

Representation	Officer Response
<p data-bbox="185 316 517 344">AV14 Peckham Area Vision</p> <p data-bbox="185 355 367 421">Derek Kinrade NSPPSV47.12</p> <p data-bbox="185 464 1111 564">AV14 : Para 1. Peckham is more than its town centre; para.3, last line: should be plural 'areas'; there are a few important pre-Victorian buildings; suggest insert ' the iconic clock tower' before 'former',</p>	<p data-bbox="1140 464 2042 529">The whole area vision provides a description of the area, not only the town centre.</p> <p data-bbox="1140 534 2042 635">These comments do not change the meaning of the text and therefore we will not be making changes at this stage of the process which is considering legal tests of soundness.</p>

Representation	Officer Response
<p>NSP71 Aylesham Centre and Peckham Bus Station</p>	
<p>Peckham Heritage Regeneration Partnership NSPPSV471.2</p> <p>Note: this submission contains 6 comments over 3 pages</p> <p>TOPIC 01 NSP71 (including PNAAP 1) Aylesham Centre and Peckham Bus Station TALL BUILDING AND COMMUNITY CONSULTATION The site-specific guidance (PNAAP) states, “There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm”. I do not consider this policy sound because the inclusion of a ‘taller landmark building of up to 20 storeys’ is not positively prepared, for the following reason: A). There is inadequate evidence of community participation in supporting inclusion of a 20 storey building in this site allocation. Suggested change: the policy should remove the reference to the taller landmark building of up to 20 storeys</p> <p>TOPIC 02 NSP 71 (including PNAAP 1) Aylesham Centre and Peckham Bus Station TALL BUILDINGS, AFFORDABLE HOUSING AND VIABILITY The site-specific guidance (PNAAP) states, “There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm”. I do not consider this policy sound because the inclusion of a ‘taller landmark building of up to 20 storeys’ is not justified, for the following reason: A). Since the adoption of the PNAAP in November 2014, evidence has grown - on tall buildings, affordable housing and viability - which now needs to be taken into consideration. See the examples cited below. Suggested change: the policy should remove the reference to the taller landmark building of up to 20 storeys.</p>	<p>Representation noted.</p> <p>Topic 01: The principle of tall buildings was established by the adopted Peckham and Nunhead AAP which has undergone public examination. P16 Tall Buildings also provides overarching guidance for tall buildings. Both the Peckham and Nunhead AAP and the NSP have been consulted on extensively.</p> <p>Topic 02: Strategic policy SP1, sets out the need and vision for Quality Affordable homes and this applies, as an overarching vision to the Aylesham and Peckham Bus Garage site allocation.</p> <p>Topic 03: Policy P16 Tall buildings and the tall buildings background paper and set out that the tall building must be sustainably designed meeting carbon reduction standards onsite, ensure proper ventilation and heating and cooling, as well as provide amenity space both private and public and deliver communal open and play spaces.</p> <p>Topic 04: The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework. In this case, the Peckham and Nunhead AAP outlines a maximum height of 20 stories to</p>

(i) The GLA has commissioned two studies that have looked at the relationship

between tall buildings and viability:

- London Plan Viability Study (Draft December 2017)
- Lessons from Higher Density Development (September 2016)

(GLA (2019b) Freedom of Information Request: Tall Buildings Affordable Housing and Viability for Planning Policy. FOI reference number:

MGLA100119-2766. Available via:

[https://www.london.gov.uk/sites/default/files/mgla100119-2766\\_-\\_foi\\_response.docx\\_redacted.pdf](https://www.london.gov.uk/sites/default/files/mgla100119-2766_-_foi_response.docx_redacted.pdf) )

(ii) Evidence is accruing about the perceived low levels of affordable housing in tall buildings (Bailey, 2020; Marrs, 2019; Neate, 2018; Just Space, 2019; Wainwright, 2015). In particular, organisations such as the 35% Campaign in Southwark have campaigned on behalf of their residents arguing that many tall buildings do not provide compliant levels of affordable housing (35% Campaign, 2016).

(Bailey C. (2020) Pretty Vacant: The 500 hi-rise towers that won't solve London's housing crisis. Action on empty homes. Published: 12th May 2020.

Available via: <https://www.actiononemptyhomes.org/blog/pretty-vacant-the-500-hi-rise-towers-that-wont-solve-londons-housing-crisis> [Accessed 23 May 2020]

Marrs C., (2019) London towers approved despite affordable housing policy breach. Planning Resource: independent intelligence for planning professionals. Available via:

<https://www.planningresource.co.uk/article/1583083/london-towers-approved-despite-affordable-housing-policy-breach> [Accessed 15 May 2020])

Neate R. (2018) Ghost towers: half of new-build luxury London flats fail to sell. The Guardian. Available via:

<https://www.theguardian.com/business/2018/jan/26/ghost-towers-half-of-new-build-luxury-london-flats-fail-to-sell> [Accessed 14 June 2020]

Just Space (2019) Tall Buildings written statement in response to M41.

London Plan Examination in public. 6 March 2019. Available via:

<https://justspace.org.uk/hearings-eip-2019/> [Accessed 12 June 2020]

protect the character of the site area, which has been referenced in the NSP site allocation as follows: The site is within the setting of Rye Lane Peckham and Peckham Hill Street conversation areas, so any taller development should be set back from the Rye Lane shopping frontage, towards the eastern end of site, to mitigate its impact. Development massing should be directed to the east of the site to minimise impact on the view to the City from the Bussey Building rooftop. In any case a maximum height of 20 storeys proposals should be carefully considered to conform with guidance set out in the Peckham and Nunhead Area Action Plan. Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.

Topic 05/06:

The NSP sets out an indicative residential capacity. The methodology behind this is set out in the updated Sites Methodology Paper. This is an indicative capacity.

TOPIC 03.

NSP 71 (including PNAAP1) Aylesham Centre and Peckham Bus Station  
TALL BUILDINGS – SOCIAL AND ENVIRONMENTAL IMPACT

The site-specific guidance (PNAAP) states, “There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm”.

I do not consider this policy sound because the inclusion of a ‘taller landmark building of up to 20 storeys’ is not justified, for the following reason:

A). There is inadequate evidence on the long-term environmental and social impact of tall buildings, and poor understanding of the future refurbishment challenges if the block is privately owned.

Suggested change: the policy should remove the reference to the taller landmark building of up to 20 storeys.

TOPIC 04

NSP71 ((including PNAAP1) Aylesham Centre and Peckham Bus Station  
TALL BUILDINGS AND VIEWS

The site-specific guidance (PNAAP) states, “There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm”.

I do not consider this policy sound because the inclusion of a ‘taller landmark building of up to 20 storeys’ is not justified or positively prepared, for the following reasons:

A). In New Southwark Plan Submission Version document, page 22 – Tall Buildings and Views – site PNAAP1/ NSP71 is outside the area identified as ‘possible location for tall buildings’. This indicates that there is no wider strategy of where tall buildings in the borough should be located.

B). The site lies within the Borough View of St Paul’s Cathedral from One Tree Hill; therefore the locating off a tall building on this site disrupts this view.

Suggested change: the policy should remove the reference to the taller landmark building of up to 20 storeys.

TOPIC 05.

NSP71 (including PNAAP1) Aylesham Centre and Peckham Bus Station  
INDICATIVE CAPACITY – RESIDENTIAL UNITS

<p>The PNAAP site-specific guidance indicates that 400 'residential units' are appropriate for this site. The NSP indicates an indicative residential capacity of 850 'homes'.</p> <p>I do not consider this policy sound because the higher indicative residential capacity is not justified for the following reason:</p> <p>A.) The provision of 850 residential units on this site will inevitably lead to the creation of a 'superdense' medium to high rise neighbourhood. There is no evidence that this is appropriate for Peckham town centre, which is generally low rise in character.</p> <p>Suggested change: the policy should remove the reference to an indicative residential capacity of 850 residential units</p> <p>TOPIC 06.</p> <p>NSP71 (including PNAAP1) Aylesham Centre and Peckham Bus Station</p> <p>INDICATIVE CAPACITY – RESIDENTIAL UNITS</p> <p>The PNAAP site-specific guidance indicates that 400 'residential units' are appropriate for this site. The NSP indicates an indicative residential capacity of 850 'homes'.</p> <p>I do not consider this policy sound because the higher indicative residential capacity is not justified for the following reason:</p> <p>A.) The indicative residential capacity doubles between the two related policy documents, the PNAAP and unadopted NSP. There is no evidence that neither the reasoning for nor the implications of this more than doubling of residential provision has been agreed in participation with the local community.</p> <p>Suggested change: the policy should remove the reference to an indicative residential capacity of 850 residential units</p>	
<p><b>TfL Commercial Development</b> NSPPSV182.5</p> <p>NSP71: Aylesham Centre and Peckham Bus Station (Formerly NSP75) Since the submission of our previous representation letters of February 2018 and May 2019, TfL has continued to actively engage with Southwark Council</p>	<p>Representation noted.</p> <p>The site allocation sets out the development must retain a bus garage if the</p>

and the adjoining landowner in order to consider a collective and collaborative future for this site.

As set out in previous representations we consider it is imperative that transport infrastructure is protected on the wider site and the allocation needs to be clear in this regard, consistent with draft London Plan Policies T3 (Transport capacity, connectivity and safeguarding) and E4 (Land for industry, logistics and services), and Policy SPG 16 (Buses: garages, stations, passenger infrastructure, coaches) of the Mayor's Land for Industry and Transport SPG (2012) which states:

"In implementing London Plan policies, the Mayor will, and boroughs, TfL and other partners should:

- i) Safeguard existing land and identify future requirements for additional land, for bus operations (including depot storage and maintenance) in agreement with TfL;
- ii) Resist the loss of any bus garage through redevelopment unless a suitable alternative site that results in no overall loss of capacity can be found in the immediately adjacent area, or TfL agrees formally that the particular facility is no longer required."

If TfL decides that the bus station is no longer required, it is the Mayor's aspiration to prioritise housing delivery on surplus TfL sites. However, as currently worded, the draft Site Vision requires the bus station to be replaced with an equivalent amount of business floorspace. To clarify, the existing bus station comprises bus stands, roadways and hardstanding only and the sole building on this part of the site allocation provides driver welfare facilities. There is therefore no justification to require an equivalent amount of floorspace for business use. In addition, as highlighted above, paragraph 6.4.5B of the emerging draft London Plan is clear that requirements to protect employment floorspace capacity do not apply to sites that are used for transport functions which are no longer required.

Given the above, bullet point two should acknowledge TfL's authority in determining the redevelopment of transport hubs (i.e. whether the bus station is surplus to requirements) and should prioritise the delivery of housing, as opposed to B1 small business spaces and should be amended as

use is still required. Any redevelopment of the site will require consultation with the relevant stakeholders and consultees.

If redevelopment of the site comes forward, consideration will be given to the need for the station and how this will function during any redevelopment.

<p>follows:  Retain the bus station if the use is determined by TfL to still be required. If at some point in the future the bus station is determined by TfL to be surplus to requirements, new homes should be provided, and other town centre uses may be considered. the equivalent space should be provided as a small business space (B1).</p>	
<p><b>TfL Spatial Planning</b>  <b>NSPPSV181.16</b></p> <p>NSP71 – Aylesham Centre and Peckham Bus Station  Although there may be potential for future redevelopment or reconfiguration while retaining an operational bus station use on this site, we are concerned about the proposed wording that has been inserted which refers to the bus station use and states: ‘...if that use is still required. If the bus garage (sic) is required, redevelopment should consider over the station development to provide new homes.’ This wording is inconsistent with policy T3 in the ItPLP which requires development plans to safeguard existing land and buildings used for public transport, active travel or related support functions. We do, however, acknowledge the discussions with the landowner for the adjacent Aylesham Centre which could result in a reconfiguration of the uses on the combined site as part of a redevelopment scheme. In these discussions, we have been clear that bus station capacity and efficient operations must be retained even if on a different part of the combined site. The proposed wording also confuses a bus garage with a bus station. A bus station provides passenger facilities while a bus garage provides depot, storage and maintenance facilities for buses. It should be made clear that any over-site development must retain or increase the existing vehicle capacity, ensure continuity of operation during construction, meet existing and future operational needs including 24/7 operation by a full range of vehicles including electric charging, and be the subject of approval by TfL. In order to provide high quality facilities for passengers it must additionally meet TfL standards for safety, lighting and ventilation</p>	<p>Representation noted.</p> <p>The site allocation sets out the development must retain a bus garage if the use is still required. Any redevelopment of the site will require consultation with the relevant stakeholders and consultees.</p> <p>If redevelopment of the site comes forward, consideration will be given to the need for the station and how this will function during any redevelopment.</p> <p>The wording will be amended in the design and accessibility guidance to reference bus station rather than garage.</p>

CONSULTATION RESPONSE – PROPOSED CHANGES TO THE SUBMITTED NEW SOUTHWARK PLAN (EIP27A, AUGUST 2020)

INTRODUCTION

1. These representations are made on behalf of Tiger Developments Ltd in relation to policies affecting the Aylesham Centre and Peckham Bus Station, covered by draft site allocation NSP71.
2. Representations have been submitted on behalf of Tiger Developments in relation to previous stages of consultation, including in relation to the Preferred Options Version (2016 & 2017), Proposed Submission Version Consultation (2017) and Proposed Submission Version Amended Policies (2019).
3. These current representations are submitted in the context of on-going pre-application engagement with LB Southwark (the Local Planning Authority/LPA), Transport for London (TfL) and the Greater London Authority (GLA) and on-going public consultation in relation to proposals for this site. These representations are also submitted in the context of changes to the Use Classes Order as a result of the 2020 amendment Regulations. On this basis, whilst this round of consultation is focused upon the specific modifications proposed at this stage, we consider that there are reasonable grounds to provide views in relation to broader aspects of the draft policy.
4. The site allocation wording has not been updated to be consistent with the LPA's position set out through pre-application engagement, nor has it been updated in relation to national reform of the planning system. This presents a significant threat to the soundness of the draft New Southwark Plan because it undermines the extent to which the plan can be judged effective and deliverable, and consistent with national policy.
5. National Planning Policy Framework (NPPF) paragraph 35 states that plans are 'sound' if they are:
  - positively prepared, seeking to meet objectively assessed needs;
  - justified, taking account reasonable alternatives and being evidence-based;

Representation noted.

The NSP's approach to the new Use Class Order will be addressed in the matters issued by the Inspectors.

The pre application advice given by planning officers is not a consideration when determining the soundness of a development plan. However we have worked closely with our development management colleagues to ensure that advice given is consistent and this has been the case for this application.

It is unnecessary to have a policy that suggests the provision of the new bus route means that on-street servicing would be acceptable. There has been no indication at pre-app discussions that this approach to servicing is acceptable.

The omission of the tall buildings guidance in the clean version will be updated in the plan to be in line with the track changes NSP.

The community land trust would be a welcome addition to the housing mix in Peckham with the opportunity for a different housing tenure.

- effective and deliverable, and
- consistent with national policy, enabling the delivery of sustainable development.

6. We consider below how various matters of soundness are raised by outstanding issues with the revised wording of the draft NSP. We have had regard to the Planning Advisory Service Soundness Self-Assessment Checklist (March 2014).

#### PREVIOUS REPRESENTATIONS

7. Representations have been submitted on behalf of Tiger Developments in relation to previous stages of consultation, including in relation to the Preferred Options Version (2016 & 2017), Proposed Submission Version Consultation (2017) and Proposed Submission Version Amended Policies (2019).

8. Tiger has previously objected to the draft site allocation policy safeguarding a private view from the Bussey Building and its potential impact on the ability to optimise the redevelopment potential of the site. The Council has noted within its consultation response reporting (in relation to Borough Views) that 'locations that do not guarantee long-term public access do not meet our requirements to be designated as a borough view'. We consider that policy protection of a view within a site allocation should be subject to the same logic, given that such protection may still have a limiting effect on development and a directive effect on the distribution of height and massing.

9. Comments were also made in relation to Borough View 1 (One Tree Hill), that the view should be maintained or enhanced; the council confirmed it would not include this wording but would amend to refer to 'where possible enhance'; it was also noted by the Council that this policy should be applied flexibly, which we support.

10. Previous representations also sought to clarify that the site allocation should refer to the potential for a 20 storey building, not a 20m building; this was an acknowledged drafting error which has now been corrected.

11. Tiger sought a change to policy P28 (Small and independent businesses) to ensure that it is clear this only applies to B uses; this was confirmed to be

the case in the Council's response, set out within the Amended Policies Version Consultation Report (January 2019), though no policy wording changes are proposed. Clarity within the policy wording would be preferable to ensure no interpretation and implementation issues over the plan period.

12. It was also noted that the provision of small shops (P29) may not be appropriate to the Aylesham Centre and that larger units to meet modern retailer requirements would complement existing small and independent retailers elsewhere within the town centre, in accordance with the draft site allocation requirement to 'diversify and complement the existing retail offer'. The Council noted that a range of shop sizes is required and therefore declined to make policy wording changes. We consider that this is an inadequate response and that the NSP should acknowledge that the Aylesham Centre is a location for which the provision of larger shop units would complement the existing retail offer in the town centre; this should be a focus even if this does not preclude small shops.

#### FURTHER REPRESENTATIONS

Consistency with pre-application advice

13. Extensive pre-application engagement has been undertaken in relation to proposals by Tiger Developments to redevelop the Aylesham Centre and Peckham Bus Station, since Tiger's last representations in relation to the Proposed Submission Version Amended Policies (2019). This has included formal pre-application meetings, Design Review Panel sessions and written pre-application feedback. Public consultation has been on-going, most recently a consultation exercise was undertaken between July – August 2020; we anticipate further consultation in advance of the submission of a formal planning application.

14. We consider that consistency between policy and pre-application advice raises matters relevant to the NPPF soundness test, set out above, because any inconsistency threatens delivery of the plan in relation to this specific site, through presenting potential planning risk (in terms of LPA decision-making) and, furthermore, in order to be effective and deliverable, the strategy must have delivery partners who are signed up to the approach<sup>1</sup>.

15. Any inconsistency between policy requirements and pre-application advice also raises questions as to whether policies are justified i.e. can the policy be considered to set out the most appropriate strategy, when considered against reasonable alternatives, where a reasonable alternative must surely comprise the approach put forward by the developer through a considerable and iterative pre-application process with the LPA.

16. There is also the matter of consistency with national planning policy, with the NPPF clearly setting out that pre-application engagement is intended to facilitate 'better coordination between public and private resources' (NPPF paragraph 39) and that the preparation of policies 'should be underpinned by relevant and up-to-date evidence' (paragraph 31).

17. We consider that the site allocation, as drafted and amended, does not fully reflect feedback from LBS through this pre-application process and we consider that it is important that the LPA adopts a consistent position between pre-application advice and emerging planning policy. In this respect we make the following detailed comments:

#### Bus Infrastructure

18. In December 2018 LBS (with input from TfL) wrote formally to Turley, representing Tiger Developments, confirming that the proposals would be required to invest in on-site improvements to bus infrastructure. The site allocation currently provides no acknowledgement that there are deficiencies with the existing bus network in the town centre and that the site is considered by LBS to have an important role in improving this situation. In order for the provision of new bus infrastructure on the site to be attributed clear weight in decision-making, as a public benefit, the site allocation policy should be updated to clearly state that LBS considers there to be issues with the current bus network in the town centre, including bus routing and bus stop and stand location and interchange, and that, specifically, there is policy support for a new bus route through the site as a substantial public benefit. This should be indicated on the site allocation diagram. Furthermore, redevelopment of the bus station should be noted as an opportunity to expand bus stand provision within the TfL land within the site allocation.

19. The plan should be clear that there are existing bus infrastructure issues

within Peckham town centre more widely and that any contributions or on-site measures to improve bus infrastructure as part of redevelopment would be a public benefit beyond the specific development needs of this site allocation.

20. This approach would be consistent with other policies in the draft NSP.

Policy AV.14 (Peckham Area Vision) states that development should 'Prioritise walking, cycling and improve public transport' albeit that policy AV.14 specifically mentions improved access to Peckham Rye railway station but does not mention Peckham bus station. Policy P48 (Public transport) states that development must 'Improve, maintain and enhance public transport services'.

21. We also note that the proposed bus route in the pre-application scheme has knock-on effects for the wider transport strategy, including the approach to servicing. Acknowledgement of the planning benefits of the bus route will enable other matters to be assessed on balance. For example, the Council's in principal position that all servicing should be carried out on site should not apply where other on site transport infrastructure precludes this as part of a deliverable scheme.

22. With regards to the tests of soundness, specific reference in the policy to the above infrastructure would ensure that the plan is positively prepared, seeking to meet objectively assessed needs and would also support delivery, by ensuring that significant weight can be given to proposed bus infrastructure improvements in decision-making.

#### Pedestrian/Cyclist Permeability

23. We note that the site diagram shows improved connectivity east-west, which we support in principle; however, pre-application engagement has established that LBS does not currently support opening up access through to the east, onto Clayton Road, which would require access over LBS land. LBS should either assist with facilitating this route or remove this as a policy aspiration. The current aspiration is not deliverable due to third party land ownership restrictions and the requirement for land beyond the Site boundary.

24. The site diagram also includes a requirement for improved connectivity

to Peckham High Street. This would require a route through the ground floor of the Clock Tower building (former Jones and Higgins Department Store) which lies outside the site boundary. The proposed development (i.e. the pre-application scheme) would deliver a connection to the northern end of Rye Lane instead and this is supported by the LPA. The site allocation diagram should be amended to reflect this.

25. With regards to the tests of soundness, the current proposed connection east-west beyond the eastern site boundary is unlikely to be deliverable, unless support is obtained from LBS as land owner. The connection to Peckham High Street is also unlikely to be deliverable and a reasonable alternative is proposed by the pre-application scheme. The policy as draft is therefore unlikely to be effective nor is it justified.

26. We request that the site allocation diagram be amended so that the connectivity arrow does not cross the eastern site boundary. We request the connection to Peckham High Street be relocated as a connection to Rye Lane, at the north-west corner of the site, in accordance with the emerging development proposals.

#### Affordable Housing Tenures

27. The proposals being brought forward and subject to pre-application engagement do not feature a Community Land Trust (CLT). At this time affordable housing content is the subject of pre-application negotiation which excludes this tenure form.

28. The draft NSP and its evidence base does not set out a rationale and justification as to why this specific site within LBS (the only one within the Borough) should provide a CLT. Furthermore, the draft NSP only provides a very brief and limited definition of what is meant by CLT.

29. We understand that this specific tenure was requested directly by Peckham Citizens, a local interest group. We understand that this inclusion was not generated by the LPA. This policy requires a robust evidence base in order to be supported.

30. The site-specific conditions that would support a CLT have not been set out. It is highly unusual for the required tenure of housing on a specific site

to be different to the tenure required on all other sites within an LPA area. Moreover, the evidence base does not set out why CLT should be required at all in the Borough, nor why CLT should be provided in lieu of other housing tenures, including alternative intermediate and affordable housing products which may be more affordable and therefore better meet identified needs set out in the policy evidence base.

31. Any policy reference to CLT should acknowledge that CLT homes will not attract GLA grant funding and that this will therefore have a negative impact on scheme viability and, potentially, affordable housing delivery; furthermore, the provision of a CLT should be subject to specific viability testing as part of the Local Plan evidence base, before this policy can be considered sound. The policy evidence base contains no background work to justify or support the introduction of CLT within the Borough and on this basis the required to include CLT on this or any site cannot be considered sound.

32. The inclusion of a requirement for CLT should be subject to objective assessment in order to meet the tests of soundness, including its potential impact on viability and delivery. The requirement for CLT also needs to be justified as the most appropriate strategy, when considered against reasonable alternatives (such as other forms of affordable housing). This work has not been undertaken in relation to the draft NSP.

#### Existing Floorspace

33. At earlier stages in the consultation process Tiger did not have floorspace information available to share; however, we can now confirm that the existing floorspace is as follows (in sqm GIA): (Please refer to the full rep for table)

35. The current floorspace is incorrect in relation to the existing commercial floorspace and is also incorrect in relation to the inclusion of floorspace in relation to the bus station, other than the driver welfare building, which is approximately 80 sqm.

#### Proposed Town Centre Uses and Use Classes Order amendments

36. More recent pre-application engagement, in 2020, with both LBS and the GLA, has highlighted a desire by both parties for the provision of some form

of creative and/or cultural use on the site. This is not reflected in the site allocation as drafted. If this is a requirement of the LPA this should be set out in policy and also justified through an appropriate evidence base. At present, policies within the draft NSP set out specific provisions in relation to the re-provision of existing 'A uses' (now out-of-date, as discussed below) and this potentially limits the scope for non-retail uses as part of the proposed mix of uses on the site. Draft policies NSP71 (site allocation) and P36 (protected frontages, which requires 75% of units to be in A1 use) present an overly restrictive approach to town centre land uses.

37. In addition, the draft site allocation (and draft NSP in general) has not been updated in relation to the new Use Classes Order amendment Regulations 2020. This has brought in a fundamental change to land use classification and potentially will have a significant impact on land use planning. We consider that it is unlikely the draft plan can be considered sound without being updated to reflect these changes, which took effect as of 1st September. We request that all policies in the plan which make reference to commercial uses should be reviewed in light of these changes.

38. We believe that greater flexibility should be afforded to the development opportunity to reflect the commercial property market (specifically retailing) and the desire of the local community and local planning authority to provide a greater range of commercial uses (such as cultural uses and workspaces). This would also be consistent with the Government's revised approach i.e. the greater flexibilities afforded by Class E.

39. We note that NPPF paragraph 31 states that planning policy evidence base should 'be underpinned by relevant and up-to-date evidence' and 'take into account relevant market signals'. The retail market has been operating in challenging conditions in recent years. With the additional significant challenge posed by the Covid19 pandemic, market conditions for retailing are likely to worsen. In this respect we note that a report issued by Price Waterhouse Coopers and the Local Data Company, 19th October 2020, indicates that shop closures hit record levels in the first half of 2020.

40. At present the plan cannot be considered effective or deliverable given that draft policies refer to Use Classes which no longer exist. This also

presents an inconsistency point with higher tier element of the planning system, in this case the Use Classes Order, as amended by the 2020 Regulations. Furthermore, in order to be effective and deliverable, policies should be sufficiently flexible; we consider this is not the case in relation to the draft retail policies. This also raises issues as to whether the plan is positively prepared in order to deliver sustainable development, including the need to ensure the vitality of town centres.

41. We request that the site allocation refers to and supports the provision of Class E, F1 and F2 floorspace, as well as other appropriate town centre uses which are Sui Generis. We also request that the Protected Frontages policy be deleted from the draft plan. We request that the draft NSP as a whole is reviewed and updated in relation to the changes to the Use Classes Order.

#### Site Capacity

42. The site allocation refers to an indicative residential capacity of 850 homes. Our current proposals are for in the range of 920-950 homes. It is helpful that the capacity is noted as indicative; however, we consider that 850 homes should be indicated as a minimum target in order to ensure the site contributes as much as possible towards LBS' housing supply. Alternatively/additionally, the policy wording should include a statement that 'housing delivery should be optimised beyond the indicative target'.

43. Draft NSP policy AV.14 (Peckham Area Vision) notes that development in Peckham should 'provide as many homes as possible of all tenures including social housing while respecting the local character'. The site allocation is not consistent with this approach as drafted.

44. In order to ensure the plan is positively prepared, the indicative housing capacity should be set as a minimum and/or wording with regards to optimisation should be included.

#### Tall Buildings

45. Please note that the 'clean' version of the consultation pdf is missing the section titled 'approach to tall buildings' within draft site allocation NSP71. This would appear to be a formatting error, on the basis that the text is present within the pdf but is invisible. We are happy to liaise with the policy

team to explain this further.

46. As above, we note and maintain previous comments regarding private views from the Bussey Building.

47. In addition, we note that there is a consistency issue across the plan in relation to tall buildings and views impacts. We are not aware of any other private views being protected within the plan. Furthermore, it is important to note that a substantial extent of the view proposed to be protected from the Bussey Building is being affected by and will be more significantly affected over time by tall building developments in the Old Kent Road Area Action Plan area, including those under construction, permitted through planning and pending for planning approval. We can provide verified views to illustrate this point should this be helpful in considering the consistency of approach across the borough in this respect.

48. I trust that these representations are helpful in further development of the draft policy. Please contact me should you have any questions.

49. We also request to be called upon to represent Tiger Developments at the Examination in Public.

Aylesham Community Action  
NSPPSV479.1

Document EIP 27A NSP 71 - Aylesham Centre and Peckham Bus Station  
(note: read in conjunction with PNAAP 1: Aylesham Centre)

Not positively prepared or justified

The site-specific guidance (PNAAP) states, "There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm".

This policy is not sound because the inclusion of a 'taller landmark building of up to 20 storeys' is not positively prepared, for the following reason:

A). There is inadequate evidence of community participation in supporting inclusion of a 20 storey building in this site allocation.

Representation noted.

The principle of tall buildings was established by the adopted Peckham and Nunhead AAP which has undergone public examination. P16 Tall Buildings also provides overarching guidance for tall buildings. Both the Peckham and Nunhead AAP and the NSP have been consulted on extensively.

Strategic policy SP1, sets out the need and vision for Quality Affordable homes and this applies, as an overarching vision to the Aylesham and Peckham Bus Garage site allocation. Furthermore, NSP75 outlines mixed use re-development of the site that will provide more affordable housing and create jobs.

Policy P16 Tall buildings and the tall buildings background paper and set out that the tall building must be sustainably designed meeting carbon reduction

PNAAP 1 / NSP 71 Aylesham Centre and Peckham Bus Station TALL BUILDINGS, AFFORDABLE HOUSING AND VIABILITY  
Not positively prepared, effective or justified

2. TOPIC: PNAAP 1 / NSP 71 Aylesham Centre and Peckham Bus Station TALL BUILDINGS, AFFORDABLE HOUSING AND VIABILITY

The site-specific guidance (PNAAP) states, "There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm".

This policy is not sound because the inclusion of a 'taller landmark building of up to 20 storeys' is not justified, for the following reason:

A). Since the adoption of the PNAAP in November 2014, evidence has grown - on tall buildings, affordable housing and viability - which now needs to be taken into consideration. See the examples cited below:

(i) The GLA has commissioned two studies that have looked at the relationship

between tall buildings and viability:

- London Plan Viability Study (Draft December 2017)
- Lessons from Higher Density Development (September 2016)

(GLA (2019b) Freedom of Information Request: Tall Buildings Affordable Housing and Viability for Planning Policy. FOI reference number:

MGLA100119-2766. Available via:

[https://www.london.gov.uk/sites/default/files/mgla100119-2766\\_-\\_foi\\_response.docx\\_redacted.pdf](https://www.london.gov.uk/sites/default/files/mgla100119-2766_-_foi_response.docx_redacted.pdf))

(ii) Evidence is accruing about the perceived low levels of affordable housing in tall buildings (Bailey, 2020; Marrs, 2019; Neate, 2018; Just Space, 2019; Wainwright, 2015). In particular, organisations such as the 35% Campaign in

standards onsite, ensure proper ventilation and heating and cooling, as well as provide amenity space both private and public and deliver communal open and play spaces.

The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework. In this case, the Peckham and Nunhead AAP outlines a height restriction of up to 20 stories to protect the character of the site area, which has been referenced in the NSP site allocation as follows: The site is within the setting of Rye Lane Peckham and Peckham Hill Street conversation areas, so any taller development should be set back from the Rye Lane shopping frontage, towards the eastern end of site, to mitigate its impact. Development massing should be directed to the east of the site to minimise impact on the view to the City from the Bussey Building rooftop. In any case an up to 20 storey height restriction on development proposals should be carefully considered to conform with guidance set out in the Peckham and Nunhead Area Action Plan. Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.

The NSP sets out an indicative residential capacity. The methodology behind this is set out in the updated Sites Methodology Paper.

Southwark have campaigned on behalf of their residents arguing that many tall buildings do not provide compliant levels of affordable housing (35% Campaign, 2016).

(Bailey C. (2020) Pretty Vacant: The 500 hi-rise towers that won't solve London's housing crisis. Action on empty homes. Published: 12th May 2020. Available via: <https://www.actiononemptyhomes.org/blog/pretty-vacant-the-500-hi-rise-towers-that-wont-solve-londons-housing-crisis> [Accessed 23 May 2020])

Marrs C., (2019) London towers approved despite affordable housing policy breach. Planning Resource: independent intelligence for planning professionals. Available via: <https://www.planningresource.co.uk/article/1583083/london-towers-approved-despite-affordable-housing-policy-breach> [Accessed 15 May 2020])

Neate R. (2018) Ghost towers: half of new-build luxury London flats fail to sell. The Guardian. Available via: <https://www.theguardian.com/business/2018/jan/26/ghost-towers-half-of-new-build-luxury-london-flats-fail-to-sell> [Accessed 14 June 2020]

Just Space (2019) Tall Buildings written statement in response to M41. London Plan Examination in public. 6 March 2019. Available via: <https://justspace.org.uk/hearings-eip-2019/> [Accessed 12 June 2020]

PNAAP 1 / NSP 71 Aylesham Centre and Peckham Bus Station TALL BUILDINGS – SOCIAL AND ENVIRONMENTAL IMPACT

Not positively prepared, effective or justified

The site-specific guidance (PNAAP) states, "There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm".

This policy is not sound because the inclusion of a 'taller landmark building of up to 20 storeys' is not justified, for the following reason:

A). There is inadequate evidence on the long-term environmental and social

impact of tall buildings, and poor understanding of the future refurbishment challenges if the block is privately owned.

#### PNAAP 1 / NSP71 Aylesham Centre and Peckham Bus Station TALL BUILDINGS AND VIEWS

Not positively prepared, effective or justified

The site-specific guidance (PNAAP) states, “There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm”.

This policy is not sound because the inclusion of a ‘taller landmark building of up to 20 storeys’ is not justified or positively prepared, for the following reasons:

A). In New Southwark Plan Submission Version document, page 22 – Tall Buildings and Views – site PNAAP1/NSP71 is outside the area identified as ‘possible location for tall buildings’. This indicates that there is no wider strategy of where tall buildings in the borough should be located.

B). The site lies within the Borough View of St Paul’s Cathedral from One Tree Hill; therefore the locating off a tall building on this site disrupts this view.

#### PNAAP 1 / NSP71 Aylesham Centre and Peckham Bus Station INDICATIVE CAPACITY – RESIDENTIAL UNITS

Not positively prepared, effective or justified

The PNAAP site-specific guidance indicates that 400 ‘residential units’ are appropriate for this site. The NSP indicates an indicative residential capacity of 850 ‘homes’.

This policy is not sound because the higher indicative residential capacity is not justified for the following reason:

A.) The provision of 850 residential units on this site will inevitably lead to the

<p>creation of a 'superdense' medium to high rise neighbourhood. There is no evidence that this is appropriate for Peckham town centre, which is generally low rise in character.</p>	
<p><b>Julie Brinkley</b> NSPPSV503</p> <p>NSP 71: Aylesham Centre and Peckham Bus Station (read in conjunction with PNAAP 1: Aylesham Centre). The following is based upon the document EIP27A – Proposed Changes to the submitted New Southwark Plan 2020 (Clean version). This appears to contradict the 'tracked changes' version EIP27B – Proposed Changes to the submitted NSP 2020 (Track Changes version). Assuming the 'clean' version to be the correct one, then I wholeheartedly commend Southwark Council for removing the section "Approach to tall buildings" from this site allocation policy.</p> <p>I would urge the policy to go further and specifically limit the height of any buildings on the site to nine stories which is in line with the Peckham Citizens' A Citizens' Charter for the redevelopment of the Aylesham Centre, Peckham. This charter was written in consultation with local people and gained over 5000 signatories in support, showing the general agreement that tall buildings are not appropriate in this location. There is no opposing evidence presented that tall buildings are wanted by local people and the Peckham and Nunhead Area Action Plan (PNAAP) is considerably out of date. It should explicitly be contradicted in this policy where it differs. The Charter also calls for between 35 and 50% genuinely and permanently affordable homes for local people, including a Community Land Trust and meaningful community engagement. I support the inclusion of a Community Land Trust and would urge the policy to be strengthened to call for the affordable housing to be proved to be affordable for local people. As this is a crucially important site within the community, I would also suggest that the policy can only be considered positively prepared and justified if it calls for</p>	<p>Representation noted.</p> <p>The absence of tall buildings guidance in the clean version of the NSP is an omission that will be added to the clean version so that it is in line with the track changes NSP.</p> <p>The creation of a Citizens Charter to assign uses to the site for Aylesham Centre and Peckham Bus Garage is noted. Southwark Council are currently updating the Statement of Community Involvement and producing two new documents to ensure greater consultation with communities and residents, the Developer's Consultation Charter and the Social Regeneration Charter.</p> <p>The principle of tall buildings was established by the adopted Peckham and Nunhead AAP which has undergone public examination. P16 Tall Buildings also provides overarching guidance for tall buildings. Both the Peckham and Nunhead AAP and the NSP have been consulted on extensively.</p> <p>The design and layout of any development coming forward will be expected to take into account the impact of the development on the existing character of the area as is set out in policies under SP2. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework. In this case, the Peckham and Nunhead AAP outlines a height restriction of up to 20 stories to protect the character of the site area, which has been referenced in the NSP site allocation as follows: The site is within the setting of Rye Lane Peckham and Peckham Hill Street conversation areas, so any taller development should be</p>

extensive community consultation that then can be shown to be enacted in any proposals.

The plan on page 369 showing the site, should include the Jones and Higgins Clock Tower as a building of architectural and historic merit. It is probably the most loved building in Peckham and is currently being proposed for Listing by Historic England. It would certainly feature on any 'local list' and while it is almost inconceivable that anyone should want to demolish it, it should be given as much protection in this document as is possible. It is even acknowledged as a "heritage asset" in the table on page 371. The same situation applied to nos.43-49 Rye Lane. In this respect the policy is not sound because it is not positively prepared.

The PNAAP site-specific guidance indicated that '400 residential units' would be appropriate on the site, however this has been increased to '850 homes' in the proposed NSP 71, without any evidence given that the site or surrounding neighbourhood can accommodate this increase, or that those who already reside nearby wish a very dense development to be built in what is a generally a low-rise town centre. Please note that I do not disagree that the provision of more than 400 homes on this site might be appropriate, however, the implications in terms of townscape, character and amenity for neighbours has not been demonstrated and therefore cannot be said to be appropriate or acceptable to the local community. This policy is not justified because it does not show how the other policies P12: Design of place, P19 Conservation areas and P18 Listed buildings and structures can be met and it is not evidenced by local community participation.

**If the EIP27B – Proposed Changes to the submitted NSP 2020 (Track Changes version) is to be the submitted version, then the following comments apply in addition:**

I do not consider the policy NSP 71: Aylesham Centre and Peckham Bus Station (Track Changes version) read in conjunction with PNAAP 1: Aylesham Centre to be sound because it is not positively prepared:

The policy is inconsistent because states "Careful consideration would also

set back from the Rye Lane shopping frontage, towards the eastern end of site, to mitigate its impact. Development massing should be directed to the east of the site to minimise impact on the view to the City from the Bussey Building rooftop. In any case an up to 20 storey height restriction on development proposals should be carefully considered to conform with guidance set out in the Peckham and Nunhead Area Action Plan. Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.

The NSP sets out an indicative residential capacity. The methodology behind this is set out in the updated Sites Methodology Paper. This is an indicative capacity. A detailed proposal would need to set out a definite figure as development comes forward

The Area Vision is not inconsistent with SP2 as the NSP is intended to be read as a whole and therefore it is not necessary to repeat these policies under each site allocation.

need to be given to the neighbouring residential areas and important local heritage buildings”, yet suggests that a taller building of up to 20 stories could be appropriate in this location. It is a well acknowledged principle of townscape planning that a tall building adjacent to much lower development, particularly those with heritage value, will tend to loom and causes harm. The site is surrounded by much lower buildings: 2-5 stories to the North on Peckham High Street, 3 (with some architectural features raising the level to 4 or 5) stories to the West on Rye Lane, 2-4 stories to the South on Hanover Park and 6-7 to the East on Mckerrell Road. The only tall building currently in the area is Whitcombe Point on the opposite side of Clayton road. This building is a remnant of the days when the ‘North Peckham Estate’ was synonymous with poverty, crime, poor living conditions and poor outcomes for residents on almost every scale. It is also an older building, closer to the end of its useful life than the beginning, and should not be taken as the benchmark for a vision for the future of Peckham. There is no part of this site where a building of 20 stories will not negatively impact both the living amenity of the existing residents, the quality of the townscape generally, or the setting of historic buildings and areas. Therefore the inclusion of a tall building runs contrary to the policies set out in P12 Design of Places regarding height, scale, massing and arrangement Mitigation of the impact on the Rye Lane Peckham and Peckham Hill Street conservation areas is proposed by siting any taller buildings to the eastern end of the site, yet a very tall building (such as 20 stories in this generally low-level context) has a very wide impact and will form the backdrop to not only the immediately adjacent areas, but also to important local views and therefore the setting of, such important buildings as the Jones and Higgins clock tower as it is approached from Camberwell along Peckham High Street, and to the Holly Grove conservation area, again causing harm to the nature and special architectural and cultural interest of the area and it’s many nonconformist chapels including the Grade II listed Rye Lane Chapel when seen from Highshore Rd. Therefore this policy runs contrary to the policies set out in P19 Conservation areas and P18

Listed buildings and structures, and P12: Design of place which states that development “must ensure height, scale, massing and arrangement must respond positively to existing townscape, character and context, and reveal local distinctiveness”. Yet these principles are not consistent with the inclusion of a tall building that is over three times higher than any surrounding building.

If, as referenced research states: “the character and feel of neighbourhoods influences community cohesion and social interaction” then NSP 71 should describe how this could be enacted on the Aylesham site.

NSP71: Aylesham Centre and Peckham Bus Garage (Track Changes version) and AV14: Peckham

Area Vision are also not consistent with SP2: Regeneration that works for all and SP4: Strong local economy as it is not shown how these intricately linked policies have been addressed in such a significant site in the town centre, particularly P34: Town and local centres which states that “Southwark's town centres are the central meeting places for residents... it is important to ensure that we maintain our town centres as lively and interesting places... each town centre has a unique identity that helps create a sense of place”. P2 New family homes states that “Family homes in apartment blocks should have direct access to outdoor amenity space and allow oversight of children outside so children will be encouraged to use the space and can safely do so.” However it is not explained how this can be accommodated in a tall building. If the policy is intended to address the (very real) local housing need particularly in affordable family housing, then it has not been positively prepared because it does not show how a tall building will do this, as compared with other typologies, see below for further explanation of this point.

**I do not consider the policy NSP 71: Aylesham Centre and Peckham Bus Station (Tracked Changes version) read in conjunction with PNAAP 1: Aylesham Centre to be sound because it is not justified:**

The justification in NSP 71 for the possibility of a tall building comes from its inclusion in the Peckham and Nunhead Area Action Plan (PNAPP) which is

widely acknowledged to be out of date and inconsistent with local opinion. There is no evidence given that this policy is supported by local people, in fact, there is no evidence that this policy was widely consulted on or that such a significant change was brought to public attention. To the contrary; there is evidence (a petition signed by over 5000 people two years ago) that when the possibility of a tall building on this site was brought to public attention, it was widely rejected. Continuing to entrench an out of date and unsupported policy by inclusion in NSP 71 is not justified.

This policy is also not justified because there is significant and growing evidence that tall buildings are not the best drivers for addressing the (very real) housing shortage. In fact, evidence supports the theory that this sort of development can create a demand from outside the area (including from overseas) that pushes up prices, while not delivering the type or number of affordable housing units required to address local need.

Please refer to the following:

(i) The GLA has commissioned two studies that have looked at the relationship between tall buildings and viability:

- London Plan Viability Study (Draft December 2017)
  - Lessons from Higher Density Development (September 2016)
- (GLA (2019b) Freedom of Information Request: Tall Buildings Affordable Housing and Viability for

Planning Policy. FOI reference number: MGLA100119-2766. Available via: [https://www.london.gov.uk/sites/default/files/mgla100119-2766\\_-\\_foi\\_response.docx\\_redacted.pdf](https://www.london.gov.uk/sites/default/files/mgla100119-2766_-_foi_response.docx_redacted.pdf))

(ii) Evidence is accruing about the perceived low levels of affordable housing in tall buildings (Bailey, 2020; Marrs, 2019; Neate, 2018; Just Space, 2019; Wainwright, 2015). In particular, organisations such as the 35% Campaign in Southwark have campaigned on behalf of their residents arguing that many tall buildings do not provide compliant levels of affordable housing (35% Campaign, 2016).

(Bailey C. (2020) Pretty Vacant: The 500 hi-rise towers that won't solve

London's housing crisis.

Action on empty homes. Published: 12th May 2020. Available via: <https://www.actiononemptyhomes.org/blog/pretty-vacant-the-500-hi-rise-towers-that-wont-solve-london-s-housing-crisis> [Accessed 23 May 2020]

Marrs C., (2019) London towers approved despite affordable housing policy breach. Planning

Resource: independent intelligence for planning professionals. Available via: <https://www.planningresource.co.uk/article/1583083/london-towers-approved-despite-affordable-housing-policy-breach> [Accessed 15 May 2020]

Neate R. (2018) Ghost towers: half of new-build luxury London flats fail to sell. The Guardian.

Available via: <https://www.theguardian.com/business/2018/jan/26/ghost-towers-half-of-new-build-luxury-london-flats-fail-to-sell> [Accessed 14 June 2020]

Just Space (2019) Tall Buildings written statement in response to M41. London Plan Examination in public. 6 March 2019. Available via: <https://justspace.org.uk/hearings-eip-2019/> [Accessed 12 June 2020]

I do not consider the policy NSP 71: Aylesham Centre and Peckham Bus Station (Track Changes version) read in conjunction with PNAAP 1: Aylesham Centre to be sound because it is not effective:

The policy does not include a strategy for what would happen in the event any tall building was not desirable to buyers/renters in the future. There is no suggestion as to how these could be stopped from becoming another run down and undesirable tower block, particularly considering the very high costs of maintenance for a tall building and the difficulties in carrying this out when the units are in private ownership.

A similar problem exists with its policy in setting a lower limit for retail space requirements but not an upper level. It does not address the increasingly

tenuous future of high streets generally and how a very large amount of new retail space could negatively affect the existing high street/s. For example, I understand that at least three existing retailers on Rye Lane, are considering moving into any future development at the Aylesham site. What then becomes of those retailers' existing prominent shops?

If the 'Clean' version: document EIP27A is the proposed version, then I fully support the changes made that remove any reference to a tall building on the Aylesham site in NSP71 and would hope that the comparable change can be made to P16 to make it consistent. If the references to tall buildings on the Aylesham site remain in NSP71 and P16, then I suggest that the removal of these references would help considerably in making the document sound by making it more consistent, justified and positively prepared.

Further, explicit reference to a tall building not being appropriate on the NSP71 site would make the policy consistent with P12 Design of place, P19 Conservation areas and P18 Listed buildings and structures.

The PNAAP (which was adopted in 2014 and written in the years preceding it), should be explicitly referred to as requiring revision and stated as supplanted by NSP71.

I propose that to make the policies above effective and legally compliant, they are rewritten in such a way to acknowledge their impact and affect upon each other, and to include strategies for the increasingly likely event that high street retailers will continue to operate more and more online, causing a very real possibility of existing high streets that are ghost towns with empty shops, while a privately owned area supplies all the required retail space.

Paula Orr  
NSPPSV136.4

NSP71 Aylesham Centre and Peckham Bus Station.  
Not justified, not positively prepared.

Open space

I do not consider this site allocation justified because there has been a large

The NSP sets out an indicative residential capacity. The methodology behind this is set out in the updated Sites Methodology Paper. This is an indicative capacity. A detailed proposal would need to set out a definite figure as development comes forward

increase in the indicative residential capacity specified in relation to the amount provided for in the Peckham and Nunhead Area Action Plan from 400 'housing units' in the PNAAP to 850 'homes' in the NSP. No justification is provided for why this very high housing density is now considered appropriate. All the evidence is that the allocation of housing should have been reduced, given the existence of the bus station on site. There is a lot of evidence about the problems faced by people living near to a bus garage, as a result of continuous noise and air pollution. A further consideration for not increasing the indicative residential capacity is the lack of provision for any green space for recreation: green corridors, walls and roof terraces do not allow residents to enjoy outdoor recreation. There is already a lack of greenspace in this part of the borough. Major residential development of the scale proposed should be accompanied by provision for significant greenspace to meet the needs of existing and future residents. Research by the developer Barratt London in 2019 found that 80% of respondents to the company's Green City Research study, rated trees and dedicated planted areas as the most important elements of a new build (<https://www.theconcretejungle.org/barratt-london-green-space/>) The need for greater provision of green space has been highlighted by the Covid-19 pandemic, which has seen people in city centres shut into apartments with no access to open space for recreation.

#### Suggested changes:

- Under 'Indicative residential capacity', change '850 homes' to '400 homes'.
- Under 'Redevelopment of the site must', add 'Provide at least 5 hectares of planted areas, parks and grassed areas and open space between buildings'.

#### Taller building

The site-specific guidance (PNAAP) states, "There is potential for a taller landmark building of up to 20 storeys, alongside a significant increase of meaningful public space and improved public realm".

The provision of green space and green infrastructure is dealt with elsewhere in the plan and in policies under SP6. Policies within Cleaner, Greener, Safer recognise the importance of open spaces (Policy P56) and green infrastructure (Policy P58). Policy P58 requires the provision of publically accessible open space and green links in major developments. Site allocations also identify where open spaces are required

The principle of tall buildings was established by the adopted Peckham and Nunhead AAP which has undergone public examination. P16 Tall Buildings also provides overarching guidance for tall buildings. Both the Peckham and Nunhead AAP and the NSP have been consulted on extensively.

The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework. In this case, the Peckham and Nunhead AAP outlines a height restriction of up to 20 stories to protect the character of the site area, which has been referenced in the NSP site allocation as follows: The site is within the setting of Rye Lane Peckham and Peckham Hill Street conversation areas, so any taller development should be set back from the Rye Lane shopping frontage, towards the eastern end of site, to mitigate its impact. Development massing should be directed to the east of the site to minimise impact on the view to the City from the Bussey Building rooftop. In any case of up to 20 storey height restriction on development proposals should be carefully considered to conform with guidance set out in the Peckham and Nunhead Area Action Plan. Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.

<p>I do not consider this policy sound because the inclusion of a ‘taller landmark building of up to 20 storeys’ is not positively prepared, for the following reasons:</p> <p>A) A 20-storey building would impact either directly or indirectly on the view of St Paul’s from One Tree Hill as well on as the iconic view from the top of the Multistorey Car Park (new Peckham Levels) towards central London.</p> <p>B). There is inadequate evidence of community participation in supporting inclusion of a 20 storey building in this site allocation.</p> <p>Suggested change: the policy should remove the reference to the taller landmark building of up to 20 storeys</p>	
<p><b>Nancy Coleman-Frank</b> <b>NSPPSV487</b></p> <p>TOPIC: PNAAP1/ NSP71 Aylesham Centre and Peckham Bus Station- Residential Units is not justified.</p> <p>PNAAP1 site-specific guidance indicates that 400 ‘residential units’ are appropriate for this site.</p> <p>The NSP indicates an indicative residential capacity of 850 ‘homes’. This policy is not justified because the two policy documents are in conflict. Additionally, an indicative residential capacity of 850 homes will create an extremely dense, high rise neighbourhood, not in keeping or appropriate for Peckham Town Centre.</p> <p>Suggest: the policy should remove the reference to indicative capacity of 850 residential units.</p> <p>TOPIC: PNAAP1/ NSP71 Aylesham Centre and Peckham Bus Station- Tall Buildings is not justified and not positively prepared.</p> <p>A taller building is defined at more than 30 metres (more than 12 storeys) (NSP71) Stated is the potential for a taller landmark building of up to 20 storeys (PNAAP1), alongside a significant increase in meaningful public space.</p> <p>PNAAP1/NSP71 ignores policies set out in:</p> <ul style="list-style-type: none"> <li>• in P12 (Design of places) ensuring height, scale, massing, arrangement and</li> </ul>	<p>Representation noted.</p> <p>The NSP sets out an indicative residential capacity. The methodology behind this is set out in the updated Sites Methodology Paper. This is an indicative capacity. A detailed proposal would need to set out a definite figure as development comes forward</p> <p>The principle of tall buildings was established by the adopted Peckham and Nunhead AAP which has undergone public examination. P16 Tall Buildings also provides overarching guidance for tall buildings. Both the Peckham and Nunhead AAP and the NSP have been consulted on extensively.</p> <p>The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework. In this case, the Peckham and Nunhead AAP outlines a height restriction of up to 20 stories to protect the character of the site area, which has been referenced in the NSP site allocation as follows: The site is within the setting of Rye Lane Peckham and Peckham Hill Street conversation areas, so any taller development should be set back from the Rye Lane shopping frontage, towards the</p>

<p>positive response to the existing townscape. A building of this height will not fit with the distinctiveness and architectural character of the current buildings.</p> <ul style="list-style-type: none"> <li>• in P13 (Design quality) ensuring specific design solutions to the site’s historic context, fitting to the location, context and scale. There are no buildings over six storeys in the vicinity of the proposed development.</li> <li>• in P16 2. (Tall buildings) not causing harmful impact on strategic views. The site lies within the Borough View of St Paul’s Church from One Tree Hill.</li> <li>• P16 3. (Tall buildings) avoiding environmental impacts such as wind shear, overshadowing and solar glare. A building of more than 20 storeys will inevitably cause such impacts.</li> <li>• in P19 (Conservation areas) regarding the significance of conservation areas. The plan encroaches on a conservation area which contains unlisted buildings of townscape merit.</li> </ul> <p>Suggest: the policy should remove the reference to the taller landmark building up to 20 storeys.</p>	<p>eastern end of site, to mitigate its impact. Development massing should be directed to the east of the site to minimise impact on the view to the City from the Bussey Building rooftop. In any case an up to 20 storey height restriction on development proposals should be considered to conform with guidance set out in the Peckham and Nunhead Area Action Plan. Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.</p>
<p><b>Girls About Peckham</b> NSPPSV4891.1</p> <p>I would like to comment: Aylesham Community Action The way this has been conducted is highly unfair and will it have the true affect that benefits the real people of Peckham. I was harrassed by the TIGER via email to take a call over the phone when it’s COVID-19 they sent me documents to read, however from documents I gathered a decision was made with the council. Again the Council are sneaky they should be held responsible for this too, to many are using this pandemic to better themselves ITS NOT ABOUT YOU it’s about OUR COMMUNITY and they never seem to have the people that voted them into power’s interest at heart or comments at a time like this.</p> <p>This old system that is being used is a huge failure and a great PUT OFF is that what you want? Seems so as those who’s opinions you really need cannot properly read and don’t have the time to read all that information along with</p>	<p>Representation noted.</p> <p>A planning application has not yet been submitted by Tiger Developments. They are currently engaging with the council in pre-application discussions about a proposal on the site. In line with the Development Consultation Charter, they must engage with the public at this stage. In line with government guidance, consultation can now take place virtually given the current restrictions in place relating to COVID-19</p>

knowing where to start from.

Peckham needs the REAL community to be heard WE are still here have been holding down this area, and still they don't get a chance or choice to be heard

Representation	Officer Response
<p data-bbox="188 316 638 343">NSP72 Blackpool Road Business Park</p> <p data-bbox="188 355 360 419">Adam Barnett NSPPSV423.2</p> <p data-bbox="188 464 360 528">David Cannon NSPPSV43.1</p> <p data-bbox="188 571 376 635">Matteo Bianchi NSPPSV457.1</p> <p data-bbox="188 751 1088 1066">NSP72 – EIP27A Blackpool Road site allocation I do not consider this policy sound. Some of the amendments are welcome and go in the right direction, but they do not yet make this policy sound on the tests of soundness – positively prepared, justified or effective. Changes are required and some suggested for the reasons explained below. But it needs such revision that it may be better to remove the site from the Plan and initiate discussions including Buildbase and other local businesses and local people in the area to develop a plan for the site and the surrounding area</p> <p data-bbox="188 1110 1111 1426">The Old Mill Building The Old Mill Building should be retained in any redevelopment of the site. The site allocation document does not specifically state that this building should be protected, stating only that ‘the site is in proximity of important undesignated heritage assets such as the railway viaduct and the site contains the Old Mill Building at 72 Copeland Road, which is of local interest’. This provides little protection over the building. A Local List will soon be prepared and the Old Mill Building will be nominated by local people. Suggested change: the site allocation document should state that the Old</p>	<p data-bbox="1140 427 1413 454">Representation noted.</p> <p data-bbox="1140 499 2063 671">The Old Mill Building The Old Mill Building is recognised as a building of historical and architectural merit. The wording highlights that development should seek to enhance and retain Victorian heritage assets, including former industrial buildings. This would include the Old Mill Building.</p> <p data-bbox="1140 716 2063 1066">Approach to commercial and taller buildings P16 Tall Buildings provides overarching guidance for tall buildings. The policy requires that tall buildings must have a height that is proportionate to the significance of the proposed location and the size of the site; and respond positively to local character and townscape – this would include the Rye Lane Conservation Area and any relevant heritage assets. The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework.</p> <p data-bbox="1140 1110 2063 1283">Density The residential capacity set out in the plan is an indicative figure. The methodology for this is set out in the updated Sites Methodology Report. The figure is not intended to be prescriptive and residential capacity will be considered in detail as development comes forward.</p> <p data-bbox="1140 1327 2063 1426">Employment Floorspace The quantum of employment space to be re-provided will be considered and confirmed through the preparation of a Statement of Common Ground.</p>

Mill Building specifically should be retained.

#### Approach to commercial and taller buildings

The site allocation says that commercial and taller buildings should be concentrated to the north of the site. This does not take into account the current location of Buildbase as a successful commercial building on the southern half of the site. It is also not appropriate to have tall buildings at the north end of the site as suggested, as it would not support the provision and implementation of the Peckham Coal Line as they would block the view. A tall building is not considered appropriate for this locality where the vast majority of dwellings are two stories. The maximum heights of the most recent developments are 6-7 stories. To be in keeping, and to ensure sunlight is not blocked from neighbouring properties, a maximum height should be added to the site allocation document.

Suggested change: height for a taller building should be set at 6 storeys subject to impacts on the Old Mill Building and amenity of existing neighbouring occupiers, and the location of commercial buildings should secure the future of Buildbase on the site.

#### Density\*

The site allocation states an indicative residential site capacity of 250 homes. This is a residential density of 142 dwellings per hectare (dph) given that the site is 1.758 hectares. This may be a suitable level of density for this site if it were all residential. However, the site allocation specifies that employment floorspace be re-provided on the site, so the site area and space for homes would be significantly reduced (as much of the site will be taken up by employment uses). This would push the density of the housing part of the site to much higher than 142 dwellings per hectare.

Suggested change: If employment floorspace is to be re-provided, the density of housing should be lowered. Alternatively, if the housing density is to be kept at 142dph, the amount of re-provided employment floorspace should be reduced to exclude the bus depot.

#### Low Line Walking Routes

The Peckham Coal Line has been encouraged and promoted through wider policies. Where relevant, site allocations require redevelopment to support the implementation of Peckham Coal Line. NSP P51 Low Line Routes makes specific reference to the requirement of development to support the implementation of the Peckham Coal Line.

#### Green Space

The provision of green space and green infrastructure is dealt with elsewhere in the plan and in policies under SP6. Policies within Cleaner, Greener, Safer recognise the importance of open spaces (Policy P56) and green infrastructure (Policy P58). Policy P58 requires the provision of publically accessible open space and green links in major developments. Site allocations also identify where open spaces are required

#### Traffic Plan

The NSP is intended as a strategic document and therefore detailed plans are not included. A Transport Assessment will be required to accompany any planning application for redevelopment of the site.

#### Surrounding Area

Any development that comes forward will be assessed against the policies in the NSP, which include design policies under SP2. Any impact on the surrounding area would be assessed when a development comes forward.

Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure

#### Employment floorspace

The employment floorspace calculations on the site allocation document appear to treat the bus depot as employment floorspace. However, given that the bus depot takes up much of the site and is not an industrial use, but parking bays for buses, this floorspace should be excluded from the amount needed to be re-provided on site. Suggested change: the employment floorspace to be reprovided should exclude the floorspace currently being used as the bus depot.

#### Low Line Walking Routes

It is welcome that the Peckham Coal Line is given protection in this neighbouring site allocation. But the site allocation document seems to suggest that the Peckham Coal Line is part of the site under its 'low line walking routes'. This is ambiguous and therefore needs to be better worded. Suggested change: the reference to the Peckham Coal Line should be redrafted for clarity.

#### Green space

The provision for green space in the site allocation which was in earlier versions has disappeared. It is an important principle to require greenspace as part of all new development. As connectivity is an important aspect of the site, the development plan should include green spaces, for example this may be green corridors as part of the traffic redesign. Suggested change: there should be a requirement for the development to include some green space.

#### Traffic plan

Local discussions list the unhealthy and dangerous traffic situation as a major issue. The site allocation document does not specify how a new development should resolve this. The traffic issues are now considerably worse because of the diversion of bus and commercial traffic from Rye Lane for Covid-19 social distancing. This may become a permanent feature. To be sound the development plan for the site must have an effective accompanying plan for

identified by the council in our Regulation 123 list.

<p>traffic management. Without that it is not compliant with the Council’s healthy (and safe) streets policies.</p> <p>Suggested change: there should be a requirement for a traffic plan for all the north–south and east-west traffic using Copeland Road, Consort Road and Heaton Road to ensure that road infrastructure is improved as part of any redevelopment. If it is not possible to include this in the site allocation, the site should be removed from the Plan to enable the traffic plan to be developed and agreed.</p> <p>Surrounding area The site is surrounded by a variety of residential areas, a primary school, a cultural enterprises quarter, and business premises. All of these would be impacted by the development and none are mentioned.</p> <p>Suggested change: the allocation should include a requirement that the development should show how it will enhance the surrounding area.</p> <p>Elements of the site allocation document that are supported</p> <ul style="list-style-type: none"> <li>• Recognition that the Old Mill Building is a heritage asset</li> <li>• Re-provision of employment floorspace if the figure is amended to exclude the bus depot.</li> <li>• The site is suitable for housing, provided this is not delivered in high-rise blocks.</li> </ul>	
<p>Tracy Simpson NSPPSV424.1</p> <p>NSP72 – EIP27A Blackpool Road site allocation</p> <p>I do not consider this policy sound. Some of the amendments are welcome and go in the right direction, but they do not yet meet the soundness tests – positively prepared, justified or effective. Changes are required and some suggested for the reasons explained below.</p> <p>GREEN SPACE - Where has the provision for green space in the earlier version gone. There should be a requirement for the development to include green</p>	<p>Representation noted.</p> <p>Green Space The provision of green space and green infrastructure is dealt with elsewhere in the plan and in policies under SP6. Policies within Cleaner, Greener, Safer recognise the importance of open spaces (Policy P56) and green infrastructure (Policy P58). Policy P58 requires the provision of publically</p>

<p>space.</p> <p>There needs to be a traffic plan for all of the north–south and east-west traffic using Copeland Road, Consort Road and Heaton Road to ensure that road infrastructure is improved as part of any redevelopment.</p> <p>Tall buildings should have a max height of 6-7 stories. The vast majority of dwellings in this locality are two stories.</p> <p>If the employment floorspace is to be re-provided then the density of housing needs to be lowered.</p> <p>The Old Mill Building should be retained in any redevelopment of the site.</p>	<p>accessible open space and green links in major developments. Site allocations also identify where open spaces are required</p> <p>The NSP is intended as a strategic document and therefore detailed plans are not included. As development comes is proposed a traffic plan that is appropriate to the development will come forward.</p> <p>P16 Tall Buildings provides overarching guidance for tall buildings. The policy requires that tall buildings must have a height that is proportionate to the significance of the proposed location and the size of the site; and respond positively to local character and townscape – this would include the Rye Lane Conservation Area and any relevant heritage assets. The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework.</p> <p>The residential capacity set out in the plan is an indicative figure. The methodology for this is set out in the updated Sites Methodology Report. The figure is not intended to be prescriptive and residential capacity will be considered in detail as development comes forward.</p> <p>The Old Mill Building is recognised as a building of historical and architectural merit. The wording highlights that development should seek to enhance and retain Victorian heritage assets, including former industrial buildings. This would include the Old Mill Building.</p>
<p>Judith Carlton NSPPSV451.1</p> <p>I do not consider this policy sound.</p> <p>Some of the amendments are welcome but they do not yet make this policy</p>	<p>Representation noted.</p> <p>This site was previously allocated in the Peckham and Nunhead Area Action Plan, which has been through Examination. Both the AAP and the NSP have been consulted on extensively.</p>

sound on the tests of soundness – positively prepared, justified or effective. Changes are required and some suggested for the reasons explained below.

Your plan requires such revision that the site be removed from the Plan and for the council to initiate discussions with local residents who live directly along the site lines as well as the local businesses including Buildbase in the area to develop a plan for the site and the surrounding area. Consultation regarding this plan has not actually involved local residents or businesses, which surely cannot make it viable, especially within such a densely populated site area.

#### Traffic Planning:

The existing situation of Consort Road and roads surrounding the proposed site present an increasingly dangerous traffic situation as a major issue.

The ongoing Rye Lane Diversion onto Consort Road has exacerbated the ongoing severe danger and unregulated speed limit of this narrow and already heavily overused road from Peckham High street traffic, well before the diversion was put in place to maintain distancing on Rye Lane.

There are no speed limit signs nor monitoring on this road, which is in constant, high volume usage 24 hours a day 7 days a week.

The site allocation document does not specify how a new development should resolve this. The traffic issues are now considerably worse because of the diversion of bus and commercial traffic from Rye Lane for Covid-19 social distancing which we are assuming could become a permanent feature.

To be sound, the development plan for the site must have an effective accompanying plan for traffic management and controls in place to ensure that this dreadful existing traffic route is redesigned and made safe. Without that it is not compliant with the Council's healthy (and safe) streets policies. The Stable Yard development currently underway on Consort Road, which

#### Traffic Plan

The NSP is intended as a strategic document and therefore detailed plans are not included. A Transport Assessment will be required to accompany any planning application for redevelopment of the site.

#### The Old Mill Building

The Old Mill Building is recognised as a building of historical and architectural merit. The wording highlights that development should seek to enhance and retain Victorian heritage assets, including former industrial buildings. This would include the Old Mill Building.

#### Approach to commercial and taller buildings

P16 Tall Buildings provides overarching guidance for tall buildings. The policy requires that tall buildings must have a height that is proportionate to the significance of the proposed location and the size of the site; and respond positively to local character and townscape – this would include the Rye Lane Conservation Area and any relevant heritage assets. The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework.

#### Density

The residential capacity set out in the plan is an indicative figure. The methodology for this is set out in the updated Sites Methodology Report. The figure is not intended to be prescriptive and residential capacity will be considered in detail as development comes forward.

#### Employment Floorspace

The quantum of employment space to be re-provided will be considered and confirmed through the preparation of a Statement of Common Ground.

features new homes, poses further issues for traffic management as it's entrance falls just prior to the notorious bottle neck of the corner of Consort and Copeland roads.

As local residents whose flats face out directly onto Consort Road, we witness regular traffic accidents of various scales. I cannot foresee how any of your proposed plans will improve this already dangerous situation and for this development to take place we require satisfactory plans and management schedules to ensure that safe access is established within the new site plans, as well as in the period leading up to such plans being underway as it is wholly unsafe as the traffic flow currently stands.

Essential Change to your Plan Proposal: ESSENTIAL requirement for an effective traffic plan for all the north-south and east-west traffic using Copeland Road, Consort Road and Heaton Road to ensure that road infrastructure is improved in advance of and as subsequent part of any redevelopment.

If it is not possible to include this in the site allocation, the site should be removed from the Plan to enable the traffic plan to be developed and agreed.

#### Approach to commercial and taller buildings

The site allocation says that commercial and taller buildings should be concentrated to the north of the site. This does not take into account the current location of Buildbase as a successful commercial building on the southern half of the site. It is also not appropriate to have tall buildings at the north end of the site as suggested, as it would not support the provision and implementation of the Peckham Coal Line as they would block the view. A tall building is not considered appropriate for this locality where the vast majority of dwellings are two stories. The maximum heights of the most recent developments are 6-7 stories. To be in keeping, and to ensure sunlight is not blocked from neighbouring properties, a maximum height should be

#### Low Line Walking Routes

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#### Green Space

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#### Surrounding Area

Any development that comes forward will be assessed against the policies in the NSP, which include design policies under SP2. Any impact on the surrounding area would be assessed when a development comes forward.

Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure identified by the council in our Regulation 123 list.

added to the site allocation document.

Requested change to plan: height for a taller building should be set at a maximum of 6 storeys to prevent severe loss of daylight to all residents living on the parameter of the proposed site.

Your current proposals will significantly reduce if not eliminate in some cases daylight for all residents of Sarawak Court. This is unacceptable, and has been designed / planned without any consultation with local residents and any consideration for our quality of life.

We therefore insist upon the completion of a Daylight and Sunlight Assessment to accompany your proposed plans for high density housing/buildings on this site, for residential feedback and consideration, as your development of this site will directly impede our living conditions.

#### Density

The site allocation states an indicative residential site capacity of 250 homes. This is a residential density of 142 dwellings per hectare (dph) given that the site is 1.758 hectares. This may be a suitable level of density for this site if it were all residential. However, the site allocation specifies that employment floorspace be re-provided on the site, so the site area and space for homes would be significantly reduced (as much of the site will be taken up by employment uses). This would push the density of the housing part of the site to much higher than 142 dwellings per hectare.

Suggested change: If employment floorspace is to be re-provided, the density of housing should be lowered. Alternatively, if the housing density is to be kept at 142dph, the amount of re-provided employment floorspace should be reduced to exclude the bus depot.

#### Green space

The provision for green space in the site allocation which was in earlier

versions has completely disappeared. It is a crucial principle to require greenspace as part of all new developments. As connectivity is an important aspect of the site, the development plan should include green spaces, for example this may be green corridors as part of the traffic redesign.

#### The Old Mill Building

The Old Mill Building should be retained in any redevelopment of the site. The site allocation document does not specifically state that this building should be protected, stating only that 'the site is in proximity of important undesignated heritage assets such as the railway viaduct and the site contains the Old Mill Building at 72 Copeland Road, which is of local interest'. This provides little protection over the building. A Local List will soon be prepared and the Old Mill Building will be nominated by local people.

Requested change to plan: the site allocation document should state that the Old Mill Building specifically should be retained.

Requested change: there should be a requirement for the development to include green space.

#### Employment floorspace

The employment floorspace calculations on the site allocation document appear to treat the bus depot as employment floorspace. However, given that the bus depot takes up much of the site and is not an industrial use, but parking bays for buses, this floorspace should be excluded from the amount needed to be re-provided on site.

Suggested change: the employment floorspace to be provided should exclude the floorspace currently being used as the bus depot.

#### Low Line Walking Routes

It is welcome that the Peckham Coal Line is given protection in this neighbouring site allocation. But the site allocation document seems to

suggest that the Peckham Coal Line is part of the site under its 'low line walking routes'. This is ambiguous and therefore needs to be better worded.

Requested change: the reference to the Peckham Coal Line should be redrafted for clarity.

#### Surrounding area

The site is surrounded by a variety of residential areas, a primary school, a cultural enterprises quarter, and business premises. All of these would be impacted by the development and none are mentioned.

Suggested change: the allocation should include a requirement that the development should show how it will enhance the surrounding area.

Elements of the site allocation document that are supported

- Recognition that the Old Mill Building is a heritage asset
- Re-provision of employment floorspace if the figure is amended to exclude the bus depot.
- Provided this is not delivered in high-rise blocks, the site is suitable for housing

Steve Storr  
NSPPSV455.2

Russell Court SHU is positioned at the junction of Copeland Road and Heaton Road. Its North wing looks out on Copeland Road and directly towards the Blackpool Road site. Some residents have shown an interest in the proposed housing development and its impact on this area. We were not approached formally for comment about this proposal and learned more from campaigners eager to preserve the historic mill building positioned on the site and facing Copeland Road.

As secretary of this TRA I would put you two points for consideration as

Representation noted.

This site was previously allocated in the Peckham and Nunhead Area Action Plan, which has been through Examination. Both the AAP and the NSP have been consulted on extensively.

The implications of a potential development on traffic would be assessed when the site comes forward for development. . A Transport Assessment will be required to accompany any planning application for redevelopment of the site.

NSP72 - EIP27A is reviewed.

1. The document should be withdrawn for further consultation with the broader community of site users, local residents and traders. Many of us wonder where a twenty-four hour bus garage, which takes up the majority of the ground space, will be re-located if the site is changed for residential and light industry use. There is also the question of a purpose built primary school adjacent to the site and whether it can remain in situ.
2. The site is enclosed by three major highways; Copeland Road, Consort Road and Heaton Road and now has east/west filter roads Blackpool Road and Brayards Road being heavily used twenty-four hours by bus routes, commercial traffic, private cars and emergency vehicles 'on call'. The rise in traffic density and the pollution it causes is now a health & safety risk that has escalated following the closure of Rye Lane to motor vehicles. The likelihood of this changed highway system and traffic flow becoming permanent will alter the desirability of new residential dwellings being located on the site, especially for young families. Time should be allocated to review this changed scenario before any decision to proceed is taken.

Eileen Conn  
NSPPSV56.2

NSP72 – EIP27A Blackpool Road site allocation

I do not consider this policy sound. Some of the amendments are welcome and go in the right direction, but they do not yet make this policy pass the tests of soundness – positively prepared, justified or effective. Changes are still required and some are suggested for the reasons explained below. It still needs such revision that it may be better to remove the site from the Plan and initiate discussions including Buildbase and other local businesses and local people in the area to develop a plan for the site and the surrounding area. But I now discover that Grafton’s the owner of Buildbase has also commented that the allocation is unsound and have asked for discussion on a Statement of Common Ground (SOCG). As a result I have also asked if I and other local people who are concerned about some of the same

Representation noted.

A SOCG can be written with anyone who has previously made a representation on this policy if they would like to partake in one.

The Old Mill Building is recognised as a building of historical and architectural merit. The wording highlights that development should seek to enhance and retain Victorian heritage assets, including former industrial buildings. This would include the Old Mill Building.

Approach to commercial and taller buildings

P16 Tall Buildings provides overarching guidance for tall buildings. The policy requires that tall buildings must have a height that is proportionate to the significance of the proposed location and the size of the site; and respond

issues as Grafton's could join in with those discussions. This may to some extent provide the opportunity for the discussion I proposed in my previous comments in 2018 if the site could be removed from the NSP. Those discussions under the SOCG process may enable me to withdraw the suggestion that the site be removed from the NSP. I comment below on the issues or facts that have come out as a result of the changes made to the allocation.

#### The Old Mill Building

I welcome the appearance of the Old Mill Building on the map. Over the last two years or so our Peckham Vision small team has arranged some workshops and drop ins to the Old Mill Building and conducted a survey about what the visitors think about the building. We have had over 100 surveys completed and almost all said that the building was an important part of Peckham's heritage from the industrial Victorian era, and that such a sturdy building with a large interior is an important community space. But the site allocation does not specifically state that this building should be protected, stating only that 'the site is in proximity of important undesignated heritage assets such as the railway viaduct and the site contains the Old Mill Building at 72 Copeland Road, which is of local interest'. This provides little protection over the building. A Local List (Policy P70) will soon be prepared and the Old Mill Building will be nominated by local people.

Suggested change: the site allocation document should state that the Old Mill Building specifically should be retained.

#### Approach to commercial and taller buildings

The site allocation says that commercial and taller buildings should be concentrated to the north of the site. This does not take into account the current location of Buildbase as a successful commercial building on the southern half of the site. New information is that Graftons have confirmed that they wish to remain on the site. Also the Peckham Coal Line has now been included in the site location details. While it is welcome to recognise links because of proximity with the Coal Line, the location of tall buildings at the north end of the site as suggested, would not support the provision and

positively to local character and townscape – this would include the Rye Lane Conservation Area and any relevant heritage assets. The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework.

#### Density

The residential capacity set out in the plan is an indicative figure. The methodology for this is set out in the updated Sites Methodology Report. The figure is not intended to be prescriptive and residential capacity will be considered in detail as development comes forward.

#### Employment Floorspace

The quantum of employment space to be re-provided will be considered and confirmed through the preparation of a Statement of Common Ground.

#### Low Line Walking Routes

The Peckham Coal Line has been encouraged and promoted through wider policies. Where relevant, site allocations require redevelopment to support the implementation of Peckham Coal Line. NSP P51 Low Line Routes makes specific reference to the requirement of development to support the implementation of the Peckham Coal Line.

#### Green Space

The provision of green space and green infrastructure is dealt with elsewhere in the plan and in policies under SP6. Policies within Cleaner, Greener, Safer recognise the importance of open spaces (Policy P56) and green infrastructure (Policy P58). Policy P58 requires the provision of publically accessible open space and green links in major developments. Site allocations also identify where open spaces are required

#### Traffic Plan

implementation of the Coal Line as they would block the view. In addition a tall building is not considered appropriate for this locality where the vast majority of dwellings are two stories. The maximum heights of the most recent developments are 6-7 stories. To be in keeping, and to ensure sunlight is not blocked from neighbouring properties, a maximum height should be added to the site allocation document.

Suggested change: height for a taller building should be set at 6 storeys subject to impacts on the Old Mill Building and amenity of existing neighbouring occupiers, the location of commercial buildings should secure the future of Buildbase on the site.

#### Density

The site allocation states an indicative residential site capacity of 250 homes. This is a residential density of 142 dwellings per hectare (dph) given that the site is 1.758 hectares. This may be a suitable level of density for this site if it were all residential. However, the site allocation specifies that employment floorspace be re-provided on the site, so the site area and space for homes would be significantly reduced (as much of the site will be taken up by employment uses). This would push the density of the housing part of the site to much higher than 142 dwellings per hectare.

Suggested change: If employment floorspace is to be re-provided, the density of housing should be lowered. Alternatively, if the housing density is to be kept at 142dph, the amount of re-provided employment floorspace should be reduced to exclude the bus depot.

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The employment floorspace calculations on the site allocation document appear to treat the bus depot as employment floorspace. However, given that the bus depot takes up much of the site and is not an industrial use, but parking bays for buses, this floorspace should be excluded from the amount needed to be re-provided on site.

Suggested change: the employment floorspace to be reprovided should exclude the floorspace currently being used as the bus depot.

#### Low Line Walking Routes

It is welcome that the Peckham Coal Line is given protection in this

The NSP is intended as a strategic document and therefore detailed plans are not included. A Transport Assessment will be required to accompany any planning application for redevelopment of the site.

#### Surrounding Area

Any development that comes forward will be assessed against the policies in the NSP, which include design policies under SP2. Any impact on the surrounding area would be assessed when a development comes forward.

Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure identified by the council in our Regulation 123 list.

neighbouring site allocation. But the site allocation document seems to suggest that the Peckham Coal Line is part of the site under its 'low line walking routes'. This is ambiguous and therefore needs to be better worded. Suggested change: the reference to the Peckham Coal Line should be redrafted for clarity.

#### Green space

The provision for green space in the site allocation which was in earlier versions has disappeared. It is an important principle to require greenspace as part of all new development. As connectivity is an important aspect of the site, the development plan should include green spaces, for example this may be green corridors as part of the traffic redesign.

Suggested change: there should be a requirement for the development to include some green space.

#### Traffic plan

In the several local discussions over the last two years about the future of this site, its current assets and its difficulties, a major issue raised by almost all is the unhealthy and dangerous traffic situation. The site allocation document does not specify how a new development should resolve this. The traffic issues are now considerably worse because of the diversion of bus and commercial traffic from Rye Lane for Covid-19 social distancing. This may become a permanent feature. To be sound, the development plan for the site must have an effective accompanying plan for traffic management. Without that it is not compliant with the Council's healthy (and safe) streets policies.

Suggested change: there should be a requirement for a traffic plan for all the north-south and east-west traffic using Copeland Road, Consort Road and Heaton Road to ensure that road infrastructure is improved as part of any redevelopment. If it is not possible to include this in the site allocation, the site should be removed from the Plan to enable the traffic plan to be developed and agreed.

#### Surrounding area

The site is surrounded by a variety of residential areas, a primary school, a

<p>cultural enterprises quarter, and business premises. All of these would be impacted by the development and none are mentioned.</p> <p>Suggested change: the allocation should include a requirement that the development should show how it will enhance the surrounding area.</p> <p>Elements of the site allocation document that are supported</p> <ul style="list-style-type: none"> <li>☑ Recognition that the Old Mill Building is a heritage asset</li> <li>☑ Re-provision of employment floorspace if the figure is amended to exclude the bus depot.</li> <li>☑ The site is suitable for housing, provided this is not delivered in high-rise blocks.</li> </ul>	
<p><b>Alberto Santin</b> <b>NSPPSV458.1</b></p> <p>NSP72 – EIP27A Blackpool Road site allocation</p> <p>I do not consider this policy sound. Some of the amendments are welcome and go in the right direction, but they do not yet make this policy sound on any of the tests of soundness – positively prepared, justified, effective.</p> <p>Having had a read through the proposed project I strongly object with regards to the following points:</p> <ul style="list-style-type: none"> <li>☑ In recent months we have noticed a massive increase in the levels of traffic on Consort road, this road initially was one way only. This was later changed and the road widened. Soon after this changed occurred we have had 2 fatal road traffic accidents. The road is also used for heavy traffic use, yesterday we saw two accident near misses, because oncoming traffic comes at speed, and the bend under the rail bridge doesn't allow cars to see vehicles. I believe that construction of these development with commercial space and considerable amount of dwellings will increase the traffic in an already congested road. No to mention the increased pollution and noise</li> <li>☑ I believe that building 250 dwellings will mean the building have to be considerably high aprx 15 floors. This is not in keeping with the</li> </ul>	<p>Representation noted.</p> <p>The NSP is intended as a strategic document and therefore detailed plans are not included. As development comes is proposed a traffic plan that is appropriate to the development will come forward.</p> <p>The residential capacity set out in the plan is an indicative figure. The methodology for this is set out in the updated Sites Methodology Report. The figure is not intended to be prescriptive and residential capacity will be considered in detail as development comes forward. P16 Tall Buildings provides overarching guidance for tall buildings. The policy requires that tall buildings must have a height that is proportionate to the significance of the proposed location and the size of the site; and respond positively to local character and townscape – this would include the Rye Lane Conservation Area and any relevant heritage assets.</p> <p>The Old Mill Building is recognised as a building of historical and architectural merit. The wording highlights that development should seek to enhance and retain Victorian heritage assets, including former industrial buildings. This would include the Old Mill Building.</p>

surrounded area and will block the light to our home. I feel a better option will be to built at 2 to 3 storey high.

☒ I would like more clarity with regard to protection the old mill at 72 Copeland road. And clarity regarding the coal line

David Pointer  
NSPPSV459.1

NSP72 – EIP27A Blackpool Road site allocation

I do not consider this policy sound. Some of the amendments are welcome and go in the right direction, but they do not yet make this policy sound on the tests of soundness – positively prepared, justified or effective. Changes are required and some suggested for the reasons explained below.

But it needs such revision that it may be better to remove the site from the Plan and initiate discussions including Buildbase and other local businesses and local people in the area to develop a plan for the site and the surrounding area

Approach to commercial and taller buildings

The site allocation says that commercial and taller buildings should be concentrated to the north of the site. This does not take into account the current location of Buildbase as a successful commercial building on the southern half of the site. It is also not appropriate to have tall buildings at the north end of the site as suggested, as it would not support the provision and implementation of the Peckham Coal Line as they would block the view. A tall building is not considered appropriate for this locality where the vast majority of dwellings are two stories. The maximum heights of the most recent developments are 6-7 stories. To be in keeping, and to ensure sunlight is not blocked from neighbouring properties, a maximum height should be added to the site allocation document.

Suggested change: height for a taller building should be set at 6 storeys but at the very northern end of the Blackpool Site so as not to impact on the

Representation noted.

P16 Tall Buildings provides overarching guidance for tall buildings. The policy requires that tall buildings must have a height that is proportionate to the significance of the proposed location and the size of the site; and respond positively to local character and townscape – this would include the Rye Lane Conservation Area and any relevant heritage assets. The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework.

natural daylight and privacy of residents in Sarawak Court and Copeland Road. Any proposed buildings opposite Sarawak Court should take the architecture of the building in consideration. The dwellings in Sarawak Court have floor to ceiling windows so any building opposite should be lower than three floors to avoid the loss of privacy of these residents. Anything higher than this would not only impact privacy but would also increase traffic noise due to a solid corridor deflecting the noise upwards, this would also be the case with increased pollution.

Peckham Heritage Regeneration Partnership  
NSPPSV471.4

NSP72 – EIP27A Blackpool Road site allocation

This policy states;

‘The site is in proximity of important undesignated heritage assets such as the railway viaduct and the site contains the Old Mill Building at 72 Copeland Road, which is of local interest. Other Victorian heritage assets on the site may be retained and enhanced, including former industrial buildings’

I do not consider this policy sound. It is not positively prepared or justified for the reason that it does not fully acknowledge the cultural and community significance of the Old Mill Building and the other Victorian heritage assets on the site.

Suggested change: the policy should state that the Old Mill Building should be retained.

The evidence is as follows: as chair of the Peckham Heritage Regeneration Partnership (PHRP), in summer 2019, I took part in an event called “Local Buildings That You Love” - in which local people were invited to nominate Peckham buildings that have meaning for them, that they wish to protect,

Representation noted.

The Old Mill Building is recognised as a building of historical and architectural merit. The wording highlights that development should seek to enhance and retain Victorian heritage assets, including former industrial buildings. This would include the Old Mill Building. This wording, alongside design policies in SP2, is sufficient in ensuring that the Old Mill Building is incorporated into development.

<p>and that create a sense of place and belonging. This event was well attended and generated ample evidence that The Old Mill Building is highly valued both as a community space and as a robust example of Victorian industrial heritage. The PHRP supports a Local List in Southwark. When the planned Local List (Policy P70) is prepared, the above evidence (see above) indicates that the Old Mill Building will be nominated by local people.</p>	
<p><b>TfL Spatial Planning</b> <b>NSPPSV181.18</b></p> <p>NSP72 – Blackpool Road Business Park We welcome the continued emphasis on the need to retain or re-provide a bus garage in any redevelopment of the site. In line with our comments on NSP25 and NSP26, existing bus garage capacity in the borough needs to be retained and enhanced to support the local bus network.</p>	<p>Representation noted.</p> <p>The site allocation states that the bus garage must be retained or reprovided subject to need.</p>
<p><b>Paula Orr</b> <b>NSPPSV136.5</b></p> <p>NSP72 Blackpool Road Business Park Not justified, not effective, not positively prepared I do not consider this policy sound. Some of the amendments since the previous consultation are welcome and go in the right direction. One example is the mention of the Old Mill Building as an unlisted heritage building. But these amendments do not yet make this policy sound on the tests of soundness as the Site Allocation has not been positively prepared and is not justified or effective. The major reasons for the unsoundness of this site allocation are:</p> <ul style="list-style-type: none"> <li>• The description of the site has a number of inaccuracies and there has been no proper audit of its existing assets, in terms of both its physical features and its economic and cultural setting.</li> <li>• The proposed allocation does not take into account the viability of existing uses and has not considered alternative options. This seems a major</li> </ul>	<p>Representation noted.</p> <p>The Development Consultation Charter will require developers to provide an audit of the site as development comes forward.</p> <p>The NSP is a strategic document and therefore does not provide detailed design guidance. Elements of a development such as traffic flow will be considered as the development comes forward</p> <p>NSP P51 Low Line Routes makes specific reference to the requirement of development to support the implementation of the Peckham Coal Line.</p> <p>Residential capacity The residential capacity set out in the plan is an indicative figure. The methodology for this is set out in the updated Sites Methodology Report. The figure is not intended to be prescriptive and residential capacity will be</p>

flaw as the possible continuation of some significant uses (e.g. the bus garage) would inevitably change the ways in which the site could be used.

- There is no evidence of any thinking of how the uses of the site should fit in with and enhance the overall area. The lack of consideration of the dangerous traffic arrangements and how these might be exacerbated by development is a crucial flaw in the site proposals.
- There is no clarity as to how some of the proposals included in the site allocation could be achieved (e.g. 'Development should support the provision and implementation of the Peckham Coal Line': the Peckham Coal Line is not on the site nor adjacent to it).

#### Policy objections

##### Indicative residential capacity

The site allocation states an indicative residential site capacity of 250 homes. This is a residential density of 142 dwellings per hectare (dph) given that the site is 1.758 hectares. This may be a suitable level of density for this site if it were all residential. However, the site allocation specifies that employment floorspace be re-provided on the site (which is welcome given the demand for employment floorspace in Peckham and throughout Southwark) so the site area and space for homes would be significantly reduced as much of the site will be taken up by employment uses. This would push the density of the housing part of the site to much higher than 142 dwellings per hectare, which would be unacceptable for this area, particularly given the infrastructure and traffic challenges mentioned below.

Suggested change: As employment floorspace is to be re-provided, the density of housing should be lowered.

##### Employment floorspace

The employment floorspace calculations on the site allocation document appear to treat the bus depot as employment floorspace. However, given that the bus depot takes up much of the site and is not an industrial use, but parking bays for buses, this floorspace should be excluded from the amount needed to be re-provided on site.

Suggested change: the employment floorspace to be re-provided should

considered in detail as development comes forward.

##### Employment Floorspace

The quantum of employment space to be re-provided will be considered and confirmed through the preparation of a Statement of Common Ground.

##### Peckham Coal Line

The Peckham Coal Line has been encouraged and promoted through wider policies. Where relevant, site allocations require redevelopment to support the implementation of Peckham Coal Line. NSP P51 Low Line Routes makes specific reference to the requirement of development to support the implementation of the Peckham Coal Line.

##### Approach to commercial and taller buildings

P16 Tall Buildings provides overarching guidance for tall buildings. The policy requires that tall buildings must have a height that is proportionate to the significance of the proposed location and the size of the site; and respond positively to local character and townscape – this would include the Rye Lane Conservation Area and any relevant heritage assets. The London View Management Framework alongside policy P21: Borough Views protect important Borough and Strategic London views. The NSP has been prepared in conformity with the NPPF and London Plan and does not conflict with the London View Management Framework.

##### The Old Mill Building

The Old Mill Building is recognised as a building of historical and architectural merit. The wording highlights that development should seek to enhance and retain Victorian heritage assets, including former industrial buildings. This would include the Old Mill Building.

##### Green Space

The provision of green space and green infrastructure is dealt with elsewhere in the plan and in policies under SP6. Policies within Cleaner, Greener, Safer

exclude the floorspace currently being used as the bus depot.

Design and access guidance: Peckham Coal Line

It is welcome that the Peckham Coal Line (which runs along the north side of the railway line to the north of this site) is given protection in this neighbouring site allocation. Unfortunately, this stated protection is undermined by the proposal that tall buildings should be concentrated towards the north of the site. Tall buildings on this part of the site would be in close proximity to the Peckham Coal Line and would block attractive views south towards One Tree Hill and the remains of the Great North Wood. Overall, the site allocation lacks clarity about where the Peckham Coal Line is, with the suggestion in the 'low line walking routes' section that the Peckham Coal Line is part of the site. This is ambiguous and therefore needs to be better worded.

Suggested change: the reference to the Peckham Coal Line should be redrafted for clarity.

Approach to commercial and taller buildings

The site allocation says that commercial and taller buildings should be concentrated to the north of the site. This does not take into account the current location of Buildbase as a successful commercial building on the southern half of the site. Taller buildings are not considered appropriate for this area where the vast majority of dwellings are two stories. Local residents, e.g. in the nearby two-storey Atwell Estate, have expressed concern about overshadowing by current 6-7 storey development on the west side of Copeland Road. To be in keeping with the character of the area, to avoid obstructing views from the Peckham Coal Line and to ensure sunlight is not blocked from neighbouring properties, a maximum height should be added to the site allocation document.

Suggested change: height for a taller building should be set at 4 storeys subject to impacts on the Old Mill Building and amenity of existing neighbouring occupiers, and the location of commercial buildings should provide for the future of Buildbase on the site.

Impacts on Listed Buildings or undesignated heritage assets

The policy is not properly evidenced. In the section 'Impacts Listed Buildings

recognise the importance of open spaces (Policy P56) and green infrastructure (Policy P58). Policy P58 requires the provision of publically accessible open space and green links in major developments. Site allocations also identify where open spaces are required

Traffic Plan

The NSP is intended as a strategic document and therefore detailed plans are not included. A Transport Assessment will be required to accompany any planning application for redevelopment of the site.

Surrounding Area

Any development that comes forward will be assessed against the policies in the NSP, which include design policies under SP2. Any impact on the surrounding area would be assessed when a development comes forward.

Policy IP3 (community infrastructure levy (CIL) and section 106 obligations) requires proposed development that may result in potential adverse impacts to be offset by using S106 legal agreements. This requires the developer to either offset the impact or pay the council a financial contribution to enable the council to offset the impact. In addition, the council will secure money from the community infrastructure levy to fund the essential infrastructure identified by the council in our Regulation 123 list.

or undesignated heritage assets', the site allocation mentions the (offsite) railway viaduct and the Old Mill Building and says, 'Other Victorian heritage assets on the site may be retained and enhanced, including former industrial buildings.' Apart from the Old Mill Building, there are no Victorian heritage assets on the site.

The Old Mill Building should be retained in any redevelopment of the site.

The site allocation document does not specifically state that this building should be protected, providing little protection for the building. There is strong local interest in the heritage aspects of the building with over 101 of 105 people who completed a survey about the value and uses of the building stating that 'The building is an important part of Peckham's heritage.' A Local List will soon be prepared and the Old Mill Building will be nominated by local people. The building has been used as a space for community activities for almost 15 years.

Suggested change: the site allocation document should state that the Old Mill Building specifically should be retained.

#### Green space

The provision for green space in the site allocation which was in earlier versions has disappeared. It is an important principle to require greenspace as part of all new development. As connectivity is an important aspect of the site, the development plan should include green spaces, for example this may be green corridors as part of the traffic redesign.

Suggested change: there should be a requirement for the development to include some green space and consider connectivity with nearby green spaces such as Dr Harold Moody Park on Sturdy Road.

#### Traffic plan

Local discussions list the unhealthy and dangerous traffic situation as a major issue. The site allocation document does not specify how a new development should resolve this. The traffic issues are now considerably worse because of the diversion of bus and commercial traffic from Rye Lane for Covid-19 social distancing. This may become a permanent feature. To be sound the development plan for the site must have an effective accompanying plan for

traffic management. Without that it is not compliant with the Council's healthy (and safe) streets policies.

Suggested change: there should be a requirement for a traffic plan for all the north-south and east-west traffic using Copeland Road, Consort Road and Heaton Road to ensure that road infrastructure is improved as part of any redevelopment. If it is not possible to include this in the site allocation, the site should be removed from the Plan to enable the traffic plan to be developed and agreed.

Surrounding area  
The site is surrounded by a variety of residential areas, a primary school, a cultural enterprises quarter, and business premises. All of these would be impacted by the development and none are mentioned.

Suggested change: the allocation should include a requirement that the development should show how it will enhance the surrounding area.

Summary  
The lack of clarity in this site allocation document about the site, its current uses and how it fits with the local area are so major as to undermine the credibility of the site allocation. Furthermore, the proposals put forward do not reflect any thought about the choices to be made between different uses nor the infrastructure (specifically, road and traffic management infrastructure) required. For these reasons, I suggest that this site is removed from the NSP and that the Council carry out a proper audit of the area, involving local people.

Clyde Watson  
NSPPSV450.1

Not justified, Not effective, Not positively prepared.  
The proposal for redevelopment of this site is not justified for the following reasons:

- It is an artificial site made up of separate plots of land, different buildings and uses who have not been properly consulted.
- There has been no proper audit of its existing assets, in terms of both its

Representation noted.

Changes to the Use Class Order will be addressed in the matters raised by the Inspectors.

The Development Consultation Charter will require developers to carry out an audit of the site as development comes forward before development begins.

physical features and its economic and cultural setting.

- It does not take into account the viability of existing uses.
- The proposal is riddled with inaccuracies and totally misleading assertions

In more particular

#### SITE ADDRESS

The name 'Business Park' is artificial and invented to give the proposal a specious legitimacy at odds with the suggested uses that are predominantly residential.

#### PLANNING USE CATEGORIES

These are misleading and out of date.

\* The figures presumably refer to the Use classes in operation up to Aug 31st 2020. These are now considerably altered and this section therefore needs amending to reflect this. Class B has now been replaced by a new class E for example. Can we see how the area has been calculated? It appears somewhat higher than shown.

\* The phrase 'builders yards' is misleading: there is one space currently used as a Builders Merchants yard, albeit this appears to be divided into sub-spaces for operational purposes.

\* There is no mention of the hostel which is a Class C2 Residential Institution, nor of the Old Mill Building which is currently used as a place of worship, Class D1.

#### PLANNING USES WITHIN THE SITE BOUNDARY: AN AUDIT

It should be a prerequisite of any proposed development that a proper and publically accessible audit of existing uses is prepared under the following headings.

Site areas

Current functions and ownership

Description of existing features and spaces

The residential capacity is an indicative figure. The methodology for calculating this is set out in the updated Site Methodology Report.

The design and layout of any development coming forward will be expected to take into account the impact of the development on the existing character of the area as is set out in policies under SP2.

The Peckham Coal Line has been encouraged and promoted through wider policies. Where relevant, site allocations require redevelopment to support the implementation of Peckham Coal Line. NSP P51 Low Line Routes makes specific reference to the requirement of development to support the implementation of the Peckham Coal Line.

Current employment and residential figures  
Future availability for development  
Future intentions of existing owners/tenants  
Viability of retaining existing uses and buildings  
Historic and architectural significance of existing features

Very few of these topics are addressed and where they are alluded to, the relevant information is seriously inadequate. The current uses appear to be as listed below, with major omissions noted as follows.

- TFL Garage

No mention of site area, existing employees or the exact function of this facility, whether it is for maintenance, bus storage or administrative purposes. The fact that TFL appears totally uncertain as to its future makes it impossible for both the public and potential developers to formulate the realistic scope and scale of any proposal.

- Road Works Depot

This is said to be owned by Southwark Council and similar remarks apply. There is no mention of the exact purpose and significance of this facility, nor any indication of where and when it would relocate.

- 86-96 Copeland Road:

This is a residential hostel owned by the Council and is a three storey building about 40 years old. There is no statement regarding proposals for relocating this facility. Apart from having a fair amount of trees, it is not an attractive site and is at a bend in Copeland Road facing north and directly facing the railway embankment. As such any proposal for the site should include a positive evaluation of its future.

- The Old Mill Building

This is one of the largest structures on the northern part of the site and has in recent years been recognised as a building of local historic significance. It is owned by the Council and is presently rented to a local church that has stated a strong desire to remain in the building for the foreseeable future. The precise location of the building bisects the northern part of the site: it is

suggested this feature could affect the viability of any commercial development. The Council's prospectus merely notes the existence of the Building as an 'important undesignated heritage asset' but then refers to other important heritage assets which it says should be retained and enhanced. Strictly there are no others.

- Builders Merchant

This development occupies a major part of the overall site and is divided into brick buildings and open yards. It has been there as such for 40 years and presumably replaced the original terraced housing built in the 1870s.

#### PLANNING CONTEXT

There is no attempt to justify redeveloping this land in the wider context of Peckham town centre nor its peripheral residential areas. It is merely stated the site should 'provide new homes'. A figure of 250 is mentioned suggesting the prime purpose is to help meet the Council's target of 11,000 new houses within 25 odd years. If so this should be more explicitly stated. Other than a bland reference to amenity space and permeability, there are no suggestions as to how this might be achieved.

The real deficit is there is no consideration of how new development might impact on the surrounding context, and in particular little if any reference to how new design might reflect or enhance the existing setting. In addition to a building audit there should be at least some basic assessment of existing developments surrounding the site. The following adjoining areas are suggested with design implications noted where appropriate.

- Railway Arch and the proposed Coal Line

The skew-back brick bridge and high level viaduct are together distinctive features which define the northern boundary. The Coal Line is misleadingly referred to as requiring 'support and implementation' but it is difficult to see how this can be achieved by developing this piece of land, bearing in mind the proposed alignment of the Coal Line is on the north side of the viaduct and will not impinge on the site in any direct way. It is appropriate that these

features are name-checked bearing in mind one is a distinctive historical feature and the other a major aspirational proposal for Peckham

\* Consett Road This is a recent residential development of 3 to 7 storeys of some architectural distinction. This should possibly provide ideas for a new context but this is not followed up.

\* Mary Magdalene CoE Primary School. The juxtaposition of a primary school and a new large scale residential proposal could be a challenging constraint and should be highlighted at an early stage. The building is relatively new and replaces a Victorian school of the same name previously located further down Consett Road.

• 19 - 31 Sandlings Close. These are 13 no. low rise terrace houses with rear gardens backing onto Brayards Road with issues arising as to potential loss of amenity.

• 48 - 52 Copeland Road. These three houses are strictly within the geographic curtilage of the proposed site but there is no reference to this, presumably because their planning use is already C3. This is an oversight as there will inevitably be some impact on them and vice versa.

• The Atwell Estate. This is a large housing development, originally a Council estate lying on the south west perimeter and consisting of two storey terraces grouped around small pedestrian squares. The houses nearest Copeland Road are set back giving rise to grassed areas which may provide some suitable distancing for new development

• Copeland Park. The main entrance is somewhat unobtrusively located nearly opposite the Old Mill Building. Bearing in mind the significance of the Copeland Park estate in the centre of Peckham, any development must at the very least be consistent with the nature of this creative hub.

• 137 - 139 Copeland Road. These are overlooked historical assets known as the 'Safe Houses' situated adjacent to the Copeland Park entrance. They are two remaining examples of a familiar house type, the small mid Victorian terrace, once ubiquitous across many parts of South London but today mostly demolished. It should be remembered that virtually the entire

Blackpool Road site was once built over with this house type. These houses are presently used for art and filming purposes.

- 141-151 Copeland Road: These are properties in marginal industrial use. In their present use they would appear to have little impact on new residential development, albeit a somewhat adverse one.

- Road network. The A215 links Queens Road with Peckham Rye and the south. This is a local strategic route and is effectively bisected by the site with northbound traffic using Copeland Road, and southbound traffic using Consett Road. It parallels and currently replaces Rye Lane as a cross route and for a local road it generates a fair amount of traffic. There should be a separate assessment of future traffic patterns including the pedestrianisation of Rye Lane as they will impact on the site.

The one-way system at the junction of Consett Road and Copeland Road is ambiguous and should be addressed. It should be noted there was a suggested TfL link road intended to simplify this junction that was never implemented.

It may not have been formally abandoned and thus should be clarified.

#### CONCLUSION

The proposed site is sufficiently close to the south end of Rye Lane to suggest some speculation on its impact on the town centre might be appropriate but there is none stated. Equally no questions are raised concerning how the existing infrastructure might in turn affect the new proposal. The immediate area is largely residential but that should be an incentive to explore public sector solutions. How about micro-housing for key workers, Council owned housing development companies, social enterprise developments? There is no evidence of any thinking on these lines.

The NSP prospectus is silent on any kind of innovative thought. It is narrow, misinformed and depressing. In short it is a disgrace and as such fails to meet any of the tests of soundness noted above and should be taken out of the NSP forthwith.

Representation	Officer Response
<p>NSP73 Land between the railway arches (East of Rye Lane including railway arches)</p>	
<p>Turley on behalf of The Arch Co NSPPSV475.1</p> <p>AUGUST 2020) 117-125 &amp; 129 RYE LANE, PECKHAM SE15 5LE - (PROPOSED SITE ALLOCATION NSP73) INTRODUCTION</p> <ol style="list-style-type: none"> <li>1. These representations have been prepared by Turley on behalf of the Arch Company (the Arch Co), freehold owners of the above site (the Site) since February 2019.</li> <li>2. These representations are for consideration in relation to the August 2020 Local Plan consultation on the Proposed Changes to the Submitted New Southwark Plan – EIP27A (the August 2020 Draft NSP).</li> <li>3. These representations are purposed to establish a deliverable planning framework between the Council and the Arch Co, which clearly sets out how to best optimise the redevelopment of this sustainably located site and support development viability. This is to ensure that the Council’s vision for the Site’s redevelopment in the emerging New Southwark Plan (NSP) can be delivered, together with the community benefits that will flow from this vision, for the benefit of the wider town centre regeneration.</li> <li>4. The Arch Co acquired the Site in February 2019 as part of the Network Rail commercial estate portfolio sale. The Arch Co now manages a portfolio of around 5,200 properties, making it the UK’s largest small business landlord, serving thousands of business owners who make a unique and vital contribution to the UK economy.</li> <li>5. The Site is a significant holding within Peckham and is one of many of the Arch Co’s property assets in the area. It is a relatively constrained site, including relative to others within the portfolio, and policy aspirations must facilitate the delivery of a viable scheme at the site in order to enable it to</li> </ol>	<p>Representation noted.</p> <p>The allocation of uses on the site maximises our strategy for employment uses. The allocation also seeks to improve the connectivity of the site to the north and east to west.</p> <p>The NSP’s approach to the new Use Class Order will be addressed in the matters issued by the Inspectors.</p> <p>The site allocation will be updated to reference the existing community use as a church. Any application coming forward on the site that does not re-provide the church, will have to comply with Policy P46 and provide robust marketing evidence.</p> <p>The allocation is flexible in terms of provision of a market, it acknowledges that there is potential to create a market but this is not a site requirement.</p>

come forward.

6. Former Site owners Network Rail did not previously submit any representations for the new Local Plan in relation to the site. At the time of the Arch Co acquisition of the Site, the previous New Southwark Plan consultation period had already commenced. The company did not have sufficient time to assess its options for the Site prior to the consultation period closing in May 2019 and so was not in a position to constructively comment on the initial site allocation consultation. Thus the Arch Co was previously unable to submit representations relating to the Site.

7. Since then, having undertaken market research and feasibility studies, and in the wake of the Covid-19 Pandemic, Arch Co believes the site offers a potential regeneration opportunity for a mixed use scheme provided that this can incorporate residential uses, which should be supported within a revised site allocation policy.

8. Therefore, in accordance with the specific terms of the August 2020 NSP consultation set out by the London Borough of Southwark, we make these representations, relating to NSP Site Allocation NSP73, on behalf of the Arch Co, which was unable to comment on the NSP consultation content at the time and now wishes to do so.

#### SOUNDNESS

9. National Planning Policy Framework (NPPF) paragraph 35 states that plans are 'sound' if they are:

- positively prepared, seeking to meet objectively assessed needs;
- justified, taking account of reasonable alternatives and being evidence-based;
- effective and deliverable, and
- consistent with national policy, enabling the delivery of sustainable development.

10. We consider below how various matters of soundness are raised by outstanding issues with the revised wording of the draft NSP.

#### THE SITE

11. The Site comprises approximately 2 acres (0.81ha) of land in Peckham (see attached Arch Co Demise Site Plan, showing Arch Co land in blue), with a

three storey building (circa 1,599 sqm GIA) fronting Rye Lane (117-125 and 129 Rye Lane), 30 railway arches and associated open land. The site is situated directly opposite Peckham Rye Station and the proposed new square, subject to demolition of the existing arcade buildings, and has direct access from Rye Lane at one end and Consort Road at the other. The Site has a prominent location within Peckham's Major Town Centre and presents a fantastic opportunity for a redevelopment scheme to make an enhanced contribution to the town centre.

12. The Site contains undesignated heritage assets including the railway viaduct and the 'C&A Building', at 117-125 Rye Lane, which is Art Deco in style and a 'building of local interest' according to the Rye Lane Peckham Conservation Area Appraisal. Town centre uses on the Site, fronting Rye Lane, include retail (Class E, at the ground floor of the C&A Building) and a church (Class F.1, on the first and second floor of the C&A Building), all currently in use. The rear of the Site leading back from Rye Lane is in active employment use by a scaffold merchant (Class B8), though large areas of this use are open yard space.

Existing uses

117-125 Rye Lane

1,598 sqm GIA over ground – second floors, comprising:

- 533 sqm relates to ground floor retail (two units)
- 1,066 sqm relates to the church on first and second floors

Railway Arches

30 arches, of which 25 relate to scaffolder business; all accessed from the south and none double frontage, albeit arch 142 provides access to/from Consort Road.

Uses within the arches are as follows:

- Arch 138 – 54sqm (scaffolder demise – B8 Use)
- Arches 139-143 open arches – scaffolder demise – B8 land use)
- Arches 144-151 - 428 sqm (scaffolder demise – B8 Use)
- Arches 152-155 open arches (scaffolder demise – B8 Use)
- Arches 156-162 – 375 sqm (scaffolder demise – B8 Use)
- Arch 163 – 81 sqm Class E Use (Hanar Kurdish Restaurant)

- Arch 164 – 80 sqm Class E Use (Budget Carpets)
- Arch 165 – 78 sqm Class E Use (Budget Carpets)
- Arch 166 – 78 sqm Class E Use (Budget Carpets)
- Arch 167 – 89 sqm Class E (Ali's Greengrocers 115A Rye Lane)

#### Other Buildings

- 47 sqm (barber shop adjacent to railway line on Rye Lane)
- Mobile stalls (books, takeaway food) on southern edge, excluded from floorspace measurements

#### Scaffolder Business

- No measureable building floorspace – open yard and open sided (covered) storage

13. Therefore, excluding the church in accordance with NPPF definitions, town centre uses equate to 1,053 sqm. The enclosed B8 Use (Please refer to 60. Turley on behalf of The Arch group Co in the Consultation Response folder for table)

14. The Site is proposed to be allocated in the August 2020 Draft NSP within Site Allocation NSP73 'Land between the railway arches (East of Rye Lane including railway arches)' (the Site Allocation). However, the Site does not comprise the whole area of the Site Allocation, as it excludes the southern set of railway tracks and most of the land bordering this track. It does however include all the Major Town Centre frontage along Rye Lane within the Site Allocation.

15. The excluded land remains in the ownership of Network Rail and comprises the Site Allocation's southern set of railway tracks, railway embankments and retaining walls. This land is not developable and cannot be relied upon to deliver any of the additional floor space, additional active frontages or permeability improvements envisioned by the Council and set out in the draft Site Allocation.

16. The area of land identified in blue, to the north of the southern set of railway tracks, in the attached plan, is the Arch Co's land interest and is therefore considered to represent the developable portion of the draft NSP

Site Allocation. We therefore propose that the site allocation extent should be reduced to cover only the extent of the Arch Co land.

17. For the avoidance of doubt, this would also now exclude 127-129 Rye Lane (in the Arch Co's ownership) from the revised site allocation, as little strategic, feasibility or viability benefits would be derived from including this relatively small, separate site in the Site Allocation.

#### DELIVERABILITY OF THE SITE ALLOCATION

##### Provision of Town Centre Use and Employment Floorspace

18. The majority of the Site leading east from Rye Lane has been designated within the Peckham Major Town Centre. The vision for this Town Centre is currently set out in the Peckham and Nunhead Area Action Plan (PNNAP). It aims to balance delivering as many homes as possible with providing jobs, protecting industrial and office locations, continuing with vibrant town centres and protecting open space and historic characteristics.

19. Adopted PNAPP and emerging NSP policies protect town centre (nominally A Class uses; however this is now out-of-date) and Class B employment uses on the site. As such, these uses could be required to be re-provided as part of redevelopment proposals for the Site, subject to the full range of relevant planning considerations, including feasibility and viability.

20. Whilst we broadly agree with the principle of town centre and employment floorspace provision, we note that any approach requiring re-provision of the existing quantum of floorspace (including as a result of other policies within the draft NSP) should be based on measurable (internal) floorspace and not include any requirement to re-provide open yard space), which would significantly undermine prospects for viable redevelopment of this important town centre site to occur.

21. Furthermore, we request the need for a broader range of flexible mixed uses across the Site. This will enable the initial redevelopment but will also promote more market responsive, sustainable development.

22. To balance the Council's commercial use vision for the Site Allocation (which includes new active frontages within the Site) with development viability, it is necessary to allow greater flexibility in the Site Allocation on the required re-provision quantum of commercial floor. In particular, the

provision of active frontages within the site may limit the deliverable amount of B class floorspace, such that it may not be possible to fully re-provide the existing quantum. We consider that the policy should state:

‘provide employment floor space (B class) where this is consistent with the overall vision presented by this site allocation and does not conflict with the provision of active town centre frontages’.

23. Furthermore, whilst emerging NSP policy P46 would protect the church (Class F.1) on the Site, despite its lawful consent in 1997 the church has not featured in the Council’s vision for the Site Allocation at any point even since the 2014 PNAAP allocation. We suggest that town centre uses would be more appropriate in this location and could better complement (and facilitate) the Council’s redevelopment vision for the Site. Whilst we note that the site allocation does not protect the church or require its re-provision, it does state that the redevelopment of the site may provide community uses. We consider that the wording should include positive direction that a replacement church is not required as part of a redevelopment scheme. In addition, draft policy P46 should be amended to include a provision which allows an exemption to the policy where a specific site allocation directs an alternative approach. P46 1.2. should read:

‘In exceptional circumstances, community facilities can be replaced by another use where they are surplus to requirements. This needs to be demonstrated by a marketing exercise for two years immediately prior to any planning application, for both its existing condition and as an opportunity for an improved facility at market rates, unless a site allocation policy within this plan specifically allows for the loss of a defined community use, in which case no marketing exercise is required.’

24. We also note that the site refers to the opportunity to create a market within the site, though this is not specified as a requirement. The site allocation should acknowledge the potential impact of a market on the feasibility and viability of a redevelopment scheme, given that this could require a significant amount of open land which could undermine scheme viability. The site allocation should therefore be amended to state:

There may be an opportunity to create a market within this site, which would help promote the local economy; however, this is not a requirement of the site allocation policy and would need to be considered in relation to any potential impact on the feasibility and viability of a redevelopment scheme for the site’.

26. Finally, in order for the site allocation support delivery of a viable scheme, it should be clear that ‘the scale and density of development should be optimised’ and we request this wording to be included in the site allocation.

27. These proposed changes would enable the delivery of sustainable development on the Site, consistent with national planning policy and the overarching vision of the NSP, to support effective delivery of the Site Allocation and are required to make the plan sound.

#### Principle of Residential

28. It is a necessary test of soundness for a local plan that it should be deliverable over the plan period. Current Arch Co feasibility models for the Site have identified that a mixed use scheme, including residential, would be required in order to achieve the desirable upgrade and redevelopment of the Site.

29. Capital expenditure costs of refurbishing and re-letting the railway arches and 117-125 Rye Lane alone would not support delivery of the Council’s aims for the site. Residential floorspace, including within new build floorspace, is necessary for a deliverable scheme.

30. However, the Site Allocation currently states that the indicative residential capacity of the site is ‘0 homes’. This is seriously problematic for the Arch Co’s delivery of the site, as the ability to deliver residential uses on the Site is crucial to the scheme’s viability and therefore deliverability.

31. Notwithstanding this, given the Site’s size, excellent location within the Peckham Major Town Centre boundary and highest PTAL rating of 6B, we consider that the Site is an appropriate location for residential uses in principle.

32. The adjacency of live railway tracks affecting future residential amenity concerns can be mitigated through good design, as happens extensively

across London and within the London Borough of Southwark.

33. Officers have also suggested that residential use within the town centre may give rise to issues around the 'Agent of Change' principle, from a residential amenity within a town centre environment perspective. Contrary to this, there are several other sites within the defined town centre that are allocated for housing within this plan (including Aylesham Shopping Centre; Site Allocation NSP71). Again these matters are perfectly capable of being addressed through good design and management.

34. The omission of residential uses from the Site Allocation is very much at odds with the National Planning Policy Framework (NPPF) (2019) and much adopted and emerging London Plan Policy, which seeks to promote the provision of sustainable housing on brownfield sites in well-connected town centre locations. Increasing the number of new homes in the town centre will contribute to the vitality of the town centre, rather than undermine it. Draft policy SD6 of the draft London Plan (DLP) (2019) states, in part A 1), that residential uses are one of a diverse range of uses that will promote and enhance the vitality and viability of London's town centres.

35. With regards to the Agent of Change principle, draft policy D13 of the DLP sets out that the responsibility for mitigating the impacts of existing noise and other nuisance-generating activities or uses on proposed new noise-sensitive development rests with the developer of that new development. This does not however proscribe residential development in the context of potentially nuisance-generating activities, provided appropriate mitigation can be provided, through good design. This includes sites in proximity to night-time economy venues.

36. The omission is also out of step with the increased housing ambitions and policies within the August 2020 NSP, specifically Policy SP1a, which seeks to provide increased housing of all tenure types in highly accessible, sustainable locations, which include town centres under Policy SP1a. and Policy SP4, which promotes the co-location of housing and industrial land to meet identified London housing need.

37. We understand that the August 2020 NSP has strengthened site allocations policy to explicitly require ("sites must") and encourage ("sites

may”) specific land uses. Accordingly, to redress the current omission of residential and use from the Site Allocation, we propose that new text be added into the Site Allocation stating that the Site ‘may’ provide residential floor space and that, if provided, ‘residential density should be optimised’ to support site delivery.

38. These proposed changes are required to enable the site allocation to be effective and deliverable in the plan period and to align the site allocation requirements with national planning policy promoting the delivery of new housing. Without these changes the NSP would be noncompliant and unsound.

#### Deliverability of Proposed Access Routes

39. On the basis that the Arch Co. does not own the majority of the land along the southern border of the Site Allocation, it will not be in its power to deliver a complete north-south connectivity access route. In fact, beyond land ownership, there are physical constraints which cannot be overcome i.e. an embankment, retaining wall and railway tracks along the southern boundary. It may be possible to deliver a route across the northern boundary of the Site Allocation; however, this could compromise the optimal site layout and affect viability. Whilst the Arch Co. would be open to exploring increase permeability the policy wording should acknowledge that this may not be deliverable or that delivery may not be the best option for the redevelopment of the site as a whole. The Key of the site allocation diagram should be revised to refer to ‘potential for improved connectivity for pedestrians and cyclists, subject to feasibility testing’ and the route marker should not cross the southern boundary of the site.

40. It should also be noted that the Site Allocation seemingly includes two east-west access routes from Rye Lane. It is not clear if both of these routes are expected to be provided within the Arch Co’s ownership demise. However, whilst one would be feasible, two would be much more challenging and minimise the useable site area, which would be required to make a scheme work for both design and viability reasons. The Key of the site allocation diagram should be revised as above and only one indicative route marker should be included, to express the council’s aspiration for some form

of improved east-west route.

The August 2020 Draft NSP states that the Site Allocation 'must' support the implementation of the Peckham Coal Line – it goes on to state that the site can provide the Coal Line as a low line walking route. For the avoidance of doubt, the Arch Co objects to any high line walking route adjacent to the railway tracks on safety and access grounds. The east-west access route through the site at ground level, and on Arch Co land, should be sufficient to support a low line route in this location, as also envisaged in draft policy P33. The site allocation should make clear that the low line Peckham Coal Line route does not require access to operational railway land.

42. These proposed changes are required to make the NSP sound, by enabling the Site Allocation to be an effective and deliverable part of the NSP.

Deliverability of Proposed Active Frontages

43. The Site Allocation proposes a total of 3 active frontages leading east from Rye Lane. These frontages propose dual frontage activation of the northern and southern elevations of the Site Allocation's northern railway arches, together with active frontages along the line of the railway embankment and retaining wall.

44. We advise that activation of only one of the two northern frontages would be feasible, as dual access would present security and operational challenges including minimising the ability to include back-of-house space within the arches.

45. We consider that the most effective strategy would be for a redevelopment scheme to activate the southern facing frontage of these arches only, to draw people into the Site and service the new uses within the Site. Pedestrian access to the north of the railway is limited and across land outside of Arch Co's ownership.

46. The proposed active frontage to the south of the site i.e. along Network Rail's north-facing railway embankment and retaining wall, is not deliverable at all. This should be removed from the diagram.

47. These proposed amendments are required to support effective delivery

of the Site Allocation within the NSP, required to make the NSP sound.

#### USE CLASSES ORDER

52. The draft Site Allocation (and draft NSP in general) has not been updated in relation to the new Use Classes Order amendment Regulations 2020. This has brought in a fundamental change to land use classification and potentially will have a significant impact on land use planning. We consider that it is unlikely the draft plan can be considered sound without being updated to reflect these changes, which took effect as of 1st September. We request that all policies in the plan which make reference to commercial uses should be reviewed in light of these changes. This will enable consistency with national policy, required to make the plan sound.

53. At present the plan cannot be considered effective or deliverable given that draft policies refer to Use Classes which no longer exist. This also presents an inconsistency point with higher tier element of the planning system, in this case the Use Classes Order, as amended by the 2020 Regulations. Furthermore, in order to be effective and deliverable, policies should be sufficiently flexible; we consider this is not the case in relation to the draft retail policies. This also raises issues as to whether the plan is positively prepared in order to deliver sustainable development, including the need to ensure the vitality of town centres. We believe that greater flexibility should be afforded to the development opportunity to reflect the commercial property market (specifically retailing). This would also be consistent with the Government's revised approach i.e. the greater flexibilities afforded by Class E. These points are required to be addressed in order to make the NSP sound.

#### Conclusion

54. The Site Allocation and draft NSP more widely needs to be reviewed to take account of the above key concerns and considerations in order for the site to realistically deliver in line with the emerging aspirations of the NSP, including for Peckham town centre.

55. We therefore suggest the following changes to enable the Plan to meet

the tests of soundness:

- Amend the extent of the site allocation to reflect developable land, which coincides with ArchCo ownership.
  - Amend the exiting uses and areas in accordance with the details provided in this letter.
  - B use floorspace should only be required where consistent with the overall vision of the allocation and where this does not conflict with the provision of active town centre frontages.
  - Church use should not be re-provided and the site should either be exempted from policy P46 or the wording of this policy should be amended to exclude site allocations which allow for the loss of a community use (without a marketing requirement).
  - Market use should only be referred to subject to feasibility and viability of a redevelopment scheme.
  - Residential land use should be supported in principle.
  - The scale and density of development, including residential development, should be optimised.
  - Proposed pedestrian and cyclist routes should be amended as set out in detail within this letter.
  - Indicative active frontages should be amended as set out in detail within this letter.
  - Draft policy P33 should be only encourage, rather than require, specific land uses, as part of an appropriate mix of uses determined on a site-specific basis.
  - The provision of a low line route should be subject to feasibility and safety considerations.
  - The draft NSP should be updated to reflect 2020 amendments to the Use Classes Order and greater flexibility should be allowed in relation to town centre uses.
56. The Arch Co. would welcome further opportunities to discuss the proposed changes to the Site Allocation with the Council, to best enable the suggestions to be included within the NSP.
57. Notwithstanding this, and understanding that the NSP Examination in

Public is due to start in early 2021, as previously un-consulted land owners on a Site Allocation now proposing material changes to the site Allocation, going forward, the Arch Co formally requests to be called upon to present at the Examination in Public.

58. I trust that the above representations are helpful in further development of the