REVITALISE



Peckham and Nunhead Area Action Plan

Development Plan Document







Peckham and Nunhead Area Action Plan Publication/Submission version

Consultation Report: Appendix Q

Comments received and officer responses at the Publication/Submission 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 Q** of the Consultation Report and it sets out all of the responses received at the Publication/Submission stage (the Regulation 20 representations) and our officer responses to these comments.

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
1	643	Environment Agency	Muriithi	Charles			Thank you for consulting the Environment Agency on the above. We are pleased to note that our comments from the previous representation have been taken into consideration. It appears Peckham and Nunhead AAP has been prepared in accordance with legal and procedural requirements and its 'sound' in relation to the tests that are set out in paragraph 182 of the National Planning Policy Framework (NPPF).		Support noted.
2	196	Greater London Authority	Watkinson	David	Policy 17		Statement of general conformity with the London Plan (Planning and Compulsory Act 2004, Section 24 (4) a) Thank you for your letter of 24 October 2012, consulting the Mayor on the above documents. The Mayor has delegated his planning powers to me. On 23 November 2012 I considered a report on this case (reference PDU/LDF28/LDD02/05). This report, a copy of which is enclosed, together with the attached appendices constitutes the Mayor's formal representations to the submission consultation. Please note that this includes a representation relating to general conformity with the London Plan as well as other representations to clarify or improve policy. As you will be aware, by virtue of section 24(1)(b) of the Planning and Compulsory Purchase Act 2004, all development plan documents must be in general conformity with the London Plan. It is, however, the Mayor's opinion that the submission document is not in general conformity with the London Plan in respect of the following matter: • The proposed drafting of Policy 17 ('Affordable and private homes') omits Affordable Rent from the affordable housing provision sought and is consequently inconsistent with the National Planning Policy Framework and London Plan. This omission is contrary to London Plan policies 3.11 and 3.12 and the guidance in the London Plan Housing SPG because it would not: seek to maximise affordable housing provision; take account of the viability of future development taking into account future resources as far as possible, including the availability of public subsidy; take account of the fact that as a matter of national policy Affordable Rented is intended to address the housing need of those eligible for Social Rent. This policy should be amended to include Affordable Rent as part of the Social Rent requirement. The proposed drafting of Policy 17 has also been considered against the Revised Early Minor Alterations to the London Plan, which are currently subject to Examination in Public, and would not be in general conformity with these as prop		See detailed officer response to the detailed representation on this point.
3	196	Greater London Authority	Watkinson	David	Policy 17		Consultation on Pre-Submission Document Town & Country Planning Act 1990 (as amended) (TCPA); Greater London Authority Acts 1999 and 2007("GLA Act"); Planning and Compulsory Purchase Act 2004 (as amended) ("PCPA"); Town and Country Planning (Local Development) (England) Regulations 2012 ("the Regulations"). Strategic issues • Affordable housing Recommendation That the Mayor agrees to submit the comments set out in this report and in the attached appendix to Southwark Council as the formal response to the Pre-Submission consultation, and that Southwark Council be advised that the proposed Submission Document is not in general conformity with the London Plan and would not be in general conformity with the Revised Early Minor Alterations to the London Plan.		Noted. See detailed officer comments to subsequent comments.
4	196	Greater London Authority	Watkinson	David			Context 1. On 24 October 2012 Southwark Council consulted the Mayor of London on the above Document. This report sets out information for the Mayor's use in deciding what comments to make. The consultation period ends on 4 December 2012. 2. The Local Development Framework together with the Mayor's Spatial Development Strategy, ("London Plan") and the National Planning Policy Framework ("NPPF") provides the essential framework for planning at the borough level. The "development plan" in London for the		Noted.

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							purposes of section 38(6) of the Act is: • The London Plan (2011); and • Development plan documents produced by the borough councils (and saved unitary development plan policies in transitional period); and • Neighbourhood Plans as appropriate. 3. There are three types of Local Development Documents ("LDDs"): Development Plan Documents ("DPDs"); Supplementary Planning Documents ("SPDs"); and Statements of Community Involvement. The document now being consulted on is a DPD with development plan status, which will be subject to an examination to test the 'soundness' of the plan. 4. The NPPF states that a plan is "sound" where it is positively prepared, justified, effective and consistent with national policy. The Mayor's role 5. All DPDs must be in general conformity with the London Plan, in accordance with Section 24(1)(b) of the PCPA. Section 24(4) of the PCPA requires boroughs prior to submitting it to the Secretary of State to request the opinion in writing of the Mayor of London as to the general conformity of a DPD with the London Plan and advises that they may request the opinion in writing of the Mayor as to the general conformity in accordance with Section 24(5) of the PCPA. Further to this Regulation 18 requires general consultation at the pre-submission stage. By virtue of Regulation 21(2) of the Regulations the Mayor has six weeks from the date of the request to provide his opinion on whether the DPD is in general conformity with the London Plan. 6. Mayor of London's comments will be made available on the GLA website www.london.gov.uk.		
5		Greater London Authority	Watkinson	David			Previous representations 7. On 19 April 2012 the Mayor made representations on the proposals ('Preferred Options') consultation stage of the plan preparation process (planning report PDU/LDF28/LDD02/04). Representations were made by officers under delegated authority on 28 September 2011 ('Towards Preferred Options' consultation) and on 22 May 2009 ('Issues and Options' consultation). The issues that were raised at these stages have been satisfactorily resolved.		Noted that the issues raised at previous stages of consultation have been satisfactorily resolved.
6		Greater London Authority	Watkinson	David			Local development scheme 8. The most recent Local Development Scheme was approved by the Council in June 2012. The Southwark Local Development Framework will ultimately replace the Southwark Unitary Development Plan (UDP) (2007) and set the Council's approach to the planning of the borough up to 2026. The Council has published its Core Strategy and Area Action Plans for Aylesbury and Canada Water, recently consulted on its draft Community Infrastructure Levy (CIL) charging schedule, and brought forward a number of supplementary planning documents. It has saved UDP policies where necessary following the adoption of these DPDs. The Council intends to bring forward a Local Plan which will encompass Core Strategy alterations, the remaining UDP policy replacements and site allocations. The Council expects to determine the programme for the production of this document in June 2013.		Noted.
7		Greater London Authority	Watkinson	David			Proposed representations 9. The Peckham & Nunhead Area Action Plan Pre-Submission Document (hereafter the "Document") is not in general conformity with the London Plan. This is solely due to the current drafting of the proposed affordable housing policy. The remainder of the Document is in general conformity and is supported as a means to guide the ongoing regeneration of the area.		The issue on conformity with the London Plan in relation to affordable housing is dealt with under the officer comments on the detailed representations on affordable housing. Acknowledgement that the remainder of the AAP is in general conformity and is supported as a means to guide the ongoing regeneration of the area is noted.
8	196	Greater	Watkinson	David			10. The proposed affordable housing policy would not be in general conformity		Noted. The REMA EIP panel report

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	London Authority					with the Revised Early Minor Alterations (REMA) to the London Plan. The Examination in Public of the REMA to the London Plan is underway. The panel report is expected early 2013. The REMA to the London Plan are therefore at an advanced stage and likely to published in advance of the examination of the Document.		had not been published when these responses were prepared. See detailed response.
9	96 Greater London Authority	Watkinson	David			11. The Council should note and address the detailed transport comments in Appendix One that, for the avoidance of doubt, identify matters for clarification in the Document rather than maters of general conformity. All comments are set out in the following paragraphs and the attached Appendix One.		Officer comments set out under the detailed representations on transport.
	96 Greater London Authority	Watkinson	David	Policy 17		Housing 12. The proposed drafting of Policy 17 ('Affordable and private homes') would not be in general conformity with the London Plan. Policy 17 states that: "We will provide a range of homes for people on different incomes to meet the identified needs of the borough by:(4) Requiring 50% of the affordable homes to be intermediate homes and 50% to be social rented homes." 13. The omission of Affordable Rent from the affordable housing provision sought by the proposed policy is inconsistent with the National Planning Policy Framework (NPPF) and London Plan and is not justified by local circumstances. Affordable Rent is intended to meet the same housing needs hitherto addressed by social housing and should be included within the 50% of affordable homes that Policy 17 would require to be social rent. The policy should be amended as follows in order to ensure general conformity with the London Plan and NPPF: "We will provide a range of homes for people on different incomes to meet the identified needs of the borough by(4) Requiring 50% of the affordable homes to be intermediate homes and 50% to be social and affordable rented homes." 14, London Plan Policy 3.11 addresses affordable housing targets. It establishes the key principles that boroughs should take into account in setting affordable housing targets in their LDFs: • That the Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision; • The need to ensure an average of at least 13,200 more affordable homes a year; • Borough affordable housing targets should take account, inter alia, of the viability of future development taking into account future resources as far as possible. 15. London Plan Policy 3.12 addresses the negotiation of affordable housing provision in planning decisions and LDF preparation. It states that "the maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes" London Plan Policy 3.12B sta		The view of the council is that the AAP is in general conformity with the London Plan and that it is consistent with the NPPF. The adopted London Plan (2011) does not require boroughs to include a policy on affordable rent as it was prepared before its introduction. The approach set out in the Peckham and Nunhead AAP is in line with our adopted Core Strategy and is based on evidence of Southwark's specific housing needs. Our approach aims to ensure that we secure the most affordable housing that can best meet the needs of people who live and want to live in the borough. The council submitted objections to the Mayor's REMA and attended the EIP to further clarify the council's concerns and objections. Our objections to REMAs are set out within our AAP housing background paper. The NPPF requires councils to use their evidence to ensure that their Local Plan meets the full, objectively assessed need for market and affordable housing. It is acknowledged that the NPPF defines affordable rent as being let by local authorities or registered providers at up to 80% of the local market rent. However it does not explicitly state that every local authority must provide affordable rented housing or that it must be provided consistently at levels close to 80% of market rent. The council is therefore consistent with the NPPF as our policy is based on our evidence base looking at housing need, as required by the

Denvesentation	Objector		Curren						
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Hullibel	Hullibel						Policy 17 would not therefore be in general conformity with the London Plan. 19.		NPPF. We have counsel advice
							The proposed drafting of Policy 17 has also been considered in light of the		which supports this view. The
							relevant REMA to the London Plan and would not be in general conformity with		advice was submitted alongside a
							these as currently proposed. 20. The Early Minor Alterations to the London Plan		joint response with 5 other Central
							were published for public consultation in February 2012. These took account of		London boroughs who share the
							changes to the definition of affordable housing in Annex B of Planning Policy		same opinion. Details of the joint
							Statement 3. Accordingly, these proposed revisions to London Plan Policy 3.11		response and counsel advice are
							to include Affordable Rent alongside Social Rent such that, 60% of the affordable		covered in more detail in our
							housing provision should be for social and affordable rent and 40% for		housing background paper. The
							intermediate rent or sale. It was also proposed that London 3.11C(c) be revised		NPPF definition of affordable
							to require Boroughs to take account of the Mayor's London Housing Strategy in		housing states that it is provided to
							determining their affordable housing targets. 21. The Revised Early Minor		eligible households whose needs
							Alterations (REMA) to the London Plan were published for public consultation in		are not met by the market, and that
							June 2012. These took account of the publication of the National Planning Policy		eligibility is determined with regard
							Framework in March 2012 and, with respect to Policy 3.11 sought to clarify the		to local incomes and house prices,
							Mayor's approach to the new affordable rent product and the affordable housing		which clearly vary significantly by
							investment decisions he has made and also to respond to points raised during		area. When it comes to the London
							public consultation on the Early Minor Alterations. 22. The REMA proposed		context, it is well documented that
							London Plan Policy 3.11B be further revised to state the Boroughs should set an		there are wide disparities in house
							overall target in LDFs for the amount of affordable housing provision needed		prices across London and that
							over the plan period in their areas and separate targets for: social/affordable		affordability levels will therefore
							rented; and intermediate housing and reflect the strategic priority accorded to		vary. The NPPF does not state that
							provision of affordable family housing and to making the best use of available		an approach of analysing the
							resources to maximise affordable housing output. 23. The latter proposed		markets and rent levels across
							revision to London Plan Policy 3.11 strengthens the requirement on Boroughs in		London is more appropriate that
							drafting LDF documents to reflect the strategic priority accorded to making the		than allowing individual boroughs
							best use of available resources to maximise affordable housing output. This		to negotiate or determine affordable rent levels in their own
							should be read in context of the proposed revised text at London Plan paragraph 3.63 which states that: "In view of the particular priority the Mayor gives to		areas. Our Strategic Housing
							provision of new affordable homes to meet London's very pressing need,		Market Assessment, Housing
							boroughs should give particular weight to the criteria set by national government		Requirements Study, Affordable
							for the allocation of public resources for affordable housing in setting local plan		Rent Viability Study and our
							targets (Policy 3.11) or negotiating provision in private housing or mixed-use		Affordable Rent Study all support
							developments (Policy 3.12) and should avoid imposing any requirements (such		our approach that affordable rent
							as borough level caps on rent levels for affordable rented housing) that might		will not meet the key housing
							restrict the numbers of new affordable homes". 24. The omission of Affordable		needs in Southwark and that it
							Rent from the proposed drafting of Policy 17 would not give appropriate weight to		wont be affordable to those people
							the criteria set by national government for the allocation of public resources for		who are currently in social rented
							affordable housing. In light of announced investment patterns is unlikely that new		accommodation or those seeking
							social rented accommodation will attract public subsidy, notwithstanding any		affordable housing. A more
							investment by the Council, and the inclusion of social rent alone may therefore		detailed explanation of our
							preclude significant public sector investment that may otherwise be available for		approach to affordable housing and
							affordable rented products and thus fail to make the best use of available		the policies in the AAP, including
							resources to maximise the delivery of additional affordable housing. 25. Given		why it is in general conformity with
							this, the Document would not be in general conformity with the REMA to the		the adopted London Plan, how it is
							London Plan which, should they be taken forward on the current programme,		consistent with the NPPF, and why
							would be published at the time of its examination. 26. The Council has stated in		we think the REMAs are consistent
							the Document that it is reviewing its approach to Affordable Rent and considering		with the NPPF,is set out in the AAP
							its implications for Southwark through an update to its Affordable Housing SPD.		Housing Background Paper.
							Consultation on the latter is planned for November 2012. It is also noted that		
							Council has made representations to the Examination in Public of the REMA to		
							the London Plan which is underway. 27. In light of this and emerging London		
				<u> </u>			Plan Policy the Council should continue to discuss this matter and potential		

Representation	Objector		Surname						
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							changes to Policy 17 prior to the examination of the Document in order to ensure that the Document is in general conformity with the London Plan by that time. If this does not occur then the matter should be taken forward for discussion at the examination.		
11	196	Greater London Authority	Watkinson	David			Transport 28. Transport for London (TfL) considers that the Document is in general conformity with the transport policies of the London Plan. The Council should address the detailed transport comments in Appendix One that, for the avoidance of doubt, identify matters for clarification in the Document rather than maters of general conformity.		The council welcomes the response that the Peckham and Nunhead AAP is in general conformity with the London Plan transport policies. Detailed comments have been addressed individually.
12	196	Greater London Authority	Watkinson	David			Legal considerations 29. All LDDs must be in general conformity with the London Plan in accordance with Section 24(1)(b) of the Act. This is a key test of the soundness of plans. The Mayor's representations made at this stage will go forward to the examination in public and must include an opinion regarding general conformity with the London Plan. 30. The fact that a development plan document (DPD) is inconsistent with one or more policies in the London Plan, either directly or through the omission of a policy or proposal, does not, by itself, mean that the document is not in general conformity. Rather, the test is how significant the inconsistency is from the point of view of delivery of the London Plan. 31. Any expression of opinion from the Mayor that the DPD is not in general conformity will be treated as a representation to be dealt with by the Inspector at the examination. The Planning Inspectorate has stated that the view of the Mayor's opinion "will be given considerable weight" and that a lack of general conformity with the London Plan will need to be fully justified on the basis of local circumstances, based on relevant evidence. 32. The Mayor must also state why the policy is not in general conformity and his reasoning behind that opinion. The Inspector will determine whether he or she supports the opinion and recommend accordingly. The Mayor should provide the Inspector conducting the examination with any necessary additional information as appropriate, either through a representative or in writing according to the requirements of the Inspector. The examination in the present case is due to be held in March 2013.		Noted. The issue on conformity with the London Plan in relation to affordable housing is dealt with under the officer comments on the detailed representations on affordable housing.
13	196	Greater London Authority	Watkinson	David			Conclusion 33. The Peckham & Nunhead Area Action Plan is not in general conformity with the London Plan and would not be in general conformity with the Revised Early Minor Alterations to the London Plan, which are currently subject to examination. The Document should be amended accordingly in the manner described above		The issue on conformity with the London Plan in relation to affordable housing is dealt with under the officer comments on the detailed representations on affordable housing.
14	196	Greater London Authority	Watkinson	David	Policy 11		London Plan Policy cross ref: Policy 6.9 Policy 6.10 TfL broadly supports this policy although there are currently no plans to extend the Mayor's Cycle Hire scheme into southeast London.		Broad support noted. Although there are no current plans to expand cycle hire to Peckham and Nunhead, the AAP is a 15 year document and the expansion of the scheme would be consistent with the aims to improve infrastructure for active travel, as set out policy 11 and in our Core Strategy. We note that the London Plan identifies the future enhancement and expansion of the cycle hire scheme as a strategic priority and we hope to work with TfL over the plan

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number								period to realise this ambition.
15	196	Greater London Authority	Watkinson	David	Policy 12		London Plan policy cross ref Policy 6.2 TfL suggests 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 within the area. See also later comments on PNAAP 1.		We clarified at the Preferred Option stage that the bus garage site is excluded from the Copeland Industrial Park site allocation (PNAAP4). PNAAP 4 designation excludes the bus garage. The council acknowledges the guidance in the London Plan and associated Land for Transport and Industry SPG (2012) with regard to safeguarding land that is used for transport infrastructure. The London Plan forms part of our development plan and it is not necessary to repeat existing development plan policies in the AAP. We already cross refer to relevant London Plan policies, including London Plan policy 6.2 within appendix A of the AAP, which shows the relationship between the AAP, other Southwark planning policy documents and the London Plan.
16	196	Greater London Authority	Watkinson	David		PNAAP 1	London Plan policy cross ref Policy 6.2 Whilst the proposal to enhance links between the bus station and the Aylesham Centre and beyond are broadly supported TfL as owner and operator of the bus station should be closely involved in the development of proposals for these links. A new vehicular access if not just for buses could conflict with operations. New pedestrian and cycle connections would need to be designed and managed to avoid safety and operational impacts.		Noted. The site designation sets out the aspiration to improve pedestrian and cycle access to the bus station and Queens Road as there is currently little permeability in terms of access from the Aylesham Centre to Queens Road. Transport for London will be involved in future discussions when this site comes forward for development.
17	196	Greater London Authority	Watkinson	David		Table 5, Southwark Plan Proposals site number 71P	London Plan Policy cross ref Policy 6.2 Page 162 Table 5 – Southwark Plan Proposal Site Number 71P TfL recommends that as the bus garage is to be unaffected then the wording for Southwark Plan Proposal Site number 71P within Table 5 should be amended to explicitly state this.		This is already set out in table 5.
18	185		McCarthy	Donnachadh	Policy 11		The plan is unsound as the proposals fail completely to provide for a safe cycling infrastructure for the community. The removal of all existing cycle routes which were included in the first draft and the failure to detail any new cycle routes means the plan fails to satisfy National and London Mayoral policies to encourage cycling, reduce carbon emissions and to encourage healthier living. It means large proportions of the population are being discriminated against in an area where many cannot afford public transport and where there is low car ownership but high pollution levels due to passage through the community of large numbers of motorised vehicles. The Plan should have the original map of existing cycle routes restored and a comprehensive map of proposed future routes included. These or similar proposals were requested by many groups in both the previous rounds of consultation including Southwark Cyclists,		Our priorities for new and improved cycling routes are detailed in policy 11 and broadly reflected in figure 11. Our ambitions to focus improvements on links between key destinations that generate high numbers of trips, on links to wider areas and on works that will complement the proposed cycle superhighway are consistent with national and mayoral policy. The reduced amount of detail on

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reference	reference	Organisation				Paragraph	Environment Agency, Transport for London and NHS Southwark. Not a single response supported the deletion of existing cycle routes.		
									proposed community infrastructure levy and through many other funding streams, including the annual Local Implementation Plan (LIP) funding available via TfL. Just

	Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
i.	19		McCarthy	Donnachadh	Policy		In addition the plan should require the inclusion of segregated cycle provision		short of £1m worth of projects have already been identified to improve pedestrian and cycle infrastructure in and around Peckham as part of the council's 2014/15 bid to TfL. Further detail has been added to the AAP infrastructure background paper regarding these proposals; their funding and the process for delivery. The wording in the AAP reflects the
					11		wherever practical in new regeneration projects and new transport infrastructure and when existing infrastructure is being refurbished. All future road calming measures should allow permeability for cyclists. Too many build outs are forcing cyclists into the path of lethal motorised traffic. The council is removing thousands s of informal cycle parking spaces by removing safety railings on streets across the borough, thus radically reducing the number of main-street safe cycle parking spaces. The plan should commit the council to providing more parking spaces than those they are removing. All new signposts, lamp-posts etc where practical should be designed to be dual use cycle stands.		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 adopted Transport Plan. We continue to negotiate on-site cycle parking as developments come forward, having regard to standards in the saved Southwark Plan and London Plan. We stress that these are minimum standards and always aim to exceed them in areas of high demand. In addition, the council continues to seek funding for further cycling parking independently of new development. Almost 400 new on-street cycle parking spaces have been provided since 2009 and almost 350 new spaces on estates in Southwark. The council will continue to fund transport improvements through site specific s106, through the community infrastructure levy and through many other funding streams, including the annual Local Implementation Plan (LIP) funding available via TfL. Just short of £1m worth of projects have already been identified to improve pedestrian and cycle infrastructure in and around Peckham as part of the council's provisional 2014/15 bid to TfL. More information on the delivery of transport improvements and the development of our transport policies is set out in the

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									AAP infrastructure background paper.
20	792	Peckham Society					The Peckham Society is the amenity society for Peckham. It exists to encourage interest in and to care for the environment and history of Peckham. We wish to make the following observations on the Application / Submission version of the Area Action Plan on behalf of our members.		Noted.
21	792	Peckham Society					Achieving Sustainable Growth The Peckham Society welcomes the 'heritage' section of the Peckham and Nunhead Area Action Plan (PNAAP) which is well worded and strikes a good balance between the economic, social and economic strands of sustainable growth. However the Society is very concerned that the document fails to achieved this balance overall. The Ministerial foreword to the National Planning Policy Framework (NPPF) states that the purpose of planning is to help achieve sustainable development. It defines sustainable growth as being "about positive growth – making economic, environmental and social progress for this and future generations." As we will show in the second part of this response, Peckham currently achieves a level of sustainability which, we fear, the PNAAP's focus on high levels of growth will throw out of kilter.		The publication/submission document has been prepared with reference to the NPPF. It is consistent with the NPPF. Our sustainability appraisal also ensures that the AAP has a positive social, environmental and economic impact.
22	792	Peckham Society			Policy 26		The main threat to Peckham's well-functioning 'ecosystem' is the proposal to allow large retail units and tall buildings of up to 22 storeys on five key sites in the town centre (and 22+ storeys on one of these). The Society fears that this sudden surge of development will disturb the delicate balance of social, economic and environmental needs which has been achieved in the last few years.		The AAP seeks positive improvements in the quality of the built, natural and historic environment of Peckham and Nunhead. The Peckham core action area is recognised as the area where change is most likely to take place. As such, the AAP has objectively identified the required proposals sites and indicative capacity and land use so that the housing, business and other development needs of the area can be met. As noted in Policy 26 'Building heights', five large proposal sites have been identified as potentially suitable sites for a taller building. The proposed maximum building heights at these five sites range from up to 8 to 20 storeys. The policy ensures that any taller element must be of an exceptional design quality and would be linked to the creation of improved levels of public space that would improve the public realm within the town centre. This is approach is informed by our urban design background paper and study.
23	792	Peckham Society			Policy 26		This focus on growth, to the detriment of other factors, is worrying for another key reason. Southwark Council only recently recognised the importance of the historic core of Peckham Town Centre through two conservation area designations. The Peckham Society campaigned long and hard for these designations, which English Heritage, the Government's statutory adviser on the		We refer to progressing committed developments, including the Townscape Heritage Initiate in section 7.2 of the AAP. The policies in the AAP alongside the

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						historic environment, endorsed them with a detailed assessment. In the past year Southwark Council has been successful in securing a first round grant from the Heritage Lottery Fund to set up a Townscape Heritage Initiative. This has demonstrated the authority's commitment to carrying out a conservation-led regeneration of the town centre, one which will take its lead from the development which has taken place over the centuries, progressive changes which have given us the Peckham we know it today. To allow for the development of 22 and 22 + storey buildings within the very core of Peckham is to write into the PNAAP a policy which, by definition, could cause substantial harm to the Conservation Area. Had more due prominence been given to the two conservation area designations in the document, this conflict would not have arisen. We are deeply disappointed that such a contradiction in terms is embedded within the PNAAP. The inclusion is unsound in planning terms because it has not been justified through the evidence. It is ineffective because it contradicts the evidence and the overall objectives of PNAAP, and contradicts national policy for the reasons stated above. While we recognise the need for Southwark Council to attract private investment at a time when public funding is under considerable strain, we do not believe that identifying large sites and creating permissions for large-scale development is a sustainable approach. We recognise that some of these sites are owned by the local authority and that their sell-off could bring in much-needed funds, but we do not believe that these transactions should be made to the detriment of social and environmental considerations. The environment is not just about public realm and green spaces: the historic environment is not just about public realm and green spaces: the historic environment is not just about public realm and green spaces: the historic environment is not just about public realm and green seemed to have understood this, and it is all the more disappoin		policies the saved Southwark Plan, Core Strategy and London Plan policies will ensure that heritage assets are conserved and enhanced. Our sustainability appraisal also ensures that the AAP conserves and enhance the heritage assets. The range of maximum building heights proposed in policy 26 is justified by a robust evidence base that we prepared for the AAP. The AAP urban design study sets out the rationale and methodology that was undertaken to assess the potential impact of taller buildings on heritage assets (listed buildings and conservations areas) and their setting of the larger proposals sites in the core action area. The Peckham and Nunhead Characterisation study alongside the existing Conservation Area appraisals also informed the evidence base. Also – note that there is no policy proposing a 22 storey or 22 plus storey building. Development proposals will need to clearly demonstrate that all the criteria are met in their design and layout. They must demonstrate how the height, location on the site and design of the building meets the policies and aspirations of the AAP as well as how it would achieve the criteria set out here in saved Southwark Plan policy 3.20 and Core Strategy strategic policy 12. Identifying proposals sites that have the potential for development is a statutory requirement and enables the council to positively plan for the growth in the area. Consequently, the larger sites within the Peckham core action area have been identified as they have the most potential to deliver the required levels of new housing and employment space. Furthermore, Policy 29 'Built Environment' sets out the broad urban design principles for development of larger proposals

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
reference	reference number	Peckham Society				Paragraph	Protecting Peckham's Creative Industries Peckham as an artistic and cultural centre is manifest today, but generally depends on cheap rental space. It would be difficult to protect it if rental values were to increase. Some of these cultural spaces and activities are mentioned in the Area Action Plan, but the most important artistic area, which gives Peckham national and international prominence, is the car park. This area should be protected (the council is the owner) until such time as it ceases to have such prominence. It barely figures in the Plan. The role of the car park as a viewing platform must be considered positively. Where else in London are such views available to so many? The Plan does not mention the growing night club scene, nor the regular theatrical performances. Both of these are likely to increase with the arrival next week of the South London line. The other effect of the overground link will be to connect the creative hubs, as well as the entertainment centres, in Peckham, Dalston, Hackney and Shoreditch. This is a big employment opportunity, and there will probably be a demand for reasonable quality studio space. The Plan shows a keenness to develop the site north of Peckham library, including for a new cinema, which is positive, but simultaneously appears prejudiced against the existing cinema. This could be the site for new studio space.		
									and inward investment in other businesses and providing an increased number of employment opportunities. The AAP identifies the proposals sites where new arts, cultural, leisure and entertainment space should be accommodated, however there will be opportunities

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									to provide suitable space on other sites as development schemes come forward.
25	792	Peckham Society			Policy 5		Protecting Peckham's Businesses Rye Lane is a successful shopping centre which provides cheap nourishing food for a wide variety of people. The failure in shopping described (elsewhere) in Southwark is not the case in Rye Lane. The Plan also refers to a lack of life particularly in the evening, and suggests as a solution a rebuilt shopping centre. Well, compare Brent Cross at night, with the lively night-time commerce in Rye Lane. The Plan state that of the free car parks, that at Morrison's is heavily used, and those at Lidl and Asda somewhat less so. The council's car parks on the Tower Cinema site and the multi-storey are little used. The demand for parking seems to come from supermarket shoppers, and it would be good policy to maintain the link between the parking and the supermarket, as at present, and redevelop the other sites, where use is low. The multi-storey could continue its transformation into an arts venue, possibly as a sculpture park. Under 'Design and Heritage', the Plan refers to resisting the use of solid external shutters. It is hard to see why: in Bellenden Road, for example, the open shutter and solid shutter happily co-exist, according to the needs of the respective shop owners.		Policy 1 sets out that we will promote a range of new uses all along Rye Lane, not just on the Aylesham centre site. We have identified that the town centre is busy and popular, providing a range of comparison and convenience goods, however there is potential to introduce some more evening and night-time uses such as cafes, restaurants and bars, to help develop more of an evening and night-time economy in the centre. PNAAP Policy 14 sets out the approach to car parking in the town centre. Of the council owned car parks, our intention is to retain Choumert Grove car park as a car park and to develop Copeland Road car park (site PNAAP 7) and the Cerise Road multi-storey car park (site PNAAP 2). We have also identified the non-council owned Aylesham Centre, which includes the Morrison's car park (site PNAAP 14) and the Asda site (site PNAAP 15) as proposals sites. We will look at the need for car parking for shoppers and visitors when determining planning applications for the Aylesham Centre, Bellenden Road Retail Park (including Lidl), Asda site, Copeland Road car park and multi-storey car park in accordance with the policies in the saved Southwark Plan and the forthcoming Local Plan. This approach will ensure that there are sufficient car parking spaces to meet current and projected demand in the town centre, whilst making underused land available for development to boost the town centre. The draft AAP policy is supported by a town centre car parking study which identifies the opportunities that exist for a more

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									efficient approach to providing and managing car parking and servicing of businesses. The guidance on shutters is intended to encourage property owners to improve the appearance of the area, to establish active and engaging frontages in our town centres and contribute to an enhanced safety and security for the area. Large commercial centres like Peckham are transformed at the end of each day when the shutters come down and their streets are characterised by long uninterrupted stretches of shuttered frontages which feel unsafe and don't benefit from passing surveillance. Instead, our experience has been that, where owners are encouraged to retain an open frontage (perhaps install shutters internally and with open lattice-type design), their properties can contribute to a considerably improved appearance for the area without compromising on security.
26	792	Peckham Society					Conclusions While we welcome certain aspects of the plan, and in particular the 'heritage' section, we urge you to reconsider the tall building policies included in the Area Action Plan and to show greater regard for Peckham as a successful creative and cultural hub and commercial area.		Noted. We have set out detailed officer comments to the detailed representations in response to representation 23.
27	912	Starlight Music Academy	Duffus	Shanice			Background Peckham and Nunhead is an area of considerable cultural diversity and has within its boundaries some of the largest concentrations of families and individuals from the Black and minority communities who are living below the poverty line. This profile is not likely to change over the next decade as shown by the racial profiles of local primary and secondary schools where in Harris Academy Peckham for example over 90% of children are from a minority background and statistics show that individuals from these groups are more likely to be unemployed. Despite this there is no strategy, or interventionist plan within the Area Plan to deal with it. Although the council may have a strong commitment to equalities and "improving access to employment for disadvantaged communities in Southwark by removing barriers,supporting entrants to the labour marketbuilding skills of Southwark's workforce" current statistics shows that unemployment amongst young people from Black and minority communities has reached an all time high and is spiralling out of control. Unemployment rates for young people continues to rise and for young black men it continues to escalate. According to the London Poverty Profile produced by the New Policy Institute, "the unemployment rate among young people is at its highest level for nearly 20 years (23%) and is still rising. Despite, on average, being better qualified than other young people in the rest of England, young Londoners are more likely to be unemployed." During the year 2000 when work first started on the Peckham and Nunhead Area Action Plan, the UK unemployment rate stood at 5.3% whilst in Southwark it was 12.8%.		In preparing the AAP we have taken into account the needs of different groups within the community. Specifically in relation to the needs of children and youth, we have consulted schools and the representatives on the youth community council in the area. This is to ensure that the AAP policies and objectives reflect the needs of young people. We have carried out an Equalities Analysis alongside the AAP which examines how the AAP policies meet the needs of different groups and does not disadvantage any one group. Our policies set out the planning strategy to encourage economic growth in Peckham and Nunhead, particularly in Peckham town centre to include more retail and business development. This will

Representation	Objector		Surname						
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							Unemployment rates amongst the white ethnic groups were 7.8% compared to 17.2% for non white groups. Year on year unemployment has continued to rise standing at over 400,000 across London and to over 120,000 amongst young people who are struggling to cope with the brunt of the recession. The impact that unemployment has on the lives of individuals and on the lives of families is widely understood but does not come through as a priority in the Area Plan that needs to be addressed, especially as the statistics and recent riots makes clear the extent of the growing problem and feelings of frustration. When unemployment is looked at by group and by race, the group worst affected are young people from minority groups. Statistics show that 19% of whites 16-24 years are unemployed, this figure rises to 44% of Londoners from Pakistani background and a staggering 55% for young Black men and rising. It is therefore imperative to plan to address these emerging issues around youth unemployment as part of the Peckham and Nunhead Area Action Plan in terms of both the physical infrastructure and in terms of the intervention programmes needed in Southwark if the plan is to adequately plan to develop a fairer community for all in a meaningful way		help meet our AAP objective of "E5: Supporting development that provides employment and business opportunities for local people". The AAP strategy is linked and supported by the Council's Economic and Well-being Strategy 2012-2020 sets out borough wide objectives for employment in Southwark, and in particular, narrowing the gap with the London employment rate. The strategy specifically acknowledges that young people are suffering disproportionately the effects of the recession It sets out that the council's commitment to also work to ensure better co-ordination of the many different efforts to help young people into work, increasing engagement with employers and skills providers and promoting a better understanding of how study and training leads to jobs. Also to respond to the changing nature of the economy and young people's increasing interest in self- employment and starting up their own business. In particular the strategy sets out that the council will work with partners to get more employers engaged, helping more young people with work experience, tasters and getting the softer skills essential for the workplace, and mentoring towards careers and business ambitions. The strategy recognises and builds upon the existing programmes and initiatives which provide support for youth such as the Southwark Youth Training Initiative and the Youth, commissioning IAG (Information Advice and Guidance) programme. Check with Graham
28	912	Starlight Music Academy	Duffus	Shanice			Infrastructural Plans for Young People Over the past 15 years Starlight Music Academy has worked with 1000s of young people facing a range of complex challenges, including young people of colour. The main purpose of our work is to improve the quality of life for vulnerable groups of young people, to help them realise their skills, talents and worth and divert away from gangs and crime. Because we know that a child without a dream and who feels worthless is potentially a walking destruction to society and individuals within the community. The constant knockbacks and frustrations caused by unemployment and low		The AAP aims to ensure that people who live and work in Peckham and Nunhead have access to local educational, training, health and community facilities to meet their day-to-day needs. Policy 7 sets out our strategy to encourage better use of

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							economic prospects should not be under estimated. The London Poverty Profile highlighted that "Poor children in London are more likely to lack everyday items than their counterparts outside London, with 60% of children in low-income families unable to afford a week's holiday away from home." Starlight also wants to begin discussions with the Jamaican High Commission about youth exchange schemes. Last year the country experienced the worst riots since the 1980s, young people vented out and released their pented up feelings of frustrations and anger. If society thinks these feelings have suddenly gone away then they are very wrong. Enterprise, Arts, and sports Hubs which are run by organisations that understand these groups, such as Starlight Music Academy, can go a long way towards effectively engaging unemployed minority groups Families, particularly those from minority communities continue to be living in poverty. In 2002 Southwark had the fifth highest rate of benefit recipiency in London. High levels of benefit recipiency levels amongst minority groups have remained but masked now being masked by the influx of affluent homebuyers snapping up the 1000s of new properties being built in Southwark. As well as planning to build new properties to allow affluent wage earners wanting to move from the suburbs in to inner city areas to be closer to jobs in the City, the Peckham and Nunhead Area Plan also needs to plan an infrastructure that addresses the needs of its existing residents and the children of its rate payers. The plan should include within its infrastructure plan Youth Hubs, Enterprise Hubs, Sports Centres, Arts and Cultural Centres, an evening and night economy to bring jobs in to the area to positively engage the tens of thousands of young people with low job prospects The current Peckham and Nunhead area plan falls short of addressing these growing challenges facing Peckham and Nunhead and needs to be addressed within the document if it is to be representative, fair and relevant to the whole of Southwa		community facilities that are currently under-used and requiring flexible community space in new developments so that different groups can share the spaces to meet a wide range of needs. This is to make the most effective use of new opportunities. The AAP's Infrastructure Plan sets out the plans already underway for new community facilities throughout the area, and also sets out that new facilities will be considered over the plan period when local needs are reviewed. Policy 2 provides support for the growth of the creative and cultural industry sectors in the area as well as new leisure and entertainment floorspace which will all help to diversify the mix of uses and increase the overall vitality of the area making a positive contribution to the day, evening and night-time economies. We have acknowledged that these uses also boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The AAP identifies the proposals sites where new arts, cultural, leisure and entertainment space should be accommodated, however there will be opportunities to provide suitable space on other sites as development schemes come forward.
29	912	Starlight Music Academy	Duffus	Shanice			Starlight's Request On behalf of the needs of young people in Peckham and Nunhead and towards creating a fairer community where all sections of the community are catered for within the Plan, it is proposed that: 1 The needs of young people are more adequately addressed within the area plan to address the growing trend of high unemployment levels amongst this group		The AAP has looked at the needs of all the different groups to ensure the plan reflects the needs of the community whilst also being deliverable. We have worked with many different groups to prepare the plan including schools and youth community councils. We have also prepared an equality analysis alongside the preparation of the AAP. The equality analysis examines how the AAP meets the needs of the whole community and makes sure that the AAP does not disadvantage anyone in the

Representati reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									community. It looks at the impact of the AAP on the nine groups with protected characteristics, including age. Many of the policies should have a positive impact on young people, including policies promoting more shopping floorspace, more business floorspace and encouraging better use of existing community facilities.
	30 912	Starlight Music Academy	Duffus	Shanice			Starlight's Request On behalf of the needs of young people in Peckham and Nunhead and towards creating a fairer community where all sections of the community are catered for within the Plan, it is proposed that: 2 The needs of young Black people are specifically addressed in light of statistics which evidence trends of high unemployment increasing and long term unemployment growing amongst this group		We have carried out an Equalities Analysis alongside the AAP which examines how the AAP policies meet the needs of different groups and does not disadvantage any one group. We have recognised that certain groups may experience discrimination in accessing employment opportunities such as members of the BME community (especially young black people). The AAP promotes the generation of new jobs and businesses in Peckham core action area, Peckham town centre and Nunhead local centre by supporting the provision of new business and retail floorspace. This will provide important local jobs and training opportunities This approach benefits all as it will create local jobs which all members of the community will be able to access. Providing a wider range of employment opportunities may be particularly beneficial for all young people. We are also able to securing section 106 funding for employment training from new schemes. Local employment and training projects will help to ensure that local people can access sustainable jobs and share in local economic growth. This will help to reduce inequalities, both social and economic, and to create a fairer future for all residents. The AAP strategy is linked and supported by the Council's Economic and Well-being Strategy 2012-2020 sets out borough wide objectives for employment in Southwark, and in particular, narrowing the gap with

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									the London employment rate. The strategy specifically acknowledges that young people are suffering disproportionately the effects of the recession It sets out that the council's commitment to also work to ensure better co-ordination of the many different efforts to help young people into work, increasing engagement with employers and skills providers and promoting a better understanding of how study and training leads to jobs. Also to respond to the changing nature of the economy and young people's increasing interest in self-employment and starting up their own business. In particular the strategy sets out that the council will work with partners to get more employers engaged, helping more young people with work experience, tasters and getting the softer skills essential for the workplace, and mentoring towards careers and business ambitions. The strategy recognises and builds upon the existing programmes and initiatives which provide support for youth such as the Southwark Youth Training Initiative and the Youth, commissioning IAG (Information Advice and Guidance) programme.
31	912	Starlight Music Academy	Duffus	Shanice			Starlight's Request On behalf of the needs of young people in Peckham and Nunhead and towards creating a fairer community where all sections of the community are catered for within the Plan, it is proposed that: 3 Starlight Music Academy is included as an Arts and Cultural Hub within the plan. Its 15 years experience of working with young people in Southwark places it at the forefront of addressing the needs experienced by young people and it has the skills needed to effectively work with this group.		It is not appropriate to identify Starlight Music Academy within the AAP. The AAP does not provide funding for new development. The only community facility that the AAP specifically identifies is the Nunhead Community Centre which is a project with agreed funding. Furthermore with our adopted Core Strategy (2011) we already set out our borough-wide policy for community facilities – which includes facilitating a network of facilities that meet local need and ensuring flexible community spaces that can be shared by many groups. Within the AAP we set out that facilities should be located in Peckham core action area, or where there is a need

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									outside the core action area in accessible locations.
32		Starlight Music Academy		Shanice			Starlight's Request On behalf of the needs of young people in Peckham and Nunhead and towards creating a fairer community where all sections of the community are catered for within the Plan, it is proposed that: 4 The site of the old Wooddean that formally provided 316 council homes and which under the development is planned to provide 360 new private homes (page 173) should also include an Arts and Cultural Centre facilities therefore 'Required Land use' include the classification 'Class D' to allow for the facilities.		It is not appropriate to include D Use Class as a required use for this site as our aspiration for this site is to deliver new homes and some retail, to replace the majority of the homes originally on this site. The proposed site allocation (PNAAP 5) for the former Wooddene estate therefore requires residential use and retail use on the site. D Use Class is included within the site designation as an "other land use that would be acceptable", and so allows the provision of community use on this site providing housing and retail is also delivered. It is also not appropriate to include Class D as a required land use for this site, as we must be able to show that the required land uses are deliverable. The council are already in a agreement with Notting Hill for Notting Hill to deliver this project and an application is expected early 2013. Furthermore, the AAP identifies two specific areas as the focus for new cultural activities in Peckham and Nunhead: in and around Copeland Industrial Estate and in and around Peckham Square. The former Wooddene estate site is not an appropriate location for focusing more Class D use, as it is not within either of these specific areas and is also not within the town centre.
33	912	Starlight Music Academy	Duffus	Shanice			Starlight's Request On behalf of the needs of young people in Peckham and Nunhead and towards creating a fairer community where all sections of the community are catered for within the Plan, it is proposed that: 5 Any consideration for additional housing on the former Wooddeen site over and above the 360 new homes planned, for example the new 15 story building (page 173 of the Peckham and Nunhead Area Plan) should include a high propensity of one bed affordable social housing for young sofa surfer homeless group.		The existing borough-wide and draft AAP housing policies apply to this site. The 360 new homes is an indicative capacity and not a maximum target number of homes for this site. All our housing policies seek to maximise the amount of homes delivered to meet our housing need. It is therefore not appropriate to change the site designation to require a propensity of one bed affordable social housing as that would not be the most effective solution to work

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									towards meeting our identified housing need. The policies as drafted in the AAP, require a minimum of 35% of the new development to be affordable, with minimum requirements for 2 bed and 3 bed plus units, to seek to meet the housing needs identified in our housing studies.
32	4 912	Starlight Music Academy	Duffus	Shanice			Starlight's Request On behalf of the needs of young people in Peckham and Nunhead and towards creating a fairer community where all sections of the community are catered for within the Plan, it is proposed that: 6 The site of the former Acorn Housing office is designated at 'Class D' to allow the Notting hill Developers to develop this building for community use under S106		The draft proposal site policy for PNAAP 26 already sets out that community use (Class D) or residential (Class C3) is a required land use. This provides the flexibility for the site to be developed as either a mixture of the two uses, or solely community use or residential use. In accordance with Core Strategy policy 4 there needs to be a local need and an identified occupier for a community facility.
36	5 912	Starlight Music Academy	Duffus	Shanice			Starlight's Request On behalf of the needs of young people in Peckham and Nunhead and towards creating a fairer community where all sections of the community are catered for within the Plan, it is proposed that: 7 The Peckham Cinema is maintained and that the cinema multi story car park (page 165) which has the potential to include leisure and entertainment facilities on two floors above the cinema to create a leisure complex in Peckham similar to Hippodrome Leicester Square comprising of bars, gaming, high end restaurant, lounge, entertainment, cabaret theatre, potentially bringing in businesses, tourists as well as an evening and night economy and much needed jobs for young people in Peckham.		The AAP sets out that we will encourage cultural use in and around the centre of Peckham town centre in and around Peckham Rye Station and Copeland Industrial Park, and in and around Peckham Library and Eagle Wharf. The draft site allocation for PNAAP 2: Cinema/multi-storey car park already requires leisure/community use (Class D) as a "required land use" on this site. This could include a cinema. The draft site allocation for PNAAP 2 also sets the requirement to retain a cinema in Peckham town centre. Similarly draft policy 2: Arts, culture, leisure and entertainment, sets out that we will continue to support the provision of a cinema in Peckham town centre, and that we will promote the development of additional arts, cultural, leisure and entertainment floorspace in a number of locations. The existing cinema below the multi-storey car park is currently leased to a cinema provider who run the cinema. The cinema and multi-storey car park are on the council's long-term

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									disposals list for redevelopment, but in the meantime the council has allowed interim uses to take place within the multi-storey car park.
36	912	Starlight Music Academy	Duffus	Shanice			Starlight's Request On behalf of the needs of young people in Peckham and Nunhead and towards creating a fairer community where all sections of the community are catered for within the Plan, it is proposed that: 8 The former Nunhead Nursery proposal for a new community centre should include plans for an adjourning Youth Enterprise Hub that allows access and use by young people who are the largest unemployed group in need of employment in Southwark.		Proposed site allocation PNAAP 12: Nunhead community centre and housing (formerly Nunhead Early Years Centre) sets out our requirements for this site. We propose no further changes to the wording. The council had carried out intensive consultation on the new Nunhead community centre site over the past 12-18 months. A planning application is expected to be submitted in Spring 2013, which will take into account the comments received through the consultation process on the site.
37	912	Starlight Music Academy	Duffus	Shanice			We need to keep a grip on the young people we are trying to work with, we need a stable location, these successive moves experienced by Starlight and lack of opportunities for young people in the Plan are potentially destructive storing up future problems for the area. It also hampers our efforts of building the employability and social skills of our young people in Peckham and Nunhead.		The AAP has looked at the needs of all the different groups to ensure the plan reflects the needs of the community whilst also being deliverable. We have worked with many different groups to prepare the plan including schools and youth community councils. We have also prepared an equality analysis alongside the preparation of the AAP. The equality analysis examines how the AAP meets the needs of the whole community and makes sure that the AAP does not disadvantage anyone in the community. It looks at the impact of the AAP on the nine groups with protected characteristics, including age. Many of the policies should have a positive impact on young people, including policies promoting more shopping floorspace, more business floorspace and encouraging better use of existing community facilities.
38	149		Conn	Eileen			The following schedules set out our objections to the PNAAP. They are set out by topic, soundness test, and an explanation as to why the part of the PNAAP is not considered sound. The relevant paragraphs or section numbers are provided where relevant, unless the objection is to the PNAAP in general or one of its themes, in which case these are referred. In certain cases I have provided suggested amendments, and would be prepared to suggest wording in other instances too"		Noted. Officer responses are provided for each of the detailed representations.
39	149		Conn	Eileen		3.1 Vision Para	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND in a number of	I can provide	The AAP retail and business

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
					3.1	effectively ensure that the town centre will meet the diverse needs of local residents The vision (3.1) is to meet the needs of the diverse community, which is acknowledged it does not do currently as many residents within the local	suggested alternative wording which could improve the PNAAP for the comments above.	policies set out the overarching framework to promote change in the town centre. Policy 1 sets out the promotion of a range of uses and sizes of units and Appendix 6 promotes new retail uses on proposal sites in the town centre. Policy 2 promotes a greater range of uses, including arts, leisure and entertainment. Policy 4 sets a restriction in the number of A5 hot food takeaways in the town centre. Policy 5 recognises that markets in the Peckham town centre can increase the variety of retail provision. Support for the provision of street markets in town centre locations is set out in both the NPPF and the London Plan. All of these strategies will work together to increase the variety of shops and other town centre uses over time. 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. However, national planning legislation, 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 and pay day loan shops are classified within the A2 use class, this means that any restaurant or takeaway can become one of these uses 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. We have continued to lobby the government to change the legislation to put

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									betting shops into a use class of their own to have more control over this type of use in town centres.
40	149		Conn	Eileen		Para 4.2.10	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND in a number of respects for example Centre of Town (4.2.10) The Preferred Option version said 'we want to promote Peckham Square as the focus for cultural events in the town centre(para 4.2.10) This version has softened that to 'we want to promote Peckham Square as a focus for cultural events in the town centre(para 4.2.12).' This is a welcome shift but it is still not clear that the plan gives enough weight to the significance of the creative cluster around the central part of Rye Lane. So the plan to continue to promote the northern edge of town as a cultural centre might be ineffective, or go against the grain of the organic developments and not be sustainable.		We consider the AAP provides sufficient support for the existing creative and cultural uses in the town centre and seeks the expansion of these uses, identifying proposal sites in the central part of Rye Lane (PNAAP 6, PNAAP 4, PNAAP 3) where new uses could locate within the redevelopment/improvement of these sites. The supporting text to the policy acknowledges the area around Peckham Station, along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. With regard to Peckham Square, this is currently not used to its full potential and we seek to promote more active use of this area, given that the square is occupied by the Peckham library and the Peckham Pulse leisure centre.
41	149		Conn	Eileen		4.2.16	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND in a number of respects for example Evening & Night Time economy (4.2.16) The PNAAP appears to promote a night time economy as desirable for the town centre's future. This is distinct from the evening economy which is appropriate to the setting of Peckham town centre in a residential area. However a night time economy is not appropriate to what is in effect two shopping streets embedded in a fully residential area of small domestic houses. It is not effective nor sustainable to encourage night time uses which are likely to lead to conflict and stress for business operators as well as residents. Night time economic uses should be exceptions and not the rule. This was accepted at an earlier stage of the PNAAP consultations but has crept back into the submission version, without reservations or qualifying comments. An additional issue is the ineffective process for controlling new licensed premises. Page 31 after para 3.1.2 in Vision section says 'there will be careful management ofthe pleasantness of the surrounding residential neighbourhoods. This includes continuing to control the number of new licensed premises.' However the council has no links between the planning enforcement records of noise disturbances and the noise control team. The latter seems to be the only record to be used by the Environmental Protection Team for checking the history of noise nuisance when considering license applications. This indicates that the continued lack of joined up working in records in the council means that the process of controlling licensed premise applications is not effective.		The town centre is not well used in the evenings and night-time, contributing to safety and security concerns, which have been raised through our consultation. Policy 2 promotes a range of new uses in the town centre, including day, evening, as well as night time economy uses to help boost the local economy and create more of a balance. Our strategy is supported by London Plan Policy 4.6 which states that boroughs should identify, manage and coordinate strategic and more local clusters of evening and night time entertainment activities to address need. We have made clear in the AAP that 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. Our consultation on the AAP has

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									shown that people would like to see more cafes and restaurants in the town centre. We have acknowledged in the APP that careful consideration needs to be given to mitigate any potential negative impacts associated with evening economy uses to protect the amenity of nearby residents. Our saved Southwark Plan policies will also be used to assess amenity considerations, which can include the number of licensed premises in one location. The steps the council can take with regard to noise disturbances are set out in the Environmental Protection Act 1990. The noise and licensing teams are both within the Environment department.
42	2 149		Conn	Eileen		4.2.19	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND in a number of respects for example Protected shopping frontages para 4.2.19 The map showing protected shopping frontages omits the shops in Peckham Hill St, and the turnings off Rye Lane: Atwell Rd, Parkstone Rd, Choumert Rd, which are an integral part of the town centre. They are therefore not effectively protected and as no reasons are given to omit them it is not justified to exclude them.	The map showing the protected shopping frontages should include all current shops. I can offer a map showing the shops that are omitted, and should be included.	Comments noted. At this final stage it is too late to consider these proposed changes and we think based on our evidence that the boundary of the town centre, as consulted on throughout the AAP process is justified. We will review the schedule of protected shopping frontages borough-wide through the New Southwark Plan preparation process.
43	3 149		Conn	Eileen		4.2.27	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND in a number of respects for example Street markets Policy 5 (4.2.27) Street markets can have the benefits that the PNAAP outlines but the Plan gives no indication of how the council will improve its management of the street markets which currently often do not 'enhance the economy of the area' (4.2.27) because of their negative effects on the environment for example they exceed their pitches with negative effects for the surrounding retail units and are poor at managing their waste.	I can provide suggested alternative wording which could improve the PNAAP for the comments above.	The AAP is a spatial plan and it would not be appropriate for the AAP to provide details on the management of street markets. The adopted Street Trading and Markets Strategy (2010) sets out objectives for the improvement and management of street and market trading. The Retail and Employment background paper sets out further detail to the benefits of markets.
44	149		Conn	Eileen			I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND in a number of respects for example Creative industries: it does not adequately cater for the role of the creative industries as an emerging but still young part of the local economy. The PNAAP rightly identifies the creative industries as significant for Peckham. It does not however acknowledge sufficiently their emergent stage and the early stages of development of this significant strand for the future of the local economy. Most of the cultural, artistic and creative small enterprises have grown in low rent and flexible adaptable accommodation in the centre of Peckham. They are showing the potential for providing a major rejuvenating effect for the local economy through their web of connections, which is mostly	possible new section in the PNAAP might be something like this: "The Council will ensure that creative and cultural uses are	The AAP vision for Peckham promotes a mix of uses and activities, both social and economic, in the town centre and this is carried through into the objectives and policies within the AAP. The policies will help to deliver (E4) of ensuring development in town and local centres supports successful

Representation			Surname		Main				Officer response to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	representation
							invisible below the radar of public agencies. This is because it is an industry based on personal individual skills and entrepreneurship, and the complementary relationships and activities that develop between people occupying the same local economic niche. These kinds of enterprises can take root only in low rent and adaptable accommodation, and need to be protected from redevelopment disturbance. The PNAAP does not show how the redevelopment plans will ensure that this kind of accommodation continues to be available in Peckham town centre, and how the current enterprises which are incubating the new creative industries can be protected from inadvertent destruction. Please see also the comments in relation to the existing enterprises in the Copeland Industrial Park (site 4) and The Arches (site 6) where there are examples of incubating spaces and the delicate web of connections that can be easily destroyed. These enterprises are some of the roots of a new and exciting strand of local economic life in Peckham with the promise of a wider and more fulfilling set of life and work choices for local people, the basis for a genuinely sustainable local economy. Achieving this is essential to a successful PNAAP. But without considered and explicit methods of protecting the small creative enterprises at the heart of this web of economic activity, there will be no roots and no vibrant cultural and creative industries. The PNAAP also does not show that it has taken into account enough the growing National consensus that town centres need to change from being retail centric to a more integrated collection of social and economic activities. The emerging creative industries in Peckham together with its many vibrant small independent retailers provide the possibility of being at the leading edge of these wider social and economic developments. But they need nurturing and the PNAAP does not show how this will be achieved.	support the provision of new facilities. To deliver this, the Council will: a. permit new, and the expansion of existing, creative and cultural uses which predominantly serve, or which provide significant benefits to, Borough residents, b. apply the following sequential approach: i. protect land and/or buildings where the current use is or the last use was a creative or cultural use, for re-use for the same, similar or related use; ii. permit the change of use of land and/or buildings where the current or last use was a creative or cultural use from one creative or cultural use from one creative or cultural use which predominantly serves, or which provides significant benefits to Borough residents and where it is demonstrated that there is a greater benefit to the PNAAP area resulting from this change of use; iii. permit enabling development on land	business of different types and sizes including offices, workshops and creative industries. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2 identifies the proposals sites where new arts, cultural, leisure and entertainment space should be accommodated, however there may be opportunities to secure suitable space on other sites as development schemes come forward. Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. Through draft AAP Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily.

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
45		Conn	Eileen	Policy 7		I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND BECAUSE Provision for community uses: The Plan is not effective in ensuring that it provides adequately for community needs for meeting places and information centres. As a community group we are well aware of the constant and difficult search for places for community meetings and events in the town centre. We are	wording which could	Core Strategy policy 4 sets out our borough-wide approach to the provision of community facilities. It states that we will facilitate a network of community facilities to
						not aware that there has been any detailed audit with local groups of community needs or the supply of available spaces. The Plan can be effective only if it is based on well researched evidence of provision and need. Also, all developments should include community uses in their design. There is increased pressure on available spaces in the town centre as it is host to an increasing number of religious uses of premises and the plan does not have an effective method of controlling them as it relies on 'regional' policies over which it has no control (4.3.4). There needs to be a limit on the proportion of premises in the town centre allowed to be used for religious purposes so that a proper balance is maintained with other community uses as well as retail and other commercial and business uses. There is a severe lack of places to display accessible information about Peckham and the town centre, and unfortunately the Peckham Library is not designed for this. How to stimulate the provision spaces for information display centre(s) needs to be provided for in the PNAAP. Policy 7 should include a provision that all developments in the town centre should include some community use provision, as well as the provision of public toilets. The town centre has only one public toilet which is so unpleasant few people use it. This is wholly inconsistent with much of the aims of making the town centre a good place to shop, visit and work as it leads to a proliferation of public urinating. The PNAAP must address the absence of this key town centre facility effectively for much of the rest of the plan to succeed.		meet a range of needs and will ensure that development incorporates flexible community space where there is an identified need and an occupier. Policies in the Area Action Plan will help to deliver the Core Strategy policy in Peckham and Nunhead. Community uses (D class) have been included as 'required' or 'acceptable' uses on 18 of the 33 development sites identified in Appendix C. This includes all of the sites that currently have such usesoffering a degree of protection- and all of the large development sites in the town centre. The provision of new facilities would be subject to the conditions referred to in the Core Strategy; having a known occupier for the space with a clear management plan demonstrating that their use of the space is sustainable. To require community space on all sites without this

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								information being provided could lead to a host of underused and vacant spaces and would not be
								consistent with the NPPF soundness tests on ensuring that the AAP is justified and effective.
								The AAP sets out that a new community centre is to be provided
								in Nunhead to address an identified local need, whilst in Peckham, our
								infrastructure plan highlights that the Library will require significant investment over the lifetime of the
								plan if it is to adequately accommodate the increased usage
								that growth will bring. Further funding could be forthcoming
								through our proposed Community Infrastructure Levy for projects that meet an identified need over the
								lifetime of the AAP. Faith premises are part of a broad use class (D1)
								that includes a range of community uses. Within this use class, we cannot differentiate between
								different types of facility in principle, although we consider the
								relative impacts of different facilities. For example, at the
								Preferred Option stage, we added some text to the supporting text to policy 13 – The road network
								(paragraph 4.4.12) to emphasise that traffic impacts will need to be
								closely monitored as proposals for new community facilities. Such issues would need to be
								acknowledged and addressed in a transport assessment. We are not
								reliant on regional policy in relation to faith premises, but we acknowledge in the Core Strategy
								that the provision of faith premises should be considered regionally
								because of the scale of operation and the fact that congregations will
								often travel long distances to reach particular premises. Information boards exist at the libraries, at
								Peckham square, Peckham Pulse and at train stations in the Action
								Area. Whether they are sufficient is too detailed an issue for the AAP,

F	Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
										but could be considered as part of improvements to Peckham Library and the development of new community centre in Nunhead. The provision of public toilets is covered by existing planning policies. Saved Southwark Plan policy 1.7 states that where development takes places in town centres the council will consider the provision of amenities, including public toilets where appropriate.
	46			Conn	Eileen		4.4.2	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND BECAUSE Managing the traffic network to improve access to the town centre and improve network efficiency. (4.4.2 T6) This fails to take into adequate account the particular needs of local residential roads. We already know that the prevailing tendency now is to remove one way systems, and this appears to be obscuring the need to examine particular problems in a local part of the network to consider less dramatic changes to resolve the safety issues, which would also probably be less costly. This approach needs to be encouraged where it solves pedestrian and safety issues.	wording which could improve the PNAAP	The objective referred to is one of seven objectives that address important transport issues in the action area. These objectives are consistent with those of our Transport Plan, which goes into much greater detail about the priorities for transport and travel in the borough. The Transport Plan states that as well as prioritising investment in our town centres (policy 3.3), we will also create places that people can enjoy (policy 4.2) and help communities shape their street (policy 4.3). These policies help to shape investment in transport and traffic infrastructure throughout the borough, for instance, they inform our annual funding bids to TfL and our priorities for funding through s106/CIL. Our approach to transport and traffic is more holistic than addressing one way systems in isolation. This is reflected by the fact that the AAP contains transport policies that refer to active travel, the road network, public transport and car parking, all of which are intended to relieve pressure on the road network in some way; creating a more sustainable, efficient transport system and a more pleasant town centre environment for residents, workers and visitors.
	47	149		Conn	Eileen	Policy 12		I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND BECAUSE Policy 12 Public Transport The two priorities for the Bakerloo extension and the cross river tram are laudable. But they are likely to be longer term and there are two others that should be listed as high priority and achievable in the PNAAP timescale. These should be added: 3. Improving the rail services through the local stations so that there are services connecting with the Underground and	wording which could improve the PNAAP	The Bakerloo line extension and Cross River tram are named since significant development would be required should the proposals come to fruition. The Bakerloo line extension is identified in the

remote number of the policy programment of the control	tion Objecto		Surname		Main	_			Officer response to
same 7 days a veste coverage. 4. Increasing the bus routed period not help the problem and osast Cambroell between Pechanism from control and help CRI. Regulation 128 list of process we could like to Ayesbury area on their way to the Elighant & Castle and beyond. CRI. Regulation 128 list of which is a list of process we could like to the control of				First name		Paragraph	Details of representation Prop	oposed changes	
Peckham Town Centre loading Because of the limited rear access to commercial suggested alternative need to demonstrate that their premises, loading in the main shopping streets remains a necessity. The loading wording which could schemes can be safely serviced	48 14	9	Conn	Fileen			same 7 day a week coverage. 4. Increasing the bus routes going through north Peckham and east Camberwell between Peckham town centre and the Aylesbury area on their way to the Elephant & Castle and beyond.		and we have identified it within our CIL Regulation 123 list (which is a list of projects we would like to spend CIL monies on). We also remain committed to the Cross River Tram, or, should that not be delivered, a high quality alternative. The suggested amendment to refer to the regularity of rail services is an operational decision that cannot be influenced through planning policy; no development would be necessary to bring about these changes. However, the council does lobby train operators on services in the borough and recently submitted responses to the Thameslink and Southeastern franchise consultations in December 2012 setting out the need to improve services on the lines. Wording was added to the supporting text of Policy 12 at the Preferred Option stage to note that the council would be lobbying for improved services to mitigate the loss of the South London service between London Bridge and Victoria. Policy 12 states that we will work with stakeholders to improve public transport and this is not limited to the two schemes mentioned above. Improving the efficiency, regularity and quality of bus services is a priority of the council. Paragraph 4.4.7 already emphasises the importance of bus links in large parts of the action area. The issue is also highlighted in the Council's Transport Plan in Policy 3.1. As with rail services, such improvements tend to come through lobbying and negotiation with transport operators and transport bodies rather than directly through the delivery of planning policy.
satisfactory. Without a commitment to resolve this to the satisfaction of traders detailed in a transport assessment				55			Peckham Town Centre loading Because of the limited rear access to commercial sugge premises, loading in the main shopping streets remains a necessity. The loading arrangements for both the shops and also the shoppers is still far from	gested alternative ding which could rove the PNAAP	need to demonstrate that their schemes can be safely serviced and that we will expect this to be

refe		Objector reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								and the local community the PNAAP will be very defective in its attempt to improve Peckham town centre		There are limitations to what can be achieved because of the close-knit buildings in the main commercial area, such as along Rye Lane. However, the redevelopment of some of the major sites in the core action area, including the Aylesham Centre (PNAAP1), the Cinema (PNAAP2) and Copeland Industrial Estate (PNAAP4) could provide opportunities to consider the issue in more detail. Where there is less opportunity for change because of the nature of the physical environment and existing buildings, we will require applicants to demonstrate that any impacts on the road network can be minimised. Specific issues will be considered as individual planning applications are considered as part of the development management process. Planning conditions or legal agreements could be used to help reduce impacts on the road network where they are identified.
	49	149		Conn	Eileen		4.6 Theme 5	to reduce carbon emission and pollution from food transporting. The London	I can provide suggested alternative wording which could improve the PNAAP	The Peckham and Nunhead AAP recognises that open spaces can provide space to locally grow food. Policy 19 of the AAP sets out a requirement for all major developments to contribute to food growing opportunities. The provision of allotments and other food growing opportunities is predominantly a borough-wide issue and the open space strategy sets out further information on how we will encourage food growing opportunities across the borough, including promoting food growing on both existing protected open space and housing amenity land. We will review our policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year.
	50	149		Conn	Eileen		Theme 6	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND BECAUSE The important views from the roof of the Bussey building and the multi storey car park		No change. A townscape view from a private building cannot be

Representation Objector reference Organisation First name Palicy Paragraph Details of representation	Proposed changes	Officer response to
	al ed by AAP e I can provide suggested alternative wording which could improve the PNAAP wording which could improve the PNAAP ws consists by rey as at oes ding ure of m	designated under the AAP or wider planning policy, as London Plan policies 7.11 (A) and 7.12 (E) state that viewing places should be publically accessible. Furthermore, whilst the view from the roof of the Bussey Building is considered characterful, it does not have the required level of significance to warrant designation. The AAP urban design study has identified and assessed a number of locally important views area as part of a robust methodology to assess the potential impact of taller buildings within into the core action. The safeguarding of these views will be protection under the urban design policies within the AAP alongside any conservation area design study sets

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									Plan (Policies 3.11, 3.12, 3.20, 4.1, 4.2, 4.3, 4.4, 4.5) and the Core Strategy (Policies 5,6,7,8,12).
52	149		Conn	Eileen	Policy 23		Policy 23. However it does not have a convincing approach to enforcing an overall approach to design and the series of separate projects which affect the public realm. Another factor which has a dramatic affect on the quality of the public realm is not addressed at all in the PNAAP. This is the need for joined up well planned and integrated management and maintenance of the public realm. This needs a sound plan for joining up the work of the different parts of the Council, and also the council with other public agencies and private bodies which have an effect on the public realm. The absence of such an agreed plan means that much of these other public realm policies will be ineffective in producing a serious improvement in public realm which is needed for the success of the plans for the town centre.	improve the PNAAP	The suggestion of a public realm management agency is outside the scope of the AAP. However, the council has adopted a borough-wide economic well being strategy (2012) that seeks to achieve thriving town centres and high streets. For example, the council will be working with partners to help businesses to develop their own networks and establish a voice in Peckham, so that they are enabled to play a greater role in community life such as investing in the public realm and partnering with the voluntary and community sector. The AAP will improve the quality and extent of public realm within Peckham town centre through policy 23 and the requirements set out in the site specific guidance in Appendix C. Public realm improvements will also be achieved through partnership working as illustrated by the projects outlined in Section 7 of the AAP, such as the Townscape Heritage Initiative.
53	149		Conn	Eileen		Character areas	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND BECAUSE These Character Areas first appeared in the weeks leading up to the Preferred Options consultation in early 2012. There appeared to be one rushed event at Peckham Library which was a poor way to attract people from all the individual neighbourhoods covered by the character areas. This means that it Is based on external consultants' investigation at a very late stage, when to be effective it should have been part of the consultation process much earlier and not such a late thought. There needs to be further work with the people in the neighbourhoods in each of these character areas to produce a description of their area which comes from their understanding of the neighbourhoods that make up the character areas so that these external consultants' created descriptions are used only as a first step and not the last word.	wording which could improve the PNAAP We are investigating whether the process that has relied on late introduction of evidence is	Consultation on the AAP has been carried out in accordance with our adopted Statement of Community Involvement (2008) (SCI) and exceeds the requirements of the regulations. We have frontloaded our consultation, carrying out extensive consultation with many different groups, particularly at the earlier stages of the plan preparation. Our consultation report summarises the consultation we have carried out. We have consulted fully on the character area policies, which have been present (in various different forms) since the "towards a preferred option" stage of consultation. We have developed the policies for the character areas throughout the earlier informal stages of consultation, and finalised the

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									policies in the publication/submission version of the AAP. The "towards a preferred option" (May 2011) consultation introduced the idea of character areas to the draft AAP - with section 3.3 to 3.8 setting out our emerging strategy for each of the areas. We further developed the character area policies in the "preferred option" (February 2012), as well as making public the Peckham and Nunhead characterisation study (March 2012). The characterisation study is a detailed study looking at the character of the whole action area to ensure a full understanding of the areas' characterisations. As part of the preparation of the study, our consultants carried out a consultation event in Peckham to engage the local community and gauge their views to feed into the study. Appendix 2 of the study summarises this. We also have a number of other urban design and heritage studies and background papers, including conservation area appraisals and our urban design background paper and urban design study - all of which were made available for comments before or at the formal stage of consultation on the publication/submission version. The character area boundaries as they are now presented in the publication/submission version of the AAP have not changed since the preferred option consultation draft.
54	1 149		Conn	Eileen		5.4 Character area Peckham South and figs 19 and20	divides the Peckham South character area in two by the way the boundary is drawn in the south west corner. The Character Area policy will not be effective as it fails to identify the Character Area correctly. The Preferred Options version was the first time this boundary has become an issue because of the (welcome) inclusion now of planning 'character areas'. This division of our neighbourhood is however very unwelcome, and a contradiction of the idea of a character area. The line for Peckham South follows the boundary between The Lane ward	a map showing the redrawn boundaries, and I can provide suggested alternative wording which could improve the PNAAP	The boundary for the AAP has been set out since the issues and options consultation in 2009 covering the majority of Peckham and Nunhead community council area. This is set out in section 1.2 of the publication/submission AAP. We introduced the idea of character areas into the "towards a preferred option" consultation in 2011. At that time we proposed five

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Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number	Organisation		First name	policy	Faragraph	Details of representation	Proposed changes	representation
							following this boundary, set for electoral administrative purposes, excludes the		character areas: Peckham town
							streets in the south west half of the Bellenden area, to the south or west of part		centre, Queens Road, Peckham
							of Adys Rd, Maxted Rd, Bellenden Road, and Avondale Rise up to East Dulwich		neighbourhoods, Nunhead town
							Rd and Grove Vale, and excludes also the major Open Space in this neighbourhood called Goose Green. These excluded streets are in the SE15		centre, and Nunhead and Peckham
									Rye neighbourhoods (shown in
							postcode area to the west of Rye Lane, and are part of the same Character Area		figure 8 of the "towards a preferred
							that is being called Peckham South. The designation of Peckham South as a		option"). Based on the feedback
							sub-area is its shared nature as a Character Area to provide a coherent picture		we received through consultation at
							of what the neighbourhood is like for planning purposes. A major part of the		this stage and our further work
							character area the PNAAP says (5.4.1) is **Bellenden Road which 'runs through		looking at the character of these
							its centre this street was part of the Bellenden Renewal Scheme which		areas, we amended the boundaries
							transformed the whole area the character area is mainly residential consisting		and names of the character areas
							of attractive Edwardian and Victorian terraces and villas with some later infill		at the "preferred option" stage. We
							development** Part of Bellenden Road in fact runs through the area now in		also made minor amendments to
							South Camberwell ward showing how arbitrary the ward boundary is, and thus		the Peckham core action area
							also that the Character Area boundary drawn in this south west corner is also		boundary (which has minor impacts
							arbitrary because it follows the ward boundaries and not the Character Area. The		for the other character area
							Bellenden neighbourhood is formed by the natural boundaries of the railway line		boundaries at the
							and the main roads Grove Vale, East Dulwich Road and Rye Lane. This includes		publication/submission stage. The
							all the Bellenden SE15 streets now in the South Camberwell ward. The renewal		south-west boundary of the
							scheme followed this natural boundary of the character area which has been		Peckham South character area has
							totally disregarded by the PNAAP. The boundary of the Bellenden area is shown		remained constant throughout the
							on the Bellenden Residents' Group website: http://www.bellenden.net Para 5.4.3		preparation of the AAP. As set out
							lists the open spaces in the Character Area and mentions the Goose Green		in section 5 of the AAP, our
							playground. But it omits any mention of Goose Green itself which is the major		characterisation study and urban
							open space in the neighbourhood; this Bellenden neighbourhood created the		design background paper informed
							Friends of Goose Green in 2007 precisely because Goose Green is in our		our decisions on how to draw these
							neighbourhood. This paragraph mentions Warwick Gardens as the only Open		character area boundaries. As set
							Space, ignoring Goose Green open space because that is just outside The Lane		out in the characterisation study,
							ward – in fact Goose Green itself is divided by this character area boundary, as		the boundaries are based on
							the Goose Green Playground is included while the open space is excluded.		common characteristics in terms of
							Goose Green is an essential part of the character area covered by Peckham		their townscape, development age
							South and needs to be mentioned, albeit even though it is for electoral		and form, topography and
							administrative purposes in the South Camberwell ward. It suffers from being at		landscape characteristics, as well
							the corner of four ward boundaries and three Community Councils. This		as land uses, barriers and edges.
							unjustified exclusion from our Bellenden neighbourhood is yet another		There will always be some
							disadvantage of being on the edge of administrative boundaries. These streets		overlaps between character areas,
							west of Rye Lane in this south west corner of the neighbourhood, and the Goose		as there are not always clear
							Green Open Space, all of which are part of the Bellenden Area, should be		precise boundaries, and these
							designated as part of the Peckham South Character Area so they are not spilt off		boundaries represent the most
							unjustifiably. Many boundary lines for administrative purposes are inevitably		justified boundary, based on our
							arbitrary as they are in this case. The only reason for this boundary for the		evidence base. The area referred
							PNAAP and thus the Character Area is the electoral administrative ward		to within South Camberwell ward
							boundary. This boundary for non-planning purposes should not get in the way of		lies within the Camberwell
							the important planning land use character area designation. These electoral		community council boundary, and
							administrative boundaries have not been allowed to get in the way of a character		planning guidance will be provided
							area designation in the adjacent wards of Peckham Rye and East Dulwich.		for this area in the forthcoming
							There the western part of the Peckham Rye ward between Peckham Rye		Camberwell supplementary
							Common and East Dulwich ward boundary has been included in the Dulwich		planning document. We already
							SPD because it is part of that character Area, in spite of the fact that it is part of		refer to Goose Green and
							the Peckham and Nunhead Community Council which apart from that section		Peckham Rye as important open
							provides the planning area for the whole of the rest of the PNAAP. The same		spaces adjacent to the boundary of
							logic that administrative electoral ward boundaries should not get in the way of		the Peckham South character area
				<u> </u>			pogra that dominionative electoral ward boundaries should not get in the way of		uno i communi codun character area

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							the designation of Character Areas, should apply to the streets in the Bellenden SE15 part of South Camberwell ward, so they should not be excluded for planning purposes from their natural Character Area. The description of the Character area should acknowledge the ward and Community Council boundaries, and point out that they divide the neighbourhood where the character area spans the ward and Community Council boundaries.		in section 5.4.14 of the AAP. There is no further need to amend the description.
55	149		Conn	Eileen		Peckham south character area	Omission of important traffic free feature. It unjustifiably omits an important feature of the character of Peckham South in describing the Character Area. There was no response to my proposal in my comments on the Preferred Option that they should be mentioned. The important feature that has been ignored is	important features in the Character Area	Although we acknowledge the importance of the two passageways in providing traffic-free links, they are of such small scale that we do not believe that they should be highlighted as a key characteristic of the Peckham South area.
56	149		Conn	Eileen		Sites in Peckham and Nunhead + appendix C	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND BECAUSE some of the proposals for some sites are not justified or are not effective or not sustainable. For example: Site 1 Aylesham Centre Site 10 Eagle Wharf 25 former Peckham library The common feature of these three sites is that they front onto the main town centre streets near the T junction of Rye Lane, High St and Hill St, and the same part of the town centre as the cluster of important historic buildings which are the subject of the proposed THI (HLF Townscape Heritage Initiative). Sites 9, 14, and 16 are close by and can be included in my comment. One of the key aspects justifying the THI proposal and the Conservation Area designation is the way in which the town centre contains a sample of buildings across the centuries in the evolution of Peckham from a rural village to a part of the inner urban fabric of modern cosmopolitan London. This requires an understanding of the integrated nature of the town centre which must be brought out and enhanced in the future restoration initiative. The PNAAP needs to link the development sites into this overall integrated plan. This northern area of the town centre has poor urban design –the public spaces between the different sites which have previously been developed at the town square, the Library, the Pulse, Burger King and Lidl, all linked together by a main road which has uncoordinated and excessive street furniture and no apparent design at all. The PNAAP needs to have an outline indication of how the public realm throughout this large T junction should be improved in relation to the historic restorations, the development sites, and the traffic management.	need to be made in the site specific guidance for these sites, as well as a new small section somewhere in the text of the sections related to public realm	The area wide AAP policies will be used alongside the proposals sites policies to determine planning applications. Together, and also along with saved Southwark Plan and Core Strategy policies, these policies ensure development considers the historic environment.
57	149		Conn	Eileen		PNAAP 2:Cinema/multi- storey car park	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND BECAUSE It does not provide for the potentially more appropriate and effective development of the building without demolition, based on its current successful uses. The last few years has demonstrated that Peckham is already tapping into and serving a	favours re-use of the building for cultural and creative	No change. The AAP sets out that we will encourage cultural use in and around the centre of Peckham town centre in and around Peckham Rye Station and Copeland Industrial Park, and in and around Peckham Library and

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							year and including all year round events. Similarly the cinema housed in the front of the building is a very successful multi screen cinema and very popular, as the PNAAP recognises with the local community. The cinema is independently owned and has ambitious plans for developing the offer on this site once it can achieve stability and confidence in its future location. The PNAAP's plan to relocate the cinema in a new development on this site is not effective as the disruption in cinema offer may be terminal for the business, with no certainty that another independent cinema could take its place on the redeveloped site or elsewhere. The PNAAP needs to be revised to ensure that there is no disruption in the cinema offer so that if the building is demolished an agreed location has already been developed and available for full cinema running with no timing gap. However, the cinema owners have plans to develop the offer on the current site, utilising part of the current car park structure. This is also the case with Bold Tendencies, the community company that runs the summer events programme. With refurbishment and appropriate redevelopment of the car park without demolition, Bold Tendencies could run an all year round programme, with a significant contribution to the local economy, and community. This alternative future for the site without demolition is more justified, effective and sustainable. *Justified: it is a satisfactory alternative plan for the more effective use of the site and building. * Effective: It is much more likely to deliver significant early and relevant economic gains to the stimulation of the local economy. It could be put into operation much more quickly than sale of the land to a developer who would start from scratch, and with the full and complete loss of all the current important economic activities on the site. * sustainable structure: the carbon emissions involved in demolition and rebuilding would be significant and unjustified. compared with those involved in remodelling and refurbis	demolition. This requires revision of: * the required and other land uses for PNAAP 2: residential use should not be required but be another possible land use. * Indicative capacity: residential capacity should enable there to be no residential units, though it is likely that a reuse of the building could provide some residential units. The ratio of leisure/community with residential and business would need revision. * Site specific guidance: - should give the presumption in favour of remodelling and refurbishment rather than demolition for the demolition option the potential for a 'taller' building should be scaled down to no more than the same height as the current building. [see comments on taller buildings] The comments in this section should be read in conjunction with those on sections 3.1 & 4.2 (1), 4.7, and sites 4 & 6. I can provide suggested alternative wording which could improve the PNAAP	Eagle Wharf. The draft site allocation for PNAAP 2: Cinema/multi-storey car park already requires leisure/community use (Class D) as a "required land use" on this site. This could include a cinema and/or other community uses such as those currently taking place over the summer. The draft site allocation for PNAAP 2 also sets the requirement to retain a cinema in Peckham town centre. The policies as word provide flexibility within the plan. Similarly draft policy 2: Arts, culture, leisure and entertainment, sets out that we will continue to support the provision of a cinema in Peckham town centre, and that we will promote the development of additional arts, cultural, leisure and entertainment floorspace in a number of locations. The existing cinema below the multi-storey car park is currently leased to a cinema provider who run the cinema. A decision has not been made on precisely what will happen on this site, including whether the existing building would be retained or demolished. Feedback from consultation and our own urban design studies and evidence do not suggest that the best solution is to retain the existing building as there is a very mixed view on the design of the building, and many people feel the site could be better used. The cinema and multi-storey car park are on the council's long-term disposals list for redevelopment, but in the meantime the council has allowed interim uses to take place within the multi-storey car park. This will continue to be the case, with the indicative timescale for redevelopment of 16-2020.
58	3 149		Conn	Eileen		PNAAP 4L CIP and Bournemouth Road			The proposals site allocations for this site set out a number of required uses including cultural/leisure/community uses (class D) and business use (Class

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							developments. What does it think will happen to them during the redevelopment, and what will be left after redevelopment? Linked with this is that there is no	sites 2 + 6. I can provide suggested alternative wording which could improve the PNAAP	B). The area-wide policies in the AAP support these uses seeking to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts, cultural, leisure and entertainment floor space and this includes this site. The AAP also seeks to encourage more business floor space. Draft policy 6: Business space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Appendix C, page 163 of the AAP sets out information on our estimates of capacity for the proposals sites, setting out the precise figures will be determined through planning applications. We have included reference within the site specific guidance for this site the aspiration to improvements to links west 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.
59	149		Conn	Eileen		PNAAP 6	the views of the small creative enterprises there. The site specific guidance is therefore incomplete and not effective or justifiable and the effects may not be sustainable. The Arches are occupied by small creative enterprises most of which have been there for over 20 years as successful local small businesses. They are part of a 'below the radar' interconnecting web of the local micro economy. This is part of the undergrowth that is giving rise to the creative	section should be read in conjunction with those on sections 3.1 & 4.2 (1), and on sites 2 & 4. Include in the site specific guidance, protection for the existing artistic creative uses of The	Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at

Representation of priestons in the procession of
economy. Until this submission version, the stell of include this western and of the Network Rail land. So plate to this are aver not consolided on and no price was able to bring these comments loward at learning stages. Since it has provided the part of included part of included in the first land to be the part of the stages of the part of included in the stages. Since it has been development alter they are now considering alternative butures for it. To protect the vulnerable raigile emerging fabric of the resisting creative uses of the stage o
This boundary has evolved through the AAP preparation, with earlier

Representation	Objector		Surname		Mein				Officer recues to
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									Court. We have amended this
									boundary for the
									publication/submission version
									through discussions with Network
									Rail to reflect the boundary of the
									land that they own and to provide
									more opportunities for
									redevelopment as new funding has
									arisen for this site. The council
									successfully bid for substantial
									funds from the Mayor's
									Regeneration Fun to add to our
									own funds to commit to delivering significant change to Peckham Rye
									Station and its setting. In terms of
									the detail of the possible
									redevelopment of the station and
									surrounds, section 7.2 of the draft
									AAP sets out information on the
									future transformation of the station
									and its setting. The site is owned
									by Network Rail, not the council,
									and so the council are working with
									Network Rail, Southern Railways
									and the GLA on this project, with
									the aim to deliver this project over
									the next four years. It is currently early stages of preparation, with
									feasibility work being carried out on
									the project. This is a separate
									piece of work to the AAP, with the
									AAP setting out the strategic
									aspirations for the site, and the
									detail to be worked jointly by the
									council, Network Rail, the GLA and
									Southern Railways. At this stage it
									is too early to determine which
									parts of the station and its settings
									will be redeveloped, so the AAP includes the whole of the site as
									part of its proposals site
									designation. Engagement with the
									local community will take place at a
									later stage in the development of
									the proposed scheme and planning
									permission will need to be obtained
									for future development.
									Consultation on a future planning
									application will need to be carried
									out in accordance with our
									Statement of Community
			_						Involvement.
60	149		Conn	Eileen		7.4.1	I CONSIDER THIS PART OF THE PNAAP TO BE UNSOUND BECAUSE	I can produce a paper	Our Consultation Report details the

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							Partnership working 7.4.1 The engagement of the community has not been deep enough and wide enough. If the future process reflects this past experience, it will not be adequate enough to genuinely engage the community as stated in 7.4.1 said to be necessary for effective and sustainable delivery. Some small groups of residents have been engaged over a long period and have been able to contribute to some aspects of the PNAAP, but this is a tiny fraction of the people who live and work in Peckham. Moreover they have constantly had to react to long complicated reports which are impossible to interest many of their neighbours in. If suggestions I made as long ago as 2003, in the consultations on the Peckham SPD in the then developing UDP, had been taken up we could by now have had neighbourhoods across Peckham and Nunhead thoroughly engaged in the parts of the PNAAP that affect their neighbourhoods and linking with the issues of most interest to them. This would have been a constructive way to link the natural local street level concerns of residents to the top down policy oriented, inevitably bureaucratic & legalistic, proposals in developing the PNAAP. That is what now needs to be done in relation to the delivery of the PNAAP. There needs to be a commitment in the PNAAP to work with the active residents in concert with the voluntary sector to devise a new way of engaging people which links their neighbourhood concerns and interests to the delivery of the Plan. This could lead to a meaningful partnership, rather than neighbourhoods having simply to react to bureaucratic reports and proposals coming from the top which is not an effective partnership. It is possible, but it needs a shift in approach. The approach to community engagement underlying this proposal is outlined in my paper published in 2011, available via the Third Sector Research Centre http://tinyurl.com/social-eco-system-dance-paper	outlining suggestions for how this genuine partnership could be developed, and from that a form of words could be devised to include in para 7.4.1	substantial consultation that has taken place as the AAP has been prepared. Consultation has ranged from attendance at community councils and meetings with Tenants and Residents Associations and local interest and faith groups, to having stalls at local festivals, presenting information through social media, radio broadcasts and through mailouts to a comprehensive database of contacts in Peckham, Nunhead and further afield. This has led to an extensive amount of feedback at each stage in the preparation of the AAP. In addition to informal feedback that was received at the initial vision stage and then subsequently at events, we have received in excess of 1,600 separate written comments on the emerging area action plan. The extent and range of our consultation goes well beyond statutory requirements and the requirements that we have set ourselves in our adopted Statement of Community Involvement (SCI). As noted in the above comment, delivering sustainable development in Peckham and Nunhead is an ongoing process and we will continue to work with groups as part of the determination of planning applications, as part of updates to our CIL infrastructure plan and on other projects and funding bids, as appropriate.
61	913		Chalmers				Supports the AAP.		Support welcomed.
62	209	NHS Southwark	Trouton	Alex	Policy 4		The National Planning Policy Framework states that 'local authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population including expected future changes, and any information about relevant barriers to improving health and well-being.' The Public Health Team have worked with Planning Policy to identify the issues impacting health, throughout the preparation of the AAP. This collaboration has enabled us to present the health needs of Southwark and provide information that an abundance of hot food takeaways (A5 units) is detrimental to the health of the population of Southwark. I'm sure you are aware of the high prevalence of childhood obesity Southwark, with over 42% of 10 & 11 years olds now overweight or obese. The Southwark prevalence of obesity is		Support welcomed. The prevalence of childhood obesity in Peckham and Nunhead is noted. A range of policies in the AAP acknowledge the role that the built development can play in influencing our opportunities for improved health and well-being. We also acknowledge the fact that there is particularly high prevalence of overweight and obesity in the

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	Humber						higher than both the UK and London average as documented in the PNAAP background paper. Within Southwark, Peckham and Nunhead both have high concentrations of children who are overweight/obese In Public Health we have: - Reviewed the needs of the population of Peckham and Nunhead - Listened to the views of local people who are concerned about the proliferation of takeway outlets Mapped out fast food outlets - Mapped out obesity prevalence based on the NCMP data - Mapped out levels of deprivation - Contacted schools and parents groups in regard to childhood obesity and fast food provision We have worked with the Planning Policy Team in Southwark to ensure that this data has been made available to them to inform the PNAAP. For this reason we feel the evidence is sound. In obesity research the term 'obeseogenic environment' (Foresight report, 2007) is often used to describe the modern environment of an abundance of energy-dense, cheap, convenience foods in combination with sedentary lifestyles leads to a high prevalence of obesity. The restriction of a5 units in combination with the 400 metre school exclusion zone in Policy 4 will be very effective, as one of the many tools which are needed to address the increase in obesity/overweight. We currently have Public Health Officers working with schools, community and faith groups to help promote activity and healthy eating to those who need it the most. This policy will enable Southwark residents to have a better selection of retail outlets on the high streets to ensure the information we provide on healthy living can be put into practice. From personal experience, I find that the pavements around these A5 units are often littered and after school hours are surrounded by groups of youths. The restriction of these outlets will also provide a more hospitable environment for the residents of Peckham and Nunhead to walk around their high streets, encouraging physical activity.		action plan area. Collectively, the policies in AAP will help to create conditions for improved health and well-being, by locating development in accessible locations, by improving the environment, by supporting active travel and by addressing overconcentrations of hot food takeaways.
63	539		Plodowski	Anna	Policy 1		Many sites in the PNAAP are proposed as suitable for redevelopment for retail purposes. For instance, the total retail space available at sites 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 13 and 19, should they be developed as proposed, comes to 6325 sqm. To have such a high volume of space for retail purposes is not justified because it is not well-based on relevant facts. Firstly, the PNAAP 4.2.4 states that only 16% of expenditure on comparison goods is spent within Southwark and that this indicates capacity to develop comparison goods shopping in Peckham Town Centre. However, this is not relevant information upon which to base the proposed retail re-development of Peckham Town Centre. Given that Peckham and Nunhead are part of the Greater London area, there are many high quality shopping centres outside Southwark to which Southwark residents could go. In order to develop a retail re-development of Peckham Town Centre, the PNAAP needs facts (a) about the destinations of these shoppers, not that many Southwark residents shop outside the borough for such goods and (b) about the capacity and performance of these other destinations. A PNAAP that is based on appropriate facts about what the market gap actually is can then be developed. Secondly, following the financial crisis in 2007/2008, the current economic climate is extremely challenging, and recent reports from the Bank of England indicate that this is likely to remain the case for many years, if not for one or two generations: http://www.bbc.co.uk/news/business-20585549 The likelihood that the PNAAP area can be significantly stimulated by another consumer retail boom is therefore extremely small. The PNAAP is therefore not justified in its expectations of consumer-retail fuelled economic development and consequently very unlikely to be effective.		One of the AAP objective's is to ensure that mixed use development in the town centre helps to increase the range of shops, restaurants and cafes. We have not set a target for the area, however identify that there are several sites where there will be capacity to accommodate new retail space. The capacity identified on the proposal sites in Appendix C is indicative only. Indicative capacities for each site are based on our own capacity work and background evidence. The estimates of capacities should not be interpreted as exact targets as the exact capacity will depend on the mix of uses and the amount of non-residential use, and compliance with other policies such as design policies. These incapacities are important to ensure that our housing target and possible capacities for retail and employment growth are realistic and achievable. This has helped us

Representation			Surname		Main			Officer response to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation Proposed changes	representation
								to plan for infrastructure growth to
								ensure that there is suitable and
								sufficient infrastructure to support
								the increase number of people
								living, working and visiting
								Peckham and Nunhead. The
								precise figures will be determined
								through planning applications. Policy 1 is evidenced through our
								Retail Capacity Study which is
								underpinned by the use of a
								household telephone survey and
								in-centre surveys to establish
								shopping patterns, town centre
								catchments and market share
								estimates for both comparison and
								convenience goods retailing. The
								household telephone survey results
								highlight Peckham and Canada Water as the main centres in
								Southwark for comparison
								shopping. These are reviewed in
								relation to key competing centres
								identified in the survey including
								Bluewater, Brixton, Bromley,
								Canary Wharf, Catford, Croydon,
								Lewisham and London (West-End).
								The assessment of each of the
								competing centres identifies the
								main retail offer and floorspace provision, and the extent to which
								this is likely to change and
								influence shopping patterns in the
								sub-region in the future. Our Core
								Strategy (2011) has identified
								capacity for retail growth
								throughout the borough, with some
								growth identified for Peckham. The
								draft AAP has a plan period for 15
								years and needs to maintain
								flexibility in the policies, however it also must set out a vision and
								objectives for the future growth of
								the area, which includes retail
								growth.
64	539		Plodowski	Anna	Policy		In relation to waste, the PNAAP is neither justified nor effective. It is not justified	This is a borough-wide issue and
					22		because it is not based on evidence from participation with the local community.	covered within existing borough-
							For instance, evidence from community activities in which Peckham Power has	wide planning policies. Our
							been involved show that people do not save items for re-use or recover them for	approach to waste and refuge is
							novel uses if there are no suitable storage sites "on their doorstep". For instance,	set out Core Strategy policy 13
							in a 3 week period following the disturbances in August 2011, we were able to	which states that we will; • Increase
							collect 173 cans of paint, many of them from people who did not have the	recycling and composting,
			<u> </u>				money, private transport or time to take such paint to the Veolia recycling site at	minimise waste, reduce landfill and

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							Devon Street (around 3 miles away). Most of these people reported that if we had not collected this paint, they would have put it in (other people's) skips. These pressures are particularly intense for those living in flats with limited storage space, of the type frequently proposed for residential development in the PNAAP. In order for growth in the area to not result in increased waste and traffic congestion due to increased traffic from waste-collecting vehicles, the PNAAP therefore needs to identify sites within the PNAAP (in Peckham and Nunhead Town Centre locations) that can be used to store re-useable and recoverable items whether under the aegis of voluntary community groups or new small businesses and social enterprises. It is not effective because it does not identify where storage for the re-use and recovery of waste will take place within the PNAAP (which our evidence indicates is necessary for re-use and recovery to happen.) For instance, Section 4.6.20 states that the amount of growth proposed for the AAP will result in increased waste, and that "reducing, re-using, recycling and recovering" of waste is therefore necessary. Policy 22.4 states the need for "adequate provision of recycling, composting and residual waste storage facilities" without mentioning any target for this "adequate provision". However, re-using and recovering in particular require the provision of local, very cheap and medium-term storage sites. The provision of a few bins in lockers in new developments for temporary storage are not sufficient for this purpose. The PNAAP has not identified any sites for these purposes and therefore it cannot be effective. A similar point can be made about the provision of suitable sites for composting. Over the period of the PNAAP, transport costs are likely to rise very significantly, making the transport of potential locations for composting within the PNAAP therefore need to be identified now so that compostable waste produced can be managed effectively during the lifetime of the plan. T		make more use of waste as a resource. • Require applicants to demonstrate how they will avoid waste and minimise landfill from construction and use of a development. • Meet the London Plan waste apportionment target set for Southwark. Further information is also set out in our waste management strategy 2003-2021. Our Sustainable Design and Construction supplementary planning document (SPD) states that all developments will be expected to take the following approach; • Avoiding the creation of waste in the first place • Reusing waste that is created as much as possible • Allowing left-over waste to be recycled elsewhere as much as possible, minimising the waste that ends up in landfill. This will apply to the way a development is constructed. However, the design of development will need to ensure it can be used in accordance with the above principles. Further guidance on the provision of facilities for sustainable waste management are set out in section 6.2 of the Sustainable Design and Construction SPD.
65	539		Plodowski	Anna	Policy 5		The PNAAP is neither justified nor effective in relation to markets. Section 4.2.29 asserts that new markets will increase the variety of the retail offer in the PNAAP area. The PNAAP provides is no evidence for this being the case, and indeed, there is none. The provision of new markets cannot, of themselves, increase the variety of retail offer in an area unless there is a clear policy that market stalls will be allocated to traders in a way to enable this to happen, and that that policy is implemented. Such a policy can be implemented with or without the creation of new market spaces. Conversely, supporting the development of new market space may or may not result in the increased variety of retail offer. The PNAAP as it currently stands therefore cannot be effective in delivering increased retail variety via markets. Section 4.2.27 makes the astonishing claim that "markets reduce air freighting". In the context of the PNAAP, this is clear evidence of (a) a very marked lack of involvement of the local community in the work on markets and (b) the author(s) not knowing most of Peckham's markets. A considerable proportion of the produce in the currently existing markets in Peckham Town Centre is of non-native fruit and vegetables that are not grown, not even in greenhouses, in the UK (e.g. yams, sorrel etc). These markets bring many benefits to the local economy and communities, but reduced air freighting is not one of them. The PNAAP is therefore not based on credible evidence in relation to markets (i.e. not justified) and therefore cannot be effective (i.e. achieve what it sets out to achieve).		The Retail and Employment background paper to the AAP sets out the justification for the Policy. The council's Street Trading and Markets Strategy sets out how the council manages markets in Southwark and the objectives to improve street trading in the borough

Representation	Objector		Surname						
reference number		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
66			Plodowski				Section 1.2.3 proposes that large development opportunities will provide "more community uses". There is no evidence to support this claim, nor any indication how this claim can be enforced over the lifetime of the PNAAP. New developers will want community uses of premises to be paid for, which is highly unlikely from community groups in the current economic climate. Therefore this proposal is neither justified nor effective.		Core Strategy policy 4 sets out boroughwide approach to the provision of community facilities. It states that we will facilitate a network of community facilities to meet a range of needs and will ensure that development incorporates flexible community space where there is an identified need and an occupier. Policies in the Area Action Plan will help to deliver the Core Strategy policy in Peckham and Nunhead. Community uses (D class) have been included as 'required' or 'acceptable' uses on 18 of the 33 development sites identified in Appendix C. This includes all of the sites that currently have such usesoffering a degree of protection- and all of the large development sites in the town centre. The provision of new facilities would be subject to the conditions referred to in the Core Strategy; having a known occupier for the space with a clear management plan demonstrating that their use of the space is sustainable. The comment is correct in that whilst we can try to create favourable conditions for new community facilities, we cannot guarantee their delivery unless we are sure that to do so would be sustainable. The AAP does commit to a new community centre in Nunhead and the refurbishment of Peckham library to better equip it for increased usage over the lifetime of the plan. We will continue to work with groups who are interested in new community space in Peckham and Nunhead to explore what space is available and whether funding is available for new space, where appropriate. This dialogue will take place as part of ongoing work on our community infrastructure levy (CIL) and infrastructure plan. The AAP business and retail
							Lane ward, but does not state what this is. It is difficult to assess whether the PNAAP's proposals for supporting new small businesses are justified or effective		evidence background paper sets out the statistics for start-ups and

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							without this evidence. It needs to be included so that the PNAAP's justification and effectiveness can be assessed. Section 2.2.2 states that "there is the opportunity to support local economic growth by providing new and improved business space" (see also Sections 3.2.4, 4.2.36) without considering what sort of businesses are likely to develop over the next 15-20 years or providing any evidence of why this view is taken. The PNAAP is therefore not justified and cannot be effective. Given the prolonged financial challenges we now face, and reduced availability and affordability of raw materials, energy and other industrial resources, businesses focusing on resource efficiency, re-use and re-cycling of waste are likely to be increasingly important. Other new types of business also need to be encouraged. Critically, the development of new types of businesses requires very cheap premises with flexible terms of use to enable experimentation and business learning. The flourishing of the artistic and creative businesses in Peckham now is clear evidence of the need to continue to provide very cheap premises for experimental use. The PNAAP seems to understand the current availability of highly affordable premises with flexible terms of use as equivalent to the provision of new business space with flexible floorplans in new developments. There is no evidence provided for this understanding and therefore the PNAAP is not justified and cannot be effective in enabling the successful development of the local economy.		also the justification for the promotion of flexible business space in new developments. The Policies in the AAP support a range of new businesses to establish themselves in the area, with support for the further development of the creative and cultural sector, offices, retail, leisure and entertainment types of businesses.
68	539		Plodowski	Anna	Policy 22		It is very striking that in relation to energy issues, the PNAAP makes no reference to the existing housing stock and the energy efficiency and energy generation retrofits that are needed throughout the lifetime of the PNAAP to implement the "energy hierarchy". As the UK government's Green Deal makes clear, the retrofitting of the existing building stock is a key challenge that needs to be addressed. http://www.decc.gov.uk/en/content/cms/tackling/green_deal/green_deal.aspx		Measures to incorporate energy efficiency measures into existing stock are largely beyond the remit of planning which can only influence new development in Peckham and Nunhead. However, where we can adopt an approach to encourage the retrofit of energy efficiency measures this will be considered as a borough wide issue and we will review this through the preparation of the New Southwark Plan later this year.
69	539		Plodowski	Anna			Section 3.1.2 asserts that "local employment and training projects will help local people access sustainable jobs and share in local economic growth" without providing any evidence as to what these local employment and training projects might be, especially in relation to sustainable jobs". One very important emerging area of training and work will be the retrofitting of the existing building stock for energy efficiency and energy generation purposes that needs to happen under the Green New Deal. Section 4.2.34 claims that new developments to help provide employment opportunities for local people will be provided, again without mentioning the retrofitting of the existing building stock. The PNAAP is therefore not well evidenced (not justified) in relation to a significant domain of future training and employment requiring skilled workers and manual trades. The PNAAP's claims to support the development of local training and jobs are therefore not effective.		The AAP objectives are linked to and supported by the Council's Economic and Well-being Strategy 2012-2020 which sets out borough wide objectives for employment in Southwark. The ranges of ambitions set out in the strategy include (amongst others) to work to secure the best possible support from national and local agencies supporting employment and welfare reform. This includes working with Jobcentre Plus, DWP and the Work Programme to ensure coherent support for people who are furthest from getting a job and getting the best from whatever resources are available to the Council. For regeneration and development to provide lasting jobs

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							for residents in both construction
							and related industries and end-use
							job in developments, through
							training and skills programmes
							funded by section 106 contributions
							and CIL. Ensuring that residents
							are supported into work through
							other council and externally funded
							programmes (e.g. Connexions,
							Southwark Works, DWP - Troubled
							Families) The strategy also sets
							out that the council's commitment
							to also work to ensure better co-
							ordination of the many different
							efforts to help young people into
							work, increasing engagement with employers and skills providers and
							promoting a better understanding
							of how study and training leads to
							jobs. In particular the strategy sets
							out that the council will work with
							partners to get more employers
							engaged, helping more young
							people with work experience,
							tasters and getting the softer skills
							essential for the workplace, and
							mentoring towards careers and
							business ambitions. The strategy
							recognises and builds upon the
							existing programmes and initiatives
							which provide support for youth
							such as the Southwark Youth
							Training Initiative and the Youth,
							commissioning IAG (Information
							Advice and Guidance) programme.
							The AAP must maintain flexibility over the plan period and cannot
							specify specific employment and
							training projects as these may
							change over time.
70 539	Plodowski	Anna			Given the PNAAP's proposals to demolish the site of the internationally		The cinema and multi-storey
, 5	i lodowski	,			prestigious art gallery Bold Tendencies, and the hugely popular Frank's Café that		carpark (PNAAP2) is located in the
					attracts people into Peckham from across London (Site 2), as well as the		centre of Peckham town centre.
					proposals to develop Site 3 where there is a long-established, affordable and		minutes walk from Peckham Rye
					vibrant artists' hub, it is truly astonishing to read that the PNAAP will also support		Station, and this site is currently
					"proposals for new hotels in Peckham Town Centre" (Section 4.2.10 (5)). Hotel		not reaching it potential for use or
					customers use hotels either because of their location near major transport hubs		design. Draft Policy 2 sets out that
					(airports, international train stations) or because the location itself is worth		any redevelopment of the site
					seeing. Since Peckham is not on any direct major transport infrastructure links,		should maintain a cinema on the
					Peckham Town Centre itself has to continue to be worth coming to see. That		site, unless appropriate facilities
					means providing unique and unexpected experiences and facilities, combining		can be provided elsewhere in the
					the old and the new with High quality retrofits of the existing building stock and		AAP area. The council has allowed
					furnishing with panache would be ideal. For instance, see this link for a		temporary uses to operate in the

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						"reclaimed" hotel in Budapest: http://www.brodyhouse.com/about/concept http://www.brodyhouse.com/design/about if Peckham is to be a destination for hotel customers, it must continue to be worth coming to see, which means that the existing artistic community in Peckham must be supported to continue to develop in an organic way. The artistic activities in Peckham Town Centre are a key part of what makes, and will continue to make, Peckham attractive to visitors with significant disposable income. The current novel uses of the car park site are critical to this. The likely development of various facilities in and around Peckham Rye station are not sufficient attractions on their own for tourists, however many "arts and crafts" or "food" markets there may be. The PNAAP is not justified in relation to the continued organic development of the unique and distinctive local economy in Peckham Town Centre, nor the proposal to support the development of new hotels, and therefore cannot be effective. I know that many other groups and individuals will be expressing similar concerns, particularly in relation to the proposed development of Sites 2, 3 and 6, the importance of the artistic and creative industries in Peckham, energy issues, and the unique value of Peckham's distinctive character and stunning vistas of London. I add my support wholeheartedly to their concerns, both as a local resident, and as an active member of the local community seeking to develop a social enterprise for local benefit.		car park and will continue to do so where appropriate until a decision is made on the future of the cinema/multi storey car park site. Draft Policy 2 also provides support for the growth of the creative and cultural industry sectors in the area as well as new leisure and entertainment floorspace which will all help to diversify the mix of uses and increase the overall vitality of the area making a positive contribution to the day, evening and night-time economies. We have acknowledged in the draft AAP these uses 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. These uses also help to boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The AAP identifies the proposals sites (Appendix 6) where new arts, cultural, leisure and entertainment space should be accommodated (including sites PNAAP 2, 3, 4 and 6) however there will be opportunities to provide suitable space on other sites as development schemes come forward. In addition to requiring a range of uses on the wider Peckham Rye Station site (PNAAP 6) we have identified the potential to locate a possible new market to the rear of the station in a new public space in order to help bring more activity into this area and complement the improvements to the station and its surroundings and ultimately encouraging this area around the station to be more of an attractive destination. The promotion of new hotel bed spaces in the town centre is evidenced through the GLA's Hotel Demand Study 2006 which identifies the

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									need for around 2,500 rooms (net) for Southwark to be provided over the period 2007-2026. Whilst the provision of new hotel bedspaces in the town centre will be subject to viability and market forces, the draft AAP promotes the expansion of existing types of uses and also the creation of new uses, contributing to the day time economy and also the development of the evening and night time economies in the town centre which can attract more visitors to the area.
71	539		Plodowski	Anna	Policy 18		The PNAAP has made no reference to the importance of encouraging local food growing on the buildings of new developments. Local food growing will be increasingly important for a healthy and vibrant community over the lifetime of the PNAAP. In particular, it is important that all balconies and windows are of sufficient size to enable food growing, and that windows are all capable of opening fully so that food can be harvested and, in the event of flooding, people rescued from buildings. The PNAAP is therefore not as effective as it needs to be in relation to food growing and flood risk issues on new build developments.		The Peckham and Nunhead AAP recognises that open spaces can provide space to locally grow food. Policy 19 of the AAP sets out a requirement for all major developments to contribute to food growing opportunities. The provision of allotments and other food growing opportunities is predominantly a borough-wide issue and the open space strategy sets out further information on how we will encourage food growing opportunities across the borough, including promoting food growing on both existing protected open space and housing amenity land. We will review our policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year.
73	914	King's College Hospital	Desai	Ashish	Policy 4		I am a Consultant Paediatric Surgeon at King's College Hospital and also lead for childhood obesity for King's Health Partners. Childhood obesity is a serious problem in our area with increasing numbers of children becoming overweight and obese. In Southwark, the prevalence of overweight and obesity is amongst the highest in the country. Unfortunately, in spite of continued hard work, the prevalence is increasing in children of year 6. [In Year 6, 26.4% were obese (0.7~% increase since last year) and 15.4% were overweight (0.9% increase)]. I understand this figure is higher this year. This is an increasing burden on tertiary case service. There is a feeling amongst A&E staff that the number of obese paediatric patients coming into A&E is growing. We are currently in the process of quantifying this. Obesity also increases incidence of various diseases like diabetes, hypertension, sleep apnoea and liver diseases. For example, incidence of Type 2 diabetes increases by 10 fold with obesity. I feel that the policy is justified and there is increasing literature looking at association of fast food joints		Support noted.

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation Proposed changes	Officer response to representation
							and eating habits amongst school children and their BMIs. In a study looking at the food retail environment in schools neighbourhoods and its relation to lunchtime eating behaviours in youth from three countries (1); showed that Canadian children were more likely to east at a chain food retailer if there were more food retail outlets, compared to students attending schools with no nearby chain food retailers. This study did not show any associations between chain food retailer density and obesity or in any other country. However, another recent publication (2) has shown associations between food environment and youth BMI. This demonstrates that the existence of more types of food outlets in an area, including supermarkets, is associated with higher BMI. We also attended a breakfast meeting of key grass root workers in Southwark last year where similar thoughts were aired. Frontline staff expressed thoughts that availability of fast food joints and cheap retail food is one of the factors for increasing obesity in children. I feel that the policy is also justified as it is essential that we work at prevention of obesity rather than try and treat obesity once established or worse still, treat complications of obesity. This will cause severe burden on economy. This can be achieved by working as a multi-disciplinary team tackling the growing problem. Please accept this letter as support of policy 4, which is supported by background papers. 1) Heroux M, lanotti RJ, Currie D, Pickett W, Janssen I. (Nov 2012) The food retail environment in school neighbourhoods and its relation to lunchtime eating behaviours in youth from three countries, Health Place, 18(6): pp1240-1247. 2) Shier V, An R, Sturm R (Sep 2012) Is there a robust relationship between neighbourhood food environment and childhood obesity in the USA? Public Health, 126(9): pp723-730	
75		Guy's and St Thomas' NHS Foundation Trust			Policy 4		I am writing in response to the Peckham and Nunhead Area Action Plan. Families need a healthy environment to be healthy. Southwark has one of the highest rates of child obesity over the last few years and something needs to be done about this. Peckham & Nunhead in particular are two of the wards in Southwark with the highest levels of obese and unhealthy weight children. I fully support the proposed Policy 4 in the PNAAP. Peckham in particular seems to be already saturated with takeaways and fast foods which in my opinion encourage unhealthy eating habits. Fast food outlets may also displace sellers of healthy food. I would like to see streets in Peckham, where families have access to healthy affordable food as opposed to what I currently observe when I walk through Peckham - lots of unhealthy fast food outlets. There are enough unhealthy food outlets (fried chicken, pizza, kebab, takeaways) we do not need any more. This year the National Child Measurement Programme (NCMP) has shown an increase again in overweight and obesity in year 6 children in Southwark, now at 43%. These year 6 children will now be attending secondary school and will benefit from the proposed exclusion zones. The Southwark Public Health and the School Nursing team have been working to increase awareness of healthy eating, activity and obesity by running health fairs, as a follow up from the NCMP results, for Southwark's obese children to attend with their families. Families discuss with the staff the problems with regularly consuming fast food and this policy would support the hard work of the Public Health staff. This policy also would support the work of Southwark's Children Centres where families with young children can learn about healthy eating, weaning and cooking. These healthy eating educational programmes in combination with a more diverse high street (caused by a reduction in new fast food shops opening) can help support these families with healthy choices. It would be great to see this policy in place.	Support noted
76	916	LB Southwark	Thornton	Geoffrey	Policy 11		I am writing to respond to the consultation on the Publication/Submission version of the Peckham and Nunhead Area Action Plan (AAP). I welcome the opportunity to comment on this document and am responding as the lead on walking & infrastructure will be	The reduced amount of detail on individual routes compared to earlier versions of the AAP should

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number	number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	representation
							include a certain level of detail in order to achieve the council's vision. To that end, the removal of 'existing' and 'proposed' pedestrian and cycle links –	funded Commitment to a regular report to monitor delivery against transport objectives	not be interpreted as meaning cycle infrastructure is of lesser importance. The council has a strong commitment to improving cycling infrastructure, as set out in the Core Strategy and our Transport Plan. The changes made reflect the fact that as the AAP has progressed we have had to formalise our ideas and be mindful of the NPPF soundness tests that will ultimately determine if the AAP can be adopted. We believe that the policy as presented is the most justified and effective in terms of ensuring delivery of improved cycle infrastructure in Peckham and Nunhead. The change reflects the fact that funding will be sought over the plan period for individual schemes and the precise details of these schemes, including their alignment and specification, will be dependent on the amount of funding secured and on bespoke local consultation. Our approach therefore highlights our priorities, whilst ensuring sufficient flexibility to deliver individual schemes. The council will continue to fund transport improvements through site specific s106, through community infrastructure levy and through numerous other funding streams, including the annual Local Implementation Plan (LIP) funding available via TfL. Just short of £1m worth of projects have already been identified to improve pedestrian and cycle infrastructure in and around Peckham as part of the council's 2014/15 bid to TfL. Further information on the delivery of transport improvements is set out in section 7 of the AAP and particularly in the AAP infrastructure background paper. We will monitor the delivery of planning policies via the Authorities Monitoring Report (AMR). Similarly, the council produces a detailed annual report on the delivery of the Transport Plan, which will

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									summarise funding for transport infrastructure that has been secured through the planning system and other sources.
77	127	Thames Water Utilities	Bell	Carmelle			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." Within Strategic Policy 14 of the Core Strategy it is set out that the vision and objectives will be achieved by "Working with infrastructure providers to identify and deliver elements of infrastructure required to support growth and deliver environmental improvements at the right time". The supporting text goes on to state in Section 6.10 that "Where infrastructure is needed to support development, it should be provided along side it and development should not be permitted unless essential infrastructure can be completed prior to occupation of the new development." The Peckham and Nunhead AAP sets out that a minimum of 2000 new homes will be provided between 2011 and 2026. Within our comments on the 'Towards a Preferred Options' consultation in September 2011 we highlighted concerns over water supply for some of the specific sites. In addition, it was highlighted that there were unlikely to be wastewater capacity issues although this would be dependent on the point of connection and ensuring that historic flows are not exceeded. It is critical that any necessary upgrades to water or wastewater infrastructure upgrades are delivered ahead of the occupation of development to ensure that problems such as low/no water pressure and internal/external sewer flooding are avoided. While the Infrastructure Plan under Section 7.5 of the submission AAP no reference is made to water or wastewater infrastructure while Policy 46 under Section 7.6 relies on S106 agreements and CIL contributions to deliver infrastructure. These approaches cannot be applied to water and wastewater infrastructure and as	within the adopted Canada Water AAP where Section 6.4.13 states that: "Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers should also continue to will liaise with providers to ensure that any upgrades required to power, water and sewerage infrastructure are provided ahead of the occupation of development can be supplied at the appropriate time to meet development needs. With regard to water and sewerage infrastructure, the council will use planning conditions where appropriate to ensure that development does not commence until impact studies on the existing water supply and sewerage infrastructure have been approved by Southwark in conjunction with Thames Water. Where there is a capacity problem and no improvements are programmed	Our approach to infrastructure provision is set out in Strategic Policy 14 of Core Strategy which sets out how we will work with infrastructure providers to identify and deliver elements of infrastructure required to support growth and deliver environmental improvements at the right time. This approach was agreed through the examination in public with the Planning Inspectorate. It is also a key requirement of the National Planning Policy Framework that local planning authorities should work with other authorities and providers to: • assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands; and • take account of the need for strategic infrastructure including nationally significant infrastructure within their areas. It is not considered necessary to repeat this approach in the AAP, however, we have updated the infrastructure background paper to include the following text as suggested; "Southwark will monitor phasing and implementation of development and continue to share plans with infrastructure providers. Developers should also continue to will liaise with providers to ensure that any upgrades required to power, water and sewerage infrastructure are provided ahead of the occupation of development can be supplied at the appropriate time to meet development needs. With regard to water and sewerage infrastructure, the council will use planning conditions where

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Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								they will be funded."	appropriate to ensure that development does not commence until impact studies on the existing water supply and sewerage infrastructure have been approved by Southwark in conjunction with Thames Water. Where there is a capacity problem and no improvements are programmed developers should contact the utilities company to agree what improvements are required and how they will be funded."
78	917	Southwark Healthy Weight Steering Group	Dalton- Lucas	Rosie	Policy 4		This is a letter in support of Policy 4 in the Peckham and Nunhead AAP. Members of the Southwark Healthy Weight Steering Group (HWSG) include dietitians and nutritionists, public health, sport development team, local authority, health visiting team, midwifery, lay community representatives and oral health promotion. This group is responsible for developing and implementing Southwark's Healthy Weight Strategy. Dr Jin Lim (Public Health Consultant) chairs the HWSG and has directly been consulted on the PNAAP to ensure the Planning Policy team have understanding of the health status and needs of the population. Peckham and Nunhead are identified as areas of high childhood obesity prevalence through National Child Measurement Programme data and 'obesity hot-spot maps'. During 2011/12 members of the HWSG were involved in the Southwark Joint Childhood Obesity Review. The review was commissioned and reviewed by Southwark council and the Children and Young People's Trust. Through interviews with both frontline staff and parents/carers and family members thought obesity was caused by too much unhealthy food availability in Southwark and children and young people eating too much of it. Many people talked particularly about chicken and chip shops and other fast food outlets where food was cheap and accessible. For older children with their own money they talked about how convenient and accessible it was. A risk for unhealthy eating seemed to be after school and weekends (Southwark child obesity join review, March 2012, p4) Direct quotes from children interviewed from the Youth Council in Southwark identified fast-food outlets as 'in your face' and 'three chicken shops in the space of five minutes' and also commented specially that 'there weren't any of the healthier options in Peckham which you might see in a place like Victoria or Dulwich'. School children asked about what they were eating at different times of the day, their responses indicated that between the end of school and evening meal was the time they were most		Support noted

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							policy to restrict takeaways opening in specific areas, including close proximity to schools. This policy is supported by a sound evidence base, documented in the supplementary background paper and we look forward to this policy being implemented.		
79	918	Southwark Healthy Weight Steering Group	Lim	Jin	Policy 4		This is a letter in support of Policy 4 in the Peckham and Nunhead AAP. Members of the Southwark Healthy Weight Steering Group (HWSG) include dietitians and nutritionists, public health, sport development team, local authority, health visiting team, midwifery, lay community representatives and oral health promotion. This group is responsible for developing and implementing Southwark's Healthy Weight Strategy. Dr Jin Lim (Public Health Consultant) chairs the HWSG and has directly been consulted on the PNAAP to ensure the Planning Policy team have understanding of the health status and needs of the population. Peckham and Nunhead are identified as areas of high childhood obesity prevalence through National Child Measurement Programme data and obesity hot-spot maps'. During 2011/12 members of the HWSG were involved in the Southwark Joint Childhood Obesity Review. The review was commissioned and reviewed by Southwark council and the Children and Young People's Trust. Through interviews with both frontline staff and parents/carers and family members thought obesity was caused by too much unhealthy food availability in Southwark and children and young people eating too much of it. Many people talked particularly about chicken and chip shops and other fast food outlets where food was cheap and accessible. For older children with their own money they talked about how convenient and accessible it was. A risk for unhealthy eating seemed to be after school and weekends (Southwark child obesity join review, March 2012, p4) Direct quotes from children interviewed from the Youth Council in Southwark identified fast-food outlets as 'in your face' and 'three chicken shops in the space of five minutes' and also commented specially that there weren't any of the healthier options in Peckham which you might see in a place like Victoria or Dulwich'. School children asked about what they were eating at different times of the day, their responses indicated that between the end of school and evening meal was the time they were most li		Support noted
80	919	Guy's and St Thomas NHS Trust	Michie	Kenneth	Policy 4		This is a letter in support of Policy 4 in the Peckham and Nunhead AAP. Members of the Southwark Healthy Weight Steering Group (HWSG) include dietitians and nutritionists, public health, sport development team, local authority, health visiting team, midwifery, lay community representatives and oral health promotion. This group is responsible for developing and implementing		Support noted

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number						Southwark's Healthy Weight Strategy. Dr Jin Lim (Public Health Consultant) chairs the HWSG and has directly been consulted on the PNAAP to ensure the Planning Policy team have understanding of the health status and needs of the population. Peckham and Nunhead are identified as areas of high childhood obesity prevalence through National Child Measurement Programme data and 'obesity hot-spot maps'. During 2011/12 members of the HWSG were involved in the Southwark Joint Childhood Obesity Review. The review was commissioned and reviewed by Southwark council and the Children and Young People's Trust. Through interviews with both frontline staff and parents/carers and family members thought obesity was caused by too much understry food availability in Southwark and children and young people eating too much of it. Many people talked particularly about chicken and chip shops and other fast food outlets where food was cheap and accessible. For older children with their own money they talked about how convenient and accessible it was. A risk for unhealthy eating seemed to be after school and weekends (Southwark child obesity join review, March 2012, p4) Direct quotes from children interviewed from the Youth Council in Southwark identified fast-food outlets as 'in your face' and 'three chicken shops in the space of five minutes' and also commented specially that there weren't any of the healthier options in Peckham which you might see in a place like Victoria or Dulwich'. School children asked about what they were eating at different times of the day, their responses indicated that between the end of school and evening meal was the time they were most likely to eat fast food. From the review the following recommendation was made: An unhealthy food environment, in particular the concentration of unhealthy fast food outlets in the relatively more deprived parts of the borough (e.g. Walworth Road, Camberwell, Peckham and Queen's Road) 'normalises' unhealthy eating. The restriction of further fast food outlets and work to imp		
81	920	King's Hospital	Periam	Cath	Policy 4		This is a letter in support of Policy 4 in the Peckham and Nunhead AAP. Members of the Southwark Healthy Weight Steering Group (HWSG) include dietitians and nutritionists, public health, sport development team, local authority, health visiting team, midwifery, lay community representatives and oral health promotion. This group is responsible for developing and implementing Southwark's Healthy Weight Strategy. Dr Jin Lim (Public Health Consultant) chairs the HWSG and has directly been consulted on the PNAAP to ensure the Planning Policy team have understanding of the health status and needs of the population. Peckham and Nunhead are identified as areas of high childhood obesity prevalence through National Child Measurement Programme data and 'obesity hot-spot maps'. During 2011/12 members of the HWSG were involved in the Southwark Joint Childhood Obesity Review. The review was commissioned and reviewed by Southwark council and the Children and Young People's Trust. Through interviews with both frontline staff and parents/carers and family		Support noted

Representation	Objector		Surname						
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							members thought obesity was caused by too much unhealthy food availability in Southwark and children and young people eating too much of it. Many people talked particularly about chicken and chip shops and other fast food outlets where food was cheap and accessible. For older children with their own money they talked about how convenient and accessible it was. A risk for unhealthy eating seemed to be after school and weekends (Southwark child obesity join review, March 2012, p4) Direct quotes from children interviewed from the Youth Council in Southwark identified fast-food outlets as 'in your face' and 'three chicken shops in the space of five minutes' and also commented specially that 'there weren't any of the healthier options in Peckham which you might see in a place like Victoria or Dulwich'. School children asked about what they were eating at different times of the day, their responses indicated that between the end of school and evening meal was the time they were most likely to eat fast food. From the review the following recommendation was made: An unhealthy food environment, in particular the concentration of unhealthy fast food outlets in the relatively more deprived parts of the borough (e.g. Walworth Road, Camberwell, Peckham and Queen's Road) 'normalises' unhealthy eating. The restriction of further fast food outlets and work to improve the quality of food at existing outlets should be encouraged. Policy 4 directly supports the recommendations of the review. Implementation of the policy will help to reduce the availability of fast foods for young people, which is a current factor of unhealthy eating and an important determinant of obesity. The policy will also help Public Health and Southwark Council action the recommendation above and will be one of the main tools to combat obesity in Peckham and Nunhead. We collectively feel the policy follows guidance in the Greater London Authority's 'Takeaway Toolkit', which recommends local authorities should adopt planning policy to restrict takeaways open		
82	921	Southwark Healthy Weight Steering Group	Lovelock	Tejal	Policy 4		This is a letter in support of Policy 4 in the Peckham and Nunhead AAP. Members of the Southwark Healthy Weight Steering Group (HWSG) include dietitians and nutritionists, public health, sport development team, local authority, health visiting team, midwifery, lay community representatives and oral health promotion. This group is responsible for developing and implementing Southwark's Healthy Weight Strategy. Dr Jin Lim (Public Health Consultant) chairs the HWSG and has directly been consulted on the PNAAP to ensure the Planning Policy team have understanding of the health status and needs of the population. Peckham and Nunhead are identified as areas of high childhood obesity prevalence through National Child Measurement Programme data and 'obesity hot-spot maps'. During 2011/12 members of the HWSG were involved in the Southwark Joint Childhood Obesity Review. The review was commissioned and reviewed by Southwark council and the Children and Young People's Trust. Through interviews with both frontline staff and parents/carers and family members thought obesity was caused by too much unhealthy food availability in Southwark and children and young people eating too much of it. Many people talked particularly about chicken and chip shops and other fast food outlets where food was cheap and accessible. For older children with their own money they talked about how convenient and accessible it was. A risk for unhealthy eating seemed to be after school and weekends (Southwark child obesity join review, March 2012, p4) Direct quotes from children interviewed from the Youth Council in Southwark identified fast-food outlets as 'in your face' and 'three chicken shops in the space of five minutes' and also commented specially that		Support noted

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							'there weren't any of the healthier options in Peckham which you might see in a place like Victoria or Dulwich'. School children asked about what they were eating at different times of the day, their responses indicated that between the end of school and evening meal was the time they were most likely to eat fast food. From the review the following recommendation was made: An unhealthy food environment, in particular the concentration of unhealthy fast food outlets in the relatively more deprived parts of the borough (e.g. Walworth Road, Camberwell, Peckham and Queen's Road) 'normalises' unhealthy eating. The restriction of further fast food outlets and work to improve the quality of food at existing outlets should be encouraged. Policy 4 directly supports the recommendations of the review. Implementation of the policy will help to reduce the availability of fast foods for young people, which is a current factor of unhealthy eating and an important determinant of obesity. The policy will also help Public Health and Southwark Council action the recommendation above and will be one of the main tools to combat obesity in Peckham and Nunhead. We collectively feel the policy follows guidance in the Greater London Authority's 'Takeaway Toolkit', which recommends local authorities should adopt planning policy to restrict takeaways opening in specific areas, including close proximity to schools. This policy is supported by a sound evidence base, documented in the supplementary background paper and we look forward to this policy being implemented.		
83	569		Nixon	David	Policy 17		I consider the plan is partly unsound in relation: 1 to a part of its Housing Policy section 4.5 most particularly clause 4.5.13 in as much as it does not yet appear to confirm to the National Planning Policy Framework in relation to the NPPF definition of affordable housing. I appreciate that the Council are due to publish a revised Affordable Housing SPD. Once it is published I shall be able to make my representations. I can only do so today on the basis of the policy as contained in the PNAAP where there is no inclusion of affordable rent as defined in the glossary of the NPPF. I have noted that there is a revised draft Affordable Rent SPG published in connection with the London Plan. In clause 6.4 of this document it appears that the Mayor intends to introduce a benchmark of 65% of market rents across the affordable rent programme as a whole. Whilst this yet to be agreed to or further amended, there is a lengthy consultation period but this proportion or something similar to it is probably more likely to be adopted. I therefore consider that the PNAAP would do well to adopt such a figure if it is to be consistent with both National and the London Plan policy. Whilst I do sympathise with the current views expressed in the PNAAP on affordable rent, I cannot believe that such a view will be in any sense sustainable and the above SPG clause warns against this accordingly and the effect of limiting the provision of affordable housing that this may produce. In other respects, other than intended housing in tall buildings policy 26 (building heights) and in relation various specific sites for which please see below, I am broadly in agreement with section 4.5 as soundly prepared. I am also greatly concerned that we do need much more genuinely affordable suitable additional housing of all sizes. However, we ought to be capable of learning from postmistakes and a few successes as a Borough. We certainly shouldn't attempt anything which has a poor chance of success just because the housing needs are so desperate. That		It is the councils view that affordable rent does not meet our housing needs. This is illustrated by the following evidence base studies: Strategic Housing Market Assessment, Housing Requirements Study, Affordable Rent Viability Study and our Affordable Rent Study. The AAP acknowledges the change to the definition of affordable housing in the fact box which accompanies policy 17. The NPPF requires councils to use their evidence to ensure that their Local Plan meets the full, objectively assessed need for market and affordable housing. It is acknowledged that the NPPF defines affordable rent as being let by local authorities or registered providers at up to 80% of the local market rent. However it does not explicitly state that every local authority must provide affordable rented housing or that it must be provided consistently at levels close to 80% of market rent. The council is therefore consistent with the NPPF as our policy is based on our evidence base looking at housing need, as required by the NPPF. We are proposing to amend

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									our approach to affordable housing though the forthcoming Local Plan review rather than solely through the Affordable Housing SPD. This will allow us to fully investigate the impact of affordable rent and determine our approach at a borough wide level, rather than just in Peckham. examination . Please see our housing background paper for more detailed information on our approach. The broad support for section 4.5 is noted. Our response to other sections of the AAP are set out in this report. It is our view that we are maximising the number of affordable homes in the area, whilst taking deliverability and viability into account. We also need to consider the character and context of the area such as the protection of open space and preservation of local heritage. Policy 17 aims to address the balance between the tenures of homes in the area by requiring private as well as affordable homes.
84	569		Nixon		Policy 26		I regard part of this policy unsound. I agree with the heights of buildings outside the Peckham core area being restricted to 2 or no more than 4 storeys. I have serious misgivings over the policy as regards to Peckham core area. Very few buildings in the core are above four storeys in height. Much of the core is contained within one or more conservation areas. The inclusion of buildings taller than four storey may have a harmful effect on the general character of the area and may interfer with views over towards the city centre or docklands which are available from several existing taller buildings, eg Peckham Library and the Bussey Building just off Rye Lane. I have particular misgivings on tall buildings which are intended to accommodate families with children. I regard such buildings as totally unsuitable. I have worked in housing most of my life and would wish to draw attention to the findings of many sociological studies carried out both in the country and else where in the words of a Home Office survey in 1980: "As a result of a further report in 1980, the Home Office advised that child densities should be reduced in high rise council blocks and that families with children should not be accommodated in any flats becoming vacant above the fourth floor" cited in David Page 'Building for Communities' Joseph Rountree Foundation York 1993. I would also argue against mixed tenure tower blocks as owner occupies don't usually wish to live in the same blocks as social tenants or even shared owners. Because this is the case, developers don't usually like to develop blocks for mixed tenure either. That would rather unduly restrict who would actually live in such blocks unless they consisted mainly of smaller flats at least above the fourth floor. In terms of build-ability tall blocks work best when flats of the same size a stacked on top of each other both for structural reasons and for fire compartmentalisation and to reduce sound transference. Blocks of		The AAP urban design study sets out the rationale and methodology for assessing the impact of a number of taller elements within the core action area. The study sets out the assessment of a series of views from within and outside the core action area to assess the potential impact taller elements would have on heritage assets and their settings (CAs, listed buildings, etc) within the core action area. The provision of taller buildings is seen as an exception, as new development would generally be no taller than existing heights. One of the key requirements of Policy 26 is that a taller building would have to be of exceptional quality and exemplary design that positively contribute to the local character and distinctiveness of Peckham, as well as delivering generous public realm improvements. Any development proposal would have

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number							flats have never been popular with most people in Peckham. Those who live in them currently usually only do so because they have no opportunity to move anywhere else. Those who have choice, usually only live in them as a first home and then move to more suitable family sized accommodation. Given the current economic climate, I somewhat doubt whether developers would risk such ventures in the Peckham core. On all these reasons I don't believe such venture would prove sustainable in the long term. Tower blocks in the 60's in Peckham are mostly still with us, usually deply unpopular and often filled with families which does little good for crime and vandalism or for the bringing up of a well balance community. If you want a recent sociological survey, I recommend that you ask existing nearby flat dwellers what they think would be the chances of building new tower blocks and to get more detailed reasons, ask them about their experiences of living in them. I would then quietly drop the idea.		to accord with the AAP policy, in addition to the relevant saved policies of the Southwark Plan, the Core Strategy, the London Plan and the NPPF. With regards to ensuring housing quality, the three policies set out on Theme 4 of the AAP (Policies 16, 17 and 18) would be applicable to new development within the core action area, including tall buildings. Policy 18 'Mix and design of new homes' specifically requires all development to adhere to minimum dwelling standards with larger homes have direct access to amenity space and larger developments of 10 units of more providing space. The adopted Residential Design Standards (SPD (2011) sets out the general and specific housing standards that are required for new development, alongside the relevant saved policies set out in the Southwark Plan (Policies 3.11, 3.12, 3.20, 4.1, 4.2, 4.3, 4.4, 4.5) and the Core Strategy (Policies 5,6,7,8,12).
8	5 569		Nixon	David			The Ayesham Centre may not be great success at present but I have to be convinced that there is ever going to be a genuinely economic arguement for redeveloping it once again. Whilst bringing more housing back into the core may be desirable, I'm still cogitating over that one. If there was a good reason for it I would probably consider that family housing ought to be excluded. It would in my view take a really inspired masterplan to retain some attractive retail facilities as well as housing. If substantial carparking is also required on site for the retail, if not for the housing, I'm not sure I see how everything is going to fit and still provide a pleasant and safeenvironment. I think a 20 storey tower would look incredibly out of place and certainly not fit in with the surrounding uses and especially as a backdrop to the conservation area. It would interfer with views of the city and docklands. This was only 6 - 10 storeys in the earlier version of the plan document, this would at least be more likely to acceptable but 10 storeys would still be too tall on aesthetic grounds in my view. It would take an enormous amount of work to make site fully sustainable both for Morrisons and economically, I don't believe it is sound in essence.		The AAP is a 10-15 year plan, with an estimated time for redevelopment or refurbishment of the Aylesham Centre for 2016-2020. As with all the major development sites, we have met with the owners of the site through the AAP preparation process to ensure that the proposal site designation is realistic and deliverable. The proposals site designation sets out a range of uses, which based on our testing are suitable for the site. The AAP also sets out our policy on building heights in policy 26, setting out how we will ensure a taller building is appropriate to the location. The urban design background paper and urban design study sets out more information on why we think a taller building could be suitable for this site. The detail will be determined through a planning application, looking at all the

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									relevant policies within the AAP and other planning documents including the London Plan, the Core Strategy and the saved Southwark Plan.
86	5 569		Nixon	David			PNAAP5 former Wooddene estate. The Nottinghill Housing Trust is currently the Borough's preferred developer. NHT latest proposals differ from the PNAAP in that their only talk of a maximum of 9 storeys whereas the PNAAP5 has up to 15, whilst the exhibition of the proposals is not until 6th December, I hope that at least this element of the proposals may be acceptable but once again I wouldn't want to see family housing above the fourth floor as I would regard this as unsustainable. I can't comment further until I have seen the proposals.		The AAP designation for the former Woodene estate aims to provide guidance on what would be acceptable on the site. We have tested proposals for a building of up to 15 storeys on the site. This is not the say that the final scheme will include a building of this height, and the appropriate height will depend on the detail of the scheme. The final details of the scheme will be considered when a planning application is submitted. Family housing must be provided with a suitable amount of amenity space (in line with our residential design standards). There will be a mixture housing types and sizes across the site in line with the housing policies in the Core Strategy and the AAP.
87	7 569		Nixon	David			sites PNAAP2, PNAAP4 and PNAAP7 would all run the risk of not being in keeping with the character of the area and would block important views. I also couldn't agree to their use for housing families above the fourth floor as being sustainable.		The AAP urban design study sets out the rationale and methodology for assessing the impact of a number of taller elements within the core action area. The study sets out the assessment of a series of views from within and outside the core action area to assess the potential impact taller elements would have on heritage assets and their settings (CAs, listed buildings, etc) within the core action area. The provision of taller buildings is seen as an exception, as new development would generally be no taller than existing heights. One of the key requirements of Policy 26 is that a taller building would have to be of exceptional quality and exemplary design that positively contribute to the local character and distinctiveness of Peckham, as well as delivering generous public realm improvements. Any development proposal would have to accord with the AAP policy, in addition to the relevant saved

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									policies of the Southwark Plan, the Core Strategy, the London Plan and the NPPF. The AAP urban design study has identified and assessed a number of locally important views area as part of a robust methodology to assess the potential impact of taller buildings within into the core action. The safeguarding of these views will be protection under the urban design policies within the AAP alongside any conservation area designation With regards to ensuring housing quality, the three policies set out on Theme 4 of the AAP (Policies 16, 17 and 18) would be applicable to new development within the core action area, including tall buildings. Policy 18 'Mix and design of new homes" specifically requires all development to adhere to minimum dwelling standards with larger homes have direct access to amenity space and larger developments of 10 units of more providing space. The adopted Residential Design Standards (SPD (2011) sets out the general and specific housing standards that are required for new development, alongside the relevant saved policies set out in the Southwark Plan (Policies 3.11, 3.12, 3.20, 4.1, 4.2, 4.3, 4.4, 4.5) and the Core Strategy (Policies 5,6,7,8,12).
89	922		Yар	Jeremy			We would like to add our voice to the many concerns expressed about the poor shopping experience in Peckham High Street & Rye Lane, routinely described in the press as "the gritty streets of Peckham". We see addressing this issue as key to the successful regeneration of the area. In our opinion, to attract more visitors to the shopping area, drastic steps must be taken, for example: To improve street cleanliness- A simple study must be undertaken as to the cause of why our streets are filthy. If it is caused by traders, then speak to the traders & make them aware how clean streets can bring them more business. If it is caused by litter louts, educate them by having street wardens positioned in strategic locations, handing out "Keep your streets clean" leaflets. Talk about legal underpinning for press regulation! Only legal enforcement & a proper Council-led anti-litter campaign will put a stop to littering & fly tipping by sending a loud & clear message to those who are responsible for bringing dirt & filth to our streets that they will be caught & made to pay for the clean-up!		The draft AAP vision includes the commitment for the council to continue to work with the local community, landowners, businesses, the police, the Safer Southwark Partnership and NHS Southwark to make sure that Peckham is a friendly, safe and enterprising place. The council has secured funding (Mayor's Community Restoration Fund, area renewal funding, Improving Local Retail Environments (ILRE), Mayors Outer London Fund, Townscape Heritage Initiative Programme) to make improvements to the shopping

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									environment and public realm in Peckham and Nunhead. These streams of funding will complement private investment in the redevelopment of sites in the town centre and core action area, to improve the appearance and safety of the area. By way of example, the Mayor's Outer London Funding is being used to provide improvements to Nunhead, targeting the area around the green and the shopping parade to include new shop fronts, new highway and feature lighting, support for traders as well as festivals and events. Work has already taken place through the Improving Local Retail Environments (ILRE) scheme to improve shopfronts on Gibbon Road. As and when new funding become available, we will continue to work with stakeholders in the area to improve the shopping environment
90	922		Yар	Jeremy			To improve security. Shoppers need to feel safe. In the past 9 years, I don't remember one year when I don't see a broken shop window in Peckham High Street. It appears that there's currently one hairdressing shop who has not bothered to fix its broken shopfront window. I wonder why that is? Has the owner given up hope? What is the Council doing to give support to local traders who experience wanton vandalism & violence? Does Council officers drop in to local shops & talk to shop owners & workers & canvass their opinions? I have raised this issue with the Neighbourhood Police whose response I can only describe as "shrugging of the shoulders". Why are our law enforcement agencies so clueless & out of touch? Are they aware of broken shop windows & that laws are broken? Do they care? What does our Community Warden do when they walk past a broken shop window? There is a very simple solution which is to install CCTV cameras tomorrow in the High Street (real and/or dummy cameras to keep thugs guessing). CCTV may be viewed by some as invasive but they are a lesser evil compared to thugs getting away with wanton destruction of property without being caught & punished for their criminal acts. When a thug & criminal can break a law without fear of being caught & punished, there is no respect of the law or the society we live in & those sections of our community who are not protected are in effect living in a lawless society. It's better to have CCTV cameras in the High Street to protect business & shoppers than in places like Elm Grove, where I have just discovered is being used by the CCTV control centre to issue fixed penalty notices to drivers who inadvertently stop there to drop people off at Peckham Rye Station, which is a scandal & an absolute disgrace.		The draft AAP vision includes the commitment for the council to continue to work with the local community, landowners, the police, the Safer Southwark Partnership and NHS Southwark to make sure that Peckham is a friendly, safe and enterprising place. All of the draft policies for the town centre promote high quality, well designed accessible and inclusive town centre development. This includes consideration of incorporating good quality urban and built form design elements to reduce the opportunities for crime and antisocial behaviour; encouraging compatible mix of uses including daytime and night time activity to create sustained activity on the streets, and creating more natural surveillance. The council has secured funding (Mayor's Community Restoration Fund, area renewal funding, Improving Local Retail Environments (ILRE), Mayors Outer London Fund, Townscape Heritage Initiative

	reference	Organisation	Surname	First name	Main	Paragraph	Details of representation F	Proposed changes	Officer response to
number	number	3. 33			policy		•		representation Programme) to make
									improvements to the shopping
									environment and public realm in
									Peckham and Nunhead. These
									streams of funding will complement
									private investment in the
									redevelopment of sites in the town
									centre and core action area, to
									improve the appearance and safety
									of the area. By way of example, the
									Mayor's Outer London Funding is
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									improvements to Nunhead,
									targeting the area around the green
									and the shopping parade to include
									new shop fronts, new highway and
									feature lighting, support for traders
									as well as festivals and events.
									Work has already taken place
									through the Improving Local Retail
									Environments (ILRE) scheme to
									improve shopfronts on Gibbon
									Road. As and when new funding
									become available, we will continue
									to work with stakeholders in the area to improve the shopping
									environment. Throughout the
									preparation of the draft AAP we
									have worked alongside our Local
									Economy team to engage and
									meet with businesses and traders
									in the town centre to discuss issues
									and concerns and ways in which
									the AAP can assist in improving the
									environment. Our policies for the
									town centre seek to ensure that
									town centre continues to play a
									major role in Southwark, providing
									a mix of activities throughout the
									day for both local residents and
									visitors. New development will help
									bring improvements to shop fronts
									and the town centre environment.
									This will help independent shops,
									businesses and creative industries to flourish.
91	922		Yap	Jeremy			To attract good shops to the area will be difficult but it would help if the streets		The AAP seeks to promote a wider
			'				are made clean & safe first! If I was given the job to attract business to the area, I		mix of shop types to diversify the
							would do it gradually. I would start by approaching a medium-sized store that will		shopping experience, including
							fit the profile of this area. Primark & Lidl are already here. Another store like		multiple retailers and independent
							Wilkinson would be perfect because many shoppers here are cost-conscious.		stores. Policy 1 sets out that we will
							Will the Council be able to attract a medium-sized business like Wilkinson to set		put a restriction on larger retail
							up shop here by offering say a 50% business rates reduction for the first 3-5		units in new developments to

Representation	Objector		Surname						0(()
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							years? Once the likes of Wilkinson are here, I believe other stores will follow. Offering business rebates to "preferred" stores may be one solution to attracting the right mix of shops to the area. We believe it is very high time there is an AAP for this area! Thank you for the opportunity to comment.		prevent their sub-division below 500sqm. This will help to ensure there is suitably sized space to accommodate large multiple chain retailers. We are not able to approach specific businesses to locate in the area, and this will be subject to market forces and changing perceptions of the area. Charities or non-profit making organisations may apply to the council for discretionary business rate relief. From 1st April 2012 all occupied properties with a rateable value of less than £25,500 not in receipt of another mandatory relief will have their business rates liability automatically calculated using the smaller multiplier, and will receive a small business rate relief discount.
92	923	NHS Southwark	Juralowicz	Kasia	Policy 4		I am a Public Health Nutritionist in Southwark and as part of my role I am responsible for the National Child Measurement Programme in Southwark. As you may be aware of NCMP figures in Southwark show a gradual increase in obesity in our Year 6 pupils. I have been working on NCMP follow up to ensure every child in Southwark, who is measured as obese, has an invitation to a specialised health fair where they can learn about healthy eating and healthy living. Additionally, working with the school nurse team, we have conducted NCMP follow up calls to all obese children in the 20 most obese schools in Southwark. We work closely with the Department of Health's Change 4 Life team to create Southwark based materials to educate about healthy living. We recently ran a health event, where we provided free cooking demonstrations to show residence in our BME communities how to have a healthy, quick and cheap meals, without the need to go to the fast-food outlets. We are also running a similar event in Peckham at the end of November to educate families with obese children specifically. Policy 4 would very effective to reinforce the health messages we are promoting to allow individuals to have more choice and make the right choices to eat. One thing that is clear is that families find the abundance of fast food outlets in Peckham and Nunhead a convenient way to feed their families as there are high numbers of these. Chatting to parents, they would like to see a variety of food outlets and different shops on the high streets, especially once we have run health promotion programmes to educate the community about healthier eating. Policy 4 also would support our local NCMP follow-up campaigns by reducing the convenience of buying fast-food, especially around schools. I feel the policy is justified, not only due to the sound evidence base presented in the background paper, but also the need to act on obesity before the prevalence increases anymore. In Public Health we work to commission services that will help reduce obesity leve		Support noted

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							shops increase.		
93	214	Transport for London			Policy 11		TfL broadly supports this policy although there are currently no plans to extend the Mayor's Cycle Hire scheme into south east London. (* These comments are also referred to in the representations submitted by the GLA)		Broad support noted. Although we note that there are no current plans to expand cycle hire to Peckham and Nunhead, the AAP is a 15 year document and the expansion of the scheme would be consistent with the aims to improve infrastructure for active travel, as set out in our Core Strategy. We note that the London Plan identifies the future enhancement and expansion of the cycle hire scheme as a strategic priority and we hope to work with TfL over the plan period to realise this ambition.
94	214	Transport for London			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 within the area. See also later comments on PNAAP 1. (* These comments are also referred to in the representations submitted by the GLA)		We clarified at the Preferred Option stage that the bus garage site is excluded from the Copeland Industrial Park site allocation (PNAAP4). PNAAP 4 designation excludes the bus garage. The council acknowledges the guidance in the London Plan and associated Land for Transport and Industry SPG (2012) with regard to safeguarding land that is used for transport infrastructure. The London Plan forms part of our development plan and it is not necessary to repeat existing development plan policies in the AAP. We already cross refer to relevant London Plan policies, including London Plan policy 6.2 within appendix A of the AAP, which shows the relationship between the AAP, other Southwark planning policy documents and the London Plan.
95	214	Transport for London					Whilst the proposal to enhance links between the bus station and the Aylesham Centre and beyond are broadly supported TfL as owner and operator of the bus station should be closely involved in the development of proposals for these links. A new vehicular access if not just for buses could conflict with operations. New pedestrian and cycle connections would need to be designed and managed to avoid safety and operational impacts. (*These comments are also referred to in the representations submitted by the GLA)		Noted. The council will involve TfL in any discussions about proposals that potentially have an impact on the operation of the bus station.
96		Transport for London					TfL recommends that as the bus garage is to be unaffected then the wording of policy 71P within Table 5 should be amended to explicitly state this. (*These comments are also referred to in the representations submitted by the GLA)		This is already set out in table 5.
97	214	Transport for London					TfL can confirm the Peckham and Nunhead Area Action Plan (Publication/Submission Version) is in broad conformity with the transport		Support noted. The points of clarity referred to have been considered

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							policies of the London Plan. Several issues listed above should be addressed, although these are more for clarity rather than being in conflict with London Plan policies. (*These comments are also referred to in the representations submitted by the GLA)		individually.
98	206	London Borough of Lewisham	Regan	Brian			Thank you for consulting the London Borough of Lewisham regarding the above and it's accompanying papers. Officers have reviewed the AAP particularly with regard to strategic matters that may impact on Lewisham. We have no concerns regarding strategic issues in the AAP and as such we have no formal consultation comments regarding the AAP. Please note, the views expressed in this letter are those at officer level only as there has not been time to report the matter to Mayor and Cabinet. Local Planning Authorities are required to fulfil a duty to co-operate under S33A of the Planning and Compulsory Purchase Act (PCPA) 2004 (as amended) in the process of preparing Local Plans. This includes engaging 'constructively, actively and on an ongoing basis' with relevant Local Planning Authorities regarding strategic matters. Officers acknowledge that this consultation represents a formal request for comments regarding the AAP. However, officers are keen to clarify that this formal approach is additional to the active and ongoing engagement undertaken between the Boroughs of Lewisham and Southwark (and the other South East London Boroughs of Bexley, Bromley and Greenwich) in many forms, notably through the South East London Planning Group (SELPG). The SELPG provides a regular forum for the discussion of strategic planning matters that impact upon the South East London Boroughs, including the progression of Local Plans, such as the Peckham and Nunhead AAP. Officers consider that the opportunities made available to influence the development of the AAP afforded through the ongoing engagement have met the requirements placed upon the Boroughs of Southwark and Lewisham to meet the duty to cooperate as set out in S33A of the PCPA 2004 (as amended). Additionally, we would like to take this opportunity to inform you that the Catford Town Centre Local Plan – Further Options version (previously an AAP) will be going out for public consultation on 16 January 2013. During the consultation period, we will make contact with you to disc		Support noted.
100	924	Royal Borough of Greenwich	Hows	Mike			Thank you for consulting us on the Peckham and Nunhead Area Action Plan. Royal Borough of Greenwich has no comments to make.		Noted.
101	925		Jervis	Esther			To whom it may concern, I have been in Arch 226 in Blenheim Court for 8 years. I am concerned about the proposed redevelopment of the Rear Yard to Peckham Rye Station. My concern is to find out if it will preserve the Artists' Studios which have been there for over 20 years and honour our contribution to the area. The Winter and Summer Open Studios in Blenheim Court are an established part of the local cultural calendar as well as the studios opening on the last Friday of each month as part of the South London Art Map. They are a regular 'good news' story for Peckham and about local artists making and selling affordable art for local residents. For me, working as an artist can be a solitary thing so to be part of a wider collective of artists provides friendship and mentoring. It also helped when I moved into the studios to join a group of artists that already had a lot of momentum which has helped me to pursue this career path. Furthermore at my stage of life with two children under five, it is vital to have a studio space local to me as sometimes I only have short snatches of time in which to work. I am keen to know what provision will be made in these plans to meet the needs of local residents such as myself working in their local area. In the current economic		In terms of the detail of the possible redevelopment of the station and surrounds, section 7.2 of the draft AAP sets out information on the future transformation of the station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation with feasibility work being carried out on the project. This is a separate

F	epresentation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								climate I would be keen to hear that you are supporting and preserving local artists and their business ventures so they can keep overheads down and continue working. At my stage of life, living in London which is an expensive city the money in make from cards and photographs enables me to continue to earn money through doing something I love and as it is so local I can still spend the majority of my time with my children.		piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
	103	935		Hart	Duncan	Policy 2		residential surroundings and limit development to 3 and 4 storeys respectively. It is therefore confusing as to why this same principle is not applied to PNAAP development sites 4 and 7. These two development sites sandwich the 2-storey Atwell estate and other similar housing nearby. However, these development sites allow for a 15-storey and 8-storey development respectively. This is completely out of character with the Atwell Estate and other surrounding housing. It is also clear that the evidence is being used and applied contradictorily within the action plan. This is not justified and also not effective. The core Peckham area is basically two shopping streets in a dense residential	The PNAAP should be amended to more closely reflect the evidence. The reference to 8 storey building heights at PNAAP7 and 15 storey building at PNAAP4 should be removed, and greater weight should be given to prevailing building heights of the 2 storey Atwell Estate and other surrounding low rise buildings. The Core Area building heights should not reference the Wooddene Site which has been demolished, and reference to the 22 storey Witcombe Point – which is outside of the area (350m from this block to junction of Rye lane and Hannover Park) -	No change. See urban design study for evidence base concerning taller buildings within core action area. Proposals wil be assessed through the planning application process, and would have to accord with AAP policies, in addition to the relevant saved policies of the Southwark Plan, the Core Strategy, the London Plan and the NPPF. The AAP urban design study sets out the rationale and methodology for assessing the impact of a number of taller elements within the core action area. The study sets out the assessment of a series of views from within and outside the core action area to assess the potential impact taller elements would have on their context, heritage assets and their settings (CAs, listed buildings, etc) within the core action area. The provision of taller buildings is seen as an exception, as new development would generally be no taller than existing heights. One of the key requirements of Policy 26 is that a taller building would have to be of exceptional quality and exemplary design that positively contribute to

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									the local character and distinctiveness of Peckham, as well as delivering generous public realm improvements.
104	935		Hart	Duncan	Policy 11		the actual policy document. Figure 11 under para 4.4.6 is very disappointing. The map includes some very general arrows, but no detail.	the popular Surrey canal cycle path and the suggested idea in the 2nd half of the penultimate paragraph under PNAAP 2. The canal path and ideas to extend it south should be added to figure 11 and commentary added in the section. Specifically, the canal path could be extended through PNAAP development sites 1, 2, 3 and 4 and under the railway arches east of Rye lane (if they are opened up) - specifically through Morrisons car park, down Cicely road (east of multi-storey car park, or through it if knocked down), through opened up railway arch and into a redeveloped Copeland industrial site. This would remove much cycle traffic from Rye lane if it was a quicker route. This idea should be brought out more clearly in the 'active travel' policy section of the report, as it is relevant to the whole area not just PNAAP 2. As it currently stands the document fails the effective test of soundness.	Our priorities for new and improved cycling routes are detailed in policy 11 and broadly reflected in figure 11. Our ambitions to focus improvements on links between key destinations that generate high numbers of trips, on links to wider areas and on works that will complement the proposed cycle superhighway are consistent with national and mayoral policy. The reduced amount of detail on individual routes compared to earlier versions of the AAP should not be interpreted as meaning cycle infrastructure is of lesser importance. The council has a strong commitment to improving cycling infrastructure, as set out in the Core Strategy and our Transport Plan. The changes made reflect the fact that as the AAP progressed we have had to formalise our ideas and be mindful of the NPPF soundness tests that will ultimately determine if the AAP can be adopted. We believe that the policy as presented is the most justified and effective in terms of ensuring delivery of improved cycle infrastructure in Peckham and Nunhead. The change reflects the fact that funding will be sought over the plan period for individual schemes and the precise details of these schemes, including their alignment and specification, will be dependent on the amount of funding secured and on bespoke local consultation. Our approach therefore highlights our priorities, whilst ensuring sufficient flexibility to deliver individual schemes. The policy wording and the associated map was discussed and agreed with groups including Southwark Cyclists, Southwark Living Streets and with NHS Southwark, all of whom share our commitment to

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									supporting active travel. The GLA (rep 14) and TfL (rep 93) have also confirmed their support for this policy through their most recent responses, as well as Southwark Living Streets confirming that they have no further comments on this version of the AAP. The council will continue to fund transport improvements through site specific s106 agreements, through our proposed community infrastructure levy and through many other funding streams, including the annual Local Implementation Plan (LIP) funding available via TfL. Just short of £1m worth of projects have already been identified to improve pedestrian and cycle infrastructure in and around Peckham as part of the council's 2014/15 bid to TfL. Further information on these proposals; their funding and the process for delivery is set out in the AAP infrastructure background paper. Surrey Canal Walk is not identified specifically because the route is already in existence. The extension of this route parallel to Rye Lane through a combination of development sites could be a possible option to improve connections through the town centre, but this would need to be discussed in detail with a host of landowners before we could legitimately consider it a deliverable project.
105	935		Hart	Duncan	Policy 11		In addition, I strongly support policy 11, point 2 (i.e. lobby for the extension of the Mayor's cycle hire scheme to Peckham and Nunhead), but the point must be developed further. The report should state how this will be achieved and how it links with the Mayor's current plans. Southwark council should work with Lambeth council to jointly work to move the scheme further south. The scheme has been extended west, north and east since its introduction; but not south. There needs be far greater push and collaboration with the Mayor's office to get the scheme further south of the Thames. The plan should identify spots which could host docking points. Without further elaboration, the action plan is not effective, nor positively planned and so fails on these two tests of soundness.		TfL (through the GLA) have responded that they have no current plans to extend the cycle hire scheme to Peckham and Nunhead. However, given that the AAP is a strategic document that will apply up to 2026 and the fact that the enhancement and expansion of cycle hire is identified in the London Plan as a strategic priority, we are hopeful that this view will change over the lifetime of the AAP. For this reason, the only commitment that we can make at this stage is to continue to lobby

Representati reference number		e Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									TfL and encourage the extension of the scheme. This is the position that is set out in our Transport Plan. It would therefore not be appropriate to identify docking station locations at this stage. We already work closely with Lambeth (and our other neighbouring boroughs) on the development of our cross boundary transport projects and will continue to do so.
	06 93	5	Hart	Duncan	Policy 22		Waste management The plan is not effective on waste management in the core action plan area, and does NOT provide enough information to justify that the infrastructure is in place. This is a major problem for Rye Lane. Many of the retail outlets do not currently have rear access. It is important this is rectified as much as possible as part of any development plans. Disposing of waste in the front of outlets is unsightly and can be a public health hazard. This issue is only dealt with in two paragraphs (4.6.20-21). This is not sufficient and should have greater prominence in the plan. This section is not effective in its present form. As a minimum, more information needs to be added on how waste will be better managed after the sites have been developed around Rye station, notably providing better rear access for waste disposal and collection.		This is a borough-wide issue and covered within existing borough-wide planning policies. Our approach to waste and refuge is set out Core Strategy policy 13 which states that we will; • Increase recycling and composting, minimise waste, reduce landfill and make more use of waste as a resource. • Require applicants to demonstrate how they will avoid waste and minimise landfill from construction and use of a development. • Meet the London Plan waste apportionment target set for Southwark. Further information is also set out in our waste management strategy 2003-2021. Our Sustainable Design and Construction supplementary planning document (SPD) states that all developments will be expected to take the following approach; • Avoiding the creation of waste in the first place • Reusing waste that is created as much as possible • Allowing left-over waste to be recycled elsewhere as much as possible, minimising the waste that ends up in landfill. This will apply to the way a development is constructed. However, the design of development will need to ensure it can be used in accordance with the above principles. Further guidance on the provision of facilities for sustainable waste management are set out in section 6.2 of the Sustainable Design and Construction SPD.
	07 93	5	Hart	Duncan		PNAAP		Suggested change - Change language to	No change. As set out in paragraph 4.2.14 of the AAP, feedback from

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							new facility is actually built (not a promise of being built). There should be no break in service, as this risks funding being withdrawn for the new facility in the interim period. It would also be more effective for the new cinema to be located at PNAAP 10 (Eagle Wharf), as there is more space and being located to by Peckham Square and library would create a cultural centre. It would not be appropriate for a cinema to be located in the southern part of PNAAP 4 due to the proximity of residential houses (notably the Atwell Estate and the new flats on Bournemouth road). I suggest removing the reference to a potential cinema in PNAAP 4, or at least state that it should be located in the northern part of PNAAP 4.	retained on this site until appropriate facilities ARE provided and A NEW CINEMA IS OPERATIONAL AT EAGLE WHARF" (PNAAP 10).	consultation strongly supports keeping a cinema in Peckham. One of the key aspirations of policy 2: Arts, culture, leisure and entertainment, is to support the continued provision of a cinema in Peckham town centre. As set out in the policy there are four key locations where we want to promote additional arts, cultural, leisure and entertainment floorspace - in and around Peckham square, and in and around central Peckham - around Peckham Rye Station and Copeland Industrial Park. There are only a few sites within Peckham town centre which are large enough to accommodate a cinema - the existing cinema/multistorey car park (site PNAAP 2), Copeland Industrial Park (site PNAAP 4) and Eagle Wharf (PNAAP 10). It is appropriate to refer to these sites as possible locations for a cinema. The site specific guidance for site PNAAP 2: cinema/multi-storey car park states "The cinema should be retained on this site unless appropriate facilities can be provided elsewhere in the AAP area". This wording, as well as the wording in the "We are making this designation because" section clearly sets out that the cinema should be retained on this site unless appropriate facilities can be provided elsewhere.
108	531	Tiger Developments Ltd				PNAAP 1	PNAAP 1: Aylesham Centre The Aylesham centre is the subject of a site specific proposal (PNAAP 1: Aylesham Centre). My client welcomes and supports this policy which recognises the redevelopment or refurbishment potential of the shopping centre. Our specific comments are set out below.		Support noted.
109	531	Tiger Developments Ltd				PNNAP 1	Land Uses The land uses set out in the policy are considered appropriate. In addition to those listed in the "other acceptable uses" category, we consider that hotel use should be included. The wider policies of the AAP indicate that hotel uses will be appropriate in the town centre (Policy 2) and including this use in policy PNAAP 1 will provide clarity of the range of uses that could be delivered on the Aylesham Centre site.		We have suggested this change through the table of proposed minor changes to ensure consistency with policy 2.
110	531	Tiger Developments Ltd				PNAAP 1	Indicative Capacities At our meeting you clarified that the indicative capacity figures shown in the policy are your estimates and they are not intended to be prescriptive. You also indicated that higher quantities of particular uses would also be acceptable and could be considered at the planning application stage. This is important because the capacity figure of 1,500 sq m non residential uses,	For this reason we would request that a sentence is added to the first paragraph of the supporting text	Appendix C (page 163) already clearly sets out that the capacities are indicative, based on our own capacity and background evidence. It sets out that there are many

Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number				policy		potentially other uses. The benefits of this would be numerous, not least that it would provide the viability to potentially address some of the other town centre	stating: "The indicative capacity figures should not be interpreted as exact targets. In particular, additional retail floorspace would be supported on this site."	representation options for the precise mix of use, particularly within the larger proposal sites and so the amounts of different uses eventually built may vary. It sets out that the precise figures will be determined through planning applications. It is not necessary to repeat this information under the policies and guidance for each individual site.
111	531	Tiger Developments Ltd				PNAAP 1	Landmark Building The identification of the site as suitable for a landmark building of up to 20 storeys is supported as it is considered that the site offers this opportunity in townscape terms and a tall building will enable a most efficient use of this town centre site.		Support noted.
112		Tiger Developments Ltd				PNAAP 1	Active Frontages We note that the policy states that redevelopment or refurbishment should introduce more active frontages throughout the site , particularly along Rye Lane. While this is generally supported as a principle, we consider that "particularly along Rye Lane" should be deleted from this sentence. This is because the Rye Lane frontage is currently characterised by10 shop fronts - this is already an active frontage . The units are broadly comparable in size to others in the conservation area, although the character of the 1980s shopping centre does not make a strong positive contribution to the recently designated conservation area . Therefore, this statement is considered to be confusing and should be deleted. The supporting text also recognises the potential for the redevelopment/refurbishment of the Aylesham centre to attract more multiple retailers to Peckham . If this is to be the case, it is likely that medium to large unit sizes will be required . This does not suggest there will be potential to increase the number of units fronting Rye Lane above 10. The third paragraph of the supporting text also states: "Opportunities to reinstate a more active frontage along Rye Lane, in keeping with the look and feel of the smaller shop fronts within the conservation area should be maximised. "We consider that this sentence should be deleted for the same reason. If the Aylesham Centre is expected to be a catalyst for helping to diversify the retail offer in the town centre and providing suitable space to attract more multiple retailers to Peckham , it should not be constrained to providing only small retail units on its Rye Lane frontage , as this is unlikely to attract different and multiple retailers to Peckham . This also seems at odds with Policy 1: Peckham Town Centre Shopping , which states that a range of different sized unit shops will be encouraged and the Council will put restrictions on larger units through planning conditions to prevent future sub division below 500 sq m		The policy and guidance is clear that we will seek in any redevelopment of the Aylesham centre an active frontage onto Rye Lane which is appropriate given its protected shopping frontage status. The size and mix of units will be something to be considered and determined at the planning application stage.
113	531	Tiger Developments Ltd			Policy14		Policy 14: Car Parking Policy 14 refers to the need to provide enough car parking in Peckham town centre. It states that the Council will support the redevelopment of the Aylesham centre and notes that redevelopment of the listed sites will need to take in to account the need for car parking for town centre uses. This approach is supported but it should be noted that introducing new decked or multi story car parking to replace surface level parking will now attract the Community Infrastructure levy (CIL) and this can introduce a major viability challenge. This factor should be considered in the Council's parking strategy for the town centre.		Support noted. Our approach to car parking in the town centre is underpinned by our Peckham town centre car parking study and with regard to planned investment in active travel and public transport infrastructure over the plan period. The study indicates that there is scope to reduce car parking overall, based on current and projected demand for spaces. Although we assume retention of some of the car parking spaces as

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									part of the potential redevelopment of the Aylesham centre (PNAAP1), the number and composition of spaces can be considered in further detail as detailed proposals are brought forward. This approach would be possible within the guidance set out in policies 14 and 15. It is acknowledged that the community infrastructure levy will have an impact on the viability of development, but our proposed rates are at a level that would not undermine development across the borough. Site specific issues will be considered as detailed proposals are presented to the council.
114		Tiger Developments Ltd			Policy 18		Policy 18: Mix and Design of New Homes We do not agree with the onerous requirements for family sized dwellings within the Action Area Core. Whilst it is appreciated that there may be a requirement for more family sized dwellings within the Borough as a whole, the Action Area Core is not considered a suitable location for such a high proportion of them. Family dwellings require greater space, not only in terms of internal living space but also open space, amenity space and the provision of car parking spaces. Requiring 20% provision of family sized dwellings in the Action Area Core will contradict policies on residential and town centre car parking, and limit the ability for proposals to make the most appropriate use of land.		We set out in the Core Strategy that we would consider whether we should vary the level of family housing in Peckham and Nunhead through the AAP. Having reviewed the approach and consulted widely on the issue, the council has decided that maintaining the approach set out in the Core Strategy is the best option. It provides a balance between the need for more family homes and the character of the action area core. The approach is the same as the in the adopted Canada Water AAP It is the councils view that 20% family housing is achievable in the action area core. The majority of new housing will be provided in the core and so we think it is appropriate to require a mix of unit sizes to ensure we achieve a balance between meeting our housing needs and ensuring that our approach is practical and viable. We think that 20% is appropriate as it allows a range of other unit sizes. there is a particular need for family housing in the area, as set out in the Strategic Housing Market Assessment and the Housing Requirements Study.
115	531	Tiger Developments Ltd			Policy 26		Policy 26: Building Heights This policy identifies the Aylesham Centre as site where a local landmark building of up to 20 storeys will be encouraged. The policy also identifies that the Aylesham centre is a site on which a taller element		Support noted.

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							could be provided where it is a distinctive building of exceptional quality and exemplary design linked to improved and generous public realm. This approach is supported and will be considered by Tiger Developments in its future redevelopment proposals.		
116		Notting Hill Housing Group		c/o Agent			Thank you for consulting us on the above document. We respond on behalf of our client, Notting Hill Housing, who 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 'PNAAP 5: Site of the former Wooddene Estate' in the draft Area Action Plan (AAP). By way of background, 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. It is currently expected that a planning application will be submitted in early 2013. This represents a significant opportunity to redevelop this vacant site by maximising the provision of residential accommodation in order to make the best use of the site and to replace the residential floorspace that previously existed at the site, as required by London Plan and LBS policy. These representations should be read in conjunction with the representations made on behalf of Notting Hill Housing to the Towards a Preferred Option version of the AAP in September 2011 and to the Preferred Option version in April 2012. Having reviewed the document, we make the following comments and suggested amendments, which we consider necessary to ensure its legal compliance and soundness.		Noted. PNAAP 5 already refers to the fact that the council currently own the site and have signed a contract with Notting Hill Housing Group to develop and dispose of this site.
117	549	Notting Hill Housing Group		c/o Agent		PNAAP 5	Site Allocation: Former Wooddene Estate NHH supports the allocation of the Wooddene site in the AAP, which recognises the potential for the redevelopment and regeneration of this key development site for residential use. It is considered that the delivery of new homes at the site will make a significant contribution towards meeting and exceeding the Borough's minimum housing target for the Peckham and Nunhead Growth Area of 2,000 new homes between 2011 and 2026.		Support noted.
118	549	Notting Hill Housing Group		c/o Agent		PNAAP 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', although the final mix will depend on market conditions.		Noted. The introduction to appendix C already sets out that the capacities are indicative and that the precise amounts and mix will be determined through planning applications.
119	549	Notting Hill Housing Group		c/o Agent		PNAAP 5	Site Specific Guidance We note the reference to London Plan Policy 3.14 — Existing Housing, which looks to resist the loss of housing, including affordable housing. It is noted that a large majority of the housing that previously existed at the Wooddene site was affordable. When determining the appropriate quantum and mix of new homes to be provided at the site, regard should also be had to the strategic policy objective of achieving mixed and balanced communities (NPPF Para 50 and London Plan Policy 3.9) in order to be consistent with national and regional policy. The Wooddene site is located within one of the wards identified in the LBS Core Strategy (Strategic Policy 6) as having an overconcentration of affordable housing, where a minimum of 35% private housing units are sought within development schemes in order to rebalance the overall tenure of the area and ensure a choice of housing type. The emerging proposals for the Wooddene site seek to replace the amount of residential accommodation previously at the site, whilst also providing an appropriate mix of housing types to contribute towards achieving mixed and balanced communities. In doing so, it is not proposed that the full amount of affordable housing that		Following discussions with the GLA, who initially objected to the drafting of the site allocation policy for the former Wooddene estate at the preferred option stage of consultation, the council added the reference to policy 3.14 of the London Plan because any development or planning application will need to ensure that this policy is taken into consideration. The London Plan is part of our development plan and needs to be fully considered. The GLA have removed their objection to this part of the AAP and have

Representation	Objector		Surname		Moin				Officer rechange to
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							previously existed at the site will be replaced. This principle is supported by the Council in its letter to the Greater London Authority (enclosed) setting out reasons why the Council believes that better outcomes will be achieved by not replacing all the affordable housing that previously existed. As such, it is considered that the wording of the site allocation in the draft AAP should reflect the strategic objective of achieving mixed and balanced communities when determining the appropriate amount of affordable housing to be provided at the site to ensure consistency with national and regional policy.		not asked for more detail following the inclusion of the reference. The guidance in appendix C of the AAP sets out the policy requirements for the site. The text does not refer to the full replacement of all the affordable homes that were on the site. However, it does refer to the need to address the balance of types and tenure of homes in the area, particularly the high concentration of social rented homes. This is fully recognised in the adopted Core Strategy and the AAP through the application of the 35% private homes requirement.
120	549	Notting Hill Housing Group		c/o Agent		PNNAP 5	The potential for the site to accommodate a taller building of up to 15 storeys is noted and supported. As demonstrated in pre-application discussions with officers, there are a number of options for distributing the massing across the site, which could include buildings of more than 15 storeys and this should not be precluded to ensure that the AAP is effective. There could also be scope for a series of taller elements across the site, where an acceptable townscape case can be made.		Support noted and no change See urban design study for evidence base concerning taller buildings within core action area. Proposals wil be assessed through the planning application process.
121	549	Notting Hill Housing Group		c/o Agent		PNAAP 5	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 and quantum of other active frontage uses, such as retail, will be determined having regard to market demand and viability. In order to ensure that the policies in the AAP are effective in meeting the Borough's housing requirements and consistent with the objectives of the NPPF of making the best use of sites, clarification should be provided to state that active frontages can also be achieved as part of residential development.		PNAAP 5 does not specify the balance between retail and residential frontage along Queens Road and the diagram is purely indicative illustrating the possibility of where active frontages could be located. The precise design of development and proportion of retail and residential facades along this frontage will be determined through a planning application and the consideration of an active frontage will be considered alongside the definition set out within the Local Plan glossary which describes them as building facades designed to add interest and vitality to the public realm.
122	549	Notting Hill Housing Group		c/o Agent		PNAAP 5	The site's potential to provide an energy centre to serve the Wooddene site and the Acorn Estate to the north is acknowledged and it is noted that NHH is currently in discussions with LBS in relation to the feasibility and viability of this.		Noted.
123	549	Notting Hill Housing Group		c/o Agent	Policy 15		Other Policies Policy 15: Residential Parking and Policy 28: Transport and Movement It is noted that Policies 15 and 28 encourage residential development within the Peckham Core Action Area to be car free and allow up to 0.3 spaces per unit where justified in a transport assessment. 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. Initial assessments for the proposals at the Wooddene site indicate that an appropriate parking level for the site would be in excess of		It is considered that the proposed car parking standards are sufficiently flexible to accommodate residential development across the Action Area, including at Wooddene (PNAAP5). The 2011Census identifies that 65% of households in the Livesey Ward, in

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							the maximum 0.3 spaces per unit, as currently drafted in the AAP. Therefore, in order for Policies 15 and 28 to be effective and not result in unnecessary pressure on the highways network, 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 considerations such as existing parking provision, the extent of Controlled Parking Zones (CPZ) in the vicinity, highways impact and car ownership levels.		which Wooddene is situated, do not have access to a private car. In addition, the site is particularly well served by public transport with a PTAL rating of 6a. Queens Road Station is just over 250m away, well within a 5 minute walk of the site, and has regular services to Central London as well as East and South London thanks to the recent arrival of the London Overground in December 2012. In light of levels of car ownership, recent and proposed investment public transport infrastructure and the anticipated housing mix on the Wooddene site, we consider that policy 15 provides an appropriate framework for considering residential parking at the Wooddene site and for the Action Area as a whole. Further site specific details that arise for individual schemes will be dealt with as part of the consideration of planning applications as part of the development management process. In line with the Core Strategy, we will require transport assessments to be submitted alongside applications to detail potential transport impacts associated with development.
124	549	Notting Hill Housing Group		c/o Agent	Policy 17		Policy 17: Affordable and Private Homes It is noted that Policy 17 requires a tenure split of 50% social rented and 50% intermediate. It is suggested that the tenure split should be applied flexibly in the context of site specific circumstances and scheme viability so as to not unduly constrain development and to ensure that the housing requirements set out in the AAP are deliverable.		We have amended the tenure split in the AAP from the saved Southwark Plan requirement of 30:70 (social rent: intermediate) to 50:50 as this reflects the character and the housing need in the area. This split will work alongside the private housing policy, helping to address the balance of housing types and increase the range of housing types on offer. In line with Core Strategy policy 6, we take financial viability into account when considering the provision of affordable housing on each application. Our affordable housing SPD sets out detailed guidance on the requirement for financial appraisals and how we consider viability

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125	549	Notting Hill Housing Group		c/o Agent	Policy 26		Policy 26: Building Heights The recognition in Policy 25 that certain sites, such as the Wooddene site, can accommodate a taller building to act as a local landmark is welcomed and consistent with strategic policy objectives of optimising the use of sites.		Noted.
126	549	Notting Hill Housing Group		c/o Agent	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 and viability.		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.
127	549	Notting Hill Housing Group		c/o Agent			We trust that the above comments are clear and will be taken into account in advance of the AAP being submitted for Examination in Public. We would be happy to meet with officers to discuss any of the proposed amendments set out above. We also reserve the right to appear at the forthcoming Examination.		Noted.
128			Jameson	Debra			I am a resident living on Blenheim grove and this will affect me my life my children my well being my human rights. If the proposed plans include noisy bars etc and more residential buildings being built opposite my home!		Existing policies in our Core Strategy and saved Southwark Plan, as well as the policies in the draft AAP, ensure that new development takes into account the existing uses in and around the development site. In particular saved Southwark Plan policy 3.2: Protection of amenity, sets out that "Planning permission for development will not be granted where it would cause loss of amenity including disturbance from noise, to present and future occupiers in the surround area or on the application site."
129	927		Jameson	Debra		PNAAP 6	I am very worried about some issues re future Peckham redevelopment. Land opposite 43 Blenheim has been refused for planning re flats twice in the last ten years. I am concerned that housing will be built there and I think this land should remain green! I think as Blenheim is a residential area bars and restaurants will not be appropriate for the bellenden road end of the road! The garages should go but the artist community should stay as this is part of our community and we all like them. The station does need to be redeveloped opened up and new retail markets etc should be part of this but this should not go the whole way down the road. Noisy bars etc will be a nuisance and will destroy a quiet residential road.		In terms of the detail of the possible redevelopment of the station and surrounds, section 7.2 of the draft AAP sets out information on the future transformation of the station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the

Representation	Ohiootor		Surname						
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
130	928		Soares	Natasha			I am a school and community gardener based in Southwark. I work with members of the public in parks and children and adults in schools, on gardening and growing projects and environmental education. There is so much scope to have a positive impact for the local population in planning for the next 20 years, but this needs to be made as certain as possible - you can do this clearly within the plan! I have read certain sections of the PNAAP, wish to make the following observations and hope that you will reconsider the following points:		Noted. Officer comments are provided on the detailed representations.
131	928		Soares	Natasha	Policy 19		1. Provision for food growing - urban food growing is inspirational and educational at the very deepest level for children and adults. It results in both socially and environmentally positive outcomes. We consider that the policy on Open spaces and sites of importance for nature conservation (Policy 19) is unsound as not effective in achieving its own objectives. One of the objectives of Policy 19 is to promote food growing opportunities but the provisions of the PNAAP fail to ensure this will happen. Southwark Council's Open Space Study recommends that the Council make provisions are made for allotments and food growing in new developments but this has not been included as a requirement in the PNAAP.		The Peckham and Nunhead AAP recognises that open spaces can provide space to locally grow food. Policy 19 of the AAP sets out a requirement for all major developments to contribute to food growing opportunities. The provision of allotments and other food growing opportunities is predominantly a borough-wide issue and the open space strategy sets out further information on how we will encourage food growing opportunities across the borough, including promoting food growing on both existing protected open space and housing amenity land. The open space strategy sets out further information on how we will explore opportunities to increase access to food growing through alternative gardening projects. We will support alternative gardening projects by offering temporary access to local authority owned

Representatio reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									land that is not suited for the creation of allotments. Development sites which are currently left dormant also opens up the possibility of exploiting privately held stocks of undeveloped land for temporary gardening use. We will review our policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year.
13			Soares	Natasha	Policy 19		2. Provision for open space - Open space within our increasingly crowded cities is critically important to maintain a cohesive society We consider that the provision for open space provision on the PNAAP to be unsound as not likely to be effective. The plan lacks measures to ensure that the open spaces will retain "an accessible, high quality green infrastructure network for residents and visitors to enjoy that strengthens local character, promotes nature conservation, exercise and food growing opportunities" (PNAAP Policy 19). The proposals set out reductions in public park and natural space provision per 1000 population, and meanwhile don't set out how proposed developments would contribute to open space improvements and maintenance of open space allocations.		The Peckham and Nunhead AAP sets out how we will continue to protect all of our existing open spaces as well as putting forwards some new open spaces for protection. The reductions in the standards are a result of the projected population increase in Peckham and Nunhead over the next 10 to 15 years. We will seek to ensure that new open space is provided as part of new development where possible but given the limited opportunities for this, we are focusing on improving the quality of our existing open spaces. We consider the provision of open space on a borough-wide basis. The open space strategy sets out more information on how we will improve the quality and value of our existing open spaces, where we will designate additional open spaces for protection and where we will seek new open space provision on site. We use \$106 and in the future we will also use Community Infrastructure Levy monies to also improve our open spaces in line with the recommendations in our open space strategy. Our residential design standards SPD sets out how we require amenity space to be provided as part of new development.
13	928		Soares	Natasha	Policy 19		3. Provision for the meanwhile use of sites for food growing and community gardens whilst proposals are developed at sites designated for development - in the years to come, community food growing will be an important part of a whole		There may be cases where development sites have been temporarily used for other interim

Representation			Surname		Main			_	Officer response to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	representation
							country policy addressing future food security. Meanwhile sites are wasted space and should be used positively to support our communities. We consider that the absence of a policy on the meanwhile use of sites designated for development is unsound as not justified by the evidence. There are no legal impediments to local authorities setting up temporary allotments on suitable sites under their control in order to help meet current levels of demand for food growing and there are positive experiences in the borough of using temporary sites for community gardens, like the Union Street orchard. We propose that the PNAAP should include a provision for the meanwhile use of sites designated for development for food growing and community gardens.		uses such as Bold Tenancies and Frank's Cafe at the multi-storey car park, but it is not appropriate to have a specific policy on meanwhile use as most of our development sites have relatively early dates for development so this will need to be considered on a site by site basis in discussion with the council. The open space strategy sets out how we will support alternative gardening projects by offering temporary access to local authority owned land. The open space strategy also recognises that development sites which are currently left dormant also open up the possibility of exploiting privately held stocks of undeveloped land for temporary gardening use. We will review our borough-wide policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year.
134	929		Syson	Lydia	Policy 1	4.2.10 & 4.2.12	I'm writing to comment on rather a specific element of the Peckham and Nunhead Area Action Plan. As the consultation document rightly points out, '4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses.' I'm concerned that the local artists' studios referred to in this paragraph should be given some form of formal protection, both so that they can continue to exist and they remain affordable. Can we be assured that the proposal to 'protect' shop frontage at the eastern end of Blenheim Grove will not actually mean that retail outlets are extended in this area, at the expense of working space for artists? I am all in favour of the proposals to keep a limit on the number of fast food outlets, but I should like to know to what extent other types of retail outlet - particularly chainstores of the type found in every high street throughout the UK (Clone Town Britain) - can also be controlled. I should like to see small independent traders favoured over large corporations, and retail rents also kept affordable. As the last few years have shown, chain stores are the first to close high street branches in a recession. It is equally important that rents are kept low in the 'new spaces' to which paragraph 4.2.12 refers. Unfortunately, it is not currently clear where these 'new spaces' will actually be studio space or for entertainment. Peckham's thriving creative community contributes enormously to its character, and has helped make possible the changes in areas like Bellenden Road. I think we need some guarantees that the Action Plan will take the needs of local artists extremely seriously, and ensure that they are not priced out of the area. At a time when even Cork Street galleries are struggling against encroachment from retail		We will continue to protect business floorspace (B use classes) in the town centre through PNAAP Policy 6 unless in exceptional circumstances the criteria in Policy 1.4 of the Southwark Plan can be met. Policy 6 requires the provision of space in new development to be 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. There is no particular evidence that subsidised business space is required at the moment in Peckham. PNAAP Policy 2 also encourages a mix of complementary arts, cultural, leisure and entertainment uses in the 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

Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number	Organisation		T II St Hallic	policy	r aragrapii	betails of representation	Troposca onanges	representation
							outlets, and that area is fighting to maintain its historical identity, this is absolutely crucial. I look forward to hearing from you, and to finding out more about the next stage of the Plan		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). PNAAP Policies 1 and 2 list a number of proposal sites within the town centre where we will promote additional retail/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. Support noted for Policy 4. Policy 1 promotes a wider mix of uses in the town centre, including smaller independent stores. In new developments we will encourage a range of unit sizes to accommodate and attract a broader range of retail businesses.
135	930		Rutt	Loraine		PNAAP 6	l established my studio in Blenheim Court 22 years ago, so l'm sure you will understand my concern regarding proposed redevelopment at the rear of Peckham Rye Station. My creative neighbours and I have played a significant part in the natural regeneration of this area for the last 2 decades. I made the terrace and planters at Petitou which was chosen by Southwark Council to represent the regeneration of Bellenden on the Peckham Map published in 2001. If you walk through the Bellenden area you will notice a large number of individual architectural embellishments, eg character chimney pots, gargoyles, gates and railings commissioned by local people, and made in Blenheim Court, many of which pre-date the Bellenden Renewal Scheme, and give this area it's unique character. We moved into this yard at a time when it had been systematically squatted by people 'ringing' cars, and we have made a very positive contribution to the safety of this locality. Other businesses initially used the yard but these were always short lived due to the narrow access. Our creative yard works because we all know each other and collaborate to make it an effective space. There are over 20 individuals working in creative enterprises in Blenheim Court and we are a 'Linked Community', often working on projects collaboratively. Our enterprises are often inter-reliant, and Blenheim Court is unique in that it provides level access and some exterior space that facilitates this. We have Open Studios twice a year, and some studios also open on the Last Friday of each month as part of The Tate Modern and South London Gallery Art Map. We know from this that we are a valued local asset. I have concerns about the future of my studio, and I would welcome your views? Southwark Council have publicised previous area regeneration on the strength and importance of the role that artists and creatives can play. I do hope that this can continue		In terms of the detail of the possible redevelopment of the station and surrounds, section 7.2 of the draft AAP sets out information on the future transformation of the station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the

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									local community will take place as at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement
136	931	St Jude's CE Primary School	Charlton	Lynn	Policy 4		l am a Headteacher in Southwark with a responsibility of providing good quality education and to ensure the school curriculum and exte nded school programmes promote the health and wellbeing of pupils. At our primary school we participate in the nat ional child measurement programme, Southwark Free Healthy School Meals programme and previously the national Healthy Schools Programme. We work with our school I community to take a whole school approach and support healthy eating messages because there is concern about the current number of unhealthy weight children and the future health impact this could have. I strongly support Policy 4 which will limit the number of new hot food takeaways, which are already at saturation point in the town and local centres and shopp ing parades nearby and for an exclusion zone to be introduced around schools to restrict planning permission for new hot food takeaways. Combined with sound evidence presented in the background document 'PNAAP, business and retail background paper', Policy 4 will be one measure which will help to support the whole school community by encouraging children to eat more healthily out side of the school gates following the free healthy school meal they receive during the school day. Our school works closely with children and families, community and health services to address child obesity through whole school policies which request pupils to remain on site during lunchtimes. It is important to note that the lack of choice of nutrit ious food in Hot Food takeaways for children and families st ruggling to afford or access better quality healthy food before and after school is of great concern. This is reflected in comme nts made in consultation with schools for a Southwark child obesity review to provide activities such as cooking clubs and breakfast clubs which many schools do. Providing the additional activities is often challenging of r schools when hot food takeaways set up in close proximity of the school gates and time their operation to attract schoo		Support noted
137	932	Grove Nursery	Beckworth	Kay	Policy 4		I am a Headteacher in Southwark with a responsibility of providing good quality educate on and to ensure the school curriculum and exte nded school programmes promote the health and wellbeing of pupils. At our primary school we participate in the national child measurement programme, Southwark Free Healthy School Meals programme and previously the national Healthy Schools Programme. We work with our school community to take a whole school approach and support healthy eating messages because there is concern about the current number of unhealthy weight children and the future health impact this could have. I strongly support Policy 4 which will limit the number of new hot food takeaways, which are already at saturation point in the town and local centres and shopp ing parades nearby and for an exclusion zone to be introduced around schools to restrict planning permission for new hot food takeaways. Combined with sound evidence presented in the background document 'PNAAP, business and retail background paper', Policy 4 will be one measure		Support noted

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							which will help to support the whole school community by encouraging children to eat more healthily out side of the school gates following the free healthy school meal they receive during the school day. Our school works closely with children and families, community and health services to address child obesity through whole school policies which request pupils to remain on site during lunchtimes. It is important to note that the lack of choice of nutrit ious food in Hot Food takeaways for children and families st ruggling to afford or access better quality healthy food before and after school is of great concern. This is reflected in comme nts made in consultation with schools for a Southwark child obesity review to provide activities such as cooking clubs and breakfast clubs which many schools do. Providing the additional activities is often challenging of r schools when hot food takeaways set up in close proximity of the school gates and time their operation to attract school children. This undermines the work schools are involved in to promote healthy meals and conflicts with the education we are providing to our children.		
138	933	Oliver Goldsmith Primary School	Parsons	Mark	Policy 4		I am a Headteacher in Southwark with a responsibility of providing good quality educati on and to ensure the school curriculum and exte nded school programmes promote the health and wellbeing of pupils. At our primary school we participate in the national child measurement programme, Southwark Free Healthy School Meals programme and previously the national Healthy Schools Programme. We work with our school I community to take a whole school approach and support healthy eating messages because there is concern about the current number of unhealthy weight children and the future health impact this could have. I strongly support Policy 4 which will limit the number of new hot food takeaways, which are already at saturation point in the town and local centres and shopp ing parades nearby and for an exclusion zone to be introduced around schools to restrict planning permission for new hot food takeaways. Combined with sound evidence presented in the background document 'PNAAP, business and retail background paper', Policy 4 will be one measure which will help to support the whole school community by encouraging children to eat more healthily out side of the school gates following the free healthy school meal they receive during the school day. Our school works closely with children and families, community and health services to address child obesity through whole school policies which request pupils to remain on site during lunchtimes. It is important to note that the lack of choice of nutrit ious food in Hot Food takeaways for children and families st ruggling to afford or access better quality healthy food before and after school is of great concern. This is reflected in comme nts made in consultation with schools for a Southwark child obesity review to proide activities such as cooking clubs and breakfast clubswhich many schools do. Providing the additional activities is often challenging for schools when hot food takeaways set up in close proximity of the school gates and time their operation to attract school c		Support noted
139	934	NHS Southwark	Bisset	Kate	Policy 4		Policy 4: Hot-food takeaways I work as the Senior Public Health Officer for Healthy Weight in Southwark. I have only been in post 6 months but the term 'chicken and chips' is one I hear frequently! In Southwark we have one of the highest rates of obesity in the country. Peckham and Nunhead are identified as child obesity hotspots from data collected through the National Child Measurement Programme. Working with colleagues in Children's Centres and schools in these wards, I often hear that families find the convenience and the abundance of hot food takeaways a barrier to healthy eating. Qualitative evidence from our Southwark Childhood Obesity Review 2012, also details		Support noted

	nce Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number numl	per			policy		concerns from young people about the abundance of fast-food available on the high streets of Peckham. The background paper, which supplements the PNAAP, provides sound evidence to document the links fast food outlets and healthy living. As the evidence presented suggests, the energy dense foods served in hot food takeaways, have very little nutrient content and consumption of these energy dense foods can contribute to obesity. As part of our Southwark Healthy Weight Strategy, there is a action strand relating to population level prevention of obesity. I feel the restriction on new takeaways opening will allow diversity among the high streets of these wards allowing residents to have more choice of the foods they consume. This policy will help to prevent an unhealthy eating environment. I'm sure the proposed policy will also result in a long term reduction of litter on the high streets of these wards, creating a more walking friendly environment. I feel the proposed Policy 4 is justified to help create healthier environments to the communities that are in need. I urge you to implement this policy to work alongside the work we do at NHS Southwark to help the population of the borough reach a healthy weight.		representation
140	Transition Town Peckham	Orr	Paula	Policy 19		We consider that the policy on Open spaces and sites of importance for nature conservation (Policy 19) is unsound as not effective in achieving its own objectives. One of the objectives of Policy 19 is to promote food growing opportunities but the provisions of the PNAAP fail to ensure this will happen. Southwark Council's Open Space Study / Final Evidence Report published in 2010 notes that over 700 people are on waiting lists for allotments in Southwark. As it is unrealistic to expect that this number of new allotments could be created, the Study suggests that the Council should "concentrate on developing the provision of community gardens, which are already successful in Bankside and some other parts of the borough."(p 96) Growing food has multiple benefits for those involved and for the wider community, both through the provision of healthy food and in terms of the physical, social and mental health benefits of working in open spaces. The Study recommends that the Council ensure that provisions are made for allotments and food growing in new developments: "Proposals for new housing development should be accompanied by proposals to improve allotment provision or other food growing opportunities " (8.92) "Developments should also include community gardens, window boxes, planted green roofs, to provide further opportunities for gardening." (8.93) However, the PNAAP's Policy 19 suggests that this provision can be achieved by "Expecting major developments to provide opportunities for food growing." We do not believe that this expectation is likely to be met without stronger requirements being made on developers. We propose that the provision of open space for food growing in the PNAAP should be strengthened by requiring developers to provide space for community gardens or food growing on walls or roofs within each new development. Furthermore, we conclude that the policy on Open spaces and sites of importance to nature is unsound as not effective because it fails to "(promote) nature conservation, exercise an		The Peckham and Nunhead AAP recognises that open spaces can provide space to locally grow food. Policy 19 of the AAP sets out a requirement for all major developments to contribute to food growing opportunities. The provision of allotments and other food growing opportunities is predominantly a borough-wide issue and the open space strategy sets out further information on how we will encourage food growing opportunities across the borough, including promoting food growing on both existing protected open space and housing amenity land. The open space strategy sets out further information on how we will explore opportunities to increase access to food growing through alternative gardening projects. We will support alternative gardening projects by offering temporary access to local authority owned land that is not suited for the creation of allotments. Development sites which are currently left dormant also opens up the possibility of exploiting privately held stocks of undeveloped land for temporary gardening use. We will review our policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan

F	Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
										which we are due to begin work on later this year.
	141		Town Peckham	Orr		Policy 19		Provision of Open Space We consider that the provision for open space provision on the PNAAP to be unsound as not likely to be effective. Policy 19 of the PNAAP will "protect and improve our open space and sites of importance for nature conservation, shown in figure 17. We will provide an accessible, high quality green infrastructure network for residents and visitors to enjoy that strengthens local character, promotes nature conservation, exercise and food growing opportunities." The Plan lacks measures that would ensure this. The plan states that the current provision of public parks is 1.18ha per 1000 population but accepts that not all of this is of good quality and 2.06ha open spaces per 1000 population. The proposals set out that this will reduce to 1.03ha public parks per 1000 population and 1.79ha open space per 1000 population. It is not demonstrated how these reductions will be achieved, but assuming that this relates to the increasing population without increasing public park and open space provision, we are concerned that the proposed population growth will put additional pressure on public parks and open spaces. In order to maintain the local character and quality of public parks and open spaces (and improve these where these have been identified as requiring improvement as outlined in paragraph 4.6.5), there is a need for specific requirements in the PNAAP for developers to provide for public parks and open spaces as part of their development proposals. This should be used to ensure that the developments meet the commitments in the Open Space strategy that all open spaces are of good quality and provide a range of facilities associated with the size and types of each space. The link W – E across Peckham has been identified as a Green Chain Link. The PNAAP does not set out what measures will be taken to make this a more explicit link across Peckham, allowing for joining up of green corridors and open spaces. Proposed developments in the area of the green link (PNAAP2: Cinema/Multi-storey car park;		The Peckham and Nunhead AAP sets out how we will continue to protect all of our existing open spaces as well as putting forwards some new open spaces for protection. The reductions in the standards are a result of the projected population increase in Peckham and Nunhead over the next 10 to 15 years. We will seek to ensure that new open space is provided as part of new development where possible but given the limited opportunities for this, we are focusing on improving the quality of our existing open spaces. We consider the provision of open space on a borough-wide basis. The open space strategy sets out more information on how we will improve the quality and value of our existing open spaces, where we will designate additional open spaces for protection and where we will seek new open space provision on site. The open space strategy also sets out where we will encourage green links through the AAP area and sets out further detail on the characteristics of green links we will seek to promote. We use S106 and in the future we will also use Community Infrastructure Levy monies to also improve our open spaces in line with the recommendations in our open space strategy. Our residential design standards SPD sets out how we require amenity space to be provided as part of new development.
	142	926	Transition Town Peckham	Orr	Paula	Policy 19		Meanwhile uses of sites designated for development We consider that the absence of a policy on the meanwhile use of sites designated for development is unsound as not justified by the evidence. The Open Space Study carried out to provide evidence for the PNAAP has a section on temporary allotments [p 87] which says: "There may also be potential for temporary allotment sites within Southwark. These are typically located on land that was not acquired for the purpose of providing allotments, but which is destined for an alternative use. There are no additional legal impediments to local authorities setting up temporary allotments on suitable sites under their control in order to help meet current levels of demand. However, the LGA guide recommends that a key		There may be cases where development sites have been temporarily used for other interim uses such as Bold Tenancies and Frank's Cafe at the multi-storey car park, but it is not appropriate to have a specific policy on meanwhile use as most of our development sites have relatively early dates for development so this

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							lesson for local authorities considering providing temporary sites, be it on their own ground or on land on short-term lease, is to make both the end use and the likely life expectancy of the site clear from the outset." The Open Space Study notes that over 700 people are on waiting lists for allotments in Southwark. There is a high level of interest in growing food among people over 50 in the borough but also an increasing interest among young people. Community gardens provide another way of using temporary space for food growing. Community gardens have the same health and wellbeing benefits as allotments as well as building community links and providing wider access to food growing. There are positive experiences in the borough of community gardens on temporary sites. One is the Union Street orchard. We propose that the PNAAP should include a provision for the meanwhile use of sites designated for development for food growing and community gardens.		will need to be considered on a site by site basis in discussion with the council. The open space strategy sets out how we will support alternative gardening projects by offering temporary access to local authority owned land. The open space strategy also recognises that development sites which are currently left dormant also open up the possibility of exploiting privately held stocks of undeveloped land for temporary gardening use. We will review our borough-wide policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year.
143	926	Transition Town Peckham	Orr		Policy 21		Energy efficiency in new developments We consider that the policy to "reduce the energy use of new developments" is unsound as unjustified as it does not follow the evidence included in the Energy Study for the PNAAP. The Energy Study looks at the application of energy efficiency within new development identified in the PNAAP. It identifies significant opportunities for influencing the level of energy efficiency delivered in new buildings. It recognises that the London Plan set informal targets to achieve the current Building Regulations through energy efficiency alone. But does not go as far as installing low and zero carbon energy technologies to meet the higher targets set out in the London Plan. The report considers the following technologies to be most applicable for implementation within the PNAAP area based on the physical and environmental constraints in the area and the technical feasibility and commercial viability of systems currently available on the market: Gas-fired CHP • Heat Pumps • Photovoltaics • Solar Water Heating • Biomass • Energy from Waste (specifically referring to the potential to take heat from the SELCHP facility) The study recommends a number of features including support for the implementation of a District Heating Network in Peckham. The PNAAP's Energy Policy includes requirements for developers to evaluate the feasibility of connecting to existing heating and cooling networks and CHP systems and requiring development to be designed to be capable of connecting to a future CHP/communal heating network. The PNAAP does not require developers to consider any of the other technologies described as applicable for implementation. This could result in new developments being designed to connect to future CHP/communal heating systems but not implementing more applicable and immediately effective carbon reduction technologies. We suggest that the PNAAP should require developers to evaluate the feasibility of applying carbon reduction technologies, initially the ones recognised as appropriate		We have a borough wide approach to encouraging new development to meet high levels of energy efficiency is set out in the Core Strategy and we consider that it not necessary to repeat existing borough-wide policies in the AAP. Strategic policy 13 of the core strategy sets out how we will require all new development to be designed and built to minimise greenhouse gas emissions and design all developments so that they require as little energy as possible to build and use. We have set targets to ensure that major new developments achieve a 44% saving in CO2 emissions above the building regulations (2006) from energy efficiency, efficient energy supply and renewable energy generation. We have also set a target for all new major development to achieve a 20% reduction of CO2 from using onsite local low and zero carbon energy sources. The Peckham Energy study also specifically identified the potential for a combined heat and power network in the area and we have included this recommendation within Policy 20 of the AAP.

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
144	926	Transition Town Peckham	Orr		Policy 21		Energy efficiency and retrofitting The PNAAP's Energy Policy does not include any requirements for retrofitting and energy efficiency in existing buildings. The Peckham and Nunhead Area Vision includes the statement; "Peckham will be a leading Low carbon Zone". We consider that the Energy Policy fails to demonstrate this leadership and, in particular, that the provisions for requiring development to make a significant contribution towards the Government's targets to reduce national carbon dioxide emissions are unsound as not likely to be effective. The PNAAP sets out requirements for new developments in its Energy Policy but does not include any requirements for existing buildings to improve their energy efficiency. The current London Plan Policy 4B.4 on retrofitting expects Boroughs to support measures to produce a lower environmental impact from the existing stock of buildings by supporting policies and programmes for refurbishment of buildings which will reduce carbon dioxide emissions etc. The Mayor of London's Housing Strategy at Para 2.2.2 emphasises that the carbon reduction target cannot possibly be met without a major programme of retrofitting the existing housing stock. In the Mayor of London's proposals for a new London Plan, Policy 5.4 on retrofitting expects Boroughs to identify opportunities for reducing carbon dioxide emissions from existing building stock. We suggest that clear proposals for retrofitting expects Boroughs to increase energy efficiency and reduce carbon dioxide emissions should be included in the PNAAP. It is also worth pointing out that creating demand for retrofitting services would provide employment and business opportunities for local people (objective E5).		Measures to incorporate energy efficiency measures into existing stock are largely beyond the remit of planning which can only influence new development in Peckham and Nunhead. However, where we can adopt an approach to encourage the retrofit of energy efficiency measures this will be considered as a borough wide issue and we will review this through the preparation of the New Southwark Plan later this year.
145	926	Transition Town Peckham	Orr	Paula	Policy 11		Active Travel The Plan sets out (in Policy 11) that development in the area should: "Provide and promote linkages that are safe, attractive, direct and convenient for pedestrians and cyclists throughout the action area". We consider that the Plan is unsound as not effective in meeting this objective and not justified by the evidence put forward by members of the community in previous consultations, The provision of safe and clearly indicated cycle routes is critical to enable all sectors of the community to be able to cycle. In particular, cycling to school will only be possible if there are well-marked cycle routes, ideally separating cyclists from the rest of the traffic. The removal of all existing cycle routes which were included in the first draft and the failure to give the details of any new cycle routes, apart from very general 'indicative' cycle routes (Figure 11) means the plan fails to satisfy National and London Mayoral policies to encourage cycling, reduce carbon emissions and to encourage healthier living. The Plan should have the original map of existing cycle routes restored and a comprehensive map of proposed future routes included. These or similar proposals were requested by many groups in both the previous rounds of consultation including Southwark Cyclists, Environment Agency, Transport for London and NHS Southwark. Not a single response supported the deletion of existing cycle routes. Without requirements for the inclusion of segregated cycle provision wherever practical in new regeneration projects and new transport infrastructure when existing infrastructure is being refurbished, the PNAAP will not be effective in providing and promoting "linkages that are safe, attractive, direct and convenient for pedestrians and cyclists throughout the action area". All future road calming measures should allow permeability for cyclists. Too many build outs are forcing cyclists into the path of lethal motorised traffic.		Our priorities for new and improved cycling routes are detailed in policy 11 and broadly reflected in figure 11. Our ambitions to focus improvements on links between key destinations that generate high numbers of trips, on links to wider areas and on works that will complement the proposed cycle superhighway are consistent with national and mayoral policy. The reduced amount of detail on individual routes compared to earlier versions of the AAP should not be interpreted as meaning cycle infrastructure is of lesser importance. The council has a strong commitment to improving cycling infrastructure, as set out in the Core Strategy and our Transport Plan. The changes made reflect the fact that as the AAP progressed we have had to formalise our ideas and be mindful of the NPPF soundness tests that will ultimately determine if the AAP can be adopted. We believe that the policy as presented is the most justified and effective in terms of ensuring delivery of improved cycle

Representation reference		Organisation	Surname	First name	Main	Dorograph	Details of representation	Drangood changes	Officer response to
number	number	Organisation		rirst name	policy	Paragraph	Details of representation	Proposed changes	representation
									infrastructure in Peckham and
									Nunhead. The change reflects the
									fact that funding will be sought over
									the plan period for individual
									schemes and the precise details of
									these schemes, including their
									alignment and specification, will be dependent on the amount of
									funding secured and on bespoke
									local consultation. Our approach
									therefore highlights our priorities,
									whilst ensuring sufficient flexibility
									to deliver individual schemes. The
									policy wording and the associated
									map was discussed and agreed
									with groups including Southwark
									Cyclists, Southwark Living Streets
									and with NHS Southwark, all of
									whom share our commitment to supporting active travel. The GLA
									(rep 14) and TfL (rep 93) have also
									confirmed their support for this
									policy through their most recent
									responses, as well as Southwark
									Living Streets confirming that they
									have no further comments on this
									version of the AAP. The council will
									continue to fund transport
									improvements through site specific
									s106 agreements, through our proposed community infrastructure
									levy and through many other
									funding streams, including the
									annual Local Implementation Plan
									(LIP) funding available via TfL. Just
									short of £1m worth of projects have
									already been identified to improve
									pedestrian and cycle infrastructure
									in and around Peckham as part of
									the council's 2014/15 bid to TfL. Further detail on these proposals;
									their funding and the process for
									delivery, is set out in the AAP
									infrastructure background paper.
146	926	Transition	Orr	Paula		PNAAP 2	: Cinema/Multi-storey car park The PNAAP argues that this site "is currently not		The AAP sets out that we will
	020	Town					achieving its potential for use of design" and suggests opportunities for several		encourage cultural use in and
		Peckham					alternative land uses with possibilities and aspirations for improved access, the		around the centre of Peckham
							creation of better public space and better physical links with adjoining areas. It is		town centre in and around
							suggested the site could still contain a Cinema but argues a potential for a taller		Peckham Rye Station and
							building of up to 10 storeys. We agree that the car park is underused and that		Copeland Industrial Park, and in
							the site is not fulfilling its potential. Although it is encouraging that the PNAAP		and around Peckham Library and
							suggests a very wide number of uses and activities are, it is assumed that these		Eagle Wharf. The draft site
			<u> </u>				will involve the demolition and replacement of the existing car park and no		allocation for PNAAP 2:

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Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number	Organisation		riist iiaiile	policy	Faragrapii	Details of representation	Proposed changes	representation
Hamber	TIGITIDE						alternative for refurbishment is included. We therefore consider that the PNAAP		Cinema/multi-storey car park
									already requires leisure/community
							proposals for the Cinema / Multi-storey car park are unsound as not justified.		
							Comments on the site and existing building 1. Central location. The importance		use (Class D) as a "required land
							of the site derives from its centrality. It is not only just off the centre of Reye Lane		use" on this site. This could include
							but adjacent to other proposal sites identified in the PNAAP, such as the station		a cinema. The draft site allocation
							and the Copeland Industrial Park. It clearly helps identify this area as one of the		for PNAAP 2 also sets the
							'character areas' of Peckham town centre. We would endorse this. Immediate		requirement to retain a cinema in
							physical context. Despite its importance and central position, the Car park is		Peckham town centre. Similarly
							mostly hidden from its wider surroundings. It is tucked away between the		draft policy 2: Arts, culture, leisure
							northern railway viaduct and Rye Lane, the only clear view of the car park itself		and entertainment, sets out that we
							being from Cerise Road, which is also the main vehicular access. The Cinema		will continue to support the
							frontage is set back some distance form Rye Lane down the truncated west end		provision of a cinema in Peckham
							of what is still called Moncrieff St. 2. Existing access and security. A common		town centre, and that we will
							complaint is the limited indications of access. It is noted that many people		promote the development of
							perceive it as unsafe out of hours. 3. Existing building. Multi-storey car parks are		additional arts, cultural, leisure and
							usually perceived very negatively, both as physical structures as well as in terms		entertainment floorspace in a
							of their actual use however the existing building is not an unattractive structure. It		number of locations. The existing
							has an expressed concrete frame externally, with brick panelling to the		cinema below the multi-storey car
							elevations. It is in any case mostly hidden from view as noted above. The 5		park is currently leased to a cinema
							storey building occupies a space approx. 30 x 120 metres of which the lower		provider who run the cinema. The
							floors to the west are used by the cinema (lower levels only). The internal space		cinema and multi-storey car park
							is characterised by staggered floors with deep downstand concrete beams giving		are on the council's long-term
							a clear floor space of approx. c. 2.2 metres. Vehicular access is from Cerise Rd		disposals list for redevelopment,
							with additional pedestrian access from both Rye Lane and Cicely Rd at each		but in the meantime the council has
							end. By its nature the structure appears to be in a reasonably good state of		allowed interim uses to take place
							repair. 4. Prospect. One of the unique aspects of Peckham town centre derives		within the multi-storey car park.
							from its location in the centre of the Borough at the point where the flat flood		main are main elerey car paria
							plain gives way to rising ground towards the south. This means that the upper		
							floors of modest 4-5 storey high buildings can have extremely fine panoramic		
							views to the north that stretch right up to the river and beyond. This contrasts		
							with the equally delightful greener vistas that extend to Dulwich and Crystal		
							Palace to the south. The views from the roof area of the car park are no		
							exception to this, and are particularly fine. There is a widely held view that not		
							only should this asset be maintained as a publicly accessible area but should		
							always be borne in mind in the siting and design of any future tall buildings in the		
							vicinity. 5. Cinema: The current cinema proprietors have successfully raised the		
							profile of the cinema facility and provided access for a range of different film		
							showings alongside the more commercial offer. An interruption in the operation		
							of the cinema would have a significant impact on the leisure opportunities for		
							Peckham residents and would be likely to reduce the number of people coming		
							into Peckham Town centre during the period of development. The alternative for		
							refurbishment of the existing structure 1. Roof area. The existing structure's open		
							roof has a wide reputation for Frank's Café and the Hannah Barry sculpture		
							gallery. The height of the building gives it a fine prospect without impacting on		
							the adjacent Rye Lane Peckham conservation area. This type of use should be		
							exploited and extended if possible. The link W – E across Peckham has been		
							identified as a Green Chain Link. The PNAAP does not set out what measures		
							will be taken to make this a more explicit link across Peckham, allowing for		
							joining up of green corridors and open spaces. The open roof could be further		
							developed to provide green space and growing potential as has been done on		
							one of the roofs of the South Bank complex. 2. Cinema: The current cinema		
							should be retained and refurbished. 3. Residential accommodation: The cellular		
							arrangement of the lower floors lends itself to small units of accommodation		
							arrangement of the lower hoors lends uself to small units of accommodation		

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							which could either be residential such as student flats or other accommodation. Larger residential units may be difficult due to problems in integrating floors on differing levels. 4. Studio space: The lower floors also lend themselves to small units. A further possibility may be to look at how design schools or similar institutions which require large scale or intensive fabrication space might 'fit' the space. 5. Mixed use. The uses described above could be integrated. Also there could be the possibility of removing a central area to create an atrium to introduce lighting to central areas. This possibility is explored in a post-graduate study produced by University College London's Bartlett School of Architecture: http://www.bartlett.ucl.ac.uk/planning/programmes/postgraduate/mscdiploma-urban-regeneration/attachments/cerise-road We suggest that the Council should give preference to proposals for the refurbishment of the Cinema/Multi-storey site which would build on the potential demonstrated by current uses such as the roof-top cafe, the art gallery and the cinema, while developing new uses which would convert this into a vibrant and well-used facility at the heart of the Town Centre, with much less disruption to current uses.		
147	467	Compuserve	Leach	Jeremy			Many thanks for sending through the hard copy of the PNAAP document. We have reviewed it carefully and cannot find any points that we wish to address at a future EIP stage.		Noted.
148	154	English Heritage	Saunders	Graham		3.1	Support the expectation that the historic environment should be celebrated and used to stimulate regeneration. However we are concerned that the Vision includes the support for taller buildings on 5 sites within Peckham.		Support noted. See urban design study for evidence base concerning taller buildings within core action area.
149	154	English Heritage	Saunders	Graham		3.2.9	Support the content of Theme 6, especially point D2 and the requirement for new buildings to respect the character of places, and point D3 to conserve and enhance the historic environment and using the heritage of places as an asset to promote positive change.		Noted.
150	154	English Heritage	Saunders	Graham	Policy 16	4.5.7	Support the commitment to wanting to protect the local and historic character of Peckham and Nunhead by ensuring that new developments are of an appropriate density for the local character.		Noted.
151	154	English Heritage	Saunders	Graham	Policy 23		Support Policy 23 and the need for new public realm to take into account the local historic environment. However it is not clear how the policy and its criteria will be applied to existing public spaces/realm. At present the majority of the policy relates to new public realm proposals and not to the enhancement of existing public spaces.		We have suggested as change to the Planning Inspectorate through our table of proposed minor changes to the AAP to update policy 23 to make it clear that the policy applies to new and improvements to existing public realm.
152	154	English Heritage	Saunders	Graham	Policy 24	4.7.8 – 4.7.16	Support the policy wording and the associated text (paragraph's 4.7.8 – 4.7.16). To help strengthen the implementation of the policy we would suggest that the text, principally paragraphs 4.7.10 and 4.7.11 make greater reference to the details of the relevant Conservation Area Appraisal (CAA). For example in the Rye Lane CAA includes a useful section on New Design in the Conservation Area (CAA paragraph 5.3), which includes useful clarity on what scale of development would be appropriate (i.e. paragraph 5.3.6 states that "opportunities for buildings of eight to ten storeys maybe appropriate to the east of Rye lane these should not dominate views or overshadow the conservation area").		It is considered that the policy is adequately robust. Any development proposal would have to accord with the AAP policy, in addition to the relevant saved policies of the Southwark Plan, the Core Strategy, the London Plan and the NPPF, which relate to heritage assets.
153	154	English Heritage	Saunders	Graham	Policy 25		Support the emphasis provided in the text of ensuring that developments need to make a positive contribution to the local character and distinctiveness of Peckham and Nunhead.		Support noted.
154	154	English	Saunders	Graham	Policy		Object to the current version of Policy 26. Principally the policy on Building		The range of maximum building

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
	Heritage			26		Heights is not robustly supported by the evidence provided and appears therefore not to be justified. An area of concern relates to the building heights specified for the named sites in the policy as stated in part 2i). Three of the five named sites propose in principle building heights above the suggested range of 8-10 storeys, specified in the Rye Lane CAA. It is, therefore not clear from the evidence provided the justification for building heights of up to 15 storeys for site PNAAP4 and 5, and up to 20 storeys for site PNAAP1. It is noted that part 2 of the policy advises that within the Peckham core action area proposals up to 7 storeys could be supported. We would seek further clarity on the evidence to support this scale of development. For example the Rye Lane CAA (paragraph 5.2.4) which covers a large section of the core action area specifies that new developments should observe the characteristics of the conservation area, such as heights of three or four storeys. And encourages developments to remain within the range of heights of the blocks of buildings in which they are sited. This understanding of the character of the area is supported by the Characterisation Study. Further clarity is needed with regards to the relationship between part 2i) of the policy is to highlight the need for new public realm to be provided as part of the development of the three named sites (i.e. PNAAP 1, 4 and 5). The reference to taller elements in the current drafts is miss-leading and adds confusion to the suggested building heights in part 2i). We would therefore suggest further redrafting of part 2ii is needed in order to emphasis its principal purpose of ensure new public spaces are provided as part of a wider strategic network of public spaces east of Rye Lane CA. It is noted that in the supporting text to the policy that there has been an intention to strike a balance between delivering new developments within the historic environment. However further details could be provided that would help strengthen this approa		heights proposed in Policy 26 is justified by a robust evidence base that was prepared for the AAP. The AAP urban design background paper sets out the rationale and methodology that was undertaken to assess the potential impact of taller buildings on heritage assets and their settings at the sites identified in the policy. The study sets out the assessment of a series of views from within and outside the core action area to assess the potential impact taller elements would have on heritage assets and their settings (CAs, listed buildings, etc) within the core action area. It is noted that paragraph 5.3.6 of the Rye Lane CAA states that opportunities for buildings of eight to ten storeys maybe appropriate to the east of Rye Lane. The eight to ten storeys figure relates to the height of existing tall buildings to the east of Rye Lane such as the multi storey car park. However, following the testing and analysis of height options at the larger proposals sites as part of the preparation of the evidence base, it is considered that options up to the heights specified in the policy may be appropriate, provided that proposals demonstrate, through a qualitative assessment, the effect that taller height would have on the character, streetscape and skyline of the area, and avoid harm to the significance of heritage assets and their settings. The testing and assessment of potential building heights also indicated that buildings up to seven storeys may also be appropriate within the core action area. Furthermore, read in combination, AAP policies 23, 24. 25, 26 and 29 will ensure that new development responds to its context and does not harm the significance of heritage assets or their settings. We have suggested a change to the Planning Inspectorate through our table of

Representation			Surname		Main				Officer response to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	representation
number	number								proposed minor changes to the AAP to update policy 26 to improve the clarity between the sections (i) and (ii) in part 2 of the policy. The AAP urban design study sets out the rationale and methodology for assessing the impact of a number of taller elements within the core action area. The study sets out the assessment of a series of views from within and outside the core action area to assess the potential impact taller elements would have on heritage assets and their settings (CAs, listed buildings, etc) within the core action area. The provision of taller buildings is seen as an exception, as new development would generally be no taller than existing heights. One of the key requirements of Policy 26 is that a taller building would have to be of exceptional quality and exemplary design that positively contribute to the local character and distinctiveness of Peckham, as well as delivering generous public realm improvements. Any development proposal would have to accord with the AAP policy, in addition to the relevant saved policies of the Southwark Plan, the Core Strategy, the London Plan and the NPPF.
155	154	English Heritage	Saunders	Graham			It is essential to ensure consistency between the details provided for each site allocation. Principally the "site specific guidance" should highlight where there are heritage assets within the boundary of the site or close to its boundaries. Some of the sites do specify this level of useful detail but not all. This type of information should then be used to inform whether any proposed taller elements are appropriate at what height and location within both the sites named and wider area.		No change. The site specific guidance is considered adequate. Any development proposals would have to take into account any relevant heritage designations, alongside accordance with the saved policies of the Southwark Plan, the Core Strategy, the London Plan and the NPPF.
157	936		Douglas	Gayle	Policy 5				Support noted.
160	937	Arches Studios	Lang	Geoffrey	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark

Representation	Objector		Surname		Main				Officer rechange to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							includes a large number of creative and media industries." The PNAAP Policy 2:		Plan policy 1.4. However,
							Arts, Culture, Leisure and Entertainment, recognizes this local character with		Southwark Plan saved policy 1.5
							particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham		allows a range of uses to operate
							has a positive reputation as a creative hotspot and is home to many successful		in railway arches including A and B
							businesses and organisations and a thriving multi-cultural arts scene. The area		and D use classes to ensure that
							around Peckham Station, along Blenheim Grove and the Copeland industrial		the space can meet the needs of a
							Park currently hosts a number of local artists' studios It further expresses the		wide range of occupiers. These
							aspiration to build upon this positive reputation as a creative hotspot, building on		spaces have shown to be popular
							creative activities in and around Peckham Rye Station: 4.2.11 We want to		with the creative industry sector
							continue to build upon this reputation which will help to generate new jobs and		and we will to support this sector to
							contribute towards the vitality of the town centre by creating a more diverse offer		continue to grow in the action area
							for local people and visitors as well as creating opportunities for training and		to help to diversify the mix of
							learning. 4.2.12 We have identified that there are opportunities to provide nelv		business uses in the town centre
							spaces at both the north and the centre of the town centre. We want to continue		and provide more employment
							to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP		opportunities. We have
							10) as a centre for cultural events whilst also building on the many creative		acknowledged in the AAP that the creative and cultural sector will
							activities taking place in and around the Copeland industrial Park and Peckham Rye Station. We will work with landowners and developers to identify and secure		continue to be supported and
							occupants for new art, cultural, leisure and entertainment space. The PNAAP		promoted in the area and Policy 2
							Business & Retail Background paper, September 2012, stresses the growing		identifies the proposals sites where
							importance of the creative industries and identifies some of the factors that make		new arts, cultural, leisure and
							Peckham town centre attractive to the creative sector: 4.54. The creative and		entertainment space should be
							cultural sector has been identified as the fastest growing sector in London and		accommodated, however there
							they have also experienced growth in employment in Southwark in recent years.		may be opportunities to secure
							Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town		suitable space on other sites as
							centre as having characteristics suitable for creative and cultural industries such		development schemes come
							as advertising, radio, television, music production, artistic creation and art		forward. Through the proposed site
							galleries. One of the major attractions in Peckham is the relatively low rents, the		allocation PNAAP 6: Peckham Rye
							existing presence of established creative industries and the very good public		Station, we set out that the
							transport accessibility transport links. The availability of suitable small		required land use for this site is
							office/studios/workshops could lead to the establishment of a more formal		business use (Class B1), retail use
							physical cluster of creative individuals and businesses in the area which could		(Classes A1/A2/A3/A4) and public
							contribute to the physical transformation of the town centre while maintaining		square. We set out that other land
							cost efficient space for the businesses. 4.55. The following proposal sites have		uses that would be acceptable are
							been identified to accommodate new arts, cultural, leisure and entertainment		community/cultural/leisure use
							space over the plan period. We will work with landowners and developers to		(Class D) and residential use
							identify and secure occupants for new art, cultural, leisure and entertainment		(Class C3). The proposed uses
							space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-		therefore enable the wider
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP 6 (Peckham Rye Station) to
							and the 'existing presence of established creative industries'. Proposal site PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of
							industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
		I	ļi.				The state of the s		

reference number Proposed changes Proposed cha		1		1			
businesses, Require a proportion of all business spaces, including small businesses or, 2. Giving business spaces, including small four the transformation of the statistic business spaces is used and allowing more indexibility on how business spaces is used and list setting. The site is owned and allow all types of employment creating uses. The need to protect existing creative businesses is a key factor in both policy options. The need to protect of the council, and so the council are working to constitute the protect of the council and so the council and s	reference reference Organisation			Paragraph	Details of representation	Proposed changes	
does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment proposal. By allocating the site as a proposals site (PNAAP 33) we can ensure that any range of business types and size redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		Surname		Paragraph	existing businesses and give priority to more space for creative industries and businesses. Require a proportion of all business space built to be for small businesses or; 2. Giving protection to existing business spaces, including small business spaces and allowing more flexibility on how business space is used and allow all types of employment creating uses. The need to protect existing creative businesses is a key factor in both policy options. The need to protect existing creative businesses is a key factor in both policy options. The PNAAP thus recognises the importance of the creative industries to the local character and economy and outlines a vision of Peckham town centre as a creative hub. Recognition is given to key requirements for the expansion of the creative sector in the area. These include the availability of affordable business premises and the presence of existing creative industries. The provision of adequate small business space and the protection of existing businesses are thus proposed. However, the future of the existing creative businesses along Blenheim Grove, as named in the plan, appears to be under threat. PNAAP Policy 5: Markets, identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of retail provision, provide self-employment opportunities with low entry-costs and fulfil a valuable role in the local economy. The Southwark Street Trading and Markets Strategy (2010) recommends new locations for markets on a dedicated site off Rye Lane providing the opportunity to create a destination market. This could be themed as a specialty food market or arts and craft market which will help to promote the local economy. Locating market on site PNAAP 6) and the land between the railway arches (site PNAAP 3) to bring forward space for new markets. Should the development of a market on site PNAAP 6 in line with Policy 5 lead to the removal of the creative arts studios within the site boundaries,		surrounds, section 7.2 of the draft AAP sets out information on the future transformation of the station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation on this new project, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
	4								expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP.
167	937	Arches Studios	Lang	Geoffrey			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts, cultural, leisure and entertainment floor space and this includes Peckham Rye Station (site PNAAP 6). The AAP also seeks to encourage more business floor space. Draft policy 6: Business space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6:

Representation	Ohiector		Surname						
		Organisation	Sumame	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									Peckham Rye Station falls within
									the boundary of both Peckham
									town centre and Peckham core
									action area. Through the proposed
									site allocation PNAAP 6: Peckham
									Rye Station, we set out that the
									required land use for this site is
									business use (Class B1), retail use
									(Classes A1/A2/A3/A4) and public square. We set out that other land
									uses that would be acceptable are
									community/cultural/leisure use
									(Class D) and residential use
									(Class C3). The proposed uses
									therefore enable the wider
									Peckham Rye Station site to
									continue to be used for a mixture of
									uses. The AAP designates the land
									owned by Network Rail (both
									Peckham Rye Station and its
									surrounds) as proposals site PNAAP 6: Peckham Rye Station.
									This boundary has evolved through
									the AAP preparation, with earlier
									versions of the AAP (towards a
									preferred option and preferred
									option) both showing a smaller
									boundary ending at Dovedale
									Court. We have amended this
									boundary for the
									publication/submission version
									through discussions with Network
									Rail to reflect the boundary of the
									land that they own and to provide more opportunities for
									redevelopment as new funding has
									arisen for this site. The council
									successfully bid for substantial
									funds from the Mayor's
									Regeneration Fun to add to our
									own funds to commit to delivering
									significant change to Peckham Rye
									Station and its setting. In terms of
									the detail of the possible
									redevelopment of the station and
									surrounds, section 7.2 of the draft AAP sets out information on the
									future transformation of the station
									and its setting. The site is owned
									by Network Rail, not the council,
									and so the council are working with
									Network Rail, Southern Railways
									and the GLA on this project, with

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									the aim to deliver this project over the next four years. It is currently early stages of preparation, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
162	939	Arches Studios	Muir	Jane	Policy 5		1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial Park currently hosts a number of local artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities for training and learning. 4.2.12 We have identified that there are opportunities for training and learning. 4.2.14 We have identified that there are opportunities for training and learning. 4.2.15 we have identified that there are opportunities for training and learning. 4.2.16 we have identified that there are opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to promote Peckham Square, including the Eagle Wharf proposals sit		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and

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Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number	Organisation		First name	policy	Faragraph	Details of representation	Froposeu changes	representation
- Halliboi	Hamboi						occupants for new art, cultural, leisure and entertainment space. The PNAAP		promoted in the area and Policy 2
							Business & Retail Background paper, September 2012, stresses the growing		identifies the proposals sites where
							importance of the creative industries and identifies some of the factors that make		new arts, cultural, leisure and
							Peckham town centre attractive to the creative sector: 4.54. The creative and		1 ' '
									entertainment space should be
							cultural sector has been identified as the fastest growing sector in London and		accommodated, however there
							they have also experienced growth in employment in Southwark in recent years.		may be opportunities to secure
							Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town		suitable space on other sites as
							centre as having characteristics suitable for creative and cultural industries such		development schemes come
							as advertising, radio, television, music production, artistic creation and art		forward. Through the proposed site
							galleries. One of the major attractions in Peckham is the relatively low rents, the		allocation PNAAP 6: Peckham Rye
							existing presence of established creative industries and the very good public		Station, we set out that the
							transport accessibility transport links. The availability of suitable small		required land use for this site is
							office/studios/workshops could lead to the establishment of a more formal		business use (Class B1), retail use
							physical cluster of creative individuals and businesses in the area which could		(Classes A1/A2/A3/A4) and public
							contribute to the physical transformation of the town centre while maintaining		square. We set out that other land
							cost efficient space for the businesses. 4.55. The following proposal sites have		uses that would be acceptable are
							been identified to accommodate new arts, cultural, leisure and entertainment		community/cultural/leisure use
							space over the plan period. We will work with landowners and developers to		(Class D) and residential use
							identify and secure occupants for new art, cultural, leisure and entertainment		(Class C3). The proposed uses
							space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-		therefore enable the wider
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of
							industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
							existing businesses and give priority to more space for creative industries and		surrounds, section 7.2 of the draft
							businesses. Require a proportion of all business space built to be for small		AAP sets out information on the
							businesses or; 2. Giving protection to existing business spaces, including small		future transformation of the station
							business spaces and allowing more flexibility on how business space is used		and its setting. The site is owned
							and allow all types of employment creating uses. The need to protect existing		by Network Rail, not the council,
							creative businesses is a key factor in both policy options. The need to protect		and so the council are working with
							existing creative businesses is a key factor in both policy options. The PNAAP		Network Rail, Southern Railways
							thus recognises the importance of the creative industries to the local character		and the GLA on this project, with
							and economy and outlines a vision of Peckham town centre as a creative hub.		the aim to deliver this project over
							Recognition is given to key requirements for the expansion of the creative sector		the next four years. It is currently
							in the area. These include the availability of affordable business premises and		early stages of preparation on this
							the presence of existing creative industries. The provision of adequate small		new project, with feasibility work
							business space and the protection of existing businesses are thus proposed.		being carried out on the project.
							However, the future of the existing creative businesses along Blenheim Grove,		This is a separate piece of work to
							as named in the plan, appears to be under threat. PNAAP Policy 5: Markets,		the AAP, with the AAP setting out
							identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of		the strategic aspirations for the
							two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of		site, and the detail to be worked
							retail provision, provide self-employment opportunities with low entry-costs and		jointly by the council, Network Rail,
L	II.			1			i i i je i i i i i i i i i i i i i i i i		p - , - ,

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							fulfil a valuable role in the local economy. The Southwark Street Trading and Markets Strategy (2010) recommends new locations for markets on a dedicated site off Rye Lane providing the opportunity to create a destination market. This could be themed as a specialty food market or arts and craft market which will help to promote the local economy. Locating market stalls off Rye Lane would also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6) and the land between the railway arches (site PNAAP 3) to bring forward space for new markets. Should the development of a market on site PNAAP 6 in line with Policy 5 lead to the removal of the creative arts studios within the site boundaries, this would be contrary to the aims of Policy 2 to support existing creative industries		the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP.
163	3 939	Arches Studios	Muir	Jane			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space		Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set

Representation	Objector		Surname		Main				Officer recognice to
reference		Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
reference number		Organisation		First name		Paragraph	and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolit & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.	Proposed changes	
									uses. The AAP designates the land

Representation reference number	Objector reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									owned by Network Rail (both Peckham Rye Station and its
									surrounds) as proposals site
									PNAAP 6: Peckham Rye Station. This boundary has evolved through
									the AAP preparation, with earlier
									versions of the AAP (towards a preferred option and preferred
									option) both showing a smaller
									boundary ending at Dovedale
									Court. We have amended this boundary for the
									publication/submission version
									through discussions with Network
									Rail to reflect the boundary of the land that they own and to provide
									more opportunities for
									redevelopment as new funding has arisen for this site. The council
									successfully bid for substantial
									funds from the Mayor's
									Regeneration Fun to add to our own funds to commit to delivering
									significant change to Peckham Rye
									Station and its setting. In terms of the detail of the possible
									redevelopment of the station and
									surrounds, section 7.2 of the draft
									AAP sets out information on the future transformation of the station
									and its setting. The site is owned
									by Network Rail, not the council,
									and so the council are working with Network Rail, Southern Railways
									and the GLA on this project, with
									the aim to deliver this project over the next four years. It is currently
									early stages of preparation, with
									feasibility work being carried out on
									the project. This is a separate piece of work to the AAP, with the
									AAP setting out the strategic
									aspirations for the site, and the
									detail to be worked jointly by the council, Network Rail, the GLA and
									Southern Railways. At this stage it
									is too early to determine which parts of the station and its settings
									will be redeveloped, so the AAP
									includes the whole of the site as
									part of its proposals site designation. Engagement with the
									local community will take place at a

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number								later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
164	930		Rutt	Loraine	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial Park currently hosts a number of local artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP 10) as a centre for cultural events whilst also building on the many creative activities taking place in and around the Copeland industrial Park and Peckham Rye Station. We will work with landowners and developers to identify and secure occupa		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2 identifies the proposals sites where new arts, cultural, leisure and entertainment space should be accommodated, however there may be opportunities to secure suitable space on other sites as development schemes come forward. Through the proposed site allocation PNAAP 6: Peckham Rye Station, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class D) and residential use

Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number	Organisation		i ii st iiaiiie	policy	raragraph	Details of representation	r roposed changes	representation
							identify and secure occupants for new art, cultural, leisure and entertainment		(Class C3). The proposed uses
							space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-		therefore enable the wider
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16), expresses the following vision: 4.36. tn the vision, we set out that we want		market site to rear of the station in a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of
							industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
							existing businesses and give priority to more space for creative industries and		surrounds, section 7.2 of the draft
							businesses. Require a proportion of all business space built to be for small		AAP sets out information on the
							businesses or; 2. Giving protection to existing business spaces, including small		future transformation of the station
							business spaces and allowing more flexibility on how business space is used		and its setting. The site is owned
							and allow all types of employment creating uses. The need to protect existing		by Network Rail, not the council,
							creative businesses is a key factor in both policy options. The need to protect		and so the council are working with
							existing creative businesses is a key factor in both policy options. The PNAAP		Network Rail, Southern Railways
							thus recognises the importance of the creative industries to the local character and economy and outlines a vision of Peckham town centre as a creative hub.		and the GLA on this project, with the aim to deliver this project over
							Recognition is given to key requirements for the expansion of the creative sector		the next four years. It is currently
							in the area. These include the availability of affordable business premises and		early stages of preparation on this
							the presence of existing creative industries. The provision of adequate small		new project, with feasibility work
							business space and the protection of existing businesses are thus proposed.		being carried out on the project.
							However, the future of the existing creative businesses along Blenheim Grove,		This is a separate piece of work to
							as named in the plan, appears to be under threat. PNAAP Policy 5: Markets,		the AAP, with the AAP setting out
							identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of		the strategic aspirations for the
							two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of		site, and the detail to be worked
							retail provision, provide self-employment opportunities with low entry-costs and		jointly by the council, Network Rail,
							fulfil a valuable role in the local economy. The Southwark Street Trading and		the GLA and Southern Railways. At
							Markets Strategy (2010) recommends new locations for markets on a dedicated		this stage it is too early to
							site off Rye Lane providing the opportunity to create a destination market. This		determine which parts of the
							could be themed as a specialty food market or arts and craft market which will		station and its settings will be
							help to promote the local economy. Locating market stalls off Rye Lane would		redeveloped, so the AAP includes the whole of the site as part of its
							also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6)		proposals site designation.
							and the land between the railway arches (site PNAAP 3) to bring forward space		Consultation will take place at a
							for new markets. Should the development of a market on site PNAAP 6 in line		later stage on the detail of the
							with Policy 5 lead to the removal of the creative arts studios within the site		proposed scheme and planning
							boundaries, this would be contrary to the aims of Policy 2 to support existing		permission will need to be obtained
							creative industries Proposal The PNAAP needs to be amended to include a new		for future development.
							policy: To require in the first instance, the protection of creative artistic floorspace		Consultation on a future planning
							within the arches in Blenheim Court. Secondly to ensure the provision of a		application will need to be carried
							proportion of affordable floorspace in large-scale developments to provide		out in accordance with our
							affordable space for creative and art use. To underpin this policy the council		Statement of Community
							should support the local community to undertake a study and maintain a register		Involvement. Through Policy 6 we
							of the accommodation needs of the creative sector. The protection of specific		require new business space to be

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							business sites has precedence within the PNAAP: 4.2.33 Our Employment Land Review (2010) recognises that the Print Village Industrial Estate on Chadwick Road is a well-functioning business estate that accommodates SMEs. The estate does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment proposal. By allocating the site as a proposals site (PNAAP 33) we can ensure that any redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP.
165	930		Rutt	Loraine			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								Peckham town centre, as set out in draft policy 2 of the AAP. The
								policy identifies the locations in
								which we will promote the
								development of additional arts,
								cultural, leisure and entertainment floor space and this includes
								Peckham Rye Station (site PNAAP
								6). The AAP also seeks to
								encourage more business floor space. Draft policy 6: Business
								space, sets out that we will
								encourage the generation of new
								jobs and business by supporting
								the provision of new business floor space in Peckham core area and
								town centre. Site PNAAP 6:
								Peckham Rye Station falls within
								the boundary of both Peckham town centre and Peckham core
								action area. Through the proposed
								site allocation PNAAP 6: Peckham
								Rye Station, we set out that the
								required land use for this site is business use (Class B1), retail use
								(Classes A1/A2/A3/A4) and public
								square. We set out that other land
								uses that would be acceptable are
								community/cultural/leisure use (Class D) and residential use
								(Class C3). The proposed uses
								therefore enable the wider
								Peckham Rye Station site to continue to be used for a mixture of
								uses. The AAP designates the land
								owned by Network Rail (both
								Peckham Rye Station and its surrounds) as proposals site
								PNAAP 6: Peckham Rye Station.
								This boundary has evolved through
								the AAP preparation, with earlier
								versions of the AAP (towards a preferred option and preferred
								option) both showing a smaller
								boundary ending at Dovedale
								Court. We have amended this boundary for the
								publication/submission version
								through discussions with Network
								Rail to reflect the boundary of the
								land that they own and to provide more opportunities for
								redevelopment as new funding has

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation Pro	roposed changes	Officer response to representation
									arisen for this site. The council successfully bid for substantial funds from the Mayor's Regeneration Fun to add to our own funds to commit to delivering significant change to Peckham Rye Station and its setting. In terms of the detail of the possible redevelopment of the station and surrounds, section 7.2 of the draft AAP sets out information on the future transformation of the station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
166	940	Arches Studios	Corrie	Georgina	Policy 5		1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2:		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However,

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number				policy				•
							Arts, Culture, Leisure and Entertainment, recognizes this local character with		Southwark Plan saved policy 1.5
							particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham		allows a range of uses to operate
							has a positive reputation as a creative hotspot and is home to many successful		in railway arches including A and B
							businesses and organisations and a thriving multi-cultural arts scene. The area		and D use classes to ensure that
							around Peckham Station, along Blenheim Grove and the Copeland industrial		the space can meet the needs of a
							Park currently hosts a number of local artists' studios It further expresses the		wide range of occupiers. These
							aspiration to build upon this positive reputation as a creative hotspot, building on		spaces have shown to be popular
							creative activities in and around Peckham Rye Station: 4.2.11 We want to		with the creative industry sector
							continue to build upon this reputation which will help to generate new jobs and		and we will to support this sector to
							contribute towards the vitality of the town centre by creating a more diverse offer		continue to grow in the action area
							for local people and visitors as well as creating opportunities for training and		to help to diversify the mix of
							learning. 4.2.12 We have identified that there are opportunities to provide nelv		business uses in the town centre
							spaces at both the north and the centre of the town centre. We want to continue		and provide more employment
							to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP		opportunities. We have
							10) as a centre for cultural events whilst also building on the many creative		acknowledged in the AAP that the
							activities taking place in and around the Copeland industrial Park and Peckham		creative and cultural sector will
							Rye Station. We will work with landowners and developers to identify and secure		continue to be supported and
							occupants for new art, cultural, leisure and entertainment space. The PNAAP		promoted in the area and Policy 2
							Business & Retail Background paper, September 2012, stresses the growing importance of the creative industries and identifies some of the factors that make		identifies the proposals sites where
							Peckham town centre attractive to the creative sector: 4.54. The creative and		new arts, cultural, leisure and entertainment space should be
							cultural sector has been identified as the fastest growing sector in London and		accommodated, however there
							they have also experienced growth in employment in Southwark in recent years.		may be opportunities to secure
							Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town		suitable space on other sites as
							centre as having characteristics suitable for creative and cultural industries such		development schemes come
							as advertising, radio, television, music production, artistic creation and art		forward. Through the proposed site
							galleries. One of the major attractions in Peckham is the relatively low rents, the		allocation PNAAP 6: Peckham Rye
							existing presence of established creative industries and the very good public		Station, we set out that the
							transport accessibility transport links. The availability of suitable small		required land use for this site is
							office/studios/workshops could lead to the establishment of a more formal		business use (Class B1), retail use
							physical cluster of creative individuals and businesses in the area which could		(Classes A1/A2/A3/A4) and public
							contribute to the physical transformation of the town centre while maintaining		square. We set out that other land
							cost efficient space for the businesses. 4.55. The following proposal sites have		uses that would be acceptable are
							been identified to accommodate new arts, cultural, leisure and entertainment		community/cultural/leisure use
							space over the plan period. We will work with landowners and developers to		(Class D) and residential use
							identify and secure occupants for new art, cultural, leisure and entertainment		(Class C3). The proposed uses
							space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-		therefore enable the wider
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of
							industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
							existing businesses and give priority to more space for creative industries and		surrounds, section 7.2 of the draft

Representat reference number	Objector reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							businesses. Require a proportion of all business space built to be for small businesses or; 2. Giving protection to existing business spaces, including small business spaces and allowing more flexibility on how business space is used and allow all types of employment creating uses. The need to protect existing creative businesses is a key factor in both policy options. The need to protect existing creative businesses is a key factor in both policy options. The PNAAP thus recognises the importance of the creative industries to the local character and economy and outlines a vision of Peckham town centre as a creative hub. Recognition is given to key requirements for the expansion of the creative sector in the area. These include the availability of affordable business premises and the presence of existing creative industries. The provision of adequate small business space and the protection of existing businesses are thus proposed. However, the future of the existing creative businesses along Blenheim Grove, as named in the plan, appears to be under threat. PNAAP Policy 5: Markets, identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of retail provision, provide self-employment opportunities with low entry-costs and fulfil a valuable role in the local economy. The Southwark Street Trading and Markets Strategy (2010) recommends new locations for markets on a dedicated site off Rye Lane providing the opportunity to create a destination market. This could be themed as a specialty food market or arts and craft market which will help to promote the local economy. Locating market stalls off Rye Lane would also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6 in line with Policy 5 lead to the removal of the creative arts studios within the site boundaries, this would be contrary to the aims of Policy 2 to support		AAP sets out information on the future transformation of the station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation on this new project, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require

Representa referenc number	ion Objector reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
		Arches	Corrie	Georgina			2 - The PNAAP is not sound as it is not justified. It has not included the		premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP. Consultation on the AAP has been
		Studios					participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts, cultural, leisure and entertainment floor space and this includes Peckham Rye Station (site PNAAP 6). The AAP also seeks to encourage more business floor space. Draft policy 6: Business space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6: Peckham Rye Station falls within

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								the boundary of both Peckham
								town centre and Peckham core action area. Through the proposed
								site allocation PNAAP 6: Peckham
								Rye Station, we set out that the
								required land use for this site is
								business use (Class B1), retail use
								(Classes A1/A2/A3/A4) and public square. We set out that other land
								uses that would be acceptable are
								community/cultural/leisure use
								(Class D) and residential use
								(Class C3). The proposed uses
								therefore enable the wider
								Peckham Rye Station site to continue to be used for a mixture of
								uses. The AAP designates the land
								owned by Network Rail (both
								Peckham Rye Station and its
								surrounds) as proposals site
								PNAAP 6: Peckham Rye Station. This boundary has evolved through
								the AAP preparation, with earlier
								versions of the AAP (towards a
								preferred option and preferred
								option) both showing a smaller
								boundary ending at Dovedale
								Court. We have amended this boundary for the
								publication/submission version
								through discussions with Network
								Rail to reflect the boundary of the
								land that they own and to provide
								more opportunities for redevelopment as new funding has
								arisen for this site. The council
								successfully bid for substantial
								funds from the Mayor's
								Regeneration Fun to add to our
								own funds to commit to delivering significant change to Peckham Rye
								Station and its setting. In terms of
								the detail of the possible
								redevelopment of the station and
								surrounds, section 7.2 of the draft
								AAP sets out information on the future transformation of the station
								and its setting. The site is owned
								by Network Rail, not the council,
								and so the council are working with
								Network Rail, Southern Railways
								and the GLA on this project, with
								the aim to deliver this project over

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									the next four years. It is currently early stages of preparation, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
168	941	Arches Studios	Tripp	Carolyn	Policy 5		1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial Park currently hosts a number of local artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities for training and learning. 4.2.12 We have identified that there are opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP 10) as a centre for cultural events whilst also building on the many creative activities taking place in and around the Copeland industrial Park and Peckham Rye Station. We will work with landowners and developers to identify and secure		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2

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Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number	Organisation		riist iiaiile	policy	Paragraph	Details of representation	Proposed changes	representation
Hamber	Hamber						Pusinger 9 Patail Packground paper Contember 2012, atragged the growing		identifies the proposals sites where
							Business & Retail Background paper, September 2012, stresses the growing		
							importance of the creative industries and identifies some of the factors that make		new arts, cultural, leisure and
							Peckham town centre attractive to the creative sector: 4.54. The creative and		entertainment space should be
							cultural sector has been identified as the fastest growing sector in London and		accommodated, however there
							they have also experienced growth in employment in Southwark in recent years.		may be opportunities to secure
							Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town		suitable space on other sites as
							centre as having characteristics suitable for creative and cultural industries such		development schemes come
							as advertising, radio, television, music production, artistic creation and art		forward. Through the proposed site
							galleries. One of the major attractions in Peckham is the relatively low rents, the		allocation PNAAP 6: Peckham Rye
							existing presence of established creative industries and the very good public		Station, we set out that the
							transport accessibility transport links. The availability of suitable small		required land use for this site is
							office/studios/workshops could lead to the establishment of a more formal		business use (Class B1), retail use
							physical cluster of creative individuals and businesses in the area which could		(Classes A1/A2/A3/A4) and public
							contribute to the physical transformation of the town centre while maintaining		square. We set out that other land
							cost efficient space for the businesses. 4.55. The following proposal sites have		uses that would be acceptable are
							been identified to accommodate new arts, cultural, leisure and entertainment		community/cultural/leisure use
							space over the plan period. We will work with landowners and developers to		(Class D) and residential use
							identify and secure occupants for new art, cultural, leisure and entertainment		(Class C3). The proposed uses
							space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-		therefore enable the wider
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of
							industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
							existing businesses and give priority to more space for creative industries and		surrounds, section 7.2 of the draft
							businesses. Require a proportion of all business space built to be for small		AAP sets out information on the
							businesses or; 2. Giving protection to existing business spaces, including small		future transformation of the station
							business spaces and allowing more flexibility on how business space is used		and its setting. The site is owned
							and allow all types of employment creating uses. The need to protect existing		by Network Rail, not the council,
							creative businesses is a key factor in both policy options. The need to protect		and so the council are working with
							existing creative businesses is a key factor in both policy options. The PNAAP		Network Rail, Southern Railways
							thus recognises the importance of the creative industries to the local character		and the GLA on this project, with
							and economy and outlines a vision of Peckham town centre as a creative hub.		the aim to deliver this project over
							Recognition is given to key requirements for the expansion of the creative sector		the next four years. It is currently
							in the area. These include the availability of affordable business premises and		early stages of preparation on this
							the presence of existing creative industries. The provision of adequate small		new project, with feasibility work
							business space and the protection of existing businesses are thus proposed.		being carried out on the project.
							However, the future of the existing creative businesses along Blenheim Grove,		This is a separate piece of work to
							as named in the plan, appears to be under threat. PNAAP Policy 5: Markets,		the AAP, with the AAP setting out
							identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of		the strategic aspirations for the site, and the detail to be worked
							two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of		jointly by the council, Network Rail,
							retail provision, provide self-employment opportunities with low entry-costs and fulfil a valuable role in the local economy. The Southwark Street Trading and		the GLA and Southern Railways. At
							Tulin a valuable fole in the local economy. The Southwark Street frauling and		Ine ala and Southern Hallways. At

Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number				policy		Markets Strategy (2010) recommends new locations for markets on a dedicated site off Rye Lane providing the opportunity to create a destination market. This could be themed as a specialty food market or arts and craft market which will help to promote the local economy. Locating market stalls off Rye Lane would		this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes
							also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6) and the land between the railway arches (site PNAAP 3) to bring forward space for new markets. Should the development of a market on site PNAAP 6 in line with Policy 5 lead to the removal of the creative arts studios within the site boundaries, this would be contrary to the aims of Policy 2 to support existing creative industries Proposal The PNAAP needs to be amended to include a new policy: To require in the first instance, the protection of creative artistic floorspace within the arches in Blenheim Court. Secondly to ensure the provision of a proportion of affordable floorspace in large-scale developments to provide affordable space for creative and art use. To underpin this policy the council should support the local community to undertake a study and maintain a register of the accommodation needs of the creative sector. The protection of specific business sites has precedence within the PNAAP: 4.2.33 Our Employment Land		the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new
							Review (2010) recognises that the Print Village Industrial Estate on Chadwick Road is a well-functioning business estate that accommodates SMEs. The estate does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment proposal. By allocating the site as a proposals site (PNAAP 33) we can ensure that any redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark
									require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP.
169		Arches Studios	Tripp	Carolyn			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by		Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
						council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in "Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolf a Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts, cultural, leisure and entertainment floor space and this includes Peckham Rye Station (site PNAAP 6). The AAP also seeks to encourage more business floor space. Draft policy 6: Business space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6: Peckham town centre and Peckham core action area. Through the proposed site allocation PNAAP 6: Peckham Rye Station, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class C3). The proposed uses therefore enable the wider Peckham Rye Station site to continue to be used for a mixture of uses. The AAP designates the land owned by Network Rail (both

Representation reference number	Objector reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									Peckham Rye Station and its surrounds) as proposals site PNAAP 6: Peckham Rye Station.
									This boundary has evolved through the AAP preparation, with earlier
									versions of the AAP (towards a preferred option and preferred option) both showing a smaller
									boundary ending at Dovedale Court. We have amended this
									boundary for the publication/submission version
									through discussions with Network Rail to reflect the boundary of the
									land that they own and to provide more opportunities for redevelopment as new funding has
									arisen for this site. The council successfully bid for substantial
									funds from the Mayor's Regeneration Fun to add to our
									own funds to commit to delivering significant change to Peckham Rye Station and its setting. In terms of
									the detail of the possible redevelopment of the station and
									surrounds, section 7.2 of the draft AAP sets out information on the future transformation of the station
									and its setting. The site is owned by Network Rail, not the council,
									and so the council are working with Network Rail, Southern Railways
									and the GLA on this project, with the aim to deliver this project over the next four years. It is currently
									early stages of preparation, with feasibility work being carried out on
									the project. This is a separate piece of work to the AAP, with the
									AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the
									council, Network Rail, the GLA and Southern Railways. At this stage it
									is too early to determine which parts of the station and its settings
									will be redeveloped, so the AAP includes the whole of the site as part of its proposals site
									designation. Engagement with the local community will take place at a
									later stage in the development of

Representation Objector Surnal		Main				Officer response to
reference reference Organisation number number	First name	policy	Paragraph	Details of representation	Proposed changes	representation
						the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
170 942 Arches Studios De Pas	ali Eunice	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial Park currently hosts a number of local artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities for training and learning. 4.2.12 We have identified that there are opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP 10) as a centre for cultural events whilst also building on the many creative activities taking place in and around the Copeland industrial Park and Peckham Rye Station. We will work with landowners and developers to identify and secure		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2 identifies the proposals sites where new arts, cultural, leisure and entertainment space should be accommodated, however there may be opportunities to secure suitable space on other sites as development schemes come forward. Through the proposed site allocation PNAAP 6: Peckham Rye Station, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class D) and residential use (Class C3). The proposed uses

27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land between the railway arches (site PNAAP 3) These factors are seen to include 'relatively low rents' the 'availability of suitable small office/studios/workshops' and the 'existing presence of established creative industries'. Proposal site PNAAP 6 is also identified to accommodate new arts space. The Business and	Officer response to representation nerefore enable the wider eckham Rye Station site to ontinue to be used for a mixture of ses. The identification of PNAAP (Peckham Rye Station) to ccommodate a possible new narket site to rear of the station in
space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1- 27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land between the railway arches (site PNAAP 3) These factors are seen to include 'relatively low rents' the 'availability of suitable small office/studios/workshops' and the 'existing presence of established creative industries'. Proposal site PNAAP 6 is also identified to accommodate new arts space. The Business and	eckham Rye Station site to ontinue to be used for a mixture of ses. The identification of PNAAP (Peckham Rye Station) to ccommodate a possible new narket site to rear of the station in
27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land between the railway arches (site PNAAP 3) These factors are seen to include 'relatively low rents' the 'availability of suitable small office/studios/workshops' and the 'existing presence of established creative industries'. Proposal site PNAAP 6 is also identified to accommodate new arts space. The Business and	ontinue to be used for a mixture of ses. The identification of PNAAP (Peckham Rye Station) to ccommodate a possible new narket site to rear of the station in
'relatively low rents' the 'availability of suitable small office/studios/workshops' and the 'existing presence of established creative industries'. Proposal site PNAAP 6 is also identified to accommodate new arts space. The Business and accommodate new arts space.	ses. The identification of PNAAP (Peckham Rye Station) to ccommodate a possible new narket site to rear of the station in
and the 'existing presence of established creative industries'. Proposal site PNAAP 6 is also identified to accommodate new arts space. The Business and accommodate new arts space.	(Peckham Rye Station) to ccommodate a possible new narket site to rear of the station in
PNAAP 6 is also identified to accommodate new arts space. The Business and acc	ccommodate a possible new narket site to rear of the station in
	narket site to rear of the station in
	new public space is promoted to
	ring more activity into this area
	nd complement the improvements
	o the station and its surroundings and encourage this area around
	ne station to be more of an
	ttractive destination. In terms of
	ne detail of the possible
	edevelopment of the station and
	urrounds, section 7.2 of the draft
	AP sets out information on the
	ture transformation of the station
	nd its setting. The site is owned
	y Network Rail, not the council,
	nd so the council are working with
	letwork Rail, Southern Railways
	nd the GLA on this project, with
	ne aim to deliver this project over
	ne next four years. It is currently
	arly stages of preparation on this
	ew project, with feasibility work eing carried out on the project.
	his is a separate piece of work to
	ne AAP, with the AAP setting out
	ne strategic aspirations for the
	ite, and the detail to be worked
	ointly by the council, Network Rail,
fulfil a valuable role in the local economy. The Southwark Street Trading and the	ne GLA and Southern Railways. At
	nis stage it is too early to
	etermine which parts of the
	tation and its settings will be
	edeveloped, so the AAP includes
	ne whole of the site as part of its
	roposals site designation.
	onsultation will take place at a ter stage on the detail of the
	roposed scheme and planning
	ermission will need to be obtained
	or future development.
	consultation on a future planning
	pplication will need to be carried
	ut in accordance with our
	tatement of Community
should support the local community to undertake a study and maintain a register Invo	nvolvement. Through Policy 6 we
of the accommodation needs of the creative sector. The protection of specific req	equire new business space to be
business sites has precedence within the PNAAP: 4.2.33 Our Employment Land des	esigned flexibly in new

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							Review (2010) recognises that the Print Village Industrial Estate on Chadwick Road is a well-functioning business estate that accommodates SMEs. The estate does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment proposal. By allocating the site as a proposals site (PNAAP 33) we can ensure that any redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP.
171	942	Arches Studios	De Pascali	Eunice			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								draft policy 2 of the AAP. The
								policy identifies the locations in
								which we will promote the
								development of additional arts,
								cultural, leisure and entertainment
								floor space and this includes
								Peckham Rye Station (site PNAAP
								6). The AAP also seeks to
								encourage more business floor space. Draft policy 6: Business
								space, sets out that we will
								encourage the generation of new
								jobs and business by supporting
								the provision of new business floor
								space in Peckham core area and
								town centre. Site PNAAP 6:
								Peckham Rye Station falls within
								the boundary of both Peckham
								town centre and Peckham core
								action area. Through the proposed
								site allocation PNAAP 6: Peckham
								Rye Station, we set out that the
								required land use for this site is business use (Class B1), retail use
								(Classes A1/A2/A3/A4) and public
								square. We set out that other land
								uses that would be acceptable are
								community/cultural/leisure use
								(Class D) and residential use
								(Class C3). The proposed uses
								therefore enable the wider
								Peckham Rye Station site to
								continue to be used for a mixture of
								uses. The AAP designates the land
								owned by Network Rail (both
								Peckham Rye Station and its surrounds) as proposals site
								PNAAP 6: Peckham Rye Station.
								This boundary has evolved through
								the AAP preparation, with earlier
								versions of the AAP (towards a
								preferred option and preferred
								option) both showing a smaller
								boundary ending at Dovedale
								Court. We have amended this
								boundary for the
								publication/submission version
								through discussions with Network Rail to reflect the boundary of the
								land that they own and to provide
								more opportunities for
								redevelopment as new funding has
								arisen for this site. The council

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
reference number	reference number	Organisation		First name		Paragraph	Details of representation		
									permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
172	943	Arches Studios	Tomkinson	Steve	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5

Persence (Organisation number) The proposed changes provided to the property of the property	Representation	Objector		Surname		Main				Officer recognition
particular reference to the arrist studies alrong Blencherin Crows. 4.2.10 Feckham has a possive repolation as a creative hostina in brown to many successful businesses and organizations and a thriving multi-cultural arise sector. The area around Peckham Studies, along fasterness or on the Coopelant insulation in countries are all the possive control of the possive countries of the coopelant program of the coopelant insulation and countries of the coopelant program o	reference	reference	Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and at him-locularil and suppose. The area and Duse classes to ensure that the source can meet the made of the control of t								particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham		allows a range of uses to operate
businesses and organisations and a thriving multi-cultural arts scotin. The area around Pechalma Station along Blanking over and the Coopsian industrial the space can must be a final processes the contract of the processes the contract of the processes the contract of build upon the reputation which will help be Station 4.2.1 to what the creative admirties in and around Pechalma Station 4.2.1 and the station of contract to build upon the reputation which will help be greated to contract to build upon the reputation which will help be greated to contract to build upon the reputation which will help be greated to contract to build upon the reputation which will help be greated to contract the build of the contract to the contract to build upon the reputation which will help be greated to the contract to the station of the contract to contract to build upon the separation will be greated to the contract to the contr										
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Park currently hosts an number of local artisal studies it further expresses the aspiration to build upon this positive tupon at the studies of the studies										the space can meet the needs of a
aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Pedra Ps. Station. 4.2.11 We want to continue to build upon this reputation which will not be proceed to continue to build upon this reputation which will not be proceed to continue to build upon this reputation which will not be proceed to continue to the process of the proce										ı ·
criative activities in and around Pockhaim Rys Station: 4.2.11 We want to confinue to build upon this reputative with build help to generate new jobs and contribute towards the vitality of the loren centre by creating a more diverse offer for local people and visitors as well as creating opportunities by training and the properties of the properties. We have the activities taking pace in and a crouse whilst also building on the many creative activities taking pace in and sort operation. A properties of the properties of the properties of the properties of the properties. We have a chromodogad in the AAP that the activities taking pace in and sort operation. A properties of the properties. We have a common of the properties of the properties of the properties of the properties. We have a continue to be supported and promoted in the area and rectified to the properties of the propert								aspiration to build upon this positive reputation as a creative hotspot, building on		spaces have shown to be popular
contribute towards the visiting of the town centre by presting a more diverse offer for local people and visitors as well as creating opportunities for training and learning, 4.2.12 We have identified that there are apportunities to provide new spaces at both he north and the centre of the town centre. We want to continue and provide more employment and provide more expectation. We will work with landowners and developers to identify and secure occupants for new art. cultural, leave and entertainment appears to the factors that make a provide more appearance of the provide more and provide more and provided in the area and p								creative activities in and around Peckham Rye Station: 4.2.11 We want to		with the creative industry sector
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								cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
										surrounds, section 7.2 of the draft
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humber reference number policy policy policy businesses or; 2. Giving protection to existing business spaces, including small business spaces and allowing more flexibility on how business space is used and allow all types of employment creating uses. The need to protect existing by Network creative businesses is a key factor in both policy options. The need to protect and so	Officer response to representation
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thus récognises the importance of the creative industries to the local character and exponent yand outlines a vision of Pedcharm town centre as a creative bub. the aim and exponent yand outlines and the presence of sensitive to key requirements for the expansion of the creative sector in the area. These include the availability of altrocable business premises and the presence of sensiting creative industries. The provision of attequate small be presenced to sensiting creative industries. The provision of attequate small be a sensitive to the presence of the station along the presence of the station along the presence of the station along Bentheim Grove, as a named in the plan, appears to be under threat. PNAAP Policy 5: Markets, idealines set PNAAP at the presence of the station along Bentheim Grove as one of the station of the station of the presence of the station of	re transformation of the station its setting. The site is owned Network Rail, not the council, so the council are working with work Rail, Southern Railways the GLA on this project, with aim to deliver this project over next four years. It is currently y stages of preparation on this project, with feasibility work in grained out on the project. It is a separate piece of work to AAP, with the AAP setting out strategic aspirations for the land the detail to be worked the designation. It is the detail to be straight the designation will take place at a restage on the detail of the posed scheme and planning mission will need to be obtained the development. It is the detail of the development will need to be carried in accordance with our dement of Community of the development. Through Policy 6 we designed flexibly in new delopments, to support new delopments, and to ensure that smaller erprises are able to move into space easily. Our Employment deleview (2010) surveyed desses clusters throughout the detail that SMEs in Southwark wire flexible space and debator units capable for possible deasion and also require

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
reference	reference number	Arches Studios				Paragraph	2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolf & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		representation road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP. Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts,
									cultural, leisure and entertainment floor space and this includes Peckham Rye Station (site PNAAP 6). The AAP also seeks to encourage more business floor space. Draft policy 6: Business
									space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6: Peckham Rye Station falls within the boundary of both Peckham

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								town centre and Peckham core
								action area. Through the proposed site allocation PNAAP 6: Peckham
								Rye Station, we set out that the
								required land use for this site is
								business use (Class B1), retail use
								(Classes A1/A2/A3/A4) and public
								square. We set out that other land uses that would be acceptable are
								community/cultural/leisure use
								(Class D) and residential use
								(Class C3). The proposed uses
								therefore enable the wider
								Peckham Rye Station site to
								continue to be used for a mixture of uses. The AAP designates the land
								owned by Network Rail (both
								Peckham Rye Station and its
								surrounds) as proposals site
								PNAAP 6: Peckham Rye Station.
								This boundary has evolved through the AAP preparation, with earlier
								versions of the AAP (towards a
								preferred option and preferred
								option) both showing a smaller
								boundary ending at Dovedale
								Court. We have amended this
								boundary for the publication/submission version
								through discussions with Network
								Rail to reflect the boundary of the
								land that they own and to provide
								more opportunities for redevelopment as new funding has
								arisen for this site. The council
								successfully bid for substantial
								funds from the Mayor's
								Regeneration Fun to add to our
								own funds to commit to delivering
								significant change to Peckham Rye Station and its setting. In terms of
								the detail of the possible
								redevelopment of the station and
								surrounds, section 7.2 of the draft
								AAP sets out information on the
								future transformation of the station and its setting. The site is owned
								by Network Rail, not the council,
								and so the council are working with
								Network Rail, Southern Railways
								and the GLA on this project, with
								the aim to deliver this project over the next four years. It is currently
	<u> </u>							une next iour years, it is currently

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number								early stages of preparation, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community
174	944	Arches Studios	Pickles	Sarah	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial Park currently hosts a number of local artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities for training and learning. 4.2.12 We have identified that there are opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP 10) as a centre for cultural events whilst also building on the many creative activities taking place in and around the Copeland industrial Park and Peckham Rye Station. We will work with landowners and developers to identify and secure		Involvement. Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2 identifies the proposals sites where

Representation			Surname		Main				Officer response to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	representation
							importance of the creative industries and identifies some of the factors that make		new arts, cultural, leisure and
							Peckham town centre attractive to the creative sector: 4.54. The creative and		entertainment space should be
							cultural sector has been identified as the fastest growing sector in London and		accommodated, however there
							they have also experienced growth in employment in Southwark in recent years.		may be opportunities to secure
							Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town		suitable space on other sites as
							centre as having characteristics suitable for creative and cultural industries such		development schemes come
							as advertising, radio, television, music production, artistic creation and art		forward. Through the proposed site
							galleries. One of the major attractions in Peckham is the relatively low rents, the		allocation PNAAP 6: Peckham Rye
							existing presence of established creative industries and the very good public		Station, we set out that the
							transport accessibility transport links. The availability of suitable small		required land use for this site is
							office/studios/workshops could lead to the establishment of a more formal		business use (Class B1), retail use
							physical cluster of creative individuals and businesses in the area which could contribute to the physical transformation of the town centre while maintaining		(Classes A1/A2/A3/A4) and public square. We set out that other land
							cost efficient space for the businesses. 4.55. The following proposal sites have		uses that would be acceptable are
							been identified to accommodate new arts, cultural, leisure and entertainment		community/cultural/leisure use
							space over the plan period. We will work with landowners and developers to		(Class D) and residential use
							identify and secure occupants for new art, cultural, leisure and entertainment		(Class C3). The proposed uses
							space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-		therefore enable the wider
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of the detail of the possible
							industries in the area. Two policy options are proposed: 4.38. For creative and cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
							existing businesses and give priority to more space for creative industries and		surrounds, section 7.2 of the draft
							businesses. Require a proportion of all business space built to be for small		AAP sets out information on the
							businesses or; 2. Giving protection to existing business spaces, including small		future transformation of the station
							business spaces and allowing more flexibility on how business space is used		and its setting. The site is owned
							and allow all types of employment creating uses. The need to protect existing		by Network Rail, not the council,
							creative businesses is a key factor in both policy options. The need to protect		and so the council are working with
							existing creative businesses is a key factor in both policy options. The PNAAP		Network Rail, Southern Railways
							thus recognises the importance of the creative industries to the local character		and the GLA on this project, with
							and economy and outlines a vision of Peckham town centre as a creative hub.		the aim to deliver this project over
							Recognition is given to key requirements for the expansion of the creative sector		the next four years. It is currently
							in the area. These include the availability of affordable business premises and		early stages of preparation on this
							the presence of existing creative industries. The provision of adequate small		new project, with feasibility work
							business space and the protection of existing businesses are thus proposed.		being carried out on the project.
							However, the future of the existing creative businesses along Blenheim Grove,		This is a separate piece of work to
							as named in the plan, appears to be under threat. PNAAP Policy 5: Markets,		the AAP, with the AAP setting out
							identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of		the strategic aspirations for the
							two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of		site, and the detail to be worked
							retail provision, provide self-employment opportunities with low entry-costs and		jointly by the council, Network Rail,
							fulfil a valuable role in the local economy. The Southwark Street Trading and		the GLA and Southern Railways. At
							Markets Strategy (2010) recommends new locations for markets on a dedicated		this stage it is too early to

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
175	944	Arches	Pickles	Sarah			site off Rye Lane providing the opportunity to create a destination market. This could be themed as a specialty food market or arts and craft market which will help to promote the local economy. Locating market stalls off Rye Lane would also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6) and the land between the railway arches (site PNAAP 3) to bring forward space for new markets. Should the development of a market on site PNAAP 6 in line with Policy 5 lead to the removal of the creative arts studios within the site boundaries, this would be contrary to the aims of Policy 2 to support existing creative industries Proposal The PNAAP needs to be amended to include a new policy: To require in the first instance, the protection of creative artistic floorspace within the arches in Blenheim Court. Secondly to ensure the provision of a proportion of affordable floorspace in large-scale developments to provide affordable space for creative and art use. To underpin this policy the council should support the local community to undertake a study and maintain a register of the accommodation needs of the creative sector. The protection of specific business sites has precedence within the PNAAP: 4.2.33 Our Employment Land Review (2010) recognises that the Print Village Industrial Estate on Chadwick Road is a well-functioning business estate that accommodates SMEs. The estate does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP. Consultation on the AAP has been
173	544	Studios	IIICNICS	Saran			participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development		carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a

Representatio reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
						stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolf & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts, cultural, leisure and entertainment floor space and this includes Peckham Rye Station (site PNAAP 6). The AAP also seeks to encourage more business floor space. Draft policy 6: Business space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6: Peckham Rye Station falls within the boundary of both Peckham core action area. Through the proposed site allocation PNAAP 6: Peckham Rye Station falls within the boundary of both Peckham core action area. Through the proposed site allocation PNAAP 6: Peckham Rye Station, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class C3). The proposed uses therefore enable the wider Peckham Rye Station site to continue to be used for a mixture of uses. The AAP designates the land owned by Network Rail (both Peckham Rye Station and its

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								surrounds) as proposals site
								PNAAP 6: Peckham Rye Station.
								This boundary has evolved through
								the AAP preparation, with earlier versions of the AAP (towards a
								preferred option and preferred
								option) both showing a smaller
								boundary ending at Dovedale
								Court. We have amended this
								boundary for the
								publication/submission version through discussions with Network
								Rail to reflect the boundary of the
								land that they own and to provide
								more opportunities for
								redevelopment as new funding has
								arisen for this site. The council
								successfully bid for substantial funds from the Mayor's
								Regeneration Fun to add to our
								own funds to commit to delivering
								significant change to Peckham Rye
								Station and its setting. In terms of
								the detail of the possible
								redevelopment of the station and surrounds, section 7.2 of the draft
								AAP sets out information on the
								future transformation of the station
								and its setting. The site is owned
								by Network Rail, not the council,
								and so the council are working with
								Network Rail, Southern Railways and the GLA on this project, with
								the aim to deliver this project over
								the next four years. It is currently
								early stages of preparation, with
								feasibility work being carried out on
								the project. This is a separate
								piece of work to the AAP, with the AAP setting out the strategic
								aspirations for the site, and the
								detail to be worked jointly by the
								council, Network Rail, the GLA and
								Southern Railways. At this stage it
								is too early to determine which
								parts of the station and its settings
								will be redeveloped, so the AAP includes the whole of the site as
								part of its proposals site
								designation. Engagement with the
								local community will take place at a
								later stage in the development of
								the proposed scheme and planning

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
176	925		Jervis	Esther	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial Park currently hosts a number of local artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP 10) as a centre for cultural events whilst also building on the many creative activities taking place in and around the Copeland industrial Park and Peckham Rye Station. We will work with landowners and developers to identify and secure occupa		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2 identifies the proposals sites where new arts, cultural, leisure and entertainment space should be accommodated, however there may be opportunities to secure suitable space on other sites as development schemes come forward. Through the proposed site allocation PNAAP 6: Peckham Rye Station, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class C3). The proposed uses therefore enable the wider

Representation			Surname		Main				Officer response to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	representation
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of
							industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and surrounds, section 7.2 of the draft
							existing businesses and give priority to more space for creative industries and businesses. Require a proportion of all business space built to be for small		AAP sets out information on the
							businesses or; 2. Giving protection to existing business spaces, including small		future transformation of the station
							business spaces and allowing more flexibility on how business space is used		and its setting. The site is owned
							and allow all types of employment creating uses. The need to protect existing		by Network Rail, not the council,
							creative businesses is a key factor in both policy options. The need to protect		and so the council are working with
							existing creative businesses is a key factor in both policy options. The PNAAP		Network Rail, Southern Railways
							thus recognises the importance of the creative industries to the local character		and the GLA on this project, with
							and economy and outlines a vision of Peckham town centre as a creative hub.		the aim to deliver this project over
							Recognition is given to key requirements for the expansion of the creative sector		the next four years. It is currently
							in the area. These include the availability of affordable business premises and		early stages of preparation on this
							the presence of existing creative industries. The provision of adequate small		new project, with feasibility work
							business space and the protection of existing businesses are thus proposed.		being carried out on the project.
							However, the future of the existing creative businesses along Blenheim Grove,		This is a separate piece of work to
							as named in the plan, appears to be under threat. PNAAP Policy 5: Markets,		the AAP, with the AAP setting out
							identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of		the strategic aspirations for the
							two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of		site, and the detail to be worked
							retail provision, provide self-employment opportunities with low entry-costs and		jointly by the council, Network Rail,
							fulfil a valuable role in the local economy. The Southwark Street Trading and		the GLA and Southern Railways. At
							Markets Strategy (2010) recommends new locations for markets on a dedicated site off Rye Lane providing the opportunity to create a destination market. This		this stage it is too early to determine which parts of the
							could be themed as a specialty food market or arts and craft market which will		station and its settings will be
							help to promote the local economy. Locating market stalls off Rye Lane would		redeveloped, so the AAP includes
							also avoid cluttering the narrow footpaths and free up space for pedestrians. We		the whole of the site as part of its
							will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6)		proposals site designation.
							and the land between the railway arches (site PNAAP 3) to bring forward space		Consultation will take place at a
							for new markets. Should the development of a market on site PNAAP 6 in line		later stage on the detail of the
							with Policy 5 lead to the removal of the creative arts studios within the site		proposed scheme and planning
							boundaries, this would be contrary to the aims of Policy 2 to support existing		permission will need to be obtained
							creative industries Proposal The PNAAP needs to be amended to include a new		for future development.
							policy: To require in the first instance, the protection of creative artistic floorspace		Consultation on a future planning
							within the arches in Blenheim Court. Secondly to ensure the provision of a		application will need to be carried
							proportion of affordable floorspace in large-scale developments to provide		out in accordance with our
							affordable space for creative and art use. To underpin this policy the council		Statement of Community
							should support the local community to undertake a study and maintain a register		Involvement. Through Policy 6 we
							of the accommodation needs of the creative sector. The protection of specific		require new business space to be
							business sites has precedence within the PNAAP: 4.2.33 Our Employment Land		designed flexibly in new
							Review (2010) recognises that the Print Village Industrial Estate on Chadwick		developments, to support new

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number						Road is a well-functioning business estate that accommodates SMEs. The estate does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment proposal. By allocating the site as a proposals site (PNAAP 33) we can ensure that any redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP.
177	925		Jervis	Esther			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The

Representation	Objector		Surname		Main				Officer recognition
		Organisation		First name	Main policy	Paragraph	Details of representation F	Proposed changes	Officer response to representation
									policy identifies the locations in
									which we will promote the
									development of additional arts,
									cultural, leisure and entertainment
									floor space and this includes
									Peckham Rye Station (site PNAAP
									6). The AAP also seeks to
									encourage more business floor
									space. Draft policy 6: Business
									space, sets out that we will
									encourage the generation of new
									jobs and business by supporting
									the provision of new business floor
									space in Peckham core area and town centre. Site PNAAP 6:
									Peckham Rye Station falls within
									the boundary of both Peckham
									town centre and Peckham core
									action area. Through the proposed
									site allocation PNAAP 6: Peckham
									Rye Station, we set out that the
									required land use for this site is
									business use (Class B1), retail use
									(Classes A1/A2/A3/A4) and public
									square. We set out that other land
									uses that would be acceptable are
									community/cultural/leisure use
									(Class D) and residential use
									(Class C3). The proposed uses
									therefore enable the wider
									Peckham Rye Station site to
									continue to be used for a mixture of
									uses. The AAP designates the land
									owned by Network Rail (both
									Peckham Rye Station and its
									surrounds) as proposals site PNAAP 6: Peckham Rye Station.
									This boundary has evolved through
									the AAP preparation, with earlier
									versions of the AAP (towards a
									preferred option and preferred
									option) both showing a smaller
									boundary ending at Dovedale
									Court. We have amended this
									boundary for the
									publication/submission version
									through discussions with Network
									Rail to reflect the boundary of the
									land that they own and to provide
									more opportunities for
									redevelopment as new funding has
									arisen for this site. The council
									successfully bid for substantial

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									funds from the Mayor's Regeneration Fun to add to our own funds to commit to delivering significant change to Peckham Rye Station and its setting. In terms of the detail of the possible redevelopment of the station and surrounds, section 7.2 of the draft AAP sets out information on the future transformation of the station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
178	343	Arches Studios	Smith	Lou	Policy 5	4 . <i>2</i> .20	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate

Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number	Organisation		Tilotilalile	policy	r urugrupii	Betans of representation	Troposca onanges	representation
							has a positive reputation as a creative hotspot and is home to many successful		in railway arches including A and B
							businesses and organisations and a thriving multi-cultural arts scene. The area		and D use classes to ensure that
							around Peckham Station, along Blenheim Grove and the Copeland industrial		the space can meet the needs of a
							Park currently hosts a number of local artists' studios It further expresses the		wide range of occupiers. These
							aspiration to build upon this positive reputation as a creative hotspot, building on		spaces have shown to be popular
							creative activities in and around Peckham Rye Station: 4.2.11 We want to		with the creative industry sector
							continue to build upon this reputation which will help to generate new jobs and		and we will to support this sector to
							contribute towards the vitality of the town centre by creating a more diverse offer		continue to grow in the action area
							for local people and visitors as well as creating opportunities for training and		to help to diversify the mix of
							learning. 4.2.12 We have identified that there are opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue		business uses in the town centre and provide more employment
							to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP		opportunities. We have
							10) as a centre for cultural events whilst also building on the many creative		acknowledged in the AAP that the
							activities taking place in and around the Copeland industrial Park and Peckham		creative and cultural sector will
							Rye Station. We will work with landowners and developers to identify and secure		continue to be supported and
							occupants for new art, cultural, leisure and entertainment space. The PNAAP		promoted in the area and Policy 2
							Business & Retail Background paper, September 2012, stresses the growing		identifies the proposals sites where
							importance of the creative industries and identifies some of the factors that make		new arts, cultural, leisure and
							Peckham town centre attractive to the creative sector: 4.54. The creative and		entertainment space should be
							cultural sector has been identified as the fastest growing sector in London and		accommodated, however there
							they have also experienced growth in employment in Southwark in recent years.		may be opportunities to secure
							Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town		suitable space on other sites as
							centre as having characteristics suitable for creative and cultural industries such		development schemes come
							as advertising, radio, television, music production, artistic creation and art		forward. Through the proposed site
							galleries. One of the major attractions in Peckham is the relatively low rents, the		allocation PNAAP 6: Peckham Rye
							existing presence of established creative industries and the very good public		Station, we set out that the
							transport accessibility transport links. The availability of suitable small		required land use for this site is
							office/studios/workshops could lead to the establishment of a more formal		business use (Class B1), retail use
							physical cluster of creative individuals and businesses in the area which could		(Classes A1/A2/A3/A4) and public
							contribute to the physical transformation of the town centre while maintaining cost efficient space for the businesses. 4.55. The following proposal sites have		square. We set out that other land uses that would be acceptable are
							been identified to accommodate new arts, cultural, leisure and entertainment		community/cultural/leisure use
							space over the plan period. We will work with landowners and developers to		(Class D) and residential use
							identify and secure occupants for new art, cultural, leisure and entertainment		(Class C3). The proposed uses
							space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-		therefore enable the wider
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of
							industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
							existing businesses and give priority to more space for creative industries and businesses. Require a proportion of all business space built to be for small		surrounds, section 7.2 of the draft AAP sets out information on the
							businesses or; 2. Giving protection to existing business spaces, including small		future transformation of the station
							pasificases of, 2. Giving protoction to existing pasificas spaces, including sinal		interestation attention of the station

		1		1				1
Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
						business spaces and allowing more flexibility on how business space is used and allow all types of employment creating uses. The need to protect existing creative businesses is a key factor in both policy options. The need to protect existing creative businesses is a key factor in both policy options. The PNAAP thus recognises the importance of the creative industries to the local character and economy and outlines a vision of Peckham town centre as a creative hub. Recognition is given to key requirements for the expansion of the creative sector in the area. These include the availability of affordable business premises and the presence of existing creative industries. The provision of adequate small business space and the protection of existing businesses are thus proposed. However, the future of the existing creative businesses along Blenheim Grove, as named in the plan, appears to be under threat. PNAAP Policy 5: Markets, identifies site PNAAP 6 at the rear of the station along Blenheim Grove, as named in the plan, appears to be under threat. PNAAP Policy 5: Markets, identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of retail provision, provide self-employment opportunities with low entry-costs and fulfil a valuable role in the local economy. The Southwark Street Trading and Markets Strategy (2010) recommends new locations for markets on a dedicated site off Rye Lane providing the opportunity to create a destination market. This could be themed as a specialty food market or arts and craft market which will help to promote the local economy. Locating market stalls off Rye Lane would also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6) and the land between the railway arches (site PNAAP 3) to bring forward space for new markets. Should the development of a market on site PNAAP 6 in line with Policy		and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation on this new project, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
reference	reference			Lou		Paragraph	2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.	Proposed changes	
									jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6: Peckham Rye Station falls within the boundary of both Peckham town centre and Peckham core

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
								action area. Through the proposed site allocation PNAAP 6: Peckham
								Rye Station, we set out that the
								required land use for this site is
								business use (Class B1), retail use
								(Classes A1/A2/A3/A4) and public square. We set out that other land
								uses that would be acceptable are
								community/cultural/leisure use
								(Class D) and residential use
								(Class C3). The proposed uses
								therefore enable the wider Peckham Rye Station site to
								continue to be used for a mixture of
								uses. The AAP designates the land
								owned by Network Rail (both
								Peckham Rye Station and its
								surrounds) as proposals site PNAAP 6: Peckham Rye Station.
								This boundary has evolved through
								the AAP preparation, with earlier
								versions of the AAP (towards a
								preferred option and preferred
								option) both showing a smaller boundary ending at Dovedale
								Court. We have amended this
								boundary for the
								publication/submission version
								through discussions with Network Rail to reflect the boundary of the
								land that they own and to provide
								more opportunities for
								redevelopment as new funding has
								arisen for this site. The council
								successfully bid for substantial funds from the Mayor's
								Regeneration Fun to add to our
								own funds to commit to delivering
								significant change to Peckham Rye
								Station and its setting. In terms of
								the detail of the possible redevelopment of the station and
								surrounds, section 7.2 of the draft
								AAP sets out information on the
								future transformation of the station
								and its setting. The site is owned
								by Network Rail, not the council, and so the council are working with
								Network Rail, Southern Railways
								and the GLA on this project, with
								the aim to deliver this project over
								the next four years. It is currently
								early stages of preparation, with

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
180	946	Arches Studios	Randall	D.C.	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial businesses and organisations and a artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities for training and learning. 4.2.12 We have identified that there are opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP 10) as a centre for cultural events whilst also building on the many creative activities taking place in and around the Copeland industrial Park and Peckham Rye Station. We will work with landowners and developers to identify and secure oc		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2 identifies the proposals sites where new arts, cultural, leisure and

Representation	Objector		Surname						
		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							Peckham town centre attractive to the creative sector: 4.54. The creative and		entertainment space should be
							cultural sector has been identified as the fastest growing sector in London and		accommodated, however there
							they have also experienced growth in employment in Southwark in recent years.		may be opportunities to secure
							Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town		suitable space on other sites as
							centre as having characteristics suitable for creative and cultural industries such		development schemes come
							as advertising, radio, television, music production, artistic creation and art		forward. Through the proposed site
							galleries. One of the major attractions in Peckham is the relatively low rents, the		allocation PNAAP 6: Peckham Rye
							existing presence of established creative industries and the very good public		Station, we set out that the
							transport accessibility transport links. The availability of suitable small		required land use for this site is
							office/studios/workshops could lead to the establishment of a more formal		business use (Class B1), retail use
							physical cluster of creative individuals and businesses in the area which could		(Classes A1/A2/A3/A4) and public
							contribute to the physical transformation of the town centre while maintaining		square. We set out that other land
							cost efficient space for the businesses. 4.55. The following proposal sites have		uses that would be acceptable are
							been identified to accommodate new arts, cultural, leisure and entertainment		community/cultural/leisure use
							space over the plan period. We will work with landowners and developers to		(Class D) and residential use (Class C3). The proposed uses
							identify and secure occupants for new art, cultural, leisure and entertainment space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-		therefore enable the wider
							27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land		Peckham Rye Station site to
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an
							recognises the need for affordable business space to foster the creative		attractive destination. In terms of
							industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
							existing businesses and give priority to more space for creative industries and		surrounds, section 7.2 of the draft
							businesses. Require a proportion of all business space built to be for small		AAP sets out information on the
							businesses or; 2. Giving protection to existing business spaces, including small		future transformation of the station
							business spaces and allowing more flexibility on how business space is used and allow all types of employment creating uses. The need to protect existing		and its setting. The site is owned by Network Rail, not the council,
							creative businesses is a key factor in both policy options. The need to protect		and so the council are working with
							existing creative businesses is a key factor in both policy options. The PNAAP		Network Rail, Southern Railways
							thus recognises the importance of the creative industries to the local character		and the GLA on this project, with
							and economy and outlines a vision of Peckham town centre as a creative hub.		the aim to deliver this project over
							Recognition is given to key requirements for the expansion of the creative sector		the next four years. It is currently
							in the area. These include the availability of affordable business premises and		early stages of preparation on this
							the presence of existing creative industries. The provision of adequate small		new project, with feasibility work
							business space and the protection of existing businesses are thus proposed.		being carried out on the project.
							However, the future of the existing creative businesses along Blenheim Grove,		This is a separate piece of work to
							as named in the plan, appears to be under threat. PNAAP Policy 5: Markets,		the AAP, with the AAP setting out
							identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of		the strategic aspirations for the
							two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of		site, and the detail to be worked
							retail provision, provide self-employment opportunities with low entry-costs and		jointly by the council, Network Rail,
							fulfil a valuable role in the local economy. The Southwark Street Trading and		the GLA and Southern Railways. At
							Markets Strategy (2010) recommends new locations for markets on a dedicated		this stage it is too early to
							site off Rye Lane providing the opportunity to create a destination market. This		determine which parts of the
							and an injurial promaing the opportunity to droute a document mather. The		parto or the

Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number	number	Organisation		T ii St Huille	policy	- urugrupn	·	Troposca onanges	representation
							could be themed as a specialty food market or arts and craft market which will help to promote the local economy. Locating market stalls off Rye Lane would also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6) and the land between the railway arches (site PNAAP 3) to bring forward space for new markets. Should the development of a market on site PNAAP 6 in line with Policy 5 lead to the removal of the creative arts studios within the site boundaries, this would be contrary to the aims of Policy 2 to support existing creative industries Proposal The PNAAP needs to be amended to include a new policy: To require in the first instance, the protection of creative artistic floorspace within the arches in Blenheim Court. Secondly to ensure the provision of a proportion of affordable floorspace in large-scale developments to provide affordable space for creative and art use. To underpin this policy the council should support the local community to undertake a study and maintain a register of the accommodation needs of the creative sector. The protection of specific business sites has precedence within the PNAAP: 4.2.33 Our Employment Land Review (2010) recognises that the Print Village Industrial Estate on Chadwick Road is a well-functioning business estate that accommodates SMEs. The estate does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment proposal. By allocating the site as a proposals site (PNAAP 33) we can ensure that any redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core
181	946	Arches Studios	Randall	D.C.			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as		Strategy and also the draft AAP. Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation

Representation			Surname		Main				Officer response to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	representation
							shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus.		stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts, cultural, leisure and entertainment floor space and this includes Peckham Rye Station (site PNAAP 6). The AAP also seeks to encourage more business floor space. Draft policy 6: Business space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6: Peckham Rye Station falls within the boundary of both Peckham town centre and Peckham core action area. Through the proposed site allocation PNAAP 6: Peckham Rye Station, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class C3). The proposed uses therefore enable the wider Peckham Rye Station site to continue to be used for a mixture of uses. The AAP designates the land owned by Network Rail (both Peckham Rye Station and its surrounds) as proposals site

Representation	Objector		Surname						
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
Hamber	Hamber								PNAAP 6: Peckham Rye Station.
									This boundary has evolved through
									the AAP preparation, with earlier
									versions of the AAP (towards a
									preferred option and preferred
									option) both showing a smaller
									boundary ending at Dovedale Court. We have amended this
									boundary for the
									publication/submission version
									through discussions with Network
									Rail to reflect the boundary of the
									land that they own and to provide
									more opportunities for
									redevelopment as new funding has arisen for this site. The council
									successfully bid for substantial
									funds from the Mayor's
									Regeneration Fun to add to our
									own funds to commit to delivering
									significant change to Peckham Rye
									Station and its setting. In terms of
									the detail of the possible redevelopment of the station and
									surrounds, section 7.2 of the draft
									AAP sets out information on the
									future transformation of the station
									and its setting. The site is owned by Network Rail, not the council,
									and so the council are working with
									Network Rail, Southern Railways
									and the GLA on this project, with
									the aim to deliver this project over
									the next four years. It is currently
									early stages of preparation, with
									feasibility work being carried out on the project. This is a separate
									piece of work to the AAP, with the
									AAP setting out the strategic
									aspirations for the site, and the
									detail to be worked jointly by the
									council, Network Rail, the GLA and
									Southern Railways. At this stage it is too early to determine which
									parts of the station and its settings
									will be redeveloped, so the AAP
									includes the whole of the site as
									part of its proposals site
									designation. Engagement with the
									local community will take place at a
									later stage in the development of
									the proposed scheme and planning permission will need to be obtained
									permission will need to be obtained

Representation Objector reference number Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
182 947 Arches Studios	Hart	Cathy	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial Park currently hosts a number of local artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities for training and learning. 4.2.12 We have identified that there are opportunities for training and learning. 4.2.12 We have identified that there are opportunities for training and learning. 4.2.12 we have identified that there are opportunities for training and learning. 4.2.12 we have identified that there are opportunities for training and learning. 4.2.12 we have identified that there are opportunities for training and learning. 4.2.12 we have identified that there are opportunitie		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2 identifies the proposals sites where new arts, cultural, leisure and entertainment space should be accommodated, however there may be opportunities to secure suitable space on other sites as development schemes come forward. Through the proposed site allocation PNAAP 6: Peckham Rye Station, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class C3). The proposed uses therefore enable the wider Peckham Rye Station site to

Representation			Surname		Main				Officer response to
reference number	reference number	Organisation		First name	policy	Paragraph	Details of representation	Proposed changes	representation
							between the railway arches (site PNAAP 3) These factors are seen to include		continue to be used for a mixture of
							'relatively low rents' the 'availability of suitable small office/studios/workshops'		uses. The identification of PNAAP
							and the 'existing presence of established creative industries'. Proposal site		6 (Peckham Rye Station) to
							PNAAP 6 is also identified to accommodate new arts space. The Business and		accommodate a possible new
							Retail Background paper, under Policy 2, Issues and Options (2009) (CD16),		market site to rear of the station in
							expresses the following vision: 4.36. tn the vision, we set out that we want		a new public space is promoted to
							Peckham and Nunhead to be a creative place, as a destination for music, art and		bring more activity into this area
							events for people from different backgrounds and where creative and cultural		and complement the improvements
							industries will be thriving. The issues which were identified were recognition of		to the station and its surroundings
							the growing reputation of Peckham as a creative hub, and how this can be		and encourage this area around
							fostered more; and the need for affordable business space. This again		the station to be more of an attractive destination. In terms of
							recognises the need for affordable business space to foster the creative industries in the area. Two policy options are proposed: 4.38. For creative and		the detail of the possible
							cultural business space we also set out two options which included: 1. Protect		redevelopment of the station and
							existing businesses and give priority to more space for creative industries and		surrounds, section 7.2 of the draft
							businesses. Require a proportion of all business space built to be for small		AAP sets out information on the
							businesses or; 2. Giving protection to existing business spaces, including small		future transformation of the station
							business spaces and allowing more flexibility on how business space is used		and its setting. The site is owned
							and allow all types of employment creating uses. The need to protect existing		by Network Rail, not the council,
							creative businesses is a key factor in both policy options. The need to protect		and so the council are working with
							existing creative businesses is a key factor in both policy options. The PNAAP		Network Rail, Southern Railways
							thus recognises the importance of the creative industries to the local character		and the GLA on this project, with
							and economy and outlines a vision of Peckham town centre as a creative hub.		the aim to deliver this project over
							Recognition is given to key requirements for the expansion of the creative sector		the next four years. It is currently
							in the area. These include the availability of affordable business premises and		early stages of preparation on this
							the presence of existing creative industries. The provision of adequate small		new project, with feasibility work
							business space and the protection of existing businesses are thus proposed.		being carried out on the project.
							However, the future of the existing creative businesses along Blenheim Grove,		This is a separate piece of work to
							as named in the plan, appears to be under threat. PNAAP Policy 5: Markets,		the AAP, with the AAP setting out
							identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of		the strategic aspirations for the site, and the detail to be worked
							retail provision, provide self-employment opportunities with low entry-costs and		jointly by the council, Network Rail,
							fulfil a valuable role in the local economy. The Southwark Street Trading and		the GLA and Southern Railways. At
							Markets Strategy (2010) recommends new locations for markets on a dedicated		this stage it is too early to
							site off Rye Lane providing the opportunity to create a destination market. This		determine which parts of the
							could be themed as a specialty food market or arts and craft market which will		station and its settings will be
							help to promote the local economy. Locating market stalls off Rye Lane would		redeveloped, so the AAP includes
							also avoid cluttering the narrow footpaths and free up space for pedestrians. We		the whole of the site as part of its
							will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6)		proposals site designation.
							and the land between the railway arches (site PNAAP 3) to bring forward space		Consultation will take place at a
							for new markets. Should the development of a market on site PNAAP 6 in line		later stage on the detail of the
							with Policy 5 lead to the removal of the creative arts studios within the site		proposed scheme and planning
							boundaries, this would be contrary to the aims of Policy 2 to support existing		permission will need to be obtained
							creative industries Proposal The PNAAP needs to be amended to include a new		for future development.
							policy: To require in the first instance, the protection of creative artistic floorspace		Consultation on a future planning
							within the arches in Blenheim Court. Secondly to ensure the provision of a		application will need to be carried
							proportion of affordable floorspace in large-scale developments to provide		out in accordance with our
							affordable space for creative and art use. To underpin this policy the council		Statement of Community
							should support the local community to undertake a study and maintain a register		Involvement. Through Policy 6 we
							of the accommodation needs of the creative sector. The protection of specific business sites has precedence within the PNAAP: 4.2.33 Our Employment Land		require new business space to be designed flexibly in new
							Review (2010) recognises that the Print Village Industrial Estate on Chadwick		developments, to support new
							Road is a well-functioning business estate that accommodates SMEs. The estate		business start-ups and growing
							i todo io a won functioning business estate that accommodates siviles. The estate		pasiness start-ups and growing

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment proposal. By allocating the site as a proposals site (PNAAP 33) we can ensure that any redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP.
183	947	Arches Studios	Hart	Cathy			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus		Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation Proposed change	Officer response to representation
Humber	Hullibel							which we will promote the
								development of additional arts,
								cultural, leisure and entertainment
								floor space and this includes
								Peckham Rye Station (site PNAAP
								6). The AAP also seeks to
								encourage more business floor
								space. Draft policy 6: Business
								space, sets out that we will
								encourage the generation of new
								jobs and business by supporting
								the provision of new business floor
								space in Peckham core area and
								town centre. Site PNAAP 6:
								Peckham Rye Station falls within
								the boundary of both Peckham
								town centre and Peckham core
								action area. Through the proposed
								site allocation PNAAP 6: Peckham
								Rye Station, we set out that the
								required land use for this site is
								business use (Class B1), retail use
								(Classes A1/A2/A3/A4) and public
								square. We set out that other land
								uses that would be acceptable are
								community/cultural/leisure use
								(Class D) and residential use
								(Class C3). The proposed uses
								therefore enable the wider
								Peckham Rye Station site to
								continue to be used for a mixture of
								uses. The AAP designates the land
								owned by Network Rail (both
								Peckham Rye Station and its
								surrounds) as proposals site
								PNAAP 6: Peckham Rye Station.
								This boundary has evolved through
								the AAP preparation, with earlier
								versions of the AAP (towards a
								preferred option and preferred
								option) both showing a smaller
								boundary ending at Dovedale
								Court. We have amended this
								boundary for the
								publication/submission version through discussions with Network
								Rail to reflect the boundary of the
								land that they own and to provide
								more opportunities for
								redevelopment as new funding has
								arisen for this site. The council
								successfully bid for substantial
								funds from the Mayor's
			<u> </u>	l				pands nom the Mayor s

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									Regeneration Fun to add to our own funds to commit to delivering significant change to Peckham Rye Station and its setting. In terms of the detail of the possible redevelopment of the station and surrounds, section 7.2 of the draft AAP sets out information on the future transformation of the station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community linvolvement.
184	948	Arches Studios	Moreton- Griffiths	L.	Policy 5		1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B

Representation reference number Proposed changes Proposed changes	o ensure that the needs of a piers. These to be popular ustry sector ort this sector to the action area ne mix of e town centre mployment ave e AAP that the I sector will orted and
businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial the space can meet Park currently hosts a number of local artists' studios It further expresses the wide range of occup aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to with the creative incontinue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities for training and learning. 4.2.12 We have identified that there are opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to grow in spaces at both the north and the centre of the town centre. We want to continue to provide nelv spaces at both the north and the centre of the town centre. We want to continue to provide more to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP 10) as a centre for cultural events whilst also building on the many creative and cultural excitivities taking place in and around the Copeland industrial Park and Peckham creative and cultural Rye Station. We will work with landowners and developers to identify and secure occupants for new art, cultural, leisure and entertainment space. The PNAAP promoted in the are Business & Retail Background paper, September 2012, stresses the growing identifies the proposi importance of the creative industries and identifies some of the factors that make new arts, cultural, leisure and entertainment space cultural sector has been identified as the fastest growing sector in London and accommodated, how they have also experienced growth in employment in recent years. Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town	the needs of a biers. These to be popular ustry sector of this sector to the action area ne mix of e town centre exployment ave a AAP that the I sector will orted and
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they have also experienced growth in employment in Southwark in recent years. Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town may be opportunities suitable space on or suitable space.	
Our Employment Land Review (2010) (ELR) (CDE1) identifies Peckham town suitable space on o	
centre as having characteristics suitable for creative and cultural industries such	
as advertising, radio, television, music production, artistic creation and art forward. Through the	
galleries. One of the major attractions in Peckham is the relatively low rents, the allocation PNAAP 6	
existing presence of established creative industries and the very good public Station, we set out to	
transport accessibility transport links. The availability of suitable small required land use for	
office/studios/workshops could lead to the establishment of a more formal business use (Class physical cluster of creative individuals and businesses in the area which could (Classes A1/A2/A3/	
contribute to the physical transformation of the town centre while maintaining square. We set out	
cost efficient space for the businesses. 4.55. The following proposal sites have uses that would be	
been identified to accommodate new arts, cultural, leisure and entertainment community/cultural/	
space over the plan period. We will work with landowners and developers to (Class D) and reside	
identify and secure occupants for new art, cultural, leisure and entertainment (Class C3). The pro	
space: . Peckham Rye Station (site PNAAP 6) . Copeland industrial Park and 1-	
27 Bournemouth Road (site PNAAP 4) . Eagle Wharf (site PNAAP 10) . Land Peckham Rye Station	
between the railway arches (site PNAAP 3) These factors are seen to include continue to be used	I
'relatively low rents' the 'availability of suitable small office/studios/workshops' uses. The identifica	
and the 'existing presence of established creative industries'. Proposal site 6 (Peckham Rye St	
PNAAP 6 is also identified to accommodate new arts space. The Business and accommodate a pos	
Retail Background paper, under Policy 2, Issues and Options (2009) (CD16), market site to rear control of the c	
expresses the following vision: 4.36. tn the vision, we set out that we want a new public space	s promoted to
Peckham and Nunhead to be a creative place, as a destination for music, art and bring more activity i	nto this area
events for people from different backgrounds and where creative and cultural and complement the	
industries will be thriving. The issues which were identified were recognition of to the station and its	
the growing reputation of Peckham as a creative hub, and how this can be and encourage this	
fostered more; and the need for affordable business space. This again the station to be mo	
recognises the need for affordable business space to foster the creative attractive destinatio	
industries in the area. Two policy options are proposed: 4.38. For creative and the detail of the pos	
cultural business space we also set out two options which included: 1. Protect redevelopment of the	
existing businesses and give priority to more space for creative industries and surrounds, section 7	
businesses. Require a proportion of all business space built to be for small AAP sets out inform	
businesses or; 2. Giving protection to existing business spaces, including small future transformatio	1 OT the ateries '
business spaces and allowing more flexibility on how business space is used and its setting. The	

Representation reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
						and allow all types of employment creating uses. The need to protect existing creative businesses is a key factor in both policy options. The need to protect existing creative businesses is a key factor in both policy options. The PNAAP thus recognises the importance of the creative industries to the local character and economy and outlines a vision of Peckham town centre as a creative hub. Recognition is given to key requirements for the expansion of the creative sector in the area. These include the availability of affordable business premises and the presence of existing creative industries. The provision of adequate small business space and the protection of existing businesses are thus proposed. However, the future of the existing creative businesses along Blenheim Grove, as named in the plan, appears to be under threat. PNAAP Policy 5: Markets, identifies site PNAAP 6 at the rear of the station along Blenheim Grove as one of two preferred sites for outdoor markets: 4.2.23 Markets increase the variety of retail provision, provide self-employment opportunities with low entry-costs and fulfil a valuable role in the local economy. The Southwark Street Trading and Markets Strategy (2010) recommends new locations for markets on a dedicated site off Rye Lane providing the opportunity to create a destination market. This could be themed as a specialty food market or arts and craft market which will help to promote the local economy. Locating market stalls off Rye Lane would also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6) and the land between the railway arches (site PNAAP 3) to bring forward space for new markets. Should the development of a market on site PNAAP 6 in line with Policy 5 lead to the removal of the creative arts studios within the site boundaries, this would be contrary to the aims of Policy 2 to support existing creative industries Proposal The PNAAP needs to be amended to include a new p		by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation on this new project, with feasibility work being carried out on the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR

Representation reference		Organisation	Surname	First name	Main	Paragraph	Details of representation	Proposed changes	Officer response to
number 185	number		Moreton- Griffiths	L.	policy		2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the		representation recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP. Consultation on the AAP has been carried out in accordance with our
							existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus		Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts, cultural, leisure and entertainment floor space and this includes Peckham Rye Station (site PNAAP 6). The AAP also seeks to encourage more business floor space. Draft policy 6: Business space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6: Peckham Rye Station falls within the boundary of both Peckham town centre and Peckham core action area. Through the proposed

Representation reference number	Objector reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									site allocation PNAAP 6: Peckham
									Rye Station, we set out that the required land use for this site is
									business use (Class B1), retail use
									(Classes A1/A2/A3/A4) and public
									square. We set out that other land
									uses that would be acceptable are community/cultural/leisure use
									(Class D) and residential use
									(Class C3). The proposed uses
									therefore enable the wider
									Peckham Rye Station site to continue to be used for a mixture of
									uses. The AAP designates the land
									owned by Network Rail (both
									Peckham Rye Station and its
									surrounds) as proposals site PNAAP 6: Peckham Rye Station.
									This boundary has evolved through
									the AAP preparation, with earlier
									versions of the AAP (towards a
									preferred option and preferred option) both showing a smaller
									boundary ending at Dovedale
									Court. We have amended this
									boundary for the
									publication/submission version through discussions with Network
									Rail to reflect the boundary of the
									land that they own and to provide
									more opportunities for redevelopment as new funding has
									arisen for this site. The council
									successfully bid for substantial
									funds from the Mayor's
									Regeneration Fun to add to our own funds to commit to delivering
									significant change to Peckham Rye
									Station and its setting. In terms of
									the detail of the possible
									redevelopment of the station and surrounds, section 7.2 of the draft
									AAP sets out information on the
									future transformation of the station
									and its setting. The site is owned
									by Network Rail, not the council, and so the council are working with
									Network Rail, Southern Railways
									and the GLA on this project, with
									the aim to deliver this project over the next four years. It is currently
									early stages of preparation, with
									feasibility work being carried out on

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									the project. This is a separate piece of work to the AAP, with the AAP setting out the strategic aspirations for the site, and the detail to be worked jointly by the council, Network Rail, the GLA and Southern Railways. At this stage it is too early to determine which parts of the station and its settings will be redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Engagement with the local community will take place at a later stage in the development of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
186	949	Arches Studios	Fenelon	Emma	Policy 5	4.2.28	1 - The PNAAP is not sound as it is not effective. The proposed redevelopment of site PNAAP 6 as an outdoor market under Policy 5 is contrary to the stated aims of Policy 2 to protect and foster the creative industries in the area. The Peckham and Nunhead Characterisation Study Southwark Council, March 2012 recognises the creative industries as part of Peckham town centre's character: "The area is based around Peckham town centre, which is the largest town centre in Southwark Around the town centre there is also a concentration of employment activity, with most businesses being small or medium sized. This includes a large number of creative and media industries." The PNAAP Policy 2: Arts, Culture, Leisure and Entertainment, recognizes this local character with particular reference to the artist studios along Blenheim Grove: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station, along Blenheim Grove and the Copeland industrial Park currently hosts a number of local artists' studios It further expresses the aspiration to build upon this positive reputation as a creative hotspot, building on creative activities in and around Peckham Rye Station: 4.2.11 We want to continue to build upon this reputation which will help to generate new jobs and contribute towards the vitality of the town centre by creating a more diverse offer for local people and visitors as well as creating opportunities for training and learning. 4.2.12 We have identified that there are opportunities to provide nelv spaces at both the north and the centre of the town centre. We want to continue to promote Peckham Square, including the Eagle Wharf proposals site (PNAAP 10) as a centre for cultural events whilst also building on the many creative activities taking place in and around the Copeland industrial Park and Peckham Rye Station. We will work with landowners and developers to identify and secure		Our Core Strategy overarching business policy 10 requires the protection of business floorspace (B1, B2 and B8) in a range of locations including the Peckham town centre and core action area unless the exception criteria can be met which are set out in Southwark Plan policy 1.4. However, Southwark Plan saved policy 1.5 allows a range of uses to operate in railway arches including A and B and D use classes to ensure that the space can meet the needs of a wide range of occupiers. These spaces have shown to be popular with the creative industry sector and we will to support this sector to continue to grow in the action area to help to diversify the mix of business uses in the town centre and provide more employment opportunities. We have acknowledged in the AAP that the creative and cultural sector will continue to be supported and promoted in the area and Policy 2 identifies the proposals sites where new arts, cultural, leisure and entertainment space should be

interior of control of	Representation	Objector		Surname		Main				Officer recognice to
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Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							help to promote the local economy. Locating market stalls off Rye Lane would also avoid cluttering the narrow footpaths and free up space for pedestrians. We will work with Network Rail as landowner of Peckham Rye station (site PNAAP 6) and the land between the railway arches (site PNAAP 3) to bring forward space for new markets. Should the development of a market on site PNAAP 6 in line with Policy 5 lead to the removal of the creative arts studios within the site boundaries, this would be contrary to the aims of Policy 2 to support existing creative industries Proposal The PNAAP needs to be amended to include a new policy: To require in the first instance, the protection of creative artistic floorspace within the arches in Blenheim Court. Secondly to ensure the provision of a proportion of affordable floorspace in large-scale developments to provide affordable space for creative and art use. To underpin this policy the council should support the local community to undertake a study and maintain a register of the accommodation needs of the creative sector. The protection of specific business sites has precedence within the PNAAP: 4.2.33 Our Employment Land Review (2010) recognises that the Print Village Industrial Estate on Chadwick Road is a well-functioning business estate that accommodates SMEs. The estate does not have any adverse impact on the surrounding residential area. Therefore it will be important to retain business use on this site to continue to promote and maintain local employment as part of any mixed use redevelopment proposal. By allocating the site as a proposals site (PNAAP 33) we can ensure that any redevelopment for mixed use reprovides the existing B C/ass floorspace. We set out more detailed policies and guidance for this site in our schedule of proposals sites (appendix C).		redeveloped, so the AAP includes the whole of the site as part of its proposals site designation. Consultation will take place at a later stage on the detail of the proposed scheme and planning permission will need to be obtained for future development. Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP.
187	949	Arches Studios	Fenelon	Emma			2 - The PNAAP is not sound as it is not justified. It has not included the participation of stakeholders named in the plan. The PNAAP recognises the existence of local artists studios along Blenheim Grove, as shown below: 4.2.10 Peckham has a positive reputation as a creative hotspot and is home to many successful businesses and organisations and a thriving multi-cultural arts scene. The area around Peckham Station along Blenheim Grove and the Copeland Industrial Park currently hosts a number of local artists' studios, gallery space and entertainment uses. However, there has been a total lack of consultation by council with the current occupants of Blenheim Court during the development stage of the PNAAP. Previously published plans for the outdoor market as shown in 'Peckham Rye Station the case for change' clearly show the		Consultation on the AAP has been carried out in accordance with our Statement of Community Involvement (2008) (SCI). More information on how we have met and exceeded the requirements of our SCI and the regulations is set out in our consultation report. As required, we have carried out a number of informal consultation stages on the emerging AAP, with

Representati reference number	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
						marketplace only covering Dovedale Business Estate, stopping short of Blenheim Court. We thus believed our studios to be safe. The first time we heard of possible inclusion within these plans was when Network Rail sent a letter to tenants dated 16 July 2012 requesting co-operation with the architects Landolt & Brown to gain access to out studios for inspection and taking of measurements. This would seem to indicate that the late inclusion of Blenheim Court within the site boundaries has lead Network Rail to reconsider its future use. There has been no attempt by council to contact the occupants of Blenheim Court for consultation. As we hold a clear interest in the proposed development, we believe the lack of consultation has prevented us making any submissions to influence the AAP prior to this time. We thus believe the PNAAP to be founded on an incomplete evidence base. We hope that future consultation regarding the above issues will result in a true consensus		the final formal stage of consultation taking place from September to December 2012 on the publication/submission AAP. Feedback from consultation and ongoing work including looking at funding opportunities, working with landowners and collecting more evidence has informed our final strategy in the publication/submission AAP. The AAP seeks to encourage a mixture of complementary arts, cultural, leisure and entertainment uses in Peckham town centre, as set out in draft policy 2 of the AAP. The policy identifies the locations in which we will promote the development of additional arts, cultural, leisure and entertainment floor space and this includes Peckham Rye Station (site PNAAP 6). The AAP also seeks to encourage more business floor space. Draft policy 6: Business space, sets out that we will encourage the generation of new jobs and business by supporting the provision of new business floor space in Peckham core area and town centre. Site PNAAP 6: Peckham Rye Station falls within the boundary of both Peckham town centre and Peckham core action area. Through the proposed site allocation PNAAP 6: Peckham Rye Station, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class C3). The proposed uses therefore enable the wider Peckham Rye Station and its surrounds) as proposals site to continue to be used for a mixture of uses. The AAP designates the land owned by Network Rail (both Peckham Rye Station and its surrounds) as proposals site PNAAP 6: Peckham Rye Station.

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tito AAP progetives on the profession of the pro	whas evolved through aration, with earlier a AAP (towards a con and preferred howing a smaller ing at Dovedale we amended this he bmission version assions with Network the boundary of the own and to provide nities for at as new funding has site. The council id for substantial a Mayor's Fun to add to our commit to delivering ange to Peckham Ryes a setting. In terms of the possible at of the station and ction 7.2 of the draft information on the fination of the station. The site is owned all, not the council, uncil are working with Southern Railways on this project, with ever this project, with ever this project, with ever this project, with the strategic of the AAP, with the ut the strategic of the site, and the porked jointly by the ork Rail, the GLA and ways. At this stage it determine which ation and its settings loped, so the AAP whole of the site as

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									Consultation on a future planning application will need to be carried out in accordance with our Statement of Community Involvement.
188	950	Bold Tendencies CIC	Barry	Hannah			The Multi Storey Car Park at Cerise Road is a site of cultural and social importance in South London. Since 2007 Bold Tendencies Sculpture Project and Franks Cafe have transformed an unused building into thriving centre for visual and performing arts in Peckham. The activity on site has attracted almost 500,000 visitors in six years and has a solid audience from SE15, London and internationally. Its impact has been widely and beneficially felt in the local area. We believe that Bold Tendencies and Franks Cafe should justifiably play a key part in the site's future and any development proposal must take these two institutions into consideration. Bold Tendencies is developing its own ideas for a mixed use reinvention of the building which will show how the site can be beneficially developed cost-effectively and quickly, as a regenerator and as a catalyst for new investment in the town centre. Our intention is to take the existing building and transform it. We wish to create a sustainable new model for an arts building in Southwark accommodating visual art, dance and music and invent an exciting centre for people in Peckham, benefitting the local economy, community cohesion and complementing the Borough's social services. The location of the car park, at the heart of the high street, allows it to become a beacon of arts and business activities in Peckham. We believe that with the right level of activity the building will act as a destination, enlivening the high street and adding a new place for Peckham. From conversations we believe there is support for this agenda. We would be pleased to discuss our proposals further.		The purpose of the AAP is to set out planning policies for future development in Peckham and Nunhead over the next ten to fifteen years. Its scope cannot address prescriptive development proposals at individual sites or future leasing or ownership issues. However, it can set out the types of uses it would require at larger proposals sites. In relation to the cinema/multi-storey carpark site (PNAAP 2), the council will provisionally require a mix of uses that includes leisure and community uses alongside retail and residential uses that combine to contribute to a vibrant town centre.
189	951		Stewart	lan			I received an email from the Peckham Resident's Network last week that included a copy of the PNAAP Publication Submission version - Cabinet Report and referenced you as a point of contact for further information. So I'm writing to you for just that reason. I'm a local resident looking to open a microbrewery in the arches behind the Peckham Rye station. While I've been working with Network Rail to secure Arch number 3 I've found the going very slow and it raises some concerns that may be as a result of the overall regeneration program under review. In short, I have a sense both the local government / council and Network Rail are in a waiting game to see who will pay for and allocate the funds and how the money will be used and each party is unwilling to "play their cards" too early. As a prospective business owner eager to start and begin to hire local people and build the local economy I am frustrated at what I perceive as standoff tactics while each party waits to see the details of regeneration program for the area. I believe this standoff is delaying my start date so I want to understand what I can do to expedite the process to get me in to my premises and also get a sense from you of what is proposed for the immediate vicinity and in particular the arches behind the station. I'd be delighted to talk it through with you so if you have a moment please don't hesitate to contact me. Thank you for your time and I look forward to hearing from you.		The AAP designates Peckham Rye Station and its surrounds as proposal site PNAAP 6: Peckham Rye Station. Through the proposed site allocation, we set out that the required land use for this site is business use (Class B1), retail use (Classes A1/A2/A3/A4) and public square. We set out that other land uses that would be acceptable are community/cultural/leisure use (Class D) and residential use (Class C3). As set out in section 7 of the draft AAP, the council received substantial funds form the Mayor's Regeneration Fund to add to our own funds to commit to delivering significant change to Peckham Rye Station and its setting. The site is owned by Network Rail, not the council, and so the council are working with Network Rail, Southern Railways and the GLA on this project, with the aim to deliver this project over the next four years. It is currently early stages of preparation with

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									feasibility work being carried out on the project. Whilst the AAP sets out the strategic aspirations and land uses for the site, the detailed design will be determined through a planning application. We have passed your contact details onto Network Rail for further discussion.
190	953	Copeland Industrial Park			Policy 1	Point 1	As currently worded, we do not consider that Policy 1 is robust enough to facilitate the effective delivery of town centre improvements nor fully accord with paragraph 157 of the National Planning Policy Framework ("The Framework") and is therefore unsound. As currently worded, Policy 1 (1) states that "Most of the new retail provision will be allocated on the following sites" This does not provide sufficient guidance for schemes coming forward. The Framework requires local planning authorities to allocate development sites, and provide detail on the quantum of development. This is particularly important when discussing core town centre uses such as retail, and paragraph 23 of The Framework notes it is important that retail needs are met in full, and are not compromised by limited site availability. On this basis, a range of retail floorspace should be identified for each site to ensure that the amount of retail floorspace for which there is an identified need can be met on the most appropriate sites. To overcome the conflict with national guidance, we envisage that the four development sites referenced within the policy would have a target floorspace range attributed to it, thus providing the guidance required whilst retaining flexibility.	follows: • Aylesham Shopping Centre (site PNAAP 1): 1,000 – 1,800 sq m • Copeland Industrial Park and 1-27 Bournemouth Road (site PNAAP 4): 1,250 sq m – 2,500 sq m • Land between the railway arches (Site PNAAP 3): 5,00 –	Policy 1 sets out the four key development proposal sites where most of the new retail provision will be accommodated in the town centre and to provide further detail, we have provided indicative capacities of retail floorspace on these sites in the supporting text and also (amongst others) in Appendix C of the AAP. Indicative capacities for each site are based on our own capacity work and background evidence. The estimates of capacities should not be interpreted as exact targets as the exact capacity will depend on the mix of uses and the amount of non-residential use, and compliance with other policies such as design policies. These incapacities are important to ensure that our housing target and possible capacities for retail and employment growth are realistic and achievable. This has helped us to plan for infrastructure growth to ensure that there is suitable and sufficient infrastructure to support the increase number of people living, working and visiting Peckham and Nunhead. The precise figures will be determined through planning applications.
191	953	Copeland Industrial Park			Policy 2	4.2.14	We consider this policy to be sound, although we would like to see the last sentence of paragraph 4.2.14 which discusses alternative cinema locations to be deleted. As currently worded, we consider this to be overly prescriptive and its removal will allow other sites within the PNAAP to appropriately respond to the opportunities presented at the time when schemes come forward for consideration.		No change. As set out in paragraph 4.2.14 of the AAP, feedback from consultation strongly supports keeping a cinema in Peckham. One of the key aspirations of policy 2: Arts, culture, leisure and entertainment, is to support the continued provision of a cinema in Peckham town centre. As set out in the policy there are four key locations where we want to promote additional arts, cultural,

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									leisure and entertainment floorspace - in and around Peckham square, and in and around central Peckham - around Peckham Rye Station and Copeland Industrial Park. There are only a few sites within Peckham town centre which are large enough to accommodate a cinema - the existing cinema/multi- storey car park (site PNAAP 2), Copeland Industrial Park (site PNAAP 4) and Eagle Wharf (PNAAP 10). It is appropriate to refer to these sites as possible locations for a cinema.
1	953	Copeland Industrial Park			Policy 6		Through Policy 6 (3) of the PNAAP, the Council are: "Requiring existing business floorspace to be retained unless an exception can be demonstrated in accordance with our borough-wide employment policies" We find this approach to be unsound as it conflicts with the wider aspirations for regeneration across the PNAAP and The Framework. Paragraph 51 of The Framework encourages the change of use from Class B uses to residential where there is an identified need for additional housing in that area, provided that there are not strong economic reasons why such development would be inappropriate. The Council has identified such a need within the PNAAP, and the release of all, or part of this site for such purposes should be defined in policy. We note that an exceptions test has yet to be set out within an adopted Development Management Policies document. Without greater clarity on policy, there would be too much uncertainty as to what the Council are requiring to allow the possible release of this employment floorspace. We also note that key regeneration sites such as PNAAP 4 include predominantly low density warehousing and light industrial space, disproportionate to the amount of jobs that are actually provided. We believe that these sites can be excluded from the policy, with the retention of as much employment space as is viable secured under Policy 45 and Appendix C of the PNAAP. This would ensure future developments utilise land more effectively.	that Policy 6 (3) is amended as follows to ensure that the policy is positively prepared. This will ensure that identified development sites can come forward unhindered by the requirement to justify any loss of employment space: "Business floorspace on those sites not mentioned in Appendix C shall be retained unless an exception can be demonstrated in accordance with our borough-wide employment policies" In line with this, we would like to see supporting paragraph 4.2.35 amended to clarify that the larger development sites should seek to introduce new or reprovide a better quality of business space as part of redevelopment proposals, rather than simply seeking	The vision for Peckham town centre and core action area is to promote a mix of uses, including business floorspace, to ensure that development provides employment and business opportunities for local people. The AAP policies will also be used alongside our borough wide policies in the Core Strategy and the Saved Southwark Plan. Core Strategy Policy 10 has been assessed for consistency with the guidance in the NPPF. The Policy sets out a clear economic vision and strategy for the borough in line with the NPPF. The policy supports existing business sectors i.e. office, small businesses and industrial/storage/warehousing, setting out sustainable locations i.e. Peckham action area core, in which business space should be provided and also protected. The policy also provides a target of up to 500,000 sqm for new business floorspace (derived through our evidence base the Employment Land Review 2010) to be accommodated over the plan period to meet the demands of businesses which need to locate in central London, with around 30,000 sqm of this forecast demand arising in the local office market outside the SE1 office area. Land outside the locations listed in Policy 10 can be released for other uses.

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								within any new scheme.	The policy is used in conjunction with Policy 1.4 of the Southwark Plan which sets out criteria to assess that where there is no reasonable prospect of land coming forward for business use in the locations listed, it can be released for other purposes, which is consistent with the guidance set out in the NPPF. PNAAP 4 (Copeland Industrial Park & 1-27 Bournemouth Road) is a key site located in the town centre which is covered by Core Strategy Policy 10 for protection and promotion of new business space. The site has a lot of potential for redevelopment. We have identified the retention of the Bussey building on the site in recognition of its contribution to local history, however we also encourage the development of other employment generating town centre uses such as cultural/community, retail and leisure to be provided alongside B uses. Southwark Plan policy 1.4 can be used to assess any proposed loss of employment floorspace.
193	953	Copeland Industrial Park			Policy 16		As currently drafted, we find this policy to be unsound as it is inconsistent with policy within the London Plan and Policy 5 of the Core Strategy. As noted within Policy 1, Peckham Town Centre is designated as a Major Centre, and also benefits from a Level 6 PTAL rating. London Plan Policy 3.4: Optimising Housing Potential seeks to ensure that development optimises housing output, and accompanying Table 3.2 sets out the target density ranges that all developments should aspire to. The supporting notes for this table defines those locations which have a mix of different uses, range between four and six storeys and within 800 metres walking distance of a Major Town Centre as being a "Central" location. It is clear that Peckham Town Centre meets this definition. Consequently, the density ranges identified in Policy 16 for the Peckham core action area are inconsistent with overarching Policy at the regional level. As discussed in Policy 26, some of the regeneration sites are to include taller elements, which may be wholly residential. These buildings will inevitably have a higher density development compared to those in the vicinity, and may, on occasion, propose a density level outside of that set out within the London Plan if they are considered in isolation. Consequently, the proposed policy also needs to take this scenario into account.	last bullet point of Policy 16 (2) is amended as follows: "Peckham core action area: Developments should aim to meet the London Plan target density range of 650 – 1100 habitable rooms per hectare. This may be exceeded where developments are of an exemplary design standard." We also note that the supporting text at paragraph 4.5.6 is	The density levels set out in the AAP are the same as those in the Core Strategy which was found sound and adopted in April 2011. The policy and the supporting text specifically refer to the fact that density levels could be higher in Peckham core action (which your site is within). The supporting text also provides a reference to the criteria that development would have to meet if the density were to be above the maximum range. This approach will protect the character of Peckham and Nunhead whilst also allowing for some development to be above the urban density zone range where it is appropriate and suitably justified. This is consistent with the London Plan, and the GLA have confirmed that with the exception of policy 17 on affordable housing, the AAP is

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								remainder of the document, and requires updating in order for this Policy to be considered sound. Currently, the text references proposal sites PNAAP 1, PNAAP 2 and PNAAP5 as being the key sites expected to deliver a large number of new homes (400, 160 and 360 units respectively). We note that no reference is made to our client's site (PNAAP 4), despite Appendix C of the PNAAP identifying at least 270 units on this site. Given the inclusion of PNAAP 2 at 160 units, our client's site should also be identified as a core residential location within the core action area.	in general conformity with the London Plan.
194	953	Copeland Industrial Park			Policy 17		As currently drafted, PNAAP Policy 17 is inconsistent with Core Strategy Strategic Policy 6 and the London Plan, and is therefore unsound. As currently worded, Policy 17 (2) identifies a minimum amount of affordable housing for new developments. However, unlike the Core Strategy, it does not take into consideration the impact that this may have upon a scheme's viability. The issue of viability is becoming evermore pressing given the introduction of the Community Infrastructure Levy which takes precedent over other benefits that a scheme can deliver.	Policy 7 needs to take these viability and circumstantial pressures into account if it is to be considered sound, and the following wording is proposed: "2. ensuring that subject to viability, developments of 10 or more units should aim to provide a minimum	We will take viability into account. Our approach to viability and how it will be considered across the whole borough is set out in our affordable hosing SPD. The Core Strategy and London Plan, alongside the AAP once adopted, form our development plan that will be used together to make decisions on planning applications. Therefore the policies in the London Plan and Core Strategy will be applied and do not need to be repeated in the AAP.

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195	953	Copeland Industrial Park			Policy 27		In line with our comments on Policy 6, we consider this policy to be unsound until reference to the identified regeneration sites is made to allow flexibility in the delivery of these sites.		We do not consider inserting reference to the sites is necessary because we have set out in Policy 1 and in Appendix 6 the key development sites and indicative capacities for development on these sites.
196	953	Copeland Industrial Park			Policy 29		for demolition. As such, the Council cannot "require" these assets to be retained and incorporated into schemes, as any works must be justified the planning merits of each application balanced against the benefits arising from the scheme	to reflect this, and we propose the following text for Policy 29 (7): "We will encourage development that increases the vitality, accessibility and activity of Peckham core action area by	No change. This policy is consistent with AAP policy 24 and the NPPF.
198	953	Copeland Industrial Park			Policy 48		The inclusion of this level of detail within the supporting text for Policy 46 of the PNAAP is unsound, as it does not represent the best and most appropriate option, nor is it effective in its implementation. The imposition of CIL on developments is having an impact upon viability and the planning benefits that can be delivered. This policy must therefore make reference to the assessment of viability if it is to deliver the maximum benefit to the community. It is therefore proposed that the policy is amended as follows:	follows: "The Council's CIL and viability based section 106 negotiations will be used to ensure the	We are not proposing to amend the Policy. The s106 Planning Obligations SPD describes the planning application process with reference to financial appraisals. The overarching aim of CIL is to contribute towards the implementation of the development plan and support development

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							mitigate the impact of development" Whilst it is appropriate for this policy to make reference to CIL, we note that the Council's charging schedule has yet to be adopted. We note that the rates being proposed are relatively high in comparison to other London Boroughs, which may result in the charging schedule being challenged on the grounds of viability and the rates being changed. These rates are also likely to be reviewed during the life of the PNAAP, and future changes to the document will therefore be required. Whilst Paragraph 7.6.7 notes that the AAP will be factually updated following the consultation of the CIL preliminary charging schedule, there is no robust mechanism in place which will allow this to happen once the PNAAP has been adopted. Paragraph 7.6.6 makes reference to the Council's	across the borough. It is therefore required to show the potential effects of the proposed CIL rates on the economic viability of development. We have prepared a CIL Viability Study to provide evidence for our proposed CIL rates. The viability testing has looked at proposed developments on sites that are acceptable in planning policy terms (including providing affordable housing). The proposed CIL rates are set deliberately below the maximum level which could be levied to ensure the deliverability of the plan, including affordable housing, is not jeopardised. In setting levy rates, Regulation 14 of the CIL Regulations requires that a charging authority must prove what it believes to be an appropriate balance between the desirability of funding infrastructure from the levy and the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area. The draft CIL charging schedule will be subject to an examination by an independent inspector who will assess whether the evidence supports the proposed CIL rates. We have noted the comments on the supporting text to the policy regarding the CIL charging schedule preparation. We will factually update the AAP prior to its adoption after receipt of the Inspector's report. This will ensure that the adopted AAP is factually as up-to-date as possible.

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								of Table 3 and subsequent changes to the supporting text will make this policy sound.	
199		Copeland Industrial Park					Appendix C, Site PNAAP2: Cinema/Multi-storey car park We do not object to the principle of this designation, but we do have reservations over how the retention of the cinema is discussed. As noted within the site specific guidance, the cinema should be retained upon this site unless other sites come forward for its replacement. It is considered that inclusion of alternative sites within the supporting text for this and subsequent designations is too prescriptive and sites should be able to respond to the opportunities presented to them rather than being specifically identified for this use. If the wording remains as drafted, there is the potential for this site to come forward without a cinema as emphasis on alternative sites could be relied upon, even if it is not viable to do so. As such, the reference to other sites should be deleted from the supporting text of this designation for it to be considered sound.		No change. As set out in paragraph 4.2.14 of the AAP, feedback from consultation strongly supports keeping a cinema in Peckham. One of the key aspirations of policy 2: Arts, culture, leisure and entertainment, is to support the continued provision of a cinema in Peckham town centre. As set out in the policy there are four key locations where we want to promote additional arts, cultural, leisure and entertainment floorspace - in and around Peckham square, and in and around central Peckham - around Peckham Rye Station and Copeland Industrial Park. There are only a few sites within Peckham town centre which are large enough to accommodate a cinema - the existing cinema/multistorey car park (site PNAAP 2), Copeland Industrial Park (site PNAAP 4) and Eagle Wharf (PNAAP 10). It is appropriate to refer to these sites as possible locations for a cinema. The site specific guidance for site PNAAP 2: cinema/multi-storey car park states "The cinema should be retained on this site unless appropriate facilities can be provided elsewhere in the AAP area". This wording, as well as the wording in the "We are making this designation because" section clearly sets out that the cinema should be retained on this site unless appropriate facilities can be provided elsewhere.
200	953	Copeland Industrial Park					Overall, we support the designation for PNAAP4 and the uses identified as being appropriate for the site, including the retention and improvement of the creative industries currently on site. In line with the comments made above on the policies contained within the core of the document, this designation needs to be updated to reflect an appropriate range in retail floorspace for the site and the potential limitations for delivering new employment space. With regard to the creative industries, their retention is expected and we note that this is a requirement of the designation. Whilst these low-income occupiers provide short-	the designation in line with the other comments contained within these representations, we consider that these	study for evidence base concerning taller buildings within core action area.

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number						site. We also note that the guidance specifically makes reference to buildings being up to 15 storeys in height. However, we note that Policy 26 and supporting evidence base also states that a taller element could be incorporated into the scheme if it is of outstanding design quality. The wording within the designation therefore conflicts with Policy 26. With regard to the creation of north-south links though the railway arches, this land is not within our client's control and it is therefore inappropriate for the Council to expect these links to be "maximised" as part of the designation for PNAAP 4. As discussed at our stakeholder meeting, we envisage that any scheme for the site is likely come forward on a phased basis, allowing retention of key buildings and deliver as part of the overall estate management. As currently worded, the site designation does not discuss implementation, and we consider that the phased delivery of a master-plan must be noted to ensure flexibility in the delivery of the best design solution for this site as part of the wider regeneration of the PNAAP.	Guidance Opportunities to improve and extend east-west links to Rye Lane should be maximised, and north/south links through the railway arches explored. Building heights	
201	953	Copeland Industrial Park					Drafting Comments We note that there is a drafting error in the document, meaning that there are two "Policy 45" within the PNAAP, and subsequent numbering also needs to be updated. We have also observed that the policies within Section 5 for each of the key PNAAP areas have the same title, which could lead to confusion when being implemented. We would suggest that the titles of the policies are updated to clarify to the public which policies are being referred to as schemes come forward for determination. We would be very pleased to answer any queries you may have regarding the above and have a further meeting with you to discuss the above points in further detail. On behalf of our client we would also like to be registered on the Council's database for notifications of the subsequent Examination in Public of this and other LDF documents. We also take this opportunity to reserve our right to represent our client at the Examination in Public of the PNAAP in due course.		Noted re the duplication of policy 45. We will factually update the AAP prior to its adoption after receipt of the Inspector's report to reflect such typos. We have recorded your details on our planning policy database, and for reference for the Examination in Public, and will continue to meet to discuss your site as appropriate.
202	954	London Wildlife Sites Board	Massini	Peter			The LWSB endorses the proposal by Southwark to identify four additional Sites of Local Importance for Nature Conservation. However, the panel also recommends that Southwark Council should consider incorporating Surrey Canal		Support noted. We consider that it is more appropriate for Surrey Canal Walk to be designated as a

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Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							Walk into the Burgess Park Site of Borough Importance.		separate SINC at this time to reflect the fact the Surrey Canal Walk and Burgess Park are designated as different open spaces on our adopted policies map. Burgess park is also outside of the boundary of the AAP and therefore we cannot make this change through the AAP. We will review the boundaries of all Sites of Importance for Nature Conservation through the New Southwark Plan which we are due to start work on later this year.
203		Kings College Hospital NHS Foundation Trust	Wilson		Policy 4		The implementation of Policy 4 would help to create diversity on the streets of Peckham and Nunhead and reduce the amount of new outlets selling unhealthy foods. I really feel that this policy will help to prevent increasing obesity levels in the borough and help reduce the number of Southwark residents who need hospital treatment for obesity My view is that dietetics is a key component of the management of obesity but it is not effective in isolation and needs to function as part of a joined up multi-disciplinary, multi agency approach, which includes environmental -and town planning policy. I welcome the policy presented in the area and action plan and feel the case for Policy 4 has been well supported by evidence in the background paper. I additionally give my support for policy 4 via this representation.		Support noted
204	956		Moss	Simon	Policy 2		The particular issue I wanted to address was how the plans might effect the artists' studios (in particular the provision of affordable studio workspace) these businesses have helped to put Peckham on the art, design map and should not be pushed from the centre, they rely on being accessible, and visible and bring people to Peckham I am completely in favour of the station square proposal and believe Rye Lane needs to be re planned to enable wider, safer, cleaner pavements, improvements are needed particularly at bus stops and the station arcade I moved to Peckham in 1999 and live on Bellenden Road, affordability, the good public transport links and cycle path, the library and the regeneration of Bellenden Road were all important as well as easy walking distance to shops, banks and cinema, supermarket all make the area great to live in, speed bumps and the 20mph zone (if only it was enforced) and closing of through routes to Rye Lane all make the area great As a artist / designer, having a creative community, Camberwell college, South London Gallery the various studio complexes all add to the locality		Policy 2 provides support for the growth of the creative and cultural industry sectors in the area as well as new leisure and entertainment floorspace which will all help to diversify the mix of uses and increase the overall vitality of the area making a positive contribution to the day, evening and night-time economies. We have acknowledged that these uses also boost the local economy by generating additional spending and inward investment in other businesses and providing an increased number of employment opportunities. The AAP identifies the proposals sites where new arts, cultural, leisure and entertainment space should be accommodated, however there will be opportunities to provide suitable space on other sites as development schemes come forward. Through Policy 6 we require new business space to be designed flexibly in new developments, to support new business start-ups and growing

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206	960	Transition Town Peckham	Barbe	Steve	Policy 19		Provision for food growing We consider that the policy on Open spaces and sites importance for nature conservation (Policy 19) is unsound as not effective in achieving its own objectives. One of the objectives of Policy 19 is to promote food growing opportunities but the provisions of the PNAAP fail to ensure this will happen. Southwark Council's Open Space Study recommends that the Council make provisions are made for allotments and food growing in new developments but this has not been included as a requirement in the PNAAP.		SMEs. This means the space will need to be flexible in its layout so that it can meet the needs of a range of business types and sizes, including the creative industry sectors, and to ensure that smaller enterprises are able to move into the space easily. Our Employment Land Review (2010) surveyed business clusters throughout the borough, and through this process identified that SMEs in Southwark require flexible space and incubator units capable for possible expansion and also require premises with visibility from the road, DDA compliance and good accessibility. The ELR recommended that existing small business units displaying these design characteristics below 500 sqm in floor space should be protected for B1 use. We have carried this forward into our Core Strategy and also the draft AAP. The Peckham and Nunhead AAP recognises that open spaces can provide space to locally grow food. Policy 19 of the AAP sets out a requirement for all major developments to contribute to food growing opportunities. The provision of allotments and other food growing opportunities. The provision of allotments and other food growing opportunities across the borough, including promoting food growing opportunities across the borough, including promoting food growing on both existing protected open space and housing amenity land. The open space strategy sets out further information on how we will encourage food growing opportunities to increase access to food growing through alternative gardening projects. We will support alternative gardening projects by offering temporary access to local authority owned land that is not suited for the creation of allotments. Development sites which are

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									currently left dormant also opens up the possibility of exploiting privately held stocks of undeveloped land for temporary gardening use. We will review our borough-wide policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year.
207		Town Peckham	Barbe	Steve	Policy 19		Provision for open space We consider that the provision for open space provision on the PNAAP to be unsound as not likely to be effective. The plan lacks measures to ensure that the open spaces will retain "an accessible, high quality green infrastructure network for residents and visitors to enjoy that strengthens local character, promotes nature conservation, exercise and food growing opportunities" (PNAAP Policy 19). The proposals set out reductions in public park and natural space provision per 1000 population, and meanwhile don't set out how proposed developments would contribute to open space improvements and maintenance of open space allocations.		The Peckham and Nunhead AAP sets out how we will continue to protect all of our existing open spaces as well as putting forwards some new open spaces for protection. The reductions in the standards are a result of the projected population increase in Peckham and Nunhead over the next 10 to 15 years. We will seek to ensure that new open space is provided as part of new development where possible but given the limited opportunities for this, we are focusing on improving the quality of our existing open spaces. We consider the provision of open space on a borough-wide basis. The open space strategy sets out more information on how we will improve the quality and value of our existing open spaces, where we will designate additional open spaces for protection and where we will seek new open space provision on site. We use S106 and in the future we will also use Community Infrastructure Levy monies to also improve our open spaces in line with the recommendations in our open space strategy. Our residential design standards SPD sets out how we require amenity space to be provided as part of new development.
208	960	Transition Town Peckham	Barbe	Steve			Provision for the meanwhile use of sites for food growing and community gardens whilst proposals are developed at sites designated for development We consider that the absence of a policy on the meanwhile use of sites designated for development is unsound as not justified by the evidence. There are no legal impediments to local authorities setting up temporary allotments on suitable sites		There may be cases where development sites have been temporarily used for other interim uses such as Bold Tenancies and Frank's Cafe at the multi-storey car

Representation reference	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number						under their control in order to help meet current levels of demand for food growing and there are positive experiences in the borough of using temporary sites for community gardens, like the Union Street orchard. We propose that the PNAAP should include a provision for the meanwhile use of sites designated for development for food growing and community gardens.		park, but it is not appropriate to have a specific policy on meanwhile use as most of our development sites have relatively early dates for development so this will need to be considered on a site by site basis in discussion with the council. The open space strategy sets out how we will support alternative gardening projects by offering temporary access to local authority owned land. The open space strategy also recognises that development sites which are currently left dormant also open up the possibility of exploiting privately held stocks of undeveloped land for temporary gardening use. We will review our borough-wide policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year.
209	960	Transition Town Peckham	Barbe		Policy 21		Energy efficiency in new developments We consider that the policy for reducing the energy use of new developments is unsound as unjustified as it does not follow the evidence included in the Energy Study for the PNAAP. The Energy Study identified significant opportunities for influencing the level of energy efficiency delivered in new buildings and identified a range of different technologies as applicable for use in the PNAAP area. The PNAAP's Energy Policy only requires development to be designed to be capable of connecting to a future Combined Heat and Power (CHP)/communal heating network and does not require developers to consider any of the other technologies described as applicable for implementation. This could result in new developments being designed to connect to future CHP/communal heating systems but not implementing more applicable and immediately effective carbon reduction technologies.		We have a borough wide approach to encouraging new development to meet high levels of energy efficiency is set out in the Core Strategy and we consider that it not necessary to repeat existing borough-wide policies in the AAP. Strategic policy 13 of the core strategy sets out how we will require all new development to be designed and built to minimise greenhouse gas emissions and design all developments so that they require as little energy as possible to build and use. We have set targets to ensure that major new developments achieve a 44% saving in CO2 emissions above the building regulations (2006) from energy efficiency, efficient energy supply and renewable energy generation. We have also set a target for all new major development to achieve a 20% reduction of CO2 from using onsite local low and zero carbon energy sources. The Peckham Energy study also specifically

Representation reference number		Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
									identified the potential for a combined heat and power network in the area and we have included this recommendation within Policy 20 of the AAP.
210	960	Transition Town Peckham	Barbe		Policy 21		Energy efficiency and retrofitting The Peckham and Nunhead Area Vision includes the statement; "Peckham will be a leading Low carbon Zone". We consider that the Energy Policy fails to demonstrate this leadership and, in particular, that the provisions for requiring development to make a significant contribution towards the Government's targets to reduce national carbon dioxide emissions are unsound as not likely to be effective. The PNAAP sets out requirements for new developments in its Energy Policy but does not include any requirements for existing buildings to improve their energy efficiency. We suggest that clear proposals for retrofitting existing housing stock to increase energy efficiency and reduce carbon dioxide emissions should be included in the PNAAP		Measures to incorporate energy efficiency measures into existing stock are largely beyond the remit of planning which can only influence new development in Peckham and Nunhead. However, where we can adopt an approach to encourage the retrofit of energy efficiency measures this will be considered as a borough wide issue and we will review this through the preparation of the New Southwark Plan later this year.
211	957	mossspace	Amos	Sue	Policy 19		Provision for food growing We consider that the policy on Open spaces and sites of importance for nature conservation (Policy 19) is unsound as not effective in achieving its own objectives. One of the objectives of Policy 19 is to promote food growing opportunities but the provisions of the PNAAP fail to ensure this will happen. Southwark Council's Open Space Study recommends that the Council make provisions are made for allotments and food growing in new developments but this has not been included as a requirement in the PNAAP.		The Peckham and Nunhead AAP recognises that open spaces can provide space to locally grow food. Policy 19 of the AAP sets out a requirement for all major developments to contribute to food growing opportunities. The provision of allotments and other food growing opportunities is predominantly a borough-wide issue and the open space strategy sets out further information on how we will encourage food growing opportunities across the borough, including promoting food growing on both existing protected open space and housing amenity land. The open space strategy sets out further information on how we will explore opportunities to increase access to food growing through alternative gardening projects. We will support alternative gardening projects by offering temporary access to local authority owned land that is not suited for the creation of allotments. Development sites which are currently left dormant also opens up the possibility of exploiting privately held stocks of undeveloped land for temporary gardening use. We will review our borough-wide policies in relation to open space to reflect the

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									recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year.
212					Policy 19		Provision for open space We consider that the provision for open space provision on the PNAAP to be unsound as not likely to be effective. The plan lacks measures to ensure that the open spaces will retain "an accessible, high quality green infrastructure network for residents and visitors to enjoy that strengthens local character, promotes nature conservation, exercise and food growing opportunities" (PNAAP Policy 19). The proposals set out reductions in public park and natural space provision per 1000 population, and meanwhile don't set out how proposed developments would contribute to open space improvements and maintenance of open space allocations.		The Peckham and Nunhead AAP sets out how we will continue to protect all of our existing open spaces as well as putting forwards some new open spaces for protection. The reductions in the standards are a result of the projected population increase in Peckham and Nunhead over the next 10 to 15 years. We will seek to ensure that new open space is provided as part of new development where possible but given the limited opportunities for this, we are focusing on improving the quality of our existing open spaces. We consider the provision of open space on a borough-wide basis. The open space strategy sets out more information on how we will improve the quality and value of our existing open spaces, where we will designate additional open spaces for protection and where we will seek new open space provision on site. We use S106 and in the future we will also use Community Infrastructure Levy monies to also improve our open spaces in line with the recommendations in our open space strategy. Our residential design standards SPD sets out how we require amenity space to be provided as part of new development.
213	957	mossspace	Amos	Sue			Provision for the meanwhile use of sites for food growing and community gardens whilst proposals are developed at sites designated for development We consider that the absence of a policy on the meanwhile use of sites designated for development is unsound as not justified by the evidence. There are no legal impediments to local authorities setting up temporary allotments on suitable sites under their control in order to help meet current levels of demand for food growing and there are positive experiences in the borough of using temporary sites for community gardens, like the Union Street orchard. We propose that the PNAAP should include a provision for the meanwhile use of sites designated for development for food growing and community gardens.		There may be cases where development sites have been temporarily used for other interim uses such as Bold Tenancies and Frank's Cafe at the multi-storey car park, but it is not appropriate to have a specific policy on meanwhile use as most of our development sites have relatively early dates for development so this will need to be considered on a site by site basis in discussion with the

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number 214		mossspace	Amos		Policy 21		Energy efficiency in new developments We consider that the policy for reducing the energy use of new developments is unsound as unjustified as it does not follow the evidence included in the Energy Study for the PNAAP. The Energy Study identified significant opportunities for influencing the level of energy efficiency delivered in new buildings and identified a range of different technologies as applicable for use in the PNAAP area. The PNAAP's Energy Policy only requires development to be designed to be capable of connecting to a future Combined Heat and Power (CHP)/communal heating network and does not require developers to consider any of the other technologies described as applicable for implementation. This could result in new developments being designed to connect to future CHP/communal heating systems but not implementing more applicable and immediately effective carbon reduction technologies		council. The open space strategy sets out how we will support alternative gardening projects by offering temporary access to local authority owned land. The open space strategy also recognises that development sites which are currently left dormant also open up the possibility of exploiting privately held stocks of undeveloped land for temporary gardening use. We will review our borough-wide policies in relation to open space to reflect the recommendations set out in the open space strategy through the New Southwark Plan which we are due to begin work on later this year. We have a borough wide approach to encouraging new development to meet high levels of energy efficiency is set out in the Core Strategy and we consider that it not necessary to repeat existing borough-wide policies in the AAP. Strategic policy 13 of the core strategy sets out how we will require all new development to be designed and built to minimise greenhouse gas emissions and design all developments so that they require as little energy as possible to build and use. We have set targets to ensure that major new developments achieve a 44% saving in CO2 emissions above the building regulations (2006) from energy efficiency, efficient energy supply and renewable energy generation. We have also set a target for all new major development to achieve a 20% reduction of CO2 from using onsite local low and zero carbon energy sources. The Peckham Energy study also specifically identified the potential for a combined heat and power network in the area and we have included this recommendation within Policy
215	957	mossspace	Amos		Policy 21		Energy efficiency and retrofitting The Peckham and Nunhead Area Vision includes the statement; "Peckham will be a leading Low carbon Zone". We		20 of the AAP. Measures to incorporate energy efficiency measures into existing

	reference	Organisation	Surname	First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
number	number				policy		consider that the Energy Policy fails to demonstrate this leadership and, in particular, that the provisions for requiring development to make a significant contribution towards the Government's targets to reduce national carbon dioxide emissions are unsound as not likely to be effective. The PNAAP sets out requirements for new developments in its Energy Policy but does not include any requirements for existing buildings to improve their energy efficiency. We suggest that clear proposals for retrofitting existing housing stock to increase energy efficiency and reduce carbon dioxide emissions should be included in the PNAAP.		stock are largely beyond the remit of planning which can only influence new development in Peckham and Nunhead. However, where we can adopt an approach to encourage the retrofit of energy efficiency measures this will be considered as a borough wide issue and we will review this through the preparation of the New Southwark Plan later this year.
216	958	Guys & St Thomas' NHS Foundation Trust	Sababady	Susheela	Policy 4		The Community Children's Nutrition & Dietetics service, Guys & St Thomas' NHS Foundation Trust delivers services to Southwark Early Years children centre. This includes the Children's Centre in the Peckham and Nun head vicinity. Our remit is to educate families, children and all those working in and around Southwark children centres on the importance of healthier eating from 0-5 years. This also includes the families of these children. We are in full support of Policy 4 of the Peckham and Nunhead Area Action Plan and would very much like it to be implemented. Last year there was a rise in reception year obesity in Southwark — we now have the highest rates for obese 5 and 6 year olds. Childhood and familial obesity are of serious concern. We support many families that visit the Children's Centre in Peckham and Nunhead to eat healthier diet by delivering, cook and eat sessions, weaning sessions, specialist health promotion, specialist nutritional advice and above all eating on a budget. The area should provide people/families with streets and shops where healthy eating opportunities are the norm, where they can buy the range of food and drink which they need to have a balanced diet (affordable markets, food outlets, shops). We strongly believe that being surrounded by the plethora of unhealthy eating outlets in Peckham normalises unhealthy eating and makes it more difficult to make healthy choices. Implementing the policy, in combination with the work of the Children's Centre teams will ensure families and therefore children get a healthy start in life. As a team we fully support the policy being put into action, to help families make healthier choices.		Support noted
217	959	Stop Murder of Cyclists Campaign	McCarthy	Donnachadh			This submission is on behalf of local cycling campaign group "Stop Murder of Cyclists Campaign Southwark's 21 members. We believe the plan is unsound as the proposals fail completely to provide for a safe cycling infrastructure for the community. The removal of all existing cycle routes which were included in the first draft and the failure to detail any new cycle routes means the plan fails to satisfy National and London Mayoral policies to encourage cycling, reduce carbon emissions and to encourage healthier living. It means large proportions of the population are being discriminated against in an area where many cannot afford public transport and where there is low car ownership but high pollution levels due to passage through the community of large numbers of motorised vehicles. The Plan should have the original map of existing cycle routes restored and a comprehensive map of proposed future routes included. These or similar proposals were requested by many groups in both the previous rounds of consultation including Southwark Cyclists, Environment Agency, Transport for London and NHS Southwark. Not a single response supported the deletion of existing cycle routes. In addition the plan should require the inclusion of segregated cycle provision wherever practical in new regeneration projects and new transport infrastructure and when existing infrastructure is being refurbished. All future road calming measures should allow permeability for cyclists. Too many build outs are forcing cyclists into the path of lethal motorised traffic. The		Our priorities for new and improved cycling routes are detailed in policy 11 and broadly reflected in figure 11. Our ambitions to focus improvements on links between key destinations that generate high numbers of trips, on links to wider areas and on works that will complement the proposed cycle superhighway are consistent with national and mayoral policy. The reduced amount of detail on individual routes compared to earlier versions of the AAP should not be interpreted as meaning cycle infrastructure is of lesser importance. The council has a strong commitment to improving cycling infrastructure, as set out in the Core Strategy and our

Representation	Objector		Surname						
		Organisation		First name	Main policy	Paragraph	Details of representation	Proposed changes	Officer response to representation
							council is removing thousands s of informal cycle parking spaces by removing		Transport Plan. The changes made
							safety railings on streets across the borough, thus radically reducing the number		reflect the fact that as the AAP
							of main-street safe cycle parking spaces. The plan should commit the council to		progressed we have had to
							providing more parking spaces than those they are removing. All new signposts,		formalise our ideas and be mindful
							lamp-posts etc where practical should be designed to be dual use cycle stands		of the NPPF soundness tests that
							Shared use roads should not be on the same level.		will ultimately determine if the AAP
									can be adopted. We believe that
									the policy as presented is the most
									justified and effective in terms of
									ensuring delivery of improved cycle
									infrastructure in Peckham and
									Nunhead. The change reflects the
									fact that funding will be sought over
									the plan period for individual
									schemes and the precise details of
									these schemes, including their
									alignment and specification, will be
									dependent on the amount of
									funding secured and on bespoke local consultation. Our approach
									therefore highlights our priorities, whilst ensuring sufficient flexibility
									to deliver individual schemes. The
									policy wording and the associated
									map was discussed and agreed
									with groups including Southwark
									Cyclists, Southwark Living Streets
									and with NHS Southwark, all of
									whom share our commitment to
									supporting active travel. The GLA
									(rep 14) and TfL (rep 93) have also
									confirmed their support for this
									policy through their most recent
									responses, as well as Southwark
									Living Streets confirming that they
									have no further comments on this
									version of the AAP. The council will
									continue to fund transport
									improvements through site specific
									s106 agreements, through our
									proposed community infrastructure
									levy and through many other
									funding streams, including the
									annual Local Implementation Plan
									(LIP) funding available via TfL. Just
									short of £1m worth of projects have
									already been identified to improve
									pedestrian and cycle infrastructure
									in and around Peckham as part of
									the council's 2014/15 bid to TfL.
									Further detail has been added to
									the AAP infrastructure background paper regarding these proposals;
			<u> </u>						paper regarding these proposals,

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									their funding and the process for delivery. 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 adopted Transport Plan. We continue to negotiate on-site cycle parking as developments come forward, having regard to standards in the saved Southwark Plan and London Plan. We stress that these are minimum standards and always aim to exceed them in areas of high demand. In addition, the council continues to seek funding for further cycling parking independently of new development. Almost 400 new on-street cycle parking spaces have been provided since 2009 and almost 350 new spaces on estates in Southwark.
218	3 154	English Heritage	Saunders	Graham			In broad terms the Submission version of the AAP contains some very useful policy 'hooks' in which to help ensure the conservation of Peckham's and Nunhead's historic environment. This is supported by a wealth of detailed evidence which provide robust information and clarity of the issues and character of the plan area (e.g. Characterisation Study, Conservation Area Appraisals and Urban Design background paper). However there are significant concerns with regards to the promotion of tall buildings of considerable height on key sites east of Rye Lane Conservation Area. We are concerned that the heights proposed in the policy wording appear contrary to the evidence prepared and based upon the evidence provided unjustified and potentially harmful to the significance of heritage assets. In short we would advise the promotion of tall buildings as prescribed is contrary to the National Planning Policy Framework (NPPF) in terms of delivering good design (e.g. paragraph's 56, 58 and 61); conserving and enhancing the historic environment (e.g. paragraph's 126, 131 and 137) and when developing local plans (e.g. paragraph's 152, 154, and 169-170).		The publication/submission document has been prepared with reference to the NPPF. It is consistent with the NPPF. The range of maximum building heights proposed in Policy 26 is justified by a robust evidence base that was prepared for the AAP. The AAP urban design background study sets out the rationale and methodology that was undertaken to assess the potential impact of taller buildings on heritage assets and their settings. The study sets out the assessment of a series of views from within and outside the core action area to assess the potential impact taller elements would have on heritage assets and their settings (CAs, listed buildings, etc) within the core action area. It is noted that paragraph 5.3.6 of the Rye Lane CAA states that opportunities for buildings of eight to ten storeys maybe appropriate to the east of Rye Lane. The eight to

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								ten storeys figure relates to the
								height of existing tall buildings to
								the east of Rye Lane such as the
								multi storey car park. However,
								following the testing and analysis of
								height options at the larger
								proposals sites as part of the
								preparation of the evidence base, it
								is considered that options up to the
								heights specified in the policy may
								be appropriate, provided that
								proposals demonstrate, through a
								qualitative assessment, the effect
								that taller height would have on the
								character, streetscape and skyline
								of the area, and avoid harm to the
								significance of heritage assets and
								their settings. The testing and
								assessment of potential building
								heights also indicated that
								buildings up to seven storeys may
								also be appropriate within the core
								action area. Furthermore, read in
								combination, AAP policies 23, 24.
								25, 26 and 29 will ensure that new
								development responds to its
								context and does not harm the
								significance of heritage assets or
								their settings. We have suggested
								as change to the Planning
								Inspectorate through our table of
								proposed minor changes to the
								AAP to update policy 26 to improve
								the clarity between the sections (i)
								and (ii) in part 2 of the policy.