing SMEs. However, Policy 1 also seeks to rebalance the range of unit sizes in the town centre by placing a restriction on the future subdivision of new larger format retail stores. The high proportion of small units in the town centre can detract from the character of the area and the quality of the retail offer. One of the findings of our retail capacity study was that there were several requirements of between 1,950-8,000 sqm in total from operators to locate in Peckham. At present there are few suitable sites for retailers wanting larger shop units to accommodate large multiple chain retailers. By putting a restriction on the subdivision of new larger format stores within future developments we will ensure that a range of unit sizes are provided which can accommodate a range of different types of retailers.</p> <p>Policy 6 sets out that new developments should support business start ups and growing SMEs in the area by</p>

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							providing business space that is flexible by design, suitable for a range of business types and sizes and allows growing businesses to remain in the area, as well as attracting new businesses to Peckham. The Council's Local Economy team currently commission advice and support for businesses in the area.
224	796		Policy 7			<p>This policy makes assumptions around the benefits of collocation, but seems to gloss over some of the consequent risks. These may include: •Lack of flexibility in existing and planned facilities; •Conflict between uses of such facilities that are not necessarily complementary. The policy also assumes that a more centralised approach to the provision of community facilities is to be adopted. Risk factors associated with this policy should be addressed. They may, for example, conflict with wider regional plans on community development and community infrastructure. They may also conflict with the way that existing community provision is organised (especially through smaller facilities such as tenants' halls, small community centres, branch libraries etc). This more atomised provision may not provide the council with the economies of scale that it might seek, but it may more accurately service community need than larger agglomerations of facilities in urban centres. This is particularly important when considering the need to support district/village centres other than Peckham town centre in the AAP. It is difficult to assess this policy in the round without knowing the council's likely approach towards CIL and s106 post-2012. Before progressing further, drafts of forthcoming policies should be shared with the community – and the</p>	<p>The aim of the policy is to ensure that facilities are focused in accessible locations and to enable a reduced number of trips to access community facilities. This approach has been analysed in a systematic fashion through the various stages of our sustainability appraisal, with consideration given to other options. Co-location of facilities and services will only be pursued where those services are compatible.</p> <p>A new community facility is to be provided adjacent to Nunhead Green at site PNAAP12.</p> <p>We are currently consulting on our boroughwide community infrastructure levy (CIL), which will be used to fund new and improved infrastructure when development takes place. Community facilities may be delivered through the CIL where a local need is identified and a clear management plan is prepared for the facility that demonstrates it is viable. Further detail is set out in section 7. At present none are highlighted through the AAP, but priorities will be regularly updated to reflect changing needs. Local communities will have a role in defining local priorities.</p> <p>The Localism Act also contains a number of provisions that would allow local community groups to become more involved in running local community facilities.</p>

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						community should have a hand in co-designing them, where appropriate – to ensure that AAPs dovetail both with CIL/s106 policy and with local aspirations.	
225	796		Policy 8			As a matter of priority LBS needs to build into this policy the implications of academy conversion/free school establishment in the AAP area. As schools opt out of local authority control, the wider objectives for extended schools services (as outlined in this policy) may be more difficult to achieve. In part, they may be subject to more delicate negotiation with the school(s) concerned. In particular, these developments will make planning for schools expansion more difficult	Whilst it is accepted that such changes would have implications for school places and potentially access to school facilities for the wider community, they are changes that would occur outside of the planning process. We will continue to work closely with colleagues in Education to understand the impact of such changes and any planning implications that they might have.
226	796		Policy 9			This policy will need to be amended in light of the forthcoming abolition of NHS Southwark and the creation of a number of CCGs across the Southwark/SE London area, which may not be coterminous with borough boundaries. The policy also needs to be amended to take account of the relocation of public health responsibilities within authorities, which may strengthen the council's hand in engaging with CCGs through HWBs, and with the services that are jointly or separately commissioned on a CCG, borough, or London-wide basis.	We have worked closely with NHS Southwark on the wording of policy 9 and on the AAP as a whole. We will continue to engage with the new health body, to be known as the Southwark Clinical Commissioning Group, to address the changing demands for health facilities in Peckham and Nunhead.
227	796		Policy 9			Opportunities to deal with health inequalities need to be mainstreamed throughout the AAP more effectively. They can and should be linked to the objectives of other AAP policies.	Section 2 of the AAP sets out some of the key health issues that are prevalent in Peckham and Nunhead. Particularly under the challenges and opportunities section, we have highlighted that it is important to address lower life expectancy in Nunhead and higher rates of childhood obesity in Peckham. Cardio-vascular disease, diabetes and mental health are also identified as needing attention.

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							Health is a cross-cutting theme and many of the policies in the AAP will contribute to reducing inequality. Policies that affect the location of particular services in relation to their uses, those on transport and the environment are particularly important, but these are by no means the only policies that are linked to dealing with health inequalities.
228	796		Policy 10			Extremely limited sports and leisure facilities available in the south of the AAP area needs to be considered and acted upon to achieve the objectives of this theme. A clearer mapping exercise needs to be carried out to identify exactly what facilities are open for use by local people, who operates them and their level of use. Clearer commitments need to be made, through the AAP process and their general council policy, to revenue support for facilities, once capital improvement work has been carried out. While CIL/s106 funding is mentioned, other sources of funding should be considered for revenue support. For example, work could be undertaken with local groups to unlock funding streams that might not be open to LBS itself, as a local authority.	<p>Figure 10 identifies a range of sports and leisure facilities that fall within the action area. Whilst we hold information on the extent of community access, management regimes are subject to change without the need for planning permission.</p> <p>Where a need for a particular community facility arises over the lifetime of the AAP, we will explore whether there is a way to deliver through working with partners or through the community infrastructure levy.</p> <p>The council is always looking to unlock new funding opportunities and would welcome working with local groups to achieve this.</p>
229	796		Policy 11			Again, policies should look to long-term revenue support for capital investment, not just the capital investment itself (particularly with regard to street scene improvements). This policy should be more coherently aspirational; at the moment it comes across as overly opportunistic – for example: •Delivery of a cycle superhighway is directed and funded by TfL; this development should provoke LBS to think about the way that the superhighway may be fed by local routes, and the knock-on impacts that it will have on local road users. For example, the limited permeability of Rye	<p>It is difficult to secure long term revenue support through the planning process due to the regulatory limitations of planning obligations and the community infrastructure levy (CIL), which are the typical mechanisms for securing such improvements. The issue will be considered in more detail as schemes are identified as priorities for funding through our boroughwide CIL.</p> <p>Policy 11 states that we will aim to create a high quality network for active travel and this will include consideration of links to the cycle superhighway. Specific interventions will be</p>

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						Lane, Moncrieff Street, Clayton Road, Consort Road and surrounding areas (particularly Scylla Road between the Rye and Nunhead) may need to be considered and planned for; •The prospect of the cycle hire scheme being expanded this far into south London is currently speculative at best. While LBS is obviously eager to see the scheme expanded, it is unclear how this policy will add to those efforts, certainly during the lifetime of the AAP itself.	<p>designed as and when funding is available and in conjunction with local residents and interest groups.</p> <p>Reference to the cycle hire scheme is to reflect the current commitment in the council's Transport Plan. Should the expansion proceed, it would have land-use implications and so its inclusion is beneficial to reflect the range of interventions that the council is pursuing with its partners.</p>
230	796		Policy 12			<p>This policy needs substantial revision; CRT and Bakerloo extension are currently unfunded. There is enthusiasm for both but realistically, both are also post-2025 prospects at best, and neither currently sits in a TfL timetable in anything other than a "far future" sense. The opportunity instead needs to be taken to engage with the Mayor's attempts to acquire control over London's suburban rail franchising operations. With Southeastern's franchise up for renewal in 2014, and significant timetable changes being put in place from 2012 onwards, this provides a critical opportunity to secure tangible service pattern improvements in the short term. This will require robust engagement with TfL Rail, with both TOCs operating in the AAP area, and will also require the development, by LBS, of strong evidence bases for submissions on future RUSs in the London and South East regions, which will have a knock-on impact on service frequencies and patterns in the railway stations in the AAP area.</p>	<p>We acknowledge that the cross river tram is currently unfunded, but we still support the delivery of the scheme or a high quality alternative as part of a suite of measures that will improve travel choice in the action area. This approach is consistent with the approach set out in our Core Strategy, through which we also safeguarded a potential route for the cross river tram.</p> <p>The Bakerloo line extension is established in the London Plan as a long term priority and significant progress is anticipated over the lifetime of the AAP.</p> <p>Policy 12 notes that the council will continue to work with Transport for London and transport operators to improve travel choice in Peckham and Nunhead, but It is not the role of the AAP to debate specific operational changes. The council continues to discuss measures that will compensate for changes to the Southern London Line service and has recently responded to consultations on both the Thameslink and South Eastern franchises.</p> <p>The infrastructure background report summarises some of the known and potential service changes that could affect</p>



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							Peckham and Nunhead. These issues have informed the process of drafting the AAP transport policies and will continue to inform priority projects over the lifetime of the AAP.
231	796		Policy 12			This policy must also take into account the likely negative impact of the withdrawal of South London Line services, change in Thameslink destinations and service frequencies, and likely differences in passenger flow when through trains to Highbury and Islington and Clapham Junction begin, in due course. In planning for such eventualities, LBS can develop a strong case for the introduction of a skip-stop or all-stopping Victoria-Bellingham service, which has been mooted for some time and which is a realistic post-2014 prospect, providing partial mitigation for the withdrawal of South London Line services. This is more important and more relevant to local communities and businesses than a focus on speculative transport infrastructure developments that may not come to pass for more than 20 years.	<p>Policy 12 notes that the council will continue to work with Transport for London and transport operators to improve travel choice in Peckham and Nunhead, but it is not the role of the AAP to debate specific operational changes. The council continues to discuss measures that will compensate for changes to the Southern London Line service and has recently responded to consultations on both the Thameslink and South Eastern franchises.</p> <p>The infrastructure background report summarises some of the known and potential service changes that could affect Peckham and Nunhead. These issues have informed the process of drafting the AAP transport policies and will continue to inform priority projects over the lifetime of the AAP.</p>
232	796		Policy 12			The policy should also take into account the impact / likelihood of station improvements within the AAP area. TfL will be investing in Queen's Road Peckham and Peckham Rye stations. LBS is seeking to capitalise on this investment by creating a new "public square" in front of Peckham Rye station, but this is not reflected prominently in the description of this policy. Improvements to Nunhead station should also be highlighted. Although the prospect of securing an additional step-free entrance to Nunhead station via Evelina Road is probably a distant prospect, work can and should be undertaken to develop an evidence	Further detail has been added to the infrastructure plan in section 7 and to the site specific guidance in the publication/submission version of the AAP to reflect proposed investment at Queens Road Peckham and Peckham Rye stations.



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						base for such work, to be presented to Network Rail, Southeastern and TfL. Should responsibility for franchising Greater London rail service pass to the Mayor, it may be that such an evidence base will be vital in pushing Nunhead up a prioritisation / feasibility list for upgrade to LO standards, as the Mayor proposes to do for all National Rail stations within Greater London as a long-term aspiration	
233	796		Policy 13			Policy 13 needs to take account of the need to work with the Mayor to further engage with utility companies over possessions for infrastructure works. Recent water main replacement works carried out by Thames Water over 2011 on Nunhead Lane/Evelina Road caused significant disruption to businesses and local people. While formal powers do not exist for LBS to require contractors of utility companies to operate in certain ways, further engagement with such organisations should be seen as a priority, to develop local agreements about keeping disruption to a minimum. Parking and road use can occasionally come into conflict. In some parts of the AAP, the use of residential roads, narrowed by parking on both sides, as bus routes can cause significant disruption and delay to road users, and significant disruption to residents. LBS and TfL will need to work closer together to consider how highways developments can minimise such conflicts. This may link back to the objectives under Policy 11.	We have engaged with the Mayor, Transport for London and Thames Water on an ongoing basis as part of the preparation of the AAP and will continue to do so to address strategic planning issues once it is adopted.
234	796		Policy 14			Care will need to be taken to accurately assess the way that changes to public transport provision (and consequent modal shifts) and major developments may affect both Peckham town centre's parking and	The Peckham Town Centre parking and servicing demand study informs our approach to car parking in the AAP. The study assessed the current supply and demand for parking in the town centre and how this might change as a result of

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						road stresses, and the way this might impact on the wider AAP area.	<p>differing levels of growth that could be delivered through the AAP.</p> <p>Policy 12 notes that the council will continue to work with Transport for London and transport operators to improve travel choice in Peckham and Nunhead. The impact of changes to public transport provision will form part of such discussions.</p>
235	796		Policy 16			The need for a higher density of homes in the core area is recognised but work will need to be carried out with developers to ascertain whether such provision will meet demographic needs, now and in the future. There has been a trend for developers to ‘ribbon’ higher density developments along (for example) railway viaducts and embankments, where visual amenity may not be affected directly but where local social amenity may be affected more than expected (for example, because local facilities and infrastructure will not be able to absorb additional residents, without investment). Care will need to be taken to ensure that such developments are designed to reflect and complement the existing built environment (building on Policy 18). A clearer commitment to excellent design as part of this policy would be valuable in this context.	Policies 16 and 17 are based on the approach to density set out in the Core Strategy. This approach is based on a series of evidence base studies including the strategic housing market assessment (2010) and the housing requirements study (2009) which set out how much and what type of housing needs to be delivered in Southwark to meet the needs of people living and wanting to live in Southwark. The supporting text to Policy 16 sets out that we want to protect the character of the area by ensuring that development is at an appropriate density for the character of the area. We have updated our policies within the character area sections to make it more clear how we will protect and enhance the character of Peckham and Nunhead.
236	796		Policy 16			Divisions between “urban” and “suburban” areas are by necessity arbitrary, and it may be that a more nuanced approach to such boundaries will need to be taken to ensure that the existing, and future, urban landscape is considered and respected. For example, the existence of individual, or small groups of, taller/denser properties should not necessarily be used by developers to demonstrate the setting of a	As noted in the response to comment 235, policy 16 specifically states that the density of development should be appropriate to the character of the area. Our evidence base demonstrates that the density zones are appropriate for the character of the area, as set out in our Core Strategy housing background paper three. We have updated our policies within the character area sections to make it more clear how we will protect and enhance the character of

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						precedent suggesting that further developments of a similar nature might also be appropriate.	Peckham and Nunhead.
237	796		Policy 17			LBS should consider unit size, as well as the number of units, to assess the proportion of affordable housing on a given site (further to Policy 18). Developers will inevitably be inclined to use more of a site, in square metreage, for private development. While affordable components are not always "crammed in" purely to meet planning requirements, they can sometimes be an afterthought, and appear of a lower quality. Currently the policy suggests a range of 20% - 30% 3, 4, 5 bedroom properties in developments of 10 units or more, and that 35% of units be affordable. It would be useful to be able to understand how and when these requirements intersect and how they have been arrived at. LBS should engage early with developers to explore creative ways of minimising the risk that individual developments will not meet these requirements, while still satisfying developers' commercial imperatives. Certainly, on major development sites, early and frequent engagement with the local community should be the norm	<p>The AAP sets out minimum dwelling sizes for all developments. Affordable housing requirements are calculated based on the number of habitable rooms, with room of 27.5sqm or more being classed as two habitable rooms. This is set out in our adopted (2008) and draft (2011) Affordable Housing supplementary planning documents.</p> <p>Our evidence base for why we require the different percentages of family dwellings is set out in our Core Strategy housing background papers one and two, based on a number of housing studies including our Strategic Housing Market Assessment (2010), our Housing Requirements Study (2009) and our Affordable Housing Viability Study (2010).</p> <p>LBS strongly encourages developers to engage in formal pre-application discussions prior to submitting a planning application so that the application can be discussed in detail before an application is submitted. Consultation on a planning application is carried out in accordance with our adopted Statement of Community Involvement (SCI) (2008). The SCI sets out minimum requirements for engagement when preparing planning policy documents and when consulting on planning applications.</p>
238	796		Policy 19			This policy should more prominently highlight biodiversity issues, in particular habitats for invertebrate life. "Ribbons" of land – often alongside railway lines, existing and disused – often provide a vital corridor through which wildlife can move, develop and flourish away from the highly managed open	Reference to the council's biodiversity action plan has been included in paragraph 4.6.7 and 7.5.20 of the publication/submission version AAP. The council is in the process of reviewing the Biodiversity Action Plan 2006-2010 and a revised action plan will be published later this year.

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						space that is designed to be used by humans. Development will need to take into account these habitat issues and their fragility. This policy should be more clearly linked to the council's BAP. It is unclear whether the 2006-2010 BAP has been renewed or replaced.	
239	796		Policy 19			The policy overly focuses on individual open spaces, and sites, rather than looking at open space, biodiversity and play across the piece. Often, children will use areas not formally designated as open space for informal play; use which should be acknowledged through this policy	This is a borough wide issue, policies to improve open spaces and the public realm may help to promote more informal recreational opportunities. Further detail is set out in the open space strategy which will be taken to Cabinet later this year for adoption.
240	796		Policy 19			The policy should be clearer about which "major" developments will be expected to provide opportunities for food growing, whether this will be for the benefit of the wider community and, as such, whether CIL or s106 issues will be affected by this requirement.	Policy 19 of the AAP sets out how we will expect all major developments to provide opportunities for food growing on site. If this is not possible, we will consider contributions through the use of S106 and/or CIL. This is in line with the approach set out in Policy 11 of our Core Strategy. Our open space strategy sets out further information for food growing opportunities in the borough.
241	796		Policy 20			This policy should highlight priorities in the GLA OLF scheme and work being carried out as part of Area Renewal	This has been updated.
242	796		Policy 20			CHP should be promoted but arguably in a more strategic way. Larger CHP facilities are more efficient than smaller ones, but may raise more concerns with residents about the presence of quasi-industrial facilities in residential areas. LBS should look to borough-wide issues in deciding how CHP is to be developed and promoted – particularly in social housing, where the council will be a freeholder – and decide local CHP policies based on this strategic	This is too strategic for the AAP. Policy 13 of the Core Strategy sets out our borough-wide approach. We will expect all major developments to set up and/or connect to local energy generation networks where possible. We will develop local energy networks across Southwark. The Peckham Energy study sets out further information as part of the evidence base.

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						vision. It does appear from the explanation that a wider strategic plan for CHP exists but this is not made clear in the document	
243	796		Policy 23			Public realm improvements must suit the environment in which it is placed. The mention of “consistent” street furniture suggests a borough-wide, or AAP-wide, approach to this, which would not be appropriate.	We have updated the wording of Policy 23: Public realm to ensure that the design of new public realm considers the local character including consideration of street furniture materials and features.
244	796		Policy 23			Improvements, when they are made, should not focus exclusively on shopping areas, or other areas with high footfall or traffic. Those in residential streets have an equal right to a high quality public realm.	We have Policy 23: Public realm and Policy 25: Built form which sets out policy for the design of new public realm in the whole action area. We also set out more detail in the character area policies in Section 5 and on specific sites in Appendix C: Schedule of proposal sites to provide guidance in the areas and for sites where most change is likely to happen such as the Peckham core action area and on the large development sites.
245	796		Policy 25			The AAP should recognise that, while an appropriate height for most development will be 2-4 storeys, this may vary depending where in the area it is. In Nunhead, for example (see below) only a tiny proportion of property in long-term residential use is 4 storeys high. A blanket prescription on height may, therefore, not be entirely appropriate. Another reason why blanket prescription may be inappropriate is that it may encourage and permit the development of taller buildings, whose uses may be unsustainable. The construction of taller buildings in Peckham town centre itself (up to ten storeys) may suit current demand for smaller homes but taller buildings are intrinsically less sustainable and flexible than shorter ones.	The wording of Policy 26: Building heights has been updated for clarity regarding existing height context and the consideration of existing heights would need to be relative to the surrounding context of heights. This policy also provides more detail of where tall buildings could go in the action area. The evidence that informs this policy is set out in the Peckham and Nunhead Action Area urban design background paper and Peckham and Nunhead characterisation study.
246	796		Policy 25			This policy mentions the need for taller buildings to “front on generous public realm”. In many respects it	The wording of Policy 26: Building heights has been updated in order to consider that a taller element is linked to the

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						may be more appropriate for such buildings to be built into the surrounding urban fabric, rather than separated from it by public realm spaces that may (as in many older, larger estates) become sterile and unused. It may be more appropriate to require active use of street-level frontages	provision of improved and generous public realm on the larger proposal sites. Policy 23: Public realm and Policy 25: Built form provide more policy for the design of new development which should be considered alongside the building height policy.
247	796					This section should be amended to reflect the GLA OLF scheme and the links between that scheme and Area Renewal funding	This has been updated.
248	796					Improving transport links between Nunhead and Peckham, and between Nunhead Station and Evelina Road, should be highlighted more. Public realm improvements along Scylla Road, and along Consort Road, would help to achieve the former. This might include more prominent wayfinding information for cyclists and pedestrians. The latter is a more long-term proposition that we have commented upon in the main transport policy above	<p>Policy 11 sets out that our broad priorities will be to improve links between key destinations including those to local stations. Figure 11 also highlights that improving north-south links between Peckham and Nunhead will be a priority.</p> <p>Work is currently being undertaken to determine specific schemes that could be implemented to achieve this. Consultation will be undertaken on these proposals once the necessary funding and approvals have been secured.</p>
249	796					The density and placement of infill development is an issues that arouses significant local feeling, as LBS is aware. While an increase in housing density may be the only way to handle housing demand, and while the council has a responsibility to obtain best consideration for surplus land, developments must be of a high quality design, and the council and developers must actively engage with local people in ensuring that such development fit into the broader urban fabric of the area. This is not about design pastiche, but the very real amenity impacts that such developments can have. This applies equally where development sites once had housing on them, which	<p>Existing policies in the Core Strategy and saved Southwark Plan set out the borough-wide approach to ensure appropriate density and high quality design. The AAP adds to these policies by setting out more detailed design policies for Peckham and Nunhead as a whole, and for each character area. Much of Nunhead also lies within conservation areas, and development within conservation areas also needs to take into account guidance in the conservation area appraisals.</p> <p>Many of the railway embankments are allocated as protected open space and sites of importance for nature conservation. Existing Core Strategy and saved Southwark Plan policies,</p>

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						has since been demolished or destroyed by enemy action during the war. Larger development sites, in prominent positions, will need to be designed and planned with particular care. Several low-quality, major developments have occurred in recent years in Nunhead, and a stronger approach on design and amenity will ensure that this situation does not continue. Steps should also be taken, through the AAP, to ensure that Nunhead is not vulnerable to the construction of denser, and taller, developments alongside railway viaducts. Such developments not only set a poor precedent for the future, and place additional stress on areas away from local facilities, but harm biodiversity along railway embankments which have been recognised as important natural corridors, particularly for invertebrate life	as well as AAP policy 19 set out how we protect these spaces from inappropriate development and protect biodiversity.
250	796		Policy 31			Backland development needs clearer description. While it includes some developments "to the rear of existing buildings" this may encompass other developments – such as conservatories and small extensions – that have hitherto been given planning permission, and/or which fall within the bounds of "permitted development". The policy will need to make clearer how the various different stipulations on such development mentioned will be considered and interpreted in making planning decisions. LBS should also look to the approval of backland development on larger development sites. For example, draft plans for site PNAAP 12 feature backland development in the form of a number of garages, providing rear access to properties from Scylla Road. Such developments may not satisfy the terms of this policy	We have amended the description of back-land development to make it more clear that is to development predominantly to the rear of existing dwellings and that is development separated from the existing residential dwelling. Further guidance is set out in our adopted residential design standards supplementary planning document (2011).

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251	796		Policy 32			This policy should also include comment on shoppers' parking around Nunhead centre. Pedestrian crossings on Nunhead Lane may need review, although it is difficult to see how more effective measures to allow crossing could be implemented without adversely affecting traffic flows, particularly considering the presence of bus stops. This is an issues that LBS should investigate further. Thought should be given to the full pedestrianisation of the north side of Nunhead Green, closing off Kirkwood Road and Gordon Road to traffic except for access. This would help to achieve LBS's aspiration of creating a "civic square" around the interface between the Green, the new community centre and the Old Nun's Head pub. On road network improvements, thought should be given to permitting banned right turns on East Dulwich Road westbound	<p>Nunhead is identified in Core Strategy policy 4 as a local centre, typically providing small shops that cater for everyday needs. In light of this, our focus is on maintaining the existing shopping offer and there are no current proposals to expand parking for shoppers in and around Nunhead local centre.</p> <p>There are no current plans to explore pedestrianisation to the north of Nunhead Green. Public realm interventions could however be delivered via CIL and so could be considered as part of the preparation of the our Infrastructure Plan. Priority schemes for funding via CIL will be updated regularly over the lifetime of the AAP.</p> <p>Changes to the road network are informed by transport modelling and typically subject to their own local consultation. Specific schemes will be identified over the lifetime of the AAP where appropriate.</p>
252	796		Policy 32			The policy should be reworded to reflect the fact that current building height in Nunhead is 2-3 storeys (2 storeys in most areas). 4 storey developments would not be appropriate in many circumstances. The only part of Nunhead in which "original" four storey housing is present is on the south side of Nunhead Green	Policy 26 of the AAP has been updated to make it more clear that outside of Peckham core action area development should be similar to existing heights (which is mostly 2-4 storeys).
253	127	Thames Water Utilities			21	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	Thames Water			20	On the information available to date we do not envisage infrastructure concerns regarding Water	Noted.



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		Utilities				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.	
255	127	Thames Water Utilities			32	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	Thames Water Utilities			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 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	Policy 14 of the Core Strategy sets out our approach to ensuring that necessary infrastructure is delivered to address the needs of new development. Paragraph 6.10 of the core strategy states that where infrastructure is needed to support development, it should be provided alongside it and development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development. This approach was agreed with Thames Water during the preparation of the Core Strategy and is not considered necessary to repeat this approach in the AAP. Further information is set out in the infrastructure plan included in the AAP and the infrastructure background paper.

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						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.	
257	127	Thames Water Utilities			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.
258	127	Thames Water Utilities			7	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	Policy 14 of the Core Strategy sets out our approach to ensuring that necessary infrastructure is delivered to address the needs of new development. Paragraph 6.10 of the core strategy states that where infrastructure is needed to support development, it should be provided alongside it and development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development. This approach was agreed with Thames Water during the preparation of the Core Strategy and is not considered necessary to repeat this approach in the AAP. Further information is set out in the infrastructure plan included in the AAP and the infrastructure background paper.

Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
						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.	
259	127	Thames Water Utilities			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.	Policy 14 of the Core Strategy sets out our approach to ensuring that necessary infrastructure is delivered to address the needs of new development. Paragraph 6.10 of the core strategy states that where infrastructure is needed to support development, it should be provided alongside it and development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development. This approach was agreed with Thames Water during the preparation of the Core Strategy and is not considered necessary to repeat this approach in the AAP. Further information is set out in the infrastructure plan included in the AAP and the infrastructure background paper.

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						Overall flows to combined sewers should not exceed historic flows and this may often be achievable by agreed surface water retention.	
260	127	Thames Water Utilities			15	<p>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</p>	<p>Policy 14 of the core strategy sets out approach to ensuring that necessary infrastructure is delivered to address the needs of new development. Paragraph 6.10 of the core strategy states that where infrastructure is needed to support development, it should be provided alongside it and development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development. Further information is set out in the infrastructure plan and the infrastructure background paper.</p>
261	127	Thames Water Utilities			9	<p>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</p>	<p>Policy 14 of the Core Strategy sets out our approach to ensuring that necessary infrastructure is delivered to address the needs of new development. Paragraph 6.10 of the core strategy states that where infrastructure is needed to support</p>

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						<p>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.</p>	<p>development, it should be provided alongside it and development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development. This approach was agreed with Thames Water during the preparation of the Core Strategy and is not considered necessary to repeat this approach in the AAP. Further information is set out in the infrastructure plan included in the AAP and the infrastructure background paper.</p>
262	127	Thames Water Utilities			3	<p>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</p>	<p>Noted.</p>

Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
						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.	
263	127	Thames Water Utilities			11	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.
264	127	Thames Water Utilities			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.
265	127	Thames Water Utilities			10	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
266	127	Thames Water			1	We have concerns regarding Water Supply Capability in relation to this site. Specifically, the water supply	Policy 14 of the core strategy sets out approach to ensuring that necessary infrastructure is delivered to address the

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		Utilities				<p>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." We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity 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 into the impact of the development and completion of this, on average, takes 12 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. "Developers will be required to demonstrate that there is adequate waste water 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</p>	<p>needs of new development. Paragraph 6.10 of the core strategy states that where infrastructure is needed to support development, it should be provided alongside it and development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development. Further information is set out in the infrastructure plan and the infrastructure background paper.</p>

Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
						ascertain whether the proposed development will lead to overloading of existing waste water infrastructure." 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	
267	127	Thames Water Utilities			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.
268	127	Thames Water Utilities			30	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.
269	127	Thames Water Utilities			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	Policy 14 of the core strategy sets out approach to ensuring that necessary infrastructure is delivered to address the needs of new development. Paragraph 6.10 of the core strategy states that where infrastructure is needed to support development, it should be provided alongside it and development should not be permitted unless essential



Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
						<p>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." We have concerns regarding Waste Water Services in relation to this site. Specifically, the sewerage network capacity 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 into the impact of the development and completion of this, on average, takes 12 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. "Developers will be required to demonstrate that there is adequate waste water 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 waste water infrastructure." Development covers a large area, currently served by combined sewers. Impact will depend upon proposed</p>	<p>infrastructure can be completed prior to occupation of the new development. Further information is set out in the infrastructure plan and the infrastructure background paper.</p>

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						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.	
270	127	Thames Water Utilities			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	Noted.
271	127	Thames Water Utilities			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.
272	241	Network Rail			3	Network Rail welcomes the opportunity to work with Southwark Council and other 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 within Network Rail ownership. Site PNAAP 3: Land between the railway arches (East of Rye Lane including railway arches)	Support noted.

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						Network Rail supports the redevelopment of land between the railway arches (East of Rye Lane including railway arches) and encourages the council to seek and promote such opportunities within the area identified, subject to the commercial viability of such a scheme.	
273	821	Bywater Properties				Further to our meeting of 6th March, I am writing to provide a formal response to the consultation process from Bywater Properties. As we discussed, Bywater properties is the owner of a number of leasehold interests in the immediate area of the proposed Peckham Rye Station improvement area. While we are generally supportive of the proposals outlined in the Action Plan, we would nonetheless be concerned with any proposal that affected our immediate ownership and the operation of our tenant, Iceland Foods Ltd. As you are aware, they have been long-term occupier and employer in the location and I am sure you would also not wish to impact their occupation. From our discussions I understand that intention at this stage is to limit the scope of works to the area within the railway viaducts. I believe this may have some impact on the operation of the Iceland store which extend into a number of arches and in some areas beyond. We await your more detailed proposals to assess what impact this may have. Thank you once again for the meeting and I look forward to further engagement with you in relation to the development of the Action Plan proposals and the development of options for the Holly Grove.	<p>The proposals site boundary allocation for PNAAP 6 - Peckham Rye Station includes the part of the station currently leased to Bywater Properties, the majority of which is currently sub-let to Iceland.</p> <p>We are currently carrying out an initial feasibility study to look at options for improving the station and reinstating the forecourt, as discussed in our meeting. At the time of preparing the AAP, the initial feasibility work is yet to be completed and so as agreed with Network Rail (as freeholder of the site) the allocation includes the area of the station currently leased to Bywater Properties. We may make a factual update to the AAP following completion of the feasibility study before we submit the AAP to the Secretary of State in December 2012.</p>
274	821	Bywater Properties			6	Further to my letter dated 19th March, I have now established, as accurately as possible, the impact of	The proposals site boundary allocation for PNAAP 6 - Peckham Rye Station includes the part of the station

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		s				<p>the proposed station forecourt improvement on the Iceland Foods unit. Unfortunately, the impact will be significant: the area that falls inside the inner facade of the northern viaduct includes the majority of the back of house functions including key elements such as the chiller facilities, cash office, staff areas etc. These would need to be repositioned on site which would require reconfiguration of the trading area of the store. Obviously a loss in trading area will not be acceptable to Iceland and reconfiguration of retail areas and particularly chiller rooms will be costly. While we remain supportive of the overall aims and ambitions of the Area Action Plan we cannot be supportive of any specific proposals that cause such a significant impact on our ownership and the retail operations of our tenant. As a key retailer on Rye Lane and employer in the area I am sure that you also would not wish to adversely affect their continued occupation in the area. I'd be happy to meet with yourselves and Network Rail to discuss this in more detail and to continue to work together to seek solutions that are compatible with the overall ambition of the Area Action Plan.</p>	<p>currently leased to Bywater Properties, the majority of which is currently sub-let to Iceland.</p> <p>We are currently carrying out an initial feasibility study to look at options for improving the station and reinstating the forecourt, as discussed in our meeting. At the time of preparing the AAP, the initial feasibility work is yet to be completed and so as agreed with Network Rail (as freeholder of the site) the allocation includes the area of the station currently leased to Bywater Properties. We may make a factual update to the AAP following completion of the feasibility study before we submit the AAP to the Secretary of State in December 2012.</p>
275	797					<p>I was pleased to see in the PNAAP under consultation that there is a commitment to improved cultural services, and particularly to support the development of, among other things, theatre spaces in the central Peckham area. I am both a Peckham resident and also a freelance theatre director. My own company, angels in the architecture, has existed in London without a permanent base for over ten years. Myself, along with a number of other creative and producing professionals, are interested in possibly developing a</p>	<p>Support noted. Thank you for expressing your interest.</p> <p>We have set out a commitment in the AAP that we will work with landowners and developers to bring forward schemes for new arts/cultural/leisure and entertainment space.</p>

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						performance space for Peckham, and have begun discussing developing a business plan for fundraising purposes. It would be extremely helpful for me to discuss with a member of your team what kind of support might be available from the council towards this aim. I believe a performance space could be an exceptional edition to Peckham's cultural life, its night-time economy and its well being offer for local residents. If I were able to find the right space to develop I would be willing to put in a great deal of development work towards establishing this goal. In particular, a discussion of what spaces already exist which might be adaptable into a theatre would be very useful. I am very interested in both the Old Mill in the Copeland area, and the Bussey Building which of course already hosts the Royal Court residency. If a member of your team could contact me that would be very helpful	
276	821	Bywater Properties			6	In relation to our ownership in Holly Grove of the former warehouse unit, we discussed a number of alternative uses. In this regard we believe that Action Plan should include residential under the potential land uses listed at page 142 in relation to this specific site.	The AAP has been updated to include residential as an "acceptable other use" for PNAAP 6.
277	196	Greater London Authority				The housing policies in the PNAAP are supported in principle. The Council should, however, note the comments in Appendix One regarding the proposals for PNAPP 5. Given the previous use of the site for affordable housing London Plan Policy 3.14 will apply and it is therefore expected that the previous affordable housing floorspace on this site will be reprovided in any proposal. The Council should duly ensure that in this case, and elsewhere in the	Through discussions and agreements with the GLA on the AAP, we have updated the supporting text for proposals site PNAAP 5 - the former Wooddene Estate, to include the following wording "The original Wooddene estate consisted of 323 homes, of which 316 were council homes and 7 were owned by leaseholders. The new development will provide high quality affordable and private housing, with the capacity to provide around 360 new homes. Proposals for development will need to consider London Plan policy 3.14 -

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						document as appropriate, the policy and proposals are in general conformity with the requirements of London Plan Policy 3.14. It is unclear at present as to whether they would be as the document is silent on this matter. In addition to addressing this issue in relation to PNAPP 5 the Council should address this issue in the reasoned justification for the housing policies as necessary to ensure clarity in their implementation for this and other development proposals in the AAP area.	Existing housing, which looks to resist the loss of housing, including affordable housing." We have also updated the table in appendix A to cross refer to London Plan policy 3.14.
278	196	Greater London Authority			4	Transport for London (TfL) has reviewed the document and has sought clarity as to whether the Copeland Road Industrial Park site (PNAPP 4) includes or excludes the bus garage. TfL would object to a Proposal which involved the loss of the bus garage as this would be contrary to London Plan Policy 6.2. The Council should confirm the relevant boundary and address and matters arising in consultation with TfL.	The proposal site PNAAP4 does not include the bus garage on Copeland road. The AAP has made this clearer in appendix C and the supporting document "schedule of proposed changes to the adopted policies map". We acknowledge the requirements of the London Plan and associated supplementary planning guidance.
279	196	Greater London Authority	Policy 19			The Council should note that since publication of the document the Mayor has published the All London Green Grid SPG (March 2012) which expounds London Plan Policy 2.18. The SPG (GGA6) identifies open spaces in the AAP area as forming part of the 'The Central London Link' and identifies opportunities to promote and enhance connections between these spaces. The PNAPP should make reference to the All London Green Grid SPG and where relevant reflect the strategic role of these open spaces and the need to enhance links between them. The Council should also ensure its draft Open Space strategy reflects the All London Green Grid SPG	Reference to the All London Green Grid SPG has been included in paragraph 4.6.11 of the publication/submission version AAP. Further detail on how linkages between these spaces will be supported and encouraged is set out in the Open Space Strategy.
280	196	Greater				The Mayor has been consulted under Regulation 25 at	Noted.

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		London Authority				<p>the preferred option stage of DPD formulation. Section 24(1)(b) of the PCPA sets out the key statutory requirement that London LDDs have to be in general conformity with the London Plan. This statutory requirement applies to all LDDs in a Borough's LDF.</p> <p>Conclusion The key issues that require further discussion relate to housing, transport and open space. Full and detailed comments on each policy is set out in Appendix One. The Council should note and address these comments to ensure general conformity with the London Plan. GLA officers welcome further discussion once the Council has collated all consultation responses and is ready to progress the document further before the pre-submission stage.</p> <p>The negotiation of further changes will hopefully lead to a Submission version of the Core Strategy that is in general conformity with the London Plan.</p>	
281	196	Greater London Authority				The planned growth in the Area encompassing around 2000 additional homes, up to 8000 sq.m. of business space and up to 15,000 sq.m. of additional retail space is supported in the context of the relevant London Plan policies and those in the Core Strategy.	Support noted.
282	196	Greater London Authority	Policy 1			These policies are supported	Support noted
283	196	Greater London Authority	Policy 2			These policies are supported	Support noted
284	196	Greater London Authority	Policy 3			These policies are supported	Support noted

Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
285	196	Greater London Authority	Policy 4			These policies are supported	Support noted
286	196	Greater London Authority	Policy 5			These policies are supported	Support noted
287	196	Greater London Authority	Policy 6			These policies are supported	Support noted
288	196	Greater London Authority	Policy 7			These policies are supported	Support noted.
289	196	Greater London Authority	Policy 8			These policies are supported	Support noted.
290	196	Greater London Authority	Policy 9			These policies are supported	Support noted
291	196	Greater London Authority	Policy 10			These policies are supported	Support noted
292	196	Greater London Authority	Policy 11			TfL broadly support this policy although it currently has no plans to extend the Mayor's Cycle Hire scheme into the AAP area.	Support noted
293	196	Greater London Authority	Policy 12			TfL suggest this policy is expanded to explicitly safeguard land for transport including the existing bus station and bus garage in Peckham and bus stopping and standing facilities in the area. See also below comments on PNAAP 1 and 4.	Comment noted.  We acknowledge the policy in the London Plan and associated supplementary planning guidance, but there is no need to repeat it in the AAP. Appendix A gives an overview of links between the AAP, London Plan and associated



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							SPGs.  The bus garage is not allocated in the AAP as a development site.
294	196	Greater London Authority	Policy 16			These policies are supported in principle but the Council should note the comments below on PNAPP 5 and ensure that the policy and proposals in the PNAAP would be in general conformity with the requirements of London Plan Policy 3.14. It is unclear at present as to whether they would be as the document is silent on this matter. In addition to addressing this issue in relation to PNAPP 5 the Council should address this issue in the reasoned justification for the housing policies as necessary to ensure clarity in their implementation for this and other development proposals in the AAP area.	Through discussions and agreements with the GLA on the AAP, we have updated the supporting text for proposals site PNAAP 5 - the former Wooddene Estate, to include the following wording "The original Wooddene estate consisted of 323 homes, of which 316 were council homes and 7 were owned by leaseholders. The new development will provide high quality affordable and private housing, with the capacity to provide around 360 new homes. Proposals for development will need to consider London Plan policy 3.14 - Existing housing, which looks to resist the loss of housing, including affordable housing." We have also updated the table in appendix A to cross refer to London Plan policy 3.14.
295	196	Greater London Authority	Policy 17			These policies are supported in principle but the Council should note the comments below on PNAPP 5 and ensure that the policy and proposals in the PNAAP would be in general conformity with the requirements of London Plan Policy 3.14. It is unclear at present as to whether they would be as the document is silent on this matter. In addition to addressing this issue in relation to PNAPP 5 the Council should address this issue in the reasoned justification for the housing policies as necessary to ensure clarity in their implementation for this and other development proposals in the AAP area.	Through discussions and agreements with the GLA on the AAP, we have updated the supporting text for proposals site PNAAP 5 - the former Wooddene Estate, to include the following wording "The original Wooddene estate consisted of 323 homes, of which 316 were council homes and 7 were owned by leaseholders. The new development will provide high quality affordable and private housing, with the capacity to provide around 360 new homes. Proposals for development will need to consider London Plan policy 3.14 - Existing housing, which looks to resist the loss of housing, including affordable housing." We have also updated the table in appendix A to cross refer to London Plan policy 3.14.
296	196	Greater London Authority	Policy 18			These policies are supported in principle but the Council should note the comments below on PNAPP 5 and ensure that the policy and proposals in the	Through discussions and agreements with the GLA on the AAP, we have updated the supporting text for proposals site PNAAP 5 - the former Wooddene Estate, to include the

Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
						PNAAP would be in general conformity with the requirements of London Plan Policy 3.14. It is unclear at present as to whether they would be as the document is silent on this matter. In addition to addressing this issue in relation to PNAPP 5 the Council should address this issue in the reasoned justification for the housing policies as necessary to ensure clarity in their implementation for this and other development proposals in the AAP area.	following wording "The original Wooddene estate consisted of 323 homes, of which 316 were council homes and 7 were owned by leaseholders. The new development will provide high quality affordable and private housing, with the capacity to provide around 360 new homes. Proposals for development will need to consider London Plan policy 3.14 - Existing housing, which looks to resist the loss of housing, including affordable housing." We have also updated the table in appendix A to cross refer to London Plan policy 3.14.
297	196	Greater London Authority	Policy 19			This policy is supported. The Council should note that since publication of the document the Mayor has published the All London Green Grid SPG (March 2012) which expounds London Plan Policy 2.18. All London Green Grid SPG GGA6 identifies open spaces in area as forming part of the 'The Central London Link' and identifies opportunities to promote and enhance connections between these spaces. The PNAPP should make reference to the All London Green Grid SPG and where relevant reflect the strategic role of these open spaces and the need to enhance links between them. Paragraph 4.6.13 and Policy 30 are welcome in respect of the latter. The Council should also ensure its emerging Open Space strategy reflects the All London Green Grid SPG.	Reference to the All London Green Grid SPG has been included in paragraph 4.6.11 of the publication/submission version AAP. Further detail on how linkages between these spaces will be supported and encouraged is set out in the open space strategy.
298	196	Greater London Authority	Policy 30			This policy is supported. The Council should note that since publication of the document the Mayor has published the All London Green Grid SPG (March 2012) which expounds London Plan Policy 2.18. All London Green Grid SPG GGA6 identifies open spaces in area as forming part of the 'The Central London Link' and identifies opportunities to promote and enhance connections between these spaces. The	Reference to the All London Green Grid SPG has been included in paragraph 4.6.11 of the publication/submission version AAP. Further detail on how linkages between these spaces will be supported and encouraged is set out in the Open Space Strategy.

Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
						PNAPP should make reference to the All London Green Grid SPG and where relevant reflect the strategic role of these open spaces and the need to enhance links between them. Paragraph 4.6.13 and Policy 30 are welcome in respect of the latter. The Council should also ensure its emerging Open Space strategy reflects the All London Green Grid SPG.	
299	196	Greater London Authority	Policy 34			This policy is supported. The Council should note that since publication of the document the Mayor has published the All London Green Grid SPG (March 2012) which expounds London Plan Policy 2.18. All London Green Grid SPG GGA6 identifies open spaces in area as forming part of the 'The Central London Link' and identifies opportunities to promote and enhance connections between these spaces. The PNAPP should make reference to the All London Green Grid SPG and where relevant reflect the strategic role of these open spaces and the need to enhance links between them. Paragraph 4.6.13 and Policy 30 are welcome in respect of the latter. The Council should also ensure its emerging Open Space strategy reflects the All London Green Grid SPG.	Reference to the All London Green Grid SPG has been included in paragraph 4.6.11 of the publication/submission version AAP. Further detail on how linkages between these spaces will be supported and encouraged is set out in the Open Space Strategy.
300	196	Greater London Authority	Policy 38			This policy is supported. The Council should note that since publication of the document the Mayor has published the All London Green Grid SPG (March 2012) which expounds London Plan Policy 2.18. All London Green Grid SPG GGA6 identifies open spaces in area as forming part of the 'The Central London Link' and identifies opportunities to promote and enhance connections between these spaces. The PNAPP should make reference to the All London Green Grid SPG and where relevant reflect the	Support noted.  Reference to the All London Green Grid SPG has been added to policy 19: open space and SINCS. Further detail will be included in the background report where necessary.

Rep Ref	Object Ref	Organisation	Main Policy	Para	Site no.	Details of Representation	Officer Response to Representation
						strategic role of these open spaces and the need to enhance links between them. Paragraph 4.6.13 and Policy 30 are welcome in respect of the latter. The Council should also ensure its emerging Open Space strategy reflects the All London Green Grid SPG.	
301	196	Greater London Authority	Policy 41			This policy is supported. The Council should note that since publication of the document the Mayor has published the All London Green Grid SPG (March 2012) which expounds London Plan Policy 2.18. All London Green Grid SPG GGA6 identifies open spaces in area as forming part of the 'The Central London Link' and identifies opportunities to promote and enhance connections between these spaces. The PNAPP should make reference to the All London Green Grid SPG and where relevant reflect the strategic role of these open spaces and the need to enhance links between them. Paragraph 4.6.13 and Policy 30 are welcome in respect of the latter. The Council should also ensure its emerging Open Space strategy reflects the All London Green Grid SPG.	Support noted.  Reference to the All London Green Grid SPG has been added to policy 19: open space and SINCS. Further detail will be included in the background report where necessary.
302	196	Greater London Authority	Policy 44			This policy is supported. The Council should note that since publication of the document the Mayor has published the All London Green Grid SPG (March 2012) which expounds London Plan Policy 2.18. All London Green Grid SPG GGA6 identifies open spaces in area as forming part of the 'The Central London Link' and identifies opportunities to promote and enhance connections between these spaces. The PNAPP should make reference to the All London Green Grid SPG and where relevant reflect the strategic role of these open spaces and the need to enhance links between them. Paragraph 4.6.13 and	Support noted.  Reference to the All London Green Grid SPG has been added to policy 19: open space and SINCS. Further detail will be included in the background report where necessary.

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						Policy 30 are welcome in respect of the latter. The Council should also ensure its emerging Open Space strategy reflects the All London Green Grid SPG.	
303	196	Greater London Authority	Policy 20			This policy is supported.	Support noted.
304	196	Greater London Authority	Policy 21			This policy is supported.	Support noted.
305	196	Greater London Authority	Policy 22			This policy is supported.	Support noted.
306	196	Greater London Authority	Policy 23			This policy is supported.	Support noted.
307	196	Greater London Authority	Policy 24			This policy is supported.	Support noted.
308	196	Greater London Authority	Policy 24			This policy is supported.	Support noted.
309	196	Greater London Authority	Policy 25			This policy is supported.	Support noted.
310	196	Greater London Authority	Policy 26			This policy is supported.	Support noted.
311	196	Greater London Authority			1	Whilst the proposal to enhance links between the bus station and the Aylsham Centre and beyond is broadly supported TfL as owner and operator of the bus	Noted.

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						station should be closely involved in the development of proposals for these links. A new vehicular access if not restricted to buses could conflict with operations. New pedestrian and cycle connections would need to be designed and managed to avoid safety and operational impacts.	
312	196	Greater London Authority			4	It is not clear whether the Copeland Road Industrial Park site (PNAPP 4) includes or excludes the bus garage. Page 116 and Figure 25 suggests that it is included although elsewhere references are less explicit. TfL would object to a Proposal which involved the loss of the bus garage as this would be contrary to London Plan Policy 6.2.	The proposal site PNAAP 4 does not include the bus garage on Copeland Road. The AAP has made this clearer in appendix C and the supporting document "schedule of proposed changes to the adopted policies map".
313	196	Greater London Authority			5	The Council should ensure that the proposals for this site are consistent with the requirements of London Plan Policy 3.14. The identification of the previous residential capacity including the number of affordable housing units is welcomed in this regard. Given the previous use of the site for affordable housing London Plan Policy 3.14 will apply and it is therefore expected that the previous affordable housing floorspace on this site will be reprovided in any proposal. The Council should note this in the accompanying text.	The supporting text to the former Wooddene Estate proposal site has been updated, as agreed with the GLA, to refer to London Plan policy 3.14.
314	196	Greater London Authority		7.7.5		The Council should note that in London the HCA is now part of the GLA.	Noted and amended wording in the AAP.
315	196	Greater London Authority				The Council should update the document as appropriate to reflect the publication of the National Planning Policy Framework (NPPF).	The AAP has been updated to reflect the NPPF.
316	823				12	In 2010 I purchased my home from Southwark Council and am now a leaseholder. When I made the	The AAP sets out the appropriate uses for the two sites: PNAAP 11 and PNAAP 12. At the time of preparing this

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						<p>application to become a leaseholder I was not made aware of any plans for building works to take place at the back of my home, although the Community Centre was out of use by then. I am very concerned from the diagrams that Mrs Smith has shown us of the extremely close proximity of this building works to the back of my flat, where I have a patio garden and can sit and enjoy the sunshine and the plants I have there. I am still waiting for the sunshine this year. It is a pleasant home at present and there are wildlife and trees at the back. I know there is a great need for homes to be built in London and the UK. However, I object very much to a 3-storey block being built right outside my back gate, as closely as your diagrams show. It will take away all natural light from my property, destroy the current wildlife habitat we enjoy here and destroy my right to sit and enjoy the summer in my patio garden. It will remove my right to privacy in my home. It will also take from the value of my property should I wish to sell it. I was not warned about this at any time during the purchase in 2010. At that time there were rumours about the refurbishment of the old Community Centre to restore its former use. I went to a planning meeting in Nunhead Library about 12-18 months ago. I have not heard or received any contact since about any of these plans, despite making comments at that meeting. Both myself and my wife are over 70 years of age and like to enjoy our own home surroundings as much as we are able to, and do not go out at night. It is currently a very pleasant area. I am very sad and distressed as is my wife that Southwark are even considering building a high block</p>	<p>stage of the AAP, the detail for PNAAP 11 - the former community centre site, is yet to be worked up. The council will carry out detailed consultation on the scheme once there are plans for the site. The design of the scheme will need to take into account existing policies such as saved Southwark Plan policy 3.2 - Protection of amenity, as well as design policies in the Southwark Plan, Core Strategy and the AAP.</p>

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						<p>almost right outside my home and overlooking the privacy of my lounge and bedroom windows. We would like to ensure that our patio garden at the back of our home here will not be destroyed in any way. We use this area a lot during the warmer months and have many plants on our wall out there. We are subsequently still not happy with the proposals for a 3 storey block outside our home, and would much prefer a 2-storey block, set back in the location of the now disused Community Centre it is replacing. The sunshine currently comes into our bedroom and lounge windows, and onto our patio, most of the day, and we enjoy this a lot, especially as we, and many of the residents and tenants here, are now retired from work. Lastly the problem of cars and exactly where any cars associated with the new homes would be parked? We already are situated on one of Nunhead's busiest roads and would not want to see cars or a car park appearing at the back of our flats in addition to the new proposed homes. There is already car parking available on Candle Grove alongside the old Community Centre, this space is hardly used and should easily provide parking for any cars belonging to the tenants and residents of the new proposed homes. Using this space already available for car parking and access would clearly avoid opening up any remaining green space in the front of the old Community Centre to cars, and subjecting us all to the further noise and pollution caused by such. My wife and I are not happy at all with the current proposals, even though the original proposed 4-storey blocks have changed to become 3-storey blocks. We would much prefer to</p>	



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						<p>have 2-storey blocks in keeping with those currently in our immediate surroundings. We are not wanting to see our right to natural light and privacy destroyed in any way and would consider taking the matter further if it cannot be resolved to our satisfaction, in keeping with the conditions of the property when we purchased it from Southwark Council. If it could be considered again that the new block/s were built behind the tree area, actually on the site of the old Community Centre, there would not be such an extreme effect and barrier to light and privacy on all of our homes here in Citron Terrace. We would be grateful if you would consider seriously these comments alongside any others you may have received concerning the proposals for the Old Community Centre site. Thank you for giving us the chance to comment at this late stage.</p>	
317	824		Policy 11			<p>What research have you done of other cycle superhighways to find out about usage/uptake/impact? Is there space along the Queens Road for one to be fitted properly? Who has decided that a cycle superhighway will be appreciated in this area? Why is there no pedestrian activated crossing from Queens Road/Claydon Road towards the centre of Peckham and the bus station?</p>	<p>The commitment to provide the cycle superhighways is established in the London Plan. The programme is being delivered by Transport for London, in conjunction with relevant boroughs and other bodies.</p> <p>Our core strategy states that we will encourage walking and cycling in the borough. The cycle superhighways are an example of one intervention that aims to improve opportunities for cycling. Other more local projects will be implemented over the lifetime of the AAP, in consultation with local people and interest groups, as funding becomes available.</p>
318	824		Policy 12			<p>Yes, we should encourage the Cross River Tram. Any update from TfL for changes to the number 78 bus route?</p>	<p>Support for the cross river tram noted.</p> <p>We have not referred to changes to individual services in the AAP since any decisions are purely operational and not</p>

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							linked to built development in the action area. Policy 12 does however set out that the council will continue to work with Transport for London to improve the frequency, quality and reliability of public transport. Paragraph 4.4.7 notes that improvements to bus services will be particularly important given that large parts of the action area are reliant of this form of transport.
319	824		Policy 13			What cross borough consultation is going on with Lewisham (and others) to ensure that where boundaries are shared there is joined up	<p>We have engaged with our neighbouring boroughs and a range of other organisations to meet the requirements of the Localism Act's duty to co-operate. Further detail is set out in our background report on the duty to co-operate and within our consultation report.</p> <p>It should also be noted that a range of strategic issues were discussed as part of the preparation of the Core Strategy, which sets out our overall vision for growth in Southwark and our strategic policies that apply across the borough.</p>
320	824		Policy 14			Agree with proposals to protect Choumert Grove car park and redevelop the Cerise Rd multi-storey and Copeland Road car parks..	Support noted.
321	824		Policy 15			Who will "judge" whether limited car parking is justified in the town centre?	Officers in transport planning will determine whether the proposed level of car parking is appropriate. This judgement will be having consideration the composition of the development and information provided in supporting documents at the planning application stage, such as transport assessments, travel plans, car parking management plans and any other material considerations.
322	153	English Heritage				In developing the AAP and the Open Space Strategy, including their supporting evidence base we would strongly support the involvement of the Borough's own conservation staff. They are often best placed to	We work closely with our design and conservation team and have worked together to prepare the relevant policies and background documents at every stage of consultation

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						advise on local heritage matters. In the meantime we welcome our continued involvement in the AAP and Open Space Strategy, and look forward to work with the Council to resolve the above highlighted issues before the submission of the AAP to the Secretary of State.	
323	153	English Heritage		2.2.2		Design and heritage: Attractive places full of character Generally support the issues identified as part of the opportunities and challenges. However we would suggest clarity is provided on what is meant by 'taller buildings' (bullet point 3). As you will appreciate clear definitions are needed so as not to cause misinterpretation of what is expected to be delivered by the plan. In addition we would suggest that the major development sites provide an opportunity to enhance the areas heritage assets (i.e. in terms of significance of heritage assets and the contribution new development may make to their settings.).	Support noted.  We have updated the wording of Policy 26: Building heights to include more clarity and also included a definition for "taller buildings" in the supporting text.
324	825		Policy 1			I think a fear that we share with many people is the inevitable homogenisation of Peckham as more and more high-street chains move in. We are also aware that we are very much implicit in encouraging this kind of transformation. We have been trying to imagine strategies that make the existing, predominantly African shops - and the communities they serve - more resilient to rising property prices. It has often struck me that the only places where you find a diversity of independent shops (and the kind of vibrancy Mark Brearley was attempting to allude to) are places like Peckham - that are low income and have a high level of cultural diversity necessitating specialist shops and services. This only seems to be possible/flourish in low	Feedback from consultation has consistently told us that local people want a range of shops in Peckham town centre, including large multiple chain retailers alongside smaller, independent stores. Our Retail Capacity Study has recognised the potential for Peckham town centre to expand its retail floorspace and appeal to a wider catchment area. New retail floorspace in the town centre will help to ensure that local people have access to a better range of shops and services and will reduce the need to make trips to other centres outside the borough such as Croydon and Lewisham. More investment in the area will also help bring more jobs and create business opportunities.  Policy 1 promotes strengthening the existing retail parades

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						<p>rent areas. The only alternative example of areas that maintain independent shops, are places like Bellenden road - where luxury goods shops are sustained by a higher income population. I find the later example an unsatisfactory replacement. Mark Brearley's presentation seemed to me to highlight all the risks of encouraging chain domination, leading to government investment in artificially inseminating high streets with life - something that is currently found in bounteous quantity on Rye Lane. Rye Lane ostensibly seems to be thriving - in its own way and on its own terms. The multiple fruit, vegetable, fish and nail and hair outlets are there because market demand means that they survive - people are voting with their feet. Yet we are told that Peckham does not have a good enough retail offer and that people are sick of hair and nail parlors that they see as redundant. I fear that often the voice that shouts loudest is not necessarily one that is representative of the local population. I am aware that it is a struggle for the council to engage people in this conversation at all, but have been disappointed by the number of shop owners on Rye Lane - and their customers - that have been brought into these discussions</p>	<p>on Rye Lane and Peckham High Street by promoting and maintaining a vibrant balance of uses and improving the shopping environment to appeal to a wider catchment. This can be achieved through our borough wide policies which require a balance of uses in protected shopping frontages, and also funding through programmes such as the Improving Local Retail Environments (ILRE) and the Outer London Fund.</p>
325	153	English Heritage				<p>The image does not show clearly some of the annotations indicted in the legend. For example the extent of conservation area coverage is not clear to see on the diagram provided.</p>	<p>We have amended this diagram to remove reference to the conservation areas. The conservation areas are shown in each character area vision diagram.</p>
326	825		Policy 2			<p>Unlike many of my colleagues i am not really concerned with the fate of the creative community, who are on the whole pretty resilient and itinerant. The creative community is predominantly made up of</p>	<p>Policies 1, 2, 3, 5 and 6 promote the generation of new jobs and businesses in the Peckham core area to support a diverse and thriving local economy across a range of sectors.</p>

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						<p>people who have choice and financial security. They have chosen to enter into an industry that does not necessarily guarantee a stable income and nimbly find ways of making this sustainable. I am more concerned with the working class / low income people in Peckham, who generally don't have the freedom of choice. What happens to these people as Peckham continues to change? I would be interested to know what the Peckham "sustainable communities" paper actually entails - the prose is encouraging but i couldn't work out what the paper would mean in practice. It would be great if you could help explain this to me.</p>	<p>Policy 2 promotes the provision of new arts, cultural, entertainment and leisure space which will bring help bring additional value and opportunities to Peckham. A vibrant arts, leisure and cultural scene, will bring employment, engage students, local people and visitors, and create opportunities for training and learning.</p> <p>One of the priorities of the Council's Economic Development Strategy (2010) is to work with our partners to develop projects to improve the employment prospects of our priority groups to develop skills and find employment. The strategy also prioritises the continued engagement with employers in the borough to develop work placements and apprenticeships for priority groups and embed local economic benefits into procurement. Our Employment Land Review (2010) also confirms that the historic growth of the creative, cultural and tourism industries has been over twice as much in Southwark as in London as a whole, over the period 1998-2007. Peckham is already home to many creative and cultural businesses providing significant employment and showcasing the area's talent. The continued growth of these industries is significant in the context of the economic future of the borough. Ensuring new workspaces are designed flexibly (through Policy 6) will help to ensure small businesses can continue to contribute to the success of the area.</p> <p>The AAP policies have been assessed for their social, environmental and economic impact in our Sustainability Appraisal. This is one of the supporting documents to the AAP. The AAP also needs to be consistent with the Council's</p>

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							sustainable community strategy ' Southwark 2016' which sets out a range of priorities and objectives to guide the council and its partners to secure the future well-being of local people. It is available on the council's website <a href="http://www.southwark.gov.uk/info/10010/southwark_alliance/580/southwark_2016">http://www.southwark.gov.uk/info/10010/southwark_alliance/580/southwark_2016</a>
327	153	English Heritage	Policy 16	4.5.6		We welcome the reference to the need for developments to be an appropriate density for the character of the area. We would suggest this message is reinforced so that developments respect both the local and historic character of the area. This could be further strengthened by referencing the Peckham and Nunhead Characterisation Study (March 2012) as a basis in which to establish appropriate density levels. This approach would accord with the NPPF paragraphs 58 and 61.	We have amended the text to include reference to this study.
328	153	English Heritage	Policy 19			Open Spaces and Sites of importance for nature conservation (SINCs): Reflecting our previous concerns to this policy 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, valued and conserved in the policy wording. In addition mindful that the English Heritage's Heritage at Risk Register 2011 identifies Nunhead Cemetery – registered park and garden grade II*, and Monuments at St Mary Magdalene Churchyard, Bermondsey – listed building grade II, we would seek a commitment in the policy wording that seeks to restore and enhance open spaces and associated	The importance of open space and its relation to associated features of heritage interest is addressed in Policy 25 of the publication/submission version AAP.

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						features of heritage interest.	
329	825					I don't have any answers to any of these problems and I'm sure they are things that you are really thinking about. I fear the current economic / political climate that seems to necessitate compromise. I fear developers who have no investment locally beyond the financial. I am aware that local councils are under a huge amount of pressure in terms of housing provision and creating the necessary amenity and investment to match this. However i do feel that an approach that allows for a more organic and representative growth with money being targeted at infrastructure and the needy may be more successful in retaining and sustaining this Peckham, the people that live in it and make it live.	Noted.
330	153	English Heritage	Policy 23			Public Realm: Support in general the overall approach of the policy, subject to the following changes. · Bullet point 1 – suggest ensuring that appropriate palette of materials are used when considering areas or features of heritage interest. · Bullet point 2 – suggest that when creating clearly defined public spaces account should be taken of the area's local and historic character. Understanding the historic development of the public realm can help inform its value and how it should be managed and enhanced. · Additional bullet point – suggest that there should be a commitment to encourage the enhancement of the existing public realm. Reference to the Peckham and Nunhead Characterisation Study (March 5 2012) should be made either in the policy or supporting text as a basis in which to apply this policy.	We have updated Policy 23: Public realm to include a point for consideration of the local historic environment.

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331	153	English Heritage	Policy 24			<p>Built form: In general support this policy subject to the following changes. · Where the wording states the need for developments to reinforce/enhance or be consistent with the existing character (bullet points 2 and 5) we would suggest that reference be made to the historic and local character. This will then provide a clear relationship between policy 24, 25 and 26. In addition this approach would accord with the NPPF paragraphs 58 and 61. · We welcome the intention of providing policy direction on shop fronts. However we would suggest that some of the requirements sought could be misinterpreted when considering the heritage interest of a building. For example bullet point 1 promotes large window sizes or glazing. This design approach may not be appropriate if the significance of a listed building or building of merit in the conservation area contains relatively small window openings or glazing.</p>	<p>We have updated the wording of Policy 25: Built form to include a point for consideration of the local historic environment.</p>
332	153	English Heritage	Policy 24			<p>Building Heights: In order to provide clarity we would suggest that developers when applying this policy should consider the impact of tall buildings upon the significance of heritage assets, with the expectation of not causing harm to their significance (bullet points 3 and 4). The policy wording (principally bullet point 2) reinforced by the supporting text, appears to promote tall buildings as the only viable option of improving legibility or reinforcing a town centres function. We would question this assumption and that legibility and the functionality of a town centre can be improved through quality contextual design that may result in building heights that reflect prevailing scales. In this context it is important to ensure that the Peckham and</p>	<p>The Peckham and Nunhead action area urban design background paper sets out the evidence base which informs Policy 26: Building heights.</p>



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						Nunhead Characterisation Study (March 2012) is referenced in the policy or supporting text. However as expressed in the covering letter we are concerned that the Study does not provide sufficient evidence to justify the promotion of tall buildings at the proposed locations.	
333	153	English Heritage	Policy 26			Heritage: We generally support the policy but would suggest that the wording could be developed further so that the distinctiveness of Peckham and Nunhead's historic environment is clearly expressed. Sources of information could include the English Heritage's funded Historic Area Assessment for Peckham and the Council's Peckham and Nunhead Characterisation Study (March 2012), and any other relevant conservation area appraisals/management plans.	We have amended the supporting text of Policy 24: Heritage, to include reference to these studies and provided more detail in the character area policy sections in Section 5.
334	153	English Heritage				Character areas in Peckham and Nunhead: It is noted that for each character area details of the heritage interest of the area is detailed in the supporting text. We would suggest that there is an opportunity to articulate this detail into a Heritage policy for each area. This could be achieved by using, where relevant, that the details of conservation areas appraisals and management plans. In the case of management plans the actions highlighted could be summarised and articulated in the policy.	We have amended all character area sections in Section 5 to include reference to the consideration of specific heritage assets.
335	153	English Heritage				Built environment (Peckham core) Under the built form component of the policy the third bullet point should take account of the need for new designs to sustain and enhance the characteristics of all heritage assets. This includes conservation areas and listed buildings that fall within the core area and beyond (i.e. taking	We have updated the character area policies in Section 5 to include consideration of the specific heritage assets in the character area.

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						account of setting issues related to heritage assets).	
336	153	English Heritage				Schedule of proposal sites: On each map accompanying each proposal site, we would suggest that all relevant heritage assets are marked. This could help inform the proximity of any heritage assets that may influence the development of the site. In addition where taller building/elements are proposed, further clarity should be provided on their approximate location and scale. This should be based upon urban design and historical analysis of the site and its surroundings. These findings could then be expressed as design principles that should help inform how the site should be developed so that it responds positively to its local and historic context.	We have amended the site diagrams in Appendix C: Schedule of proposal sites to indicate adjacent heritage assets including listed buildings, buildings identified on the local list and the conservation areas. We have also included any protected open spaces or protected shop fronts. The site specific guidance and supporting text highlight specific heritage assets for consideration.
337	241	Network Rail			6	Site PNAAP 6: Peckham Rye Station Environs including all of Station Way, 2-10 Blenheim Grove, 3 Holly Grove and 74-82a Rye Lane Network Rail supports the redevelopment of Peckham Rye Station Environs and the surrounding property subject to the commercial viability of any forthcoming scheme and the sustainability of the proposed property use classes. The redevelopment of the Peckham Rye Station Environs and the creation of a public square will enhance the experience for rail passengers who use the station. It will also create an important public realm space for the area and a more open and attractive gateway into Peckham and Nunhead. Network Rail has welcomed the opportunity to work with Southwark Council to deliver the council's aspirations and will continue to offer supportive and cooperation to facilitate the delivery of this scheme.	Support noted.

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338	241	Network Rail			28	PNAAP 28: Land to west of Queens Road Station (timber yard) Network Rail supports the scheme to transform access to Queens Road Peckham Station. The redevelopment of the site will enhance the experience for rail passengers whilst also delivering new commercial lets opportunities within the railway arches and an attractive public realm space outside the station. Should you have any queries or wish to discuss the nature of these comments and representations, please do not hesitate to contact me.	Support noted.
339	549	Notting Hill Housing Group			5	Land Uses It is noted that the allocation refers to 'required' land uses being residential (Class C3) and retail (Classes A1-A4). It is acknowledged that these uses are all appropriate in this central area, as well as those other uses including leisure/community, student accommodation and business uses 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 and market demand. Site Specific Guidance It is stated in the allocation that active frontages should be provided along the 'majority' of the Queens Road frontage. Active frontages can effectively be achieved through residential development by having front doors onto the street. The location of other active frontage uses, such as retail, will be determined having regard to market demand and viability. Clarification is therefore sought that the requirement for active frontages includes residential and that the location of active uses shown at Figure 26 is indicative and should have regard to market demand.	The site diagram for PNAAP 5 is an indicative diagram, illustrating the possibility of where active frontages could be located. The introductory text to the schedule of proposals site (appendix C) sets out that these diagrams are indicative and that the precise design of development will be determined through a planning application. This is the case for active frontages. The AAP seeks to improve Queens Road by increasing the amount of active frontages along Queens Road to better link Queens Road Station to Peckham Town Centre and improve the experience for pedestrians and cyclists using Queens Road.

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340	549	Notting Hill Housing Group			5	It is noted that the allocation supports this location as being appropriate for a 'taller landmark building', which is supported as the site is located within the Peckham Town Centre and is a significant development site, as stated in the LBS Peckham and Nunhead Characterisation Study (March 2012). Given the size of the site and as demonstrated in the initial feasibility studies presented to officers, it is considered that there is scope for a series of taller elements across the site to provide a 'variety of distinguishable buildings' and an 'interesting and varied roofline', as required by Policy 29 of the draft AAP, and the site allocation should reflect this accordingly. It is considered that the site has the potential to exceed 6-10 storeys and this should not form the upper limit for the site. The precise heights across the site will be subject to assessment through the application process.	The wording of the Policy 26: Building heights has been reviewed to ensure that there is more clarity regarding the potential location and height of tall buildings in the action area. Any proposal would need to comply with the borough-wide policies for design and building heights, particularly Southwark Plan policy 3.20 and Core Strategy strategic policy 12. The evidence that informs this policy is set out in the Peckham and Nunhead Action Area urban design background paper and Peckham and Nunhead characterisation study.
341	549	Notting Hill Housing Group			5	The allocation also states that the mature trees along Queens Road should be maintained. In order not to restrict the site's potential to maximise the delivery of high quality residential floorspace, it is requested that the wording of the allocation is amended to require that mature trees along Queens Road should be maintained 'where feasible'.	The site specific guidance for PNAAP 5 states that the mature trees along Queens Road should be maintained. Where this is not feasible, the developer will need to justify why not to the satisfaction of the local planning authority.
342	549	Notting Hill Housing Group			5	The site's potential to provide an energy centre is acknowledged and it is noted that NHH is currently in discussions with LBS in relation to the feasibility and viability of this.	Noted.
343	617				2	Cinema A building the height of the multi would be ok. Could it be adapted retaining a cafe community space at the top as already established in another form at	AAP policy 26 sets out there is potential for a taller building on this site of up to 10 storeys. The policy for PNAAP 2 - the cinema/multi-storey car park sets out that the required uses

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						present and a key feature attraction of Rye Lane, with the views / menu etc.. (Not another studio flat). The alley way around it to be redesigned as at present a convenient cut through but an uncomfortable unsafe space.	include leisure/community use (Class D) and retail use (Classes A1/A2/A3/A4). Community spaces and cafes are included within these use classes.
344	617				3	Railway Arches Not all art galleries and cafés. They will be out numbering the ethnic vegetables and all shops soon and they are not as practical. Would use for workshops / artisan spaces.	Proposal site policies for PNAAP 3 (land between the railway arches) and PNAAP 6 (Peckham Rye Station) set out that B use class is an acceptable use within the railway arches on both these sites. This could potentially include workshop/artisan spaces.
345	617				5	Wooddene Buildings to the height of those on the opposite side of the road. Terraced town houses with steps up and attics. No flats. Several rds could be built there. Absolutely NO high rise towers . Frontage could be off the street . Sympathetic development with heritage area of East Peckham / Wood s Rd etc..	AAP policy 26 sets out our approach to building heights. Based on our work in our characterisation study and our urban design background paper, we have identified the Wooddene site as a potential location for a taller building of up to 15 storeys. Policy 26 crosses references to saved Southwark Plan policy 3.20, which sets out the criteria to justify a taller building.
346	617				6	Peckham Rye Station Remove 30s shops , open up square. Retail space in the arches. Restore the Old Waiting Room . Network rail station improvements incorporated into building restoration e.g. placing of lifts .	The AAP has been updated to set out that council have secured funding from the GLA's Regeneration Fund (and committed its own money) to the project to improve the station and the forecourt. This includes improving the station building itself and opening up the square. More detail has been set out in the policies and guidance for PNAAP 6 - Peckham Rye Station and within section 7 of the AAP on delivery.
347	617				11	Nunhead Housing Site (former early years, I think) If Linden grove redeveloped with taller housing, the low level units to be replaced in kind as disabled/ elderly	The AAP sets out that the required use for this site is residential (Class C3). This use class covers conventional self-contained housing and self-contained housing for the elderly or disabled people.
348	617				9	Sumner Road (Flaxyards) Retain the green space!	This site is a proposal site and the guidance within the AAP sets out the proposals of the site.

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349	617				14	Bellenden Road Retail Park Demolish Lidl... really ugly building and waste of space.	The council do not own this site, and the current owners currently do not propose redeveloping this site. The AAP sets out that there is potential for more retail and some residential use on this site if it were to come forward to development in the future. This could include demolishing and rebuilding the Lidl building.
350	617				15	Woods Road Listed building status for those identified. The oldest point of Peckham should be celebrated.	<p>We already provide some protection for local heritage assets through listed buildings and our design and conservation team are currently in the process of preparing the local list and will be consulting on this in Spring 2013.</p> <p>Policy 24: Heritage sets out more information regarding local heritage assets with a map of these assets and their settings shown in Figure 18. We have also included consideration of the historic environment set out in other built environment policies for public realm (Policy 23) built form (Policy 25), building heights (Policy 26), in specific character area policies in Section 5 and also in site specific guidance and diagrams in Appendix C: Schedule of proposal sites.</p>
351	617				18	Peckham Lodge Restored/ listed/ social housing units.	The site is currently used as a hotel, with a planning approval for an extension to the hotel. This is a suitable use for the site.
352	617				19	Sausage Factory Restored/listed/	The site guidance for this proposal site has been updated to refer to the need for development to retain the Grade II listed former Peckham Fire Station on this site. There is an approved application for this site.
353	617				20	190 Rye Lane Restored / listed and balance of top of building restored i.e. when windows filled in.	This is too detailed for the AAP.
354	617				21	180 Rye Lane Restored / listed and balance of top of building restored i.e. when windows filled in.	This is too detailed for the AAP.

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355	617				24	Peckham Rye Baptist Church Listed/ restored/ refurbish the church hall / update / heating	The proposals site policies for PNAAP 24 set out that the required use is residential or community use. The council does not own the site and at present there are no plans for its redevelopment.
356	617				25	Former Peckham Library Rebuilt as a nursery/ drop in	The policies for proposal site PNAAP 25 set out that community use one of the required uses on this site. This could be a nursery.
357	617				27	Queens Rd Petrol Station Development similar to that at the other end of that terrace. High frontage off the pavement. No need for retail space underneath.	The policies and guidance for PNAAP 27 require both residential (Class C3) and retail (Classes A1/A2/A3/A4) on this site. Our view is that the ground floor requires active retail uses to continue to building frontage along Queens Road that will be created by the redevelopment of the former Wooddene Estate.
358	617				28	Queens Road Timber Yard/Station Plaza	Proposals site PNAAP 28 sets out policy requirements and guidance for this site. One of the required uses is a new station forecourt/square. As set out in the AAP, a planning application has been approved to create a new public square at this site.
361	149		Policy 19			P70 Protected Open Spaces I am concerned about the lack of protection in planning policies against overuse of open spaces. Peckham Rye Common and Park suffer from overuse depending on both the weather and the demand for use. I will look to see if this is covered in the Open Spaces strategy but I am mentioning it here as a relevant open space concern in relation to the PNAAP. It stems from the fact that we were unable to raise this as an issue that the planning committee could take into account in considering the planning application for the nearby new school. We were told that this was because there was no mention of it in any planning policy documents.	<p>This is too detailed for the Peckham and Nunhead AAP.</p> <p>We have set out our approach to protecting and improving open spaces in the Open Space Strategy which will be taken to Cabinet for adoption later this year. Our approach is to promote the use of open space and we do not consider over use of open space to be an issue for concern in the borough.</p>

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362	794	Friends of Burgess Park	Policy 19			We support the recognition of Jowlett Open Space as open green space and would suggest that it is raised to the same status as the Surrey Canal Walk as Metropolitan Open Land.	Support noted.  Surrey Canal walk is the borough's most important linear open space and as such is designated as MOL because it has strategic importance across London. We are proposing to designate Jowlett Street park as borough open land. Further information on our justification for this approach is set out in our Background Paper on open spaces.
363	794	Friends of Burgess Park	policy 19			Please note that a community food growing space has been established at the top of Surrey Canal Walk at the Glengall Wharf site. New housing provides an opportunity for enhancing wildlife and improving the general level of landscaping to have a bigger impact to support native species. This is particularly important in an area with fragmented green space.	Noted.  We have set out our approach to protecting and improving open spaces in the Open Space Strategy including how we will promote biodiversity through new development. The open space strategy will be taken to cabinet for adoption later this year.
364	217		Policy 21			Policy 21: Waste, Water, Flooding and Pollution: We are very concerned about run-off water going into the urban drain system. We feel that where possible, services should be designed so that water can soak away naturally rather than running into drains.	The council's Surface Water Management Plan recognises that a number of policies have already been implemented within the London Borough of Southwark to ensure that new development incorporates Sustainable Drainage Systems (SuDS) wherever possible. This includes Strategic Policy 13 of the Core Strategy which states that we will require developments to help reduce flood risk by reducing water run-off using sustainable urban drainage systems and avoiding the paving over of gardens and creation of hard standing areas.  Further information is also set out in the sustainable design and construction SPD and the Surface Water Management Plan which includes a summary of the type of SuDS that could be utilised.
365	217		Policy			Energy: 4.6.20: Whilst we support CHP plants and the	This is a borough wide issue.



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			20			use of alternative technology we question the use of biofuels anyway, but we believe 4.6.20 should also include an addition along the lines of '...as well as ensuring the biofuel will not emit harmful emissions, it should also add that biofuel will be used if it can be guaranteed that biofuel is sustainably sourced from, e.g. spent restaurant etc., oil and not from unethical sources.	Our sustainable design and construction SPD states that fuels and technology chosen for CHP and other energy systems should be of a high quality resulting in low air pollution. If bio-fuels are to be used, the preference is for biogases, such as methane and hydrogen and alcohol, or for systems that use a gasification process. Generally, large-scale community CHP systems are preferred as these are likely to be less polluting than the combined impact of individual boilers
366	217		Policy 21			Point 2. 4.6.23: With regards to using waste to generate energy, we would hope this would be by means other than incineration. The reason for this is twofold: 1: Incineration fails to encourage waste reduction, and 2: We understand that the amount of energy generated by waste is not actually that much higher than the amount used for the incineration process, plus of course, there is also the question of ash containing highly-concentrated toxins.	The Council's waste management strategy sets out how we will follow the waste hierarchy placing most emphasis on minimisation, followed by re-use, recycling, recovery and landfill as a last resort reducing the need for incineration. The waste management strategy is available to view on the council's website at; <a href="http://www.southwark.gov.uk/downloads/download/213/southwark_council_waste_management_strategy">http://www.southwark.gov.uk/downloads/download/213/southwark_council_waste_management_strategy</a>
367	217		Policy 22			Policy 22: Trees: We totally agree with this policy, we are pleased to see that trees are now taking their rightful place in planning applications. Two more observations: 1. The large areas of white space before the printed matter on pages when compiling all your documents is a waste of paper, and, Policy 19 is not followed by the policy on trees, e.g. then Policy 20: Trees, it would make more sense that way.	Support noted.  This has been amended in the publication/submission version AAP.
368	217		Policy 20			Sustainability Code 4: We believe this clause should read '...that all new development should achieve a minimum of Sustainability Code Level 4, and that the Council will actively encourage developers to aspire to	This has been amended in paragraph 4.6.23 of the publication/submission version AAP.

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						Code Levels 5 and 6, or, that they should ensure that all facilities are in place for upgrading in the future...'.	
369	795	Sport England	Policy 10			Providing for sport through new development Furthermore, Planning Policy 8 aims to promote the use of planning obligations as a way of securing the provision of new or enhanced places for sport and a contribution towards their future maintenance, to meet the needs arising from new development. The area covered by the AAP also offers great opportunities for improving access for a range of formal and informal sports and recreation, such as walking, cycling and water sports.	S106 and CIL will be used to collect contributions for improvements to sports facilities in the area. It is not possible to collect Section 106 and CIL contributions for the provision of informal sports and recreation however contributions to improve open spaces and the public realm may help to provide more informal recreational opportunities.
370	209	NHS Southwar k				The World Health Organisation has developed 11 key health objectives for urban planning which are listed below. Social cohesion Healthy lifestyles Housing quality Access to work Accessibility Local low input food production and distribution Safety Equity Aesthetics Air & Water Quality, Quality of Land & Natural Resources & Climate Stability Reading the AAP it appears that these principles have been generally factored in although some are clearly more directly amenable to planning policy than others. A framework setting out the principles of well-considered, sustainable and good quality development has a definite potential improve everyday life and health of existing and new residents and workers in the area. Equity remains an important issue – the PNAAP area is seriously disadvantaged by high levels of unemployment and it was estimated in 2008 that about half of all households had an income lower than £15, 000 pa, a situation which is ;likely to have deteriorated since then due to the continuing economic	The sustainability appraisal sets out the framework against which the AAP policies are tested to ensure they will deliver sustainable development. We have identified 17 sustainable development objectives by which the policies are assessed. The overall aim of the Peckham and Nunhead AAP is to ensure that long-lasting improvements to Peckham and Nunhead are delivered. The AAP sets out policies to make sure that over the next ten to fifteen years we get the type of development needed to support a healthy, safe and prosperous community and a fairer future for all in Peckham and Nunhead.

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						down turn. It is important to ensure that regeneration is undertaken in such a way that benefits existing residents who are experiencing socio-economic disadvantage.	
371	122	Natural England	Policy 19			Under biodiversity considerations there is reference to street trees, green/brown roofs, living walls all of which is to be commended and encouraged.	Support noted.