

Representation	Officer Response
Peckham Area Vision	
<p data-bbox="188 373 353 440">Individual NSPPSV86.12</p> <p data-bbox="188 499 667 528">This Vision statement is not justified as:</p> <ul data-bbox="188 536 1234 852" style="list-style-type: none"> <li data-bbox="188 536 1234 639">• The policy change to P14 Tall Buildings means that locations proposed for specific Tall Buildings are no longer identified in individual Area Visions or associated Site Allocations, thus rendering them as both meaningless and unfit for purpose. <li data-bbox="188 647 1234 746">• That Policy on P25 Industrial Land is inconsistent with the Mayor’s New London Plan, potentially means that Site Allocations will need to be withdrawn or substantially modified if there is to be no net loss of such land. <li data-bbox="188 754 1234 852">• The Peckham Area Vision fail to take account of submissions made by residents for their respective areas in November 2016, at the invitation of the Council, and as identified in the Consultation Report. <p data-bbox="188 895 1211 1067">This Vision statement is not sound because it is not consistent with National Planning Policy Framework, through failure to comply with the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”; which this self-evidently doesn’t do.</p> <p data-bbox="188 1110 1193 1177">This Vision statement is not positively prepared as it is vague and unclear on several points:</p> <ul data-bbox="188 1185 1211 1425" style="list-style-type: none"> <li data-bbox="188 1185 1211 1252">• Visions of residents as identified in the Consultation Report have been ignored in producing the version now submitted by the Council; <li data-bbox="188 1260 1211 1327">• Consequently, they do not reflect a distinctively different identity that is relevant to Peckham; <li data-bbox="188 1335 1211 1425">• The significant policy change to P14 Tall Buildings, means tall buildings may now be permitted anywhere in the borough which infers that they could significantly change each Area Vision in terms of both numbers and locations, and with no definition of 	<p data-bbox="1263 373 1541 402">Representation noted.</p> <p data-bbox="1263 446 2063 587">Site allocations reference where tall buildings may be appropriate, these will be considered on a case by case basis, determined through a detailed design assessment and assessed against Policy P16 (tall buildings).</p> <p data-bbox="1263 630 2040 802">The release of employment floorspace has been determined through the Employment Land Review which recommends what sites can release employment floorspace or should retain employment floorspace. These findings are reflected in site allocations.</p> <p data-bbox="1263 845 2063 1091">Throughout the process of developing the New Southwark Plan a range of events have been used to consult on the plan. A number of these included face to face questionnaires, community workshops and presentations at Community Councils and Tenants Association. This online service can be accessed at local Southwark libraries. Our online services are currently in the process of being renewed and improved.</p>

what a tall building and not clarifying what “significantly taller than their surroundings” means.

- The lack of consistent approach of Policy P25 Industrial Land compared with the Mayor’s New London Plan, potentially means that many current Site Allocations will need to be withdrawn or substantially modified if there is to be no “net loss” of such land.

This Vision statement is not effective as it does not:

- Provide a Vision for Peckham that is sufficiently clear and distinctive enough to enable measurement that can demonstrate delivery of the Vision;
- Provide a Vision for Peckham, & associated Site Allocations, that reflect where Tall Buildings are to be located, and at what height;
- Provide a clear framework to explain how the changes proposed affecting some new Sites and their juxta-position with other existing sites, would impact (positively and/or negatively) on the area.

Suggested improvements:

To make the policy and NSP sound

- Revisit the Area Visions to ensure they reflect a “collective vision” in “collaboration with neighbourhoods, local organisations and businesses”;
- The resulting Area Visions, and their associated Site Allocations, to clearly identify where tall buildings are appropriate and their indicative heights;

All of which should then be put out for consultation with residents and businesses.

Organisation: Vital OKR
NSPPSV205
Individual
NSPPSV91.46 and NSPPSV128.46

Objection 12.

We object to the failure to define any requirement for industrial accommodation within

Representation noted. The release of employment floorspace has been determined through the Employment Land Review which recommends what sites can release employment floorspace or should retain employment floorspace.

As set out in the NSP Site Allocations Methodology Report, site allocations do not include indicative development capacities for each site allocation because their purpose is not to provide

<p>mixed-development on the following allocated sites where there is clear potential to incorporate such uses. In order to improve NSP soundness in relation to NPPF and London Plan requirements we suggest that the allocation policies for each be revised to include requirements for a defined minimum quantum of industrial accommodation.</p>	<p>detailed design brief for each site. Stakeholders were concerned that inclusion of indicative development capacities would preempt the outcome of the detailed development management process.</p>
<p>Individual NSPPSV110.12</p> <p>4. Peckham Area Vision</p> <p>Vision statement AV 13.2 is unsound because it is not effective. The factors identified as needing to be taken into account in any development in Peckham, are to be commended, but they are contradicted in the subsequent, specific plans for Peckham. The Area Vision closely follows the Peckham & Nunhead Area Action Plan (PNAAP, 2014), a document that predates and does not ascribe to many of the tenets set out in the New Southwark Plan. There are therefore major inconsistencies between the Area Vision for Peckham and the main body of the Plan, as pointed out above. This vision statement is therefore not effective.</p> <p>The four plans that follow (NSP75, 76, 77 and 78), taken from the Peckham & Nunhead Area Action Plan (2014), are not sound because they are not consistent with the policies stated in the earlier sections of the New Southwark Plan (2018) and thus are not positively prepared.</p>	<p>Representation noted. Specific contradictions between the proposed policy and former planning documents have not been given and therefore cannot be commented on. The Policies and Area Visions in the NSP have been prepared to align.</p>
<p>Individual NSPPSV117.2</p> <p>As someone actively involved in supporting the Peckham Coal Line, I am encouraged by the inclusion of the Peckham Coal Line in The New Southwark Plan (NSP).</p> <p>We believe, now the feasibility stage of the project is wrapping up - there is an opportunity for the inclusion to go further than it currently does to further in its support for the implementation of the Peckham Coal Line (PCL). The delivery of the PCL is a stated aim of the planning authority, has wider Council support, and is encouraged</p>	<p>The vision has been amended to include 'Peckham' Coal Line. Policy P51 (low line routes) seeks to protect the Peckham Coal Line.</p>

by policies P49, AV.13 and NSP77, the feasibility study can provide further detail on site boundaries, benefits and opportunities to enable such delivery to be achieved. This can include what the PCL involves, how it may affect development or how development may affect it or contribute towards it.

Ideally a specific policy should be introduced that defines PCL with reference to a boundary plan with an explanation of the project and its aims. More detail can be found in the PCL feasibility study. The proposal is an elevated park, pedestrian and cycle route to connect Peckham Rye (Rye Lane) and Queen's Road Peckham (Queen's Road opposite Asylum Road), and to connect to the wider green and cycle route networks. This will promote better connections between these areas, improve public health and encourage sustainable modes of transport. Development should not compromise the delivery of this route, and should contribute directly to it where directly affecting it. The PCL team would welcome the opportunity to discuss appropriate wording further. The additional policy could be located before or after policy P49. This will make the NSP sound by clarifying what the PCL is in order that this stated aim can actually be delivered.

Regardless of whether the additional policy is introduced or not, the following changes to existing policy should be also made:

Policy AV.13: at the sixth bullet add "Peckham" before "Coal Line" and cross-refer to where this is defined at Policy P49.

Organisation: Southwark Cyclists
NSPPSV164.17

Peckham Area
Vision
Not positively
Prepared

The Peckham Area Vision fails to improve east-west cycle connectivity, with no such routes proposed south of A202/Peckham Road (a corridor with a poor safety record for cycling), or additional connectivity to Peckham Rye Station. The need to improve

The cycle routes have been updated in the Area Vision maps. The transport policies in the Plan seek to improve cycling and walking in the borough SP5 (healthy active lives), P48 (public transport) and P50 (walking), P52 (cycling).

walking routes with wider facilities to cater for increased use of this station, the redevelopment of which is starting this spring, was not considered either. Pavements are very narrow south of the station but significant changes to road layouts will be difficult while the Choumert Grove Car Park remains. This underused site close to a key transport hub has great potential for housing, in line with recent changes to the NPPF and draft NLP.

Bus access to and from the Peckham Bus Station is indirect while many buses use the northern end of Rye Lane, limiting space for walking and cycling. Direct access from Hanover Park as part of the redevelopment would improve bus journey times and enable the removal of buses from the end of Rye Lane to help provide for walking and cycling growth.

Not consistent

In addition both the Peckham Area Action Plan and draft MTS identify additional cycle routes, so there is a serious lack of consistency and clarity. Indeed the major study commissioned by TfL and Southwark for Peckham failed to note that the A202 has been designated as a cycle superhighway and more recently in the draft MTS as one of the routes with the highest potential for cycling growth in London. The failure to join up walking and cycling needs is critical at this location which is a bottleneck.

In order to make this Area Vision sound the following changes are required:

- Addition of extra east-west cycle routes, including removal of Bellenden gyratory, and links to Peckham Rye station
- Plan for very significant increases in cycling and walking, in line with draft MTS modelling
- Redevelopment of Choumert Grove Car Park site, with car parking removed but a direct, legible green link for cycling and walking between Chadwick and Bournemouth Road retained
- Direct access from Hanover Park through NSP75 (Aylesham Centre) or via McKerrell Road for buses accessing and leaving the Peckham Bus Station.

Organisation: TfL City Planning
NSPPSV181.29

The Area Vision for Peckham states development should prioritise walking and cycling and improve public transport. This includes

<p>The fifth bullet point could include specific mention of the need for development to support expansion of cycle hire into Peckham.</p>	<p>supporting cycle hire into Peckham. P50: Cycling within the NSP covers the provision of cycle hire schemes within the borough.</p>
<p>Organisation: Friends of Peckham Rye Park NSPPSV302.2</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Effective</p>	<p>Noted.</p>
<p>Organisation: Peckham Coal Line NSPPSV304.2</p> <p>Do you consider the document to be legally compliant in accordance with the Town and Country Planning (Local Planning) (England) (Amendment) Regulations 2012? - Legally compliant Yes</p> <p>Do you consider that the New Southwark Plan is sound? - Soundness No</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: Justified</p> <p>Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.</p>	<p>The vision has been amended to include 'Peckham' Coal Line. Policy P51 (low line routes) seeks to protect the Peckham Coal Line.</p>

The Friends of the Peckham Coal Line are supportive of the inclusion of the Peckham Coal Line in The New Southwark Plan (NSP).

We believe, now the feasibility stage of the project is wrapping up - there is an opportunity for the inclusion to go further than it currently does to further in its support for the implementation of the Peckham Coal Line (PCL). The delivery of the PCL is a stated aim of the planning authority, has wider Council support, and is encouraged by policies P49, AV.13 and NSP77, the feasibility study can provide further detail on site boundaries, benefits and opportunities to enable such delivery to be achieved. This can include what the PCL involves, how it may affect development or how development may affect it or contribute towards it.

Do you consider that the New Southwark Plan is unsound because it is not: - Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound. You will need to say why this change will make the New Southwark Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Ideally a specific policy should be introduced that defines PCL with reference to a boundary plan with an explanation of the project and its aims. More detail can be found in the PCL feasibility study. The proposal is an elevated park, pedestrian and cycle route to connect Peckham Rye (Rye Lane) and Queen's Road Peckham (Queen's Road opposite Asylum Road), and to connect to the wider green and cycle route networks. This will promote better connections between these areas, improve public health and encourage sustainable modes of transport. Development should not compromise the delivery of this route, and should contribute directly to it where directly affecting it. The PCL team would welcome the opportunity to discuss appropriate wording further. The additional policy could be located before or after policy P49. This will make the NSP sound by clarifying what the PCL is in order that this stated aim can actually be delivered.

If it will not be possible to include an additional policy, then the following changes to existing policy should be made:

Policy AV.13: at the sixth bullet add “Peckham” before “Coal Line” and cross-refer to where this is defined at Policy P49.

Individual
NSPPSV308.3

Do you consider that the New Southwark Plan is unsound because it is not: - Please give details of why you consider the New Southwark Plan to be not legally compliant or unsound. Please be as precise as possible. If you wish to support the legal compliance or soundness of the New Southwark Plan, please also use this box to set out your comments.

The area itself has a lot of history in itself , Camberwell workhouse on Gordon road and the bridge over the east viaduct on consort road is of great value to the past which resonates grandeur and should be given the exhibition it needs it is an icon bridge built with manual resources and with artistic skills, a fine workmanship and it looks like a picture. This bridge should be viewed from afar as it would resurrect the historical feature of Peckham - linking it with the Bussey Building and having a clear view from Bournemouth Road. The housing development, therefore, should be revised and should not include any tall buildings or housing blocks not only because of the historical value of Peckham but because the area is already suffocating the people that live locally and there are too many flats surrounding the site as it is. The road structure would have to be revised the bend on Copeland /Consort road is highly dangerous, obscured vision and dense. They had already spoilt the sentiments of the area by building that congregated iron block that does not fit well with the feature of the area or blends in with any of the other buildings. However, I do recommend that they build adequate houses for the elder who want to live independently, they too would benefit in many ways i.e.; Local shops Rye Lane, Asda, church/communities; social inclusion. Take into account green space and open planning

Representation noted.

Any proposals for tall buildings will be assessed against Policy P16 (tall buildings).

A number of policies of the Plan seek high design quality and seek to protect the historic environment - Policy P12 (design of places), P13 (design quality) and P20 (conservation of the historic environment and natural heritage).

Individual

The vision has been amended to include ‘Peckham’ Coal Line.

NSPPSV309.2

Regardless of whether the additional policy is introduced or not, the following changes to existing policy should be also made:

Policy AV.13: at the sixth bullet add “Peckham” before “Coal Line” and cross-refer to where this is defined at Policy P49.

These changes will make the NSP sound by clarifying what the PCL is, and by making clear where developments will affect PCL and be expected to support and contribute to it. This will enable the delivery of the PCL, which is a stated aim. Without these changes delivery may be compromised as it was recently with the Consort Road plans (submitted in July 2017)

Policy P51 (low line routes) seeks to protect the Peckham Coal Line.