



ELEPHANT AND CASTLE OPPORTUNITY AREA SUPPLEMENTARY PLANNING DOCUMENT

APPENDIX C: Table of representations received on the draft SPD and the council's response

MARCH 2012

No.	Title
Appendix A	Elephant and Castle Supplementary Planning Document/ opportunity area framework
Appendix B	Consultation Report (part one)
Appendix C	Consultation Report (part two): Table of representations received on the draft SPD and the council's response
Appendix D	Equalities Impact Assessment
Appendix E	Sustainability Appraisal
Appendix F	Sustainability Statement

Objector Ref	Organisation	First Name	Surname	Objector Type
784	AKS Architects	Anthony	Kyrke-Smith	Resident
769	Albert Association	Gareth	Parry	Neighbourhood group/T&RA
609	BBI	Sunny	Lambe	Business
437	Better Bankside Bankside Community Space	Valerie B	Beirne	Community group/organisation
674	Business Extra	Patrick	Blunt	Business
121	Coal Authority	Rachael	Bust	Government agency (non statutory consultee)
467	Compuserve	Jeremy	Leach	Resident
716	Corsica Studios	Amanda	Moss	Community group/organisation
675	Elephant Amenity Network	Jerry	Flynn	Community group/organisation
708	Elephant Amenity Network	Sally	Cullen	Resident
154	English Heritage	Graham	Saunders	Statutory Consultee
153	English Heritage			Statutory Consultee
643	Environment Agency	Charles	Murithi	Statutory Consultee
682	Expansion Audio UK Ltd	Angus	Hewlett	Business
785	Friends of GMHP	Maureen	Johnston	Community group/organisation
150	Friends of Nursery Row Park	Luke	Miller	Community group/organisation
711	Garland Court Tenants and Residents Association	Belinda	Magee	Neighbourhood group/T&RA
196	Greater London Authority	David	Watkinson	Statutory Consultee
663	Greater London Authority	Valerie	Shawcross AM	Statutory Consultee
786	Henshaw Street T.R.A	Mark	Tubbs	Community group/organisation
162	Highways Agency	Patrick	Blake	Business
710	Hollybrook			Business
712	Hotel Elephant Gallery	Reuben	Powell	Community group/organisation
634	Hyde Housing	Ann	Lander	Business
707	Imperial War Museum London	c/o Agent		Business
669	Key Property Investments	c/o Agent		Business
642	LB Southwark	Adele	Morris	Councillor
619	LB Southwark PCT	Jacqueline	Malone	Statutory Consultee
190	Lend Lease Retail & Communities	c/o Agent		Business
733	Liberal Democrat Group	Paul	Noblet	Councillor
773	Local Economy Group	Sarah	Randall	Community group/organisation
635	London South Bank University	c/o Agent		Government agency (non statutory consultee)
727	Merryvale No.6 International Limited	c/o Agent		Business
194	Metropolitan Police	C/O AGENT		Government agency (non statutory consultee)

Objector Ref	Organisation	First Name	Surname	Objector Type
615	Ministry of Sound	c/o Agent		Business
122	Natural England	David	Hammond	Government agency (non statutory consultee)
714	Neobrand Ltd	c/o Agent		Business
209	NHS Southwark	Alex	Trouton	Government agency (non statutory consultee)
453	NHS Southwark (PCT)	Alex	Trouton	Government agency (non statutory consultee)
639	Open City	Richard	Crutchley	Business
713	Part of Imperial War Museum	Phil	Reed	Business
659	Peabody Trust	c/o Agent		Business
165	People's Republic of Southwark	Liliana	Dmitrovic	Community group/organisation
719	Pullens Tenants and Residents Association 184 Crampton Street London SE17 3AE	Mick	Larkin	Community group/organisation
717	Robert Loader Architect	Robert	Loader	Business
688	Rockingham TRA	Charles	Le Fevre	Community group/organisation
631	Royal Mail Group	c/o Agent		Business
720	Sapient Nitro	Mark	Leahy	Other individual
686	SKM Collin Buchanan	Philip	Loy	Business
775	South Bermondsey Resident and member of BARGE's	Corinne	Turner	Community group/organisation
691	Southwark Association of Street Traders	J H	Wallington	Community group/organisation
690	Southwark Cyclists	James	Upsher	Community group/organisation
545	Southwark Housing Association Group	Tom	Harding	Community group/organisation
226	Southwark Living Streets	Alastair	Hanton	Community group/organisation
137	Southwark Living Streets	Jeremy	Leach	Community group/organisation
614	Southwark Living Streets	Erina	Rayner	Community group/organisation
718	Studiofibre	Stuart	Dickie	Business
127	Thames Water Utilities	Carmelle	Bell	Business
660	The Peabody Trust	c/o Agent		Business
161	Unite Group Plc	c/o Agent		Business
676	Walworth Society	Jeremy	Leach	Community group/organisation
166	Waterloo Community Development Group	Michael	Ball	Community group/organisation
640	Westminster Drug Project	Joe	Lashbrook	Community group/organisation

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661	Ben	Adams	Resident
610	Anonymous	Anonymous	Resident
670	David	Arditti	Other individual
672	James	Ashburnham	Other individual
778	Peter	Ashford	Resident
666	David	Balfour	Resident
628	Sally	Bartlet	Resident
689	J	Beedell	Community group/organisation
738	Avril	Benjamin	Resident
626	Rod	Bicknell	Resident
622	Rogan Tate	Bradshaw	Resident
623	Simon	Brears	Resident
772	Richard	Brookes	Resident
739	Felicia	Brown	Resident
700	Tim Murray	Browne	Other individual
740	Rosie	Bruce	Resident
725	Chris	Campbell	Resident
694	Kirsten	Campbell-Howes	Resident
620	Alex	Capon	Resident
721	Antonio Jose	Carvalho	Resident
648	Gerald	Chan	Resident
681	Tom	Chance	Resident
729	Nicholas	Chinardet	Resident
741	Jun Lee	Choon	Resident
742	Luke	Collins	Other individual
149	Eileen	Conn	Resident
779	Christina	Costas	Resident
625	Susie	Cox	Resident
743	Steve	Crawford	Resident
463	Celia	Cronin	Resident
768	Andrew	Davey	Resident
650	Peter	Davis	Resident
685	Max	De Winter	Resident
701	Jalal	Deen	Other individual
744	Louise	Delaye	Resident
621	Mandeep	Dhaliwal	Resident
723	Deborah	Doane	Resident
671	John	Drake	Resident
665	simon	Eccles	Resident
782	Amy	Eccles	Resident
641	Toby	Eckersley	Councillor
627	Ruth	Edmonds	Resident
697	Ben	Evetts	Resident
745	Paola	Farino	Resident
746	Cristina	Fernandez	Other individual
706	Mara	Ferreri	Resident
732	Judith	Flanders	Other individual

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134	Jerry	Flynn	Resident
747	Matt	Gardner	Resident
611	Candace	Gillies-Wright	Resident
748	Jim	Gleeson	Resident
749	Eileen	Goodway	Resident
750	Victoria	Gordon-Johnson	Resident
673	Jon-Paul	Graham	Resident
698	Clemens-Emanuel	Gutwenger	Resident
751	Geoffrey	Hand	Resident
752	Vicky	Harriss	Resident
734	Jay	Hayter	Resident
753	Irena	Hoare	Other individual
654	Charlie	Holland	Resident
754	Catherine	Hope	Resident
218	Simon	Hughes	Councillor
638	Christopher	Imoke	Resident
629	William T	Jackson	Resident
637	Marie-Louise	Jackson	Resident
755	Paul	James	Other individual
679	Skirmantas	Jankauskas	Other individual
677	Jenny	Jones	Government agency (non statutory consultee)
657	Chris	Jones	Other individual
680	Nicholas	Jones	Resident
624	Dayantha	Joshua	Resident
781	Anthony	Joyce	Resident
728	Dominic	Judge	Resident
653	Matthew	Kendall	Resident
664	Jessica	Kennedy	Resident
756	Laila	Khory	Resident
683	Jordan	Killiard	Resident
699	C	Lai	Resident
645	Stephen	Lancashire	Resident
140	Richard	Lee	Resident
647	Glenn	Lee	Resident
757	Alan	Lee	Other individual
758	Matthew	Liston	Resident
618	Zara	Lloyd	Resident
759	Gillian	Lycett	Resident
678	Jane	Mackelworth	Resident
760	Christopher	Mahon	Resident
655	Tari	Mandair	Resident
761	Rupert	Marlow	Resident
762	Ben	Mason	Resident
709	Katherine	McNeil	Resident
777	Chris	Mead	Resident
724	Hannah	Mellow	Resident
763	Steve	Monnier	Resident

Objector Ref	First Name	Surname	Objector Type
651	Lucy	Neville-Rolfe	Resident
787	nenad	njegovan	Resident
705	Orenda	O'Brien Davis	Resident
636	Richard	Packer	Resident
788	Tom	Packer	Resident
695	Milan	Panchmantia	Resident
776	Lyla	Patel	Other individual
722	Chris	Pedder	Resident
612	Tony	Perkins	Resident
715	Michael	Pitt	Resident
466	Seeta	Rajani	Resident
764	Ben	Ramsay	Resident
617	Fran	Rawcliffe	Resident
646	Richard	Reynolds	Resident
667	Joe	rice	Resident
765	Damian	Riddle	Resident
766	Peter	Robins	Resident
767	James	Robinson	Resident
662	Patria	Roman-Velazquez	Business
783	David	Ronchi	Resident
774	Catherine	Russell	Resident
702	Andrew	Saffrey	Other individual
780	Andrew	Sanders	Resident
658	Damion	Schumacher	Resident
652	N	Shingler	Resident
735	Stephanie	Siu	Resident
730	Samanthana	Smith	Other individual
613	Rupert	Smith	Resident
656	Mark	Spicer	Resident
703	Craig	Stansfield	Resident
736	Ian	Stevens	Other individual
687	Daria	Sulima	Resident
693	Rose	Territt	Community group/organisation
649	Ken	Thomson	Resident
737	Jack	Thurston	Resident
633	Mike	Tully	Resident
770	Marc	Urquhart	Resident
668	Sebastian	Verney	Resident
771	Anne	Wanjie	Resident
464	Sanna	Wennberg	Resident
731	Tom	Whitwell	Other individual
684	Susannah	Wight	Resident
462	Vally	Wilson	Resident
692	AS	Winkley	Resident
616	Giles	Worrell	Resident
704	Isabel	Wreford	Resident
696	Kaori	Yarmamoto	Resident

Object Ref	Rep Ref	Section	Main Policy	Character Area	Details of Representation	Officer Response to Representation
122	181	1- Introduction and background			Chapter 1: Introduction Paragraph 1.1.3 refers to public realm improvements, which are welcomed and have the potential to link in to green infrastructure and soft landscaping opportunities identified elsewhere in the document. The inclusion of open space within the infrastructure needs heading is also welcomed and to be encouraged.	Support noted.
122	183	2- History, Elephant and Castle today, challenges and opportunities			Identification of areas of deficiency for access to green space/nature as per paragraphs 2.2.3 and 2.2.4 are acknowledged and strengthen the potential for green infrastructure provision as identified in the document.	Support noted.
122	184	2- History, Elephant and Castle today, challenges and opportunities			Paragraph 2.3.7 – Natural Environment: Sustainable Use of Resources. The provision of new open spaces and connections between new and existing spaces through the provision of green routes/chains/links are to be welcomed and supported. The Council should give consideration to the enhancement and improvement of existing spaces, where appropriate, as this section does not make it explicitly clear.	Support noted. There is limited opportunity for the provision of new open space in the borough, the draft Open Space Strategy sets out the Council's approach to improving existing open spaces as well as seeking to secure new open space where possible.
122	185	3 - Vision and objectives			The Objectives are listed as seven themes which can be broadly supported, especially Theme 6: Natural Environment – Sustainable Use of Resources, paragraph 3.2.10 refers.	Support noted.
122	187	4 -The preferred option/options	SPD 15 - Public realm		SPD 15: Public realm Natural England is pleased to see the recognition of the benefits of Green Infrastructure in development proposals, such as Climate Change, Urban Heat island effects. Also welcomed are the references to Biodiversity, soft landscaping and Sustainable Urban Drainage systems (SUDs) provision. Paragraph 4.5.2 includes references to green walls and roofs which are welcomed and to be encouraged, however the Council should also give consideration to the provision of brown roofs, where appropriate. Living Roofs Natural England welcomes and encourages the inclusion of green and brown roofs in proposals. Natural England is supportive of living roofs in all developments in principle. However, so living roofs such as sedum matting can have a limited value for wildlife but these can be favoured as a generic response to requirements for living roofs> Natural England prefers the use of bespoke solutions based on the needs of the wildlife	We have amended the final SPD to refer to “living walls and roofs” which can encompass brown or green roofs depending on what would be most beneficial for the local area.

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					specific to the site of adjacent area. I would refer you to the following website for a range of solutions that may better suit this development; www.livingroofs.org.uk	
122	189	4 -The preferred option/options	SPD 18 - Open spaces		SPD 18: Open Spaces Maintenance, improvements to and creation of new green/open spaces is welcomed and supported. This SPD can also be linked to SPD 15 above. Consideration of green chains/links/corridors between existing and new open/green space is also welcomed and to be encouraged.	Support noted.
122	190	5 - Character Areas		Central Area SPD 23 - Built Environment	The potential to “soften” public spaces is to be encouraged.	Support noted.
122	192	5 - Character Areas		Heygate Street SPD 27 - Built environment	SPD 27 – Built Environment refers to the provision of a new park as part of the redevelopment of this area. This is to be welcomed and supported, and it is encouraged that green links to and from this park are provided to other green/open spaces within the wider development area.	Support noted.
122	193	5 - Character Areas		Heygate Street SPD 28 - Natural environment	SPD 28 – Natural Habitat. This SPD is encouraged and supported.	Support noted.
122	195	5 - Character Areas		Brandon Street SPD 31	SPD 31 – Built Form and Public Realm, this is welcomed and encouraged and should be linked into SPD 32 – Natural Environment through green infrastructure provision where appropriate.	Support noted.
122	196	5 - Character		Walwo	SPD 35 – Built Form and Public Realm, please see	Support noted.

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		Areas		rth Road SPD 35 - Built form and public realm	comments above as per SPD 31	
122	198	5 - Character Areas		Walworth Road SPD 36 - Natural environment	SPD 36 – Natural Environment, this is to be encouraged, see also our comments above in respect of SPD 31 and SPD 32.	Support noted.
122	199	5 - Character Areas		Rail Corridor SPD 39 - Built form and public realm	SPD 39 – Built Form and Public Realm, public realm enhancement and the provision of green infrastructure options are to be welcomed and encouraged, see also comments above in respect of SPD 31 and SPD 32.	Support noted.
122	201	5 - Character Areas		Rail Corridor SPD 40 - Natural environment	SPD 40 – Natural Environment, reference is made to the provision of a new green space at Manor Place Depot which is to be encouraged and supported.	Support noted.
122	202	5 - Character Areas		Pullens SPD 43 - Built form and	SPD 43 – Built Form and Public Realm and SPD 44 Natural Environment, please see comments above in respect of SPD 31 and SPD 32.	Support noted.

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				the public realm		
122	204	5 - Character Areas		West Square SPD 48 - Natural environment	SPD 48 – Natural Environment, welcomed and to be encouraged, see also comments above in respect of SPD 31 and SPD 32.	Support noted.
122	205	5 - Character Areas		Enterprise Quarter SPD 52 - Natural Environment	SPD 52 - Natural Environment, welcomed and to be encouraged, see also comments above in respect of SPD 31 and SPD 32.	Support noted.
122	207	5 - Character Areas		Rockingham SPD 56 - Natural environment	SPD 56 - Natural Environment, welcomed and to be encouraged, see also comments above in respect of SPD 31 and SPD 32.	Support noted.
122	208				Natural England notes in Chapter 8: Natural Environment section that a new Open Space Strategy and Biodiversity Action Plan are being prepared by Southwark Council and we would appreciate the opportunity to see and or comments on these documents.	The draft Open Space Strategy is currently out for consultation until 24th April 2012. We have undertaken a mail out to all the statutory consultees including Natural England as well as everyone on our LDF mailing list to inform people of the consultation. We have sent a copy of the draft Biodiversity Action Plan to Natural England for comment.
122	209				Natural England acknowledges and welcomes the inclusion of Green Infrastructure as a sustainability issue for the area, linking in with the recognition of the area being deficient in access to green space and nature. Eighteen Sustainable Development Objectives are listed which can be broadly supported, especially SDO 14 "To protect and improve open spaces, green corridors and biodiversity"	Support welcome.

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122	210				The objectives have been broken down in to Themes, which again can be broadly supported, especially Theme 6. Overall the approach and methodology are in line with the advice and guidance that would be offered by Natural England, suitable and appropriate plans, policies and programmes have also been identified.	Support welcome.
122	212				The approach and methodology [of the Appropriate Assessment] is in line with guidance that would be offered by Natural England, suitable and relevant sites have been identified. In relation to this document, Natural England can agree with Southwark Council's assessment, that Stages 2 and 3 of the Habitats Regulation Assessment are not required for the Elephant and castle Supplementary Planning Document. The Council's attention is drawn to Section 40 of the Natural Environment and Rural Communities Act (2006) which states that 'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity'. Section 40(3) of the same Act also states that 'conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat'.	Support noted. Reference to NERC Act 2006 noted.
127	107				It is unclear at this stage what the net increase in demand on our infrastructure will be as a result of redevelopment in and area the Elephant and Castle area. We are concerned that the network in this area may be unable to support the demand anticipated from the development. The net increase in water and waste water demand to serve the area need to be considered and also any impact the re-development may have further down the network, if problems such as no/low water pressure and internal/external sewage flooding of property is to be avoided. We would welcome the opportunity to work closely with the local authority to better understand the following: <ul style="list-style-type: none"> • the developments demand for water supply and network infrastructure both on and off site and can it be met; • the developments demand for sewage treatment and network infrastructure both on and off site and can it be met • the surface water drainage requirements and flood risk of the development both on and off site and can it be met. 	Section 6.5 of the SPD sets out our approach to working with our infrastructure providers. This wording was agreed with Thames Water as part of the preparation of the Canada Water Are Action Plan. With regard to water and sewerage infrastructure, we will use planning conditions where appropriate to ensure that development does not commence until impact studies on the existing water supply and sewerage infrastructure have been approved by Southwark in conjunction with Thames Water. Where there is a capacity problem and no improvements are programmed developers should contact the utilities company to agree what improvements are required and how they will be funded.

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127	108		SPD 19 - Energy , water amd waste		SPD19 relates to energy, water and waste but makes no specific reference to water or wastewater issues. As set out above there are concerns regarding the potential impacts of development on the water and wastewater infrastructure. Within the supporting text to paragraphs 4.6.11 and 4.6.12 relate to water and flooding issues but do not make any reference to water or wastewater infrastructure issues. Strategic Policy 14 of the Core Strategy states that the strategic vision for the borough will be achieved by working with infrastructure providers to identify and deliver elements of infrastructure required to support growth. The subtext in paragraph 6.10 sets out that any such infrastructure should be provided ahead of the occupation of development. In order to strengthen the guidance provided within the draft SPD it is considered that additional text should be added to SPD19 and the supporting text: SPD 19: "Developers will be required to demonstrate that sufficient water and wastewater infrastructure capacity exists or that extra capacity can be provided in time to serve the development. Where additional infrastructure is required developers should identify how this will be delivered ahead of the occupation of development." Supporting text: The Council will seek to ensure that there is adequate water supply, surface water, foul drainage and sewage treatment capacity to serve all new developments. Developers will be required to demonstrate that there is adequate capacity both on and off the site to serve the development and that it would not lead to problems for existing users. In some circumstances this may make it necessary for developers to carry out appropriate studies to ascertain whether the proposed development will lead to overloading of existing infrastructure. Where there is a capacity problem and no improvements are programmed by statutory undertaker, the Council will require the developer to fund appropriate improvements which must be completed prior to occupation of the development."	Section 6.5 of the SPD sets out our approach to working with our infrastructure providers. This wording was agreed with Thames Water as part of the preparation of the Canada Water Are Action Plan. With regard to water and sewerage infrastructure, we will use planning conditions where appropriate to ensure that development does not commence until impact studies on the existing water supply and sewerage infrastructure have been approved by Southwark in conjunction with Thames Water. Where there is a capacity problem and no improvements are programmed developers should contact the utilities company to agree what improvements are required and how they will be funded.
134	133	4 -The preferred option/options	SPD 20 - S106 Planni ng		The transport infrastructure should not be upgraded at the cost of other local needs, such as affordable housing and community facilities. S106 contributions should be used to benefit the local community, rather than relief the budget pressures of other organisations, such as TfL. My suspicion	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in

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			obligations and the community infrastructure levy		is that it secures this money because it is a powerful organisation, rather than the intrinsic merit of the schemes it proposes, necessary as they might be.	homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need to improve transport infrastructure. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
134	134	4 -The preferred	SPD 5		The specific commitment made in the 2004 Elephant	The Saved Southwark Plan designation for proposals site

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		option/options	- New Homes		Regeneration SPD to reprovide the 1200 social rented homes lost from the Heygate estate should be retained and repeated here and elsewhere in the SPD as appropriate.	39P (the original Heygate Estate) sets out the uses required within the Elephant and Castle Core Area. It sets out there should be "no fewer that 5,300 mixed tenure new homes, including 1,200 to replace those lost through the demolition of the Heygate Estate". This designation is still our adopted policy. We have updated the housing background paper for the SPD to show how, where and when new homes will be delivered in the area.
134	135	4 -The preferred option/options	SPD 5 - New Homes		Mr Abbott, head of Elephant Regeneration team, reported that only 527 of the Heygate replacement homes will be delivered by the early housing site programme (Elephant housing workshop on 31 Jan). This leaves a considerable shortfall that will not be met by the redevelopment of the Heygate footprint, which will only give 300 social rented units (that is if they are not to be affordable rent). The SPD should also outline how the shortfall of between 400 and 700 social rented units will be met.	We have updated our development capacity assessment (DCA) and our housing background paper to include information about what has been built and what we think will come forward. The DCA is a tool that we use to estimate the potential housing capacity of development sites that may come forward in the future. The research that has informed the background paper update shows that between April 2005 and March 2011, 1170 new homes were built in the Elephant and Castle Opportunity area, of which 122 have been social rented homes and 217 intermediate). Furthermore, the Heygate replacement programme, once completed, will provide an additional 600 homes (some of these have already been built). It is predicted that 512 of these will be affordable (422 social rent and 90 intermediate). Our development capacity assessment estimates suggests there is capacity for 6,400 new homes in the opportunity area by 2026. Based on our current planning policies we expect 2,145 of these to be affordable homes (1,020 social rent and 1,125 intermediate). This means that 7,000 homes could be delivered in the opportunity area between 2011 and 2026, with around 2,650 of these being affordable (1,560 social rent and 1,215 intermediate
134	136	4 -The preferred option/options	SPD 5 - New Homes		The SPD should distinguish between the various kinds of affordable housing and detail here how many of each type the regeneration will provide. This is particularly important now that the new category of 'affordable rent' has been introduced. The phrase 'affordable housing' is now applicable to such a wide range of incomes (£0-£60k pa) that its use obscures whether or not the poorest are having houses provided for them.	The fact box on affordable housing sets out information on the different types of affordable housing. We have updated the fact box to fully cross reference to the Affordable Housing SPD, which provides more detailed guidance on affordable housing. We will be consulted on an updated Affordable Housing SPD later this year to take into account changes to the delivery and types of affordable housing. More information can be viewed on our website at

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						www.southwark.gov.uk/ahspd
134	137	4 -The preferred option/options	SPD 5 - New Homes		The ambition to achieve 35% affordable housing has been undermined by the masterplan agreement with Lend Lease for 25% affordable housing. Lend Lease will be building 2400 of the 4000 new homes, and their representative at the housing workshop [31st January] made it clear that its outline planning applications would be for 25% affordable housing, not 35%; to compensate other developments in the area will necessarily have to provide more than 35% affordable housing. It seems very unlikely this will occur, both in the light of the planning permissions granted at the Elephant over the past 10 years and Southwark's own judgement that 65% free-market housing is needed to ensure a development's viability. The SPD should state how this problem is to be overcome, so that the 1400 target is reached.	Our policy for affordable housing is set out in the Core Strategy and the saved Southwark Plan, with further guidance in the draft and adopted affordable housing SPDs. The policy and guidance set out that the minimum amount of affordable housing should be 35% affordable housing. where this policy cannot be met the applicant needs to submit a financial appraisal to justify why a departure from policy is necessary (as set out in the affordable housing SPDs). In the case of Lend Lease, as with all schemes, we would require a financial appraisal to justify why the amount of affordable housing proposed does not meet our policy. We have updated our development capacity assessment (DCA) and our housing background paper to include information about what has been built and what we think will come forward. The DCA is a tool that we use to estimate the potential housing capacity of development sites that may come forward in the future. Our development capacity assessment estimates suggests there is capacity for 6,400 new homes in the opportunity area by 2026. Based on our current planning policies we expect 2,145 of these to be affordable homes (1,020 social rent and 1,125 intermediate).
134	138	4 -The preferred option/options	SPD 5 - New Homes		The development that will provide the Leisure Centre will not provide any affordable housing, an example of affordable housing losing out for s106 funding to competing priorities. The SPD should say what measures will be adopted to ensure that the ambition to achieve 35% affordable housing will not be undermined by other s106 demands.	Our policy for affordable housing is set out in the Core Strategy and the saved Southwark Plan, with further guidance in the draft and adopted affordable housing SPDs. The policy and guidance sets out that the minimum amount of affordable housing should be 35% affordable housing, and as set out in the affordable housing SPDs, where this policy cannot be met, the applicant needs to submit a financial appraisal to justify why a departure from policy is necessary. In the case of the leisure centre site, as with all schemes, we would require a financial appraisal to justify why affordable housing cannot be provided. The affordable housing SPDs set out guidance that there may be some exceptional circumstances where a scheme delivers exceptional community benefits over and above the standard section 106 contributions and that in these cases we may review the levels of affordable housing

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						required on the site if it can be satisfactorily demonstrated that there is a need of such facilities. A financial appraisal would also be required to demonstrate how this justifies the policy requirement of affordable housing not being provided
134	139	4 -The preferred option/options	SPD 8 - Higher education and student housing		To all appearances the amount of student accommodation has already reached saturation point in the opportunity area and much been built that does not provide affordable housing. The SPD should consider whether a complete moratorium on student housing is desirable.	SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is already a larger concentration of student housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities. Our view is that the Core Strategy policy will enable a balance between student and other types of housing, whilst SPD 33 will ensure there is no an over-concentration in the Walworth Road character area. Within other parts of the opportunity area, student housing may be acceptable, subject to the Core Strategy policies as we do not think there is an over-concentration of student housing in other parts of the opportunity area and as the two local universities both have expressed a need for more student accommodation.
134	140	4 -The preferred option/options	SPD 9 - Community facilities		The commitment to new community facilities is completely empty of any concrete proposals. The 2004 framework document promised 'a comprehensive range of social, education, health and leisure facilities', including a library/lifelong learning centre, secondary school and an energy centre. This SPD should explain why these are no longer proposed - surely something is possible out of a £1.5bn budget?	The SPD refers to a range of facilities directly in policy guidance and in the infrastructure plan. The level of detail reflects the fact that this is a 15 year plan and the SPD needs to be flexible enough to accommodate changes to policy, legislation, funding and local need. SPD 7 refers to the provision of a new leisure centre. The proposed redevelopment is currently at the design stage and a planning application is expected in Spring 2012. The provision of education and health facilities will be subject to ongoing discussion with colleagues at the Council, the GLA and NHS Southwark, respectively. There is no identified

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						need for new health facilities in the short to medium term. The new Aylesbury Academy will cater for increased demand for secondary school places, whilst a number of measures will be considered to accommodate increased demand for primary schools places. A range of community facilities will be supported as part of the redevelopment of the Heygate estate. Specific facilities, such as a library, will continue to be discussed, with firmer details being set out as planning applications for the redevelopment are submitted. SPD19 sets out that all developments should consider the feasibility of connecting to a Combined Heat and Power (CHP) system. Where a new system is required, this would usually be provided in an on-site Energy Centre. As noted in SPD9, the community facilities needed to underpin growth in the area will be kept under review over the lifetime of the SPD.
134	142	5 - Character Areas		Rockingham SPD 55 - Built form and public realm	The Rockingham character area, which consists almost entirely of the Rockingham Estate, is poorly served by the SPD. While the aspiration to improve the area is expressed several times there are few concrete proposals and without these the area will lose out in the competition for s106 funds. Most of the proposals focus on movement through the estate, rather than improving the estate itself. SPD55 'Built form and public realm' is no doubt necessary, but seems of little relevance, given that there is only one development site identified in the area (the Hand in Hand pub). The SPD should consider whether there is a case for the Rockingham having some priority for s106 funds and whether some s106 funding can be directed there from development ins the further north of the borough.	In the SPD we have flagged up the need to improve community facilities on the Rockingham Estate. We have also stated that we will explore opportunities to fund this work. This could include directing s106 contributions or in the future funding raised through the infrastructure levy (CIL) towards this project. Through the SPD and in the future through CIL we will collect contributions for community facilities. Also, over the summer we will be consulting on the community infrastructure banks. This will update the projects currently in the community project bank. The community infrastructure levy provides greater flexibility to pool resources to fund larger projects.
134	148	5 - Character Areas		Rockingham SPD 56 - Natural environment	The SPD should amplify on the value of the large green spaces and ensure that is is adequately protected by policy.	SPD 18 sets out how we will maintain and improve a network of open spaces that have a range of functions and continue to protect metropolitan open land (MOL), borough open land (BOL) and other open space (OOS) from inappropriate development. Open space that is designated as MOL, BOL or OOS will be protected using saved Southwark Plan policies 3.25-3.27. Our AMR indicates that we these policies are very successful at restricting new development on protected open space. New open spaces

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						that are provided through development such as the public park on the Heygate site will be considered for protection and this can be taken forward through the site allocations DPD.
134	149	5 - Character Areas		Rockingham SPD 53 - Land uses	The SPD should amplify on the value of the community centre and the many groups who use it and make concrete proposals for improving the centre and supporting the user groups.	The value of the community centre will be recognised by inserting some text to the 'opportunities' section in the Rockingham character area.
134	150	5 - Character Areas		Rockingham SPD 55 - Built form and public realm	Figure 43 - This shows one of the proposed pedestrian routes going through two blocks of flats on the Rockingham Estate (Wickstead and Arrol) without deviation. Is this a true representation of the proposal?	The link in figure 43 is indicative and demonstrates the need for an improved link that runs roughly from east to west through the Rockingham character area.
137	1	4 -The preferred option/options	SPD 18 - Open spaces		Southwark Living Streets is a fully constituted community group which seeks to make life in Southwark better for those on foot. We meet monthly and have an average attendance of around 15 at our meetings. Our group keeps in touch via an email network that consists of more than 80 activists. Our web-site address is: http://southwarklivingstreets.org.uk This response comprises the comments of the members of the group. There are many good things that we have seen in the Elephant and Castle Supplementary Planning Document. As well as the aspirations to make this an excellent area in terms of pedestrian and cycle connectivity and making links between the array of open/green spaces in the area, we are really pleased with the bold vision to return St Georges Road to two-way operation and the desire to create a public transport corridor on London Road. While we welcome the desire to make improvements to the area around the northern roundabout, we have to say that the plans published to date are unambitious and that problems with TfL roads throughout the area remain a major barrier to safe and widespread pedestrian and cycle movement north-south	The general support for the SPD is welcomed. Comments on the northern roundabout are noted. Our response on the matter is set out in our response to your comments on SPD11. We recognise that the cost of installing escalators is significant. However, development in the opportunity area will impact on the capacity of the northern line ticket hall and will need to be mitigated. Without adequate mitigation, the regeneration of the area will be put at risk. In addition to transport infrastructure, we will also collect contributions for other infrastructure items, such as open space and public realm using standard charges in the s106 SPD. In the future, after 2014, we will collect contributions for planned infrastructure using CIL. We will use community infrastructure projects in the project banks to help identify suitable projects. Because CIL is non-negotiable, there is greater certainty that funding will come forward. The Localism Act requires a "meaningful proportion" of CIL to be spent locally.

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					through the area. We feel that a clear statement needs to be made as to how the smaller public realm improvements will be funded. There appears to be an extremely heavy reliance on providing funding for major TfL projects such as the escalators or more lifts at the Elephant and Castle and, although these are important, other improvements such as the delivery of improvements to the pedestrian infrastructure (such as green routes in West Walworth along the railway line) offer a greater impact on the lives of ordinary people who actually live throughout the Walworth area. It is vital that a credible and genuine means is found to deliver the projects that are outlined in the SPD and that these are not sidelined as mere aspirations to be delivered once the TfL projects have been resourced or after some Projectbank schemes have been financed.	
137	2	4 -The preferred option/options	SPD 14 - Transport mitigation		20 mph. 20 mph speed limits are vital to liveability and sustainability and we can see no mention of 20mph speed limits in the SPD. We feel that given that it is official Council policy (at least on its own roads) to limit vehicle speeds to 20mph then it is important that this is stated in the SPD as this will drive the design of streets in the future and will come to include the more main arterial roads. We note too that recent DfT guidance indicates that for cyclists the most significant safety improvement is lower speeds. http://assets.dft.gov.uk/publications/infrastructure-and-cyclist-safety/infrastructure-and-cyclist-safety.pdf Although we understand the difficulties we would strongly press for 20mph speed limits on the TLRN roads in our area. We already know that the Elephant and Castle northern roundabout is the most dangerous junction in the whole of London; this week a pedestrian has been killed on the New Kent Road. 20mph speed limits can begin to address some of these dangers.	The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.
137	3	4 -The preferred option/options	SPD 18 - Open spaces		Green Routes. These are clearly an important element in the SPD. They should, we feel, be identified as such in Theme 4 (section 2.3.16), with a description of their character. We suggest the following draft: "Walking and cycling. These modes are key to the sustainable future envisaged in this SPD. They will be facilitated and encouraged by the network	We have included an additional paragraph (4.6.5a) in the final SPD setting out further detail on the potential characteristics of green routes.

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					<p>of green routes referred to throughout the SPD. The principal characteristics of these green routes will be: - they will link up the many large and small parks and other public green spaces in the opportunity area; - they will follow the lines of quiet streets, which will wherever feasible be reconfigured to improve conditions for walking and cycling; - wherever possible they will include off-road sections designed to accommodate pedestrians and cyclists enabled to use the routes responsibly and without conflict; - the links provided by green routes between green spaces will improve biodiversity by enabling wildlife to move between these spaces.</p>	
137	4	4 -The preferred option/options	SPD 18 - Open spaces		<p>Provision of green/open space. We feel that there are opportunities to increase the amount of green space or at the very least to increase the perception of the amount of green space through making our streets greener. We have seen benefits from this approach in a number of areas in Walworth in recent years such as the HomeZone in Sutherland Square, the Salisbury Road Streets For People scheme, the greening of the environment around the Pullens Estate and most recently the pedestrianisation of Sturgeon Rd SE17. The approach in all of these locations has been at the very least to reduce road capacity and in reality to replace some capacity with pedestrianisation and greening the environment through tree planting etc. We have seen in previous work such as the Southwark Living Streets Green Links scheme that, as in other parts of Southwark, there are numerous roads where (owing to relatively low and currently declining levels of car ownership) there is little vehicular movement and levels of car parking are low that there are opportunities to begin to remove road capacity and replace it with pedestrianisation/greening. We understand that the costs of this have to date been relatively high but we feel that innovative approaches could be used to bring down costs significantly. In this way through creating green links and through the pedestrianisation of roads and streets we have the chance actually to increase the level of green space provision in the SPD area. All of this is particularly important in relation to SPD 18: open spaces and in the light of the astonishingly low levels of green space in the local wards as</p>	<p>We set out in SPD 18 how we will expect all development to improve the overall greenness of places, through measures such as living walls and roofs and high quality landscaping. SPD 18 also states how we will expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest. Where trees are lost, they should be replaced by new trees which result in a net improvement in canopy cover. We will also seek to ensure that street trees are used to green streets and reinforce planting where trees are integral to the historic townscape. We will also use the guidance set out in SPD 11 to provide a high quality network of pedestrian and cycle routes in the opportunity area. Development in the opportunity area will need to provide convenient, direct, safe, and attractive pedestrian and cycle links. This will include linking new and existing public and open spaces creating a network of spaces that act as a focus for activity and draw people through the area.</p>

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					is outlined in the table below. Ward Name % Greenspace % Greenspace Ranking (out of 10,654 English wards) Cathedrals 13.2% 10,473 East Walworth 10.8% 10,529 Faraday 5.5% 10,614 Newington 4.2% 10,632 Chaucer 3.7% 10,638 Southwark Average 16.2% Source : http://cresh.org.uk/cresh-themes/green-spaces-and-health/ward-level-green-space-estimates/	
137	5	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Estate cycle parking. There is considerable demand on local estates for secure cycle parking. This is being accommodated on some estates such as the Pullens but we know from recent meetings that for other estates such at the Rockingham Estate there is still considerable demand for increased provision.	The Council has a separate project to introduce secure cycle parking to existing estates.
137	6	3 - Vision and objectives			<ul style="list-style-type: none"> Page 21 3.1.4. The Vision for the Elephant and Castle opportunity area. We very much endorse the SPD vision for the Elephant and Castle area in this section. We note the statement concerning the provision of a minimum level of car parking and given the low and declining levels of car ownership in the area, we feel very strongly that the Council should retain its vision of zero car parking in developments. PTAL levels in this area are particularly high and many people in the local community have bought into a vision for the local area that represents a dramatic change from the traditional view of the Elephant. Many feel that both sustainable living and sustainable forms of transport should be prioritised as part of the vision. We question strongly the Lend Lease insistence on 25% parking for developments as a baseline for the future and feel that with a provision for disabled parking of up to 10% and a further provision of 5% for car clubs, the need for private vehicle usage should be minimal especially if relationships can be created with car rental companies that would allow longer term rental (e.g. over a weekend) than is typical with organisations such as Zipcar where vehicles are charged by the hour. We would also like to understand to what degree the parking that has been created in places like the Printworks on Amelia Street has in fact been taken up. We suspect that levels of usage of these spaces are relatively low. •The table below highlights just how low car ownership by household now is in the 	Support noted.

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					<p>middle part of the borough and the fact that it is declining fastest in those areas where it is already lowest. Electoral Ward % Ownership-2011 % Ownership-2010 % Ownership-2009 % Change (09 to 11) East Walworth 28.4% 30.7% 33.4% -5.1% Chaucer 30.0% 31.1% 33.1% -3.1% Faraday 32.3% 34.0% 36.3% -4.0% Cathedrals 33.6% 35.1% 35.5% -1.8% Newington 34.5% 34.7% 35.9% -1.4% Grange 37.0% 37.7% 38.8% -1.9% Camberwell Green 37.3% 39.1% 39.7% -2.4% Livesey 38.3% 38.9% 40.7% -2.4% Rotherhithe 42.8% 44.2% 44.3% -1.5% Brunswick Park 43.0% 43.9% 47.2% -4.2% Peckham 43.3% 44.1% 46.7% -3.4% Riverside 45.0% 46.0% 45.8% -0.9% South Bermondsey 45.3% 44.3% 44.4% 0.9% South Camberwell 49.6% 50.5% 50.1% -0.5% The Lane 52.3% 53.9% 54.3% -2.0% Nunhead 52.7% 52.5% 53.9% -1.2% Surrey Docks 56.6% 56.6% 56.8% -0.2% East Dulwich 64.6% 65.6% 65.1% -0.5% Peckham Rye 66.0% 66.5% 67.4% -1.4% College 76.9% 78.1% 78.1% -1.1% Village 88.0% 87.2% 85.9% 2.1% Total - Southwark 46.5% 47.4% 48.3% -1.8%</p>	
137	7	3 - Vision and objectives			<p>•While we support many of the aspirations expressed in 3.1.4, we feel that, as with the Heygate regeneration, it would be helpful to express these aspirations in a short vision. What is described on page 21 is a series of attributes and targets rather than a vision against which these elements can be assessed. A vision thus expressed could then be included for example on the front of the document as an expression of the change residents and Southwark would like to see throughout the whole area. A theme that has emerged strongly in relation to the Heygate regeneration is one of greenness and many of the elements included in the SPD document are extremely progressive in this way. The potential to connect areas such as the Bankside Urban Forest and the green spaces of East Walworth into Burgess Park and thus encourage sustainable forms of transport would further support such a claim for the transformation of the local area. The promotion of smaller independent businesses could also then work well with this theme of greenness and sustainability. A retail offer that encouraged people both to walk and cycle and spend a far greater proportion of their income within Southwark and the local</p>	<p>While we appreciate that the vision is long, it is however established in the core strategy and cannot be substantively changed through the SPD. We have tried to pick up points about greenness, links to the Bankside Urban Forest, the retail offer, business space and sustainable transport through the objectives set out in section 3.2 as well as through the policies in the plan and the mini-strategies for each of the character areas.</p>

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					area again points to themes around sustainability.	
137	8	3 - Vision and objectives			<ul style="list-style-type: none"> Page 24 Theme 5 We suggest the addition of a further bullet, reading "Utilise small open areas for green public seating and children's play spaces, where the location warrants this treatment" 	<p>SPD 27 sets out how we will ensure communal amenity spaces are designed for a range of activities, including seating areas, play spaces and community planting. We will require landscaping to be of high quality and encourage biodiversity through tree planting/retention, water features and habitat creation. Our draft Open Space Strategy sets out further information on improvements to the quality of open spaces and this is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy</p>
137	9	4 -The preferred option/options	SPD 1-Shopping		<ul style="list-style-type: none"> Page 25 - 4.1.3; page 24 - 2.3.16. The north end of the Walworth Rd (north of Amelia St). We understand the desire to increase pedestrian movement between the Walworth Road shopping high street and the Elephant and Castle but do not believe this can be done purely by building retail to the eastern side of the Walworth Road. While pedestrian activity is vibrant south of the Browning St/Manor Place junction with the Walworth Rd, it falls away dramatically north of there and certainly north of the One-Stop Shop. The road has returned to being 4 lanes wide and has unattractive/intimidating/inactive frontages most notably the Met Police ballistics building north of The Tankard public house. The result of this is that very few people walk the short distance to the Elephant from Walworth – almost all hop on a bus. While the regeneration will hopefully be very successful at revitalising the eastern side of the road at this point, the character of the road itself needs to change. There have already been 2 fatal collisions involving pedestrians since the Walworth Rd Project was finished in this multi-lane section (one by Elephant Rd and one by Heygate St). We would very much hope that the Walworth Rd scheme can be finished off along the lines of the original project (principally by becoming 2 lanes wide) between Amelia St and the Elephant itself. We believe that the detailed diagrams and plans that were created by the Project Centre as part of the Walworth Road Project should still be available and that these can form the basis of plans for this northern section. 	<p>Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.</p>

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					Considerable modelling was undertaken at the time of the project to show the viability of single carriageway running on the Walworth Road and this has been proved to be successful since the project was finished a number of years ago. If adequate provision is made for bus stops then it should be possible to satisfy TfL requirements in terms of journey times with single carriageways in this northern section. We feel that, given its significance, aspirations for connecting the Walworth Road shopping high street and the Elephant area through a transformed Northern Walworth Road should appear in theme 4 on page 24, section 2.3.16.	
137	10	4 -The preferred option/options	SPD 11 - Walkn g and cycling		<ul style="list-style-type: none"> • Page 37. SPD 11: Walking and cycling. We feel that a couple of other points should be made here: - A clear statement concerning the aspiration of 20 mph speed limits is needed. - The need for major roads in the area to become less of a barrier to pedestrian and cycle movement. These roads would include the TLRN and major Borough roads such as the Walworth Road and Newington Causeway. 	The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this. Through funding secured from developments and other sources we will work to improve the environment for pedestrians and cyclists, including reducing the severance created by main roads.
137	11	4 -The preferred option/options	SPD 11 - Walkn g and cycling		<ul style="list-style-type: none"> • Page 39. We note that figure 11: existing and proposed cycle routes omits the planned cycle superhighway 6 (CS6) which will roughly follow the line of the 176 bus to Penge. We understand this is likely to start at or around Keyworth Street and follow the Walworth Road south towards Camberwell. 	The exact route of the proposed Cycle Superhighway 6 has not yet been determined and so it was considered inappropriate to include even an indicative line on the figure.
137	12	4 -The preferred option/options	SPD 11 - Walkn g and cycling		<ul style="list-style-type: none"> • Page 41. 4.4.6. The northern roundabout at the Elephant and Castle is currently the most dangerous single location in the whole of London for road casualties. While we understand the significance of removing subways and the creation of crossings on all of the principal arms of the roundabout, we feel that more is needed to humanise this area than appears currently in the proposals from TfL. A major problem is the sheer amount of carriageway and the consequences of this are high speeds through the area by motor vehicles (especially given their capacity for fast acceleration nowadays). Far more work is needed both to reduce the capacity of the road layout and reduce speeds of motor vehicles. We would of course propose the adoption and enforcement of 20mph speed limits in the area given that this is in reality a town centre with enormous numbers of pedestrian movements especially amongst people waiting for 	We are working with TfL to develop the design for the northern roundabout. While measures to "humanise" it are a key priority for the council, we must recognise that it is a strategic part of the Transport for London Road Network and as such we cannot compromise traffic capacity. The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.

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					buses. But in addition more work is needed to remove the wide lanes and high-capacity that marks out the territory as being for motor vehicles and not people. Lessons also need to be learned from the changes to the southern roundabout where vehicle speeds remain high in spite of significant changes to the carriageway layout. More creativity and thought is also needed into the way that spaces are designed that have been created from carriageway. At present the public realm around the former southern roundabout has a bleak windswept and empty feel to it. The SPD should refer to the need to create attractive places as well as reducing road capacity.	
137	13	4 -The preferred option/options	SPD 12 - Parking		<ul style="list-style-type: none"> • SPD 12. Parking. Section 4.4.8. Car ownership amongst existing residents is already low as has been noted but also is falling and falling at a faster rate in this area than in other parts of Southwark. Although East Walworth is an unusual ward owing to the absence now of people living on Heygate, private car ownership has fallen by over 5% in the last two years compared to the Southwark average of almost 2%. Car ownership levels in both East Walworth and Chaucer wards are now the lowest in Southwark at 28.4% and 30.0% of households respectively. We feel that this provides the Council with more grounds to resist higher levels of car parking on the Heygate estate as clearly the combination of the recession, the increasing presence of car clubs and the proximity to central London is ensuring a lower need for private motor vehicle ownership. Falling levels of car ownership provide the opportunity to reduce the amount of on-street car parking. Increasing cycle use, on the other hand, necessitates more cycle parking, both on and off street. On-street cycle parking can be provided in place of on-street vehicle parking, thus meeting twin objectives for cars and cycles. One car park space can accommodate ten cycles. 	The support for our policy of reducing car parking in new developments is noted. Cycle parking standards are expressed as minimums and we always look for opportunities to exceed them within new developments. As demand for public cycle parking increases we can examine options for using unused on-street parking spaces.
137	14	4 -The preferred option/options	SPD 15 - Public realm		<ul style="list-style-type: none"> • SPD 15. Public realm. The good lighting referred to should be particularly designed for pedestrians and cyclists, with the use of white light rather than orange light and shorter lighting columns than used for motorised traffic, owing to the benefits for pedestrians and cyclists. 	New lighting will be to current standards which are an improvement over older lighting.

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137	15	4 -The preferred option/options	SPD 20 - S106 Planning obligations		<p>• SPD 20: S106 Planning obligations and community infrastructure Levy. While we support significant transport programmes, it is vital that the improvements throughout the SPD area are ring fenced. The danger is that economic benefits alone will be prioritised principally to the benefit of those passing through the area on public transport and making trips to the area from other areas in order to make use of the improved retail provision at the Elephant itself. It is important that local people also benefit from these changes in their daily lives and the improvements outlined in the rest of the SPD area are fundamental to that.</p>	<p>We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need to improve transport infrastructure. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly</p>

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						reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
137	16	5 - Character Areas		Central Area SPD 21 - Land uses	<ul style="list-style-type: none"> 5.1.8. Page 63. We strongly support the references to development providing active frontages where possible. While it is relatively easy to see how this can be done for retail it is important that it is considered in relation to the new leisure centre, the shopping centre itself and other public buildings such as the London College of Communication. For example with a leisure centre the cafe could be created on the ground floor with open views into St Mary's churchyard and the pedestrian and cycling routes that will run from the site of the former southern roundabout to cycle superhighway 5. Bus passengers waiting outside the shopping centre will have a far more pleasant experience if there are active uses at ground level nearby. 	Support noted. SPD 1 sets out the overarching retail strategy for the area, which promotes active frontages along the key routes leading into the centre. The Character Area policies set out further detailed guidance for retail use, to ensure that character of neighbourhoods is reinforced and defined. SPD 21 requires all development in this area to provide active ground floor uses.
137	17	5 - Character Areas		Central Area SPD 22 - Transport and movement	<ul style="list-style-type: none"> SPD 22. Page 63. Given the reference of strengthening the links between the shopping centre and the Walworth Road, it may be appropriate to express the desire to finish the Walworth Road project in the northern section at this point. 	Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.
137	18	5 - Character Areas		Central Area SPD 23 - Built Environment	<ul style="list-style-type: none"> SPD 23: Built environment. It is not clear where the front of the shopping centre is. Assuming that it is the face of the shopping centre opposite the Tabernacle building, it will be important to design the proposed new civic space in a way that increases the space for bus passengers waiting in the area opposite the Tabernacle building. 	The location of the proposed civic space is shown on Figure 19 and is opposite the Tabernacle.

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137	19	5 - Character Areas		Heygate Street SPD 26 - Transport and movement	<ul style="list-style-type: none"> SPD 26: Transport and movement. As well as Harper Road and Falmouth Road, mention should also be made of Meadow Road owing to its connections with LCN 22. This will remain an important link to CS7 and other cycle routes to the north. We strongly agree that on-street car parking should be minimised and believe that streets can be made active without reliance on motor vehicles to be the source of that activity. 	Policy SPD 11 covers all roads in relation to cycling. Support noted.
137	20	Appendix 1- Implementation		Heygate Street SPD 27 - Built environment	<ul style="list-style-type: none"> SPD 27: Built environment. We strongly agree the courtyards should be at ground rather than podium level. It is understood that private space is needed for residents but given the extreme shortage of green space in the area, pleasant views of green space for those passing by are important and can add to the visual amenity of the development. 	Support noted.
137	21	5 - Character Areas		Heygate Street SPD 28 - Natural environment	<ul style="list-style-type: none"> SPD 28: Natural environment. Given the importance of creating links to the Bankside Urban Forest we feel that reference to that would be valuable in SPD 28. Although Balfour Street sits on the border of the SPD area we feel that some mention should be made of it as a green route and what the aspirations are for the links between the Phase 1 development and the existing homes and buildings that lie along that street. 	We have included a reference to improving links Bankside Urban Forest in the final SPD. Balfour Street is already identified as a green route on figure 16 of the SPD and we will seek to promote this in line with the requirements set out in SPD 18.
137	22	5 - Character Areas		Brandon Street SPD 29 - Land uses	<ul style="list-style-type: none"> 5.3.8. Page 80. The need for clarity as to the purpose of and character of green routes is exemplified by the bullet point “to improve green routes to Burgess Park”. It is not clear at present in what way those links exist between, for example, Nursery Row Park and Burgess Park. A key element in the implementation of the SPD will be to create such links here and elsewhere in the opportunity area. 	We have included an additional paragraph (4.6.5a) in the final SPD setting out further detail on the potential characteristics of green routes.
137	23	5 - Character Areas		Brandon Street SPD 31 - Built form	<ul style="list-style-type: none"> SPD 31: Built form and public realm. We note the mention of the junction at Orb Street but feel that more needs to be made of this opportunity. The whole idea of green links/routes is to connect green spaces. We have already mentioned Balfour Street and its significance as a means of connecting Victory Park with routes to the south. It is a very short distance from the junction of Balfour Street and Rodney 	SPD 32 sets out how we will promote opportunities to improve the natural environment that focus on enhancing the green routes shown on Figure 25, this includes Balfour Street and the connection with Nursery Row Park. SPD 32 also sets out how we will enhance Nursery Row Park, in particular its nature conservation value. We have included an additional paragraph (4.6.5a) in the final SPD setting

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					Road through to Nursery Row Park. While improvements to the junction at Orb Street can help, what is really needed is a strategy to connect the southern end of Balfour Street to Nursery Row Park to the benefit of pedestrians and cyclists. The creation of a strong green crossing at this point using planting, carriageway capacity reduction and public realm improvements immediately opens up a link between the Heygate estate and Nursery Row Park via Victory Park and Balfour Street.	out further detail on the potential characteristics of green routes.
137	24	5 - Character Areas		Walworth Road SPD 34 - Transport and movement	<p>• SPD 34: Transport and movement. Although opportunities do exist to improve pedestrian and cycle routes in terms of the links into the surrounding areas it is also vital that the improvements are made to the southern section of the Walworth Road. We know that casualties are weighted heavily nowadays towards main roads and there will be real value in completing the Walworth Road project in the area around the Gateway estate. This should be included in the SPD.</p> <p>• It was originally intended (just as in the northern section north of Amelia Street) that the Walworth Road Project would in time remove the dual carriageway section south of Fielding Street which extends as far south as John Ruskin Street. It is important to return this section to single carriageway working (obviously with sufficient ample provision bus stops) and that this is included as part of the longer term plans for the Walworth Road. Those living on the Aylesbury Estate with its lower PTA L levels than other areas nearby will rely on both shops in this area and safe crossings to bus stops around the Gateway Estate in particular for journeys northwards. The public realm in this area currently presents a hostile environment with wide fast moving vehicles in this wide section of the Walworth Road. Reducing this to single carriageway will attract both pedestrians and cyclists and improve the economic vibrancy of this lower section of the Walworth Road. Oddly enough, narrowing the carriageway could in fact have benefits for traffic flow as vehicles do not speed up and slow down as they reach the narrower sections and pedestrians will have shorter distances to cross meaning that crossing times on the formal crossings can be reduced. We would very much encourage this to be included in the SPD and also to be integrated into</p>	Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.

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					the plans for the Aylesbury Estate.	
137	25	5 - Character Areas		Rail Corridor SPD 40 - Natural environment	<ul style="list-style-type: none"> •5.5.17. Page 97. We are uncertain as to why Nursery Row Park has been referred to at this point. 	It is an aspiration of the SPD to promote a green route along Amelia St and Larcom Street to improve access to Nursery Row park.
137	26	5 - Character Areas		Rail Corridor SPD 38 - Transport and movement	<ul style="list-style-type: none"> • SPD 38: Transport and movement. At present, there are grim pedestrian links from the Newington Estate to the Walworth Rd along both Hampton St and Steedman St with narrow cluttered, broken and filthy pavements. There is an excess of carriageway; poor condition of the railway bridge. Many blank, threatening and unattractive frontages. Investment is needed in the quality of the walking and cycling links into the Newington Estate from the Walworth Rd along these streets. A statement is needed to ensure the s106 money from the developments in the area such as Alumno will be used to benefit these streets. A bold approach would be to develop them along HomeZone or DIY Streets principles where motor vehicles are very much subordinate to pedestrians and cyclists. 	Walking and cycling is covered more generally in SPD 11 which sets out our approach to providing a high quality network of pedestrian and cycle routes in the opportunity area. Development in the opportunity area will need to provide convenient, direct, safe, and attractive pedestrian and cycle links. This will include reducing severance created by the railway viaducts and main roads. SPD 20: sets out how we will use s106 planning obligations to ensure the delivery of key infrastructure and to mitigate the impact of development. We will pool contributions towards large items of infrastructure, including improvements to the public realm.
137	27	5 - Character Areas		Rail Corridor SPD 39 - Built form and public realm	<ul style="list-style-type: none"> • SPD 39: Built form and public realm. We note with interest figure 31 and its indicative proposals for the rail corridor character area. We are particularly interested in the proposed pedestrian routes that run along both sides of the rail corridor. Given the high levels of commitment that will be needed to achieve the creation of these routes, we feel that specific mention should be made of both of them under the heading of SPD 39. There are some significant barriers to be overcome to open up these routes. On the west side real vision will be needed to create a link north-south between Penrose Street and Manor Place both through the current development site of the Manor Place Depot and then past the large brick building on Penrose St. North of Manor Place, real thought will need to be given to create links through the current site of the post office sorting depot and the light industrial unit immediately to the north. A route then exists north as far as the Newington estate boiler room but needs 	SPD 15 sets out our approach to improving public realm including to secure S106 improvements that contribute towards a hierarchy of different types of streets and spaces and prioritise pedestrian and cycle movement. We have shown a continuous link from Strata south along either side of the viaduct through Manor Place depot. The east-west link through kwik-fit is shown on the plans.

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					to be opened up and work needs to be done to make that feel a safe area for pedestrians/cyclists. On the eastern side the possibilities of a route are easier to envisage especially given the Alumno development on Hampton Street. These opportunities if realised are extremely exciting for the local area and deserve to be given higher prominence in the SPD document than they are given to date. The east-west route proposed through the current Kwik-Fit site will be of tremendous used too and again needs to be highlighted.	
137	28	5 - Character Areas		Pullens SPD 42 - Transport and movement	<ul style="list-style-type: none"> While much of this area is attractive, certain parts remain neglected. Thought and mention needs to be given to Dante Road which is an extremely poor environment with large amounts of dead carriageway at present. Thought needs to be given as to how to reduce the excess road capacity of this street and how it can be made more attractive potentially through greening. 	Dante Road has now been included as an opportunity site. Public realm improvements could be looked at as part of the development proposals.
137	29	5 - Character Areas		Pullens SPD 42 - Transport and movement	<ul style="list-style-type: none"> Although figure 34 indicates a green route along Longville Road, more specific mention needs to be made of this as it will be only too easily forgotten unless specific attention is drawn to it. It has, however, significant appeal as a route for pedestrians and cyclists west towards Westminster along Brook Drive. It also has a potential role in linking up cycle/pedestrian routes that will be created alongside the leisure centre and St Mary's churchyard. 	SPD 44 sets out how we will promote opportunities to improve the natural environment that focus on enhancing the green routes shown on Figure 34. We consider that this is sufficient reference in order to promote the green routes identified in the figure. We have included an additional paragraph (4.6.5a) in the final SPD setting out further detail on the potential characteristics of green routes.
137	30	5 - Character Areas		West Square SPD 46 - Transport and movement	<ul style="list-style-type: none"> The creation of/permission for contraflow cycling along Geraldine Street would open up cycling routes in this area that can make use of Geraldine Mary Harmsworth Park. 	Noted.
137	31	5 - Character Areas		Enterprise Quarter SPD 50 - Transport and	<ul style="list-style-type: none"> SPD 50: Transport and movement. A clear statement needs to be made about the ambitions for Newington Causeway. At present as with many roads in the Elephant area Newington Causeway acts as a tremendous block to pedestrian and cycle movements owing to its motorway like appearance. Real investment is needed in this road in order to reduce capacity and vehicle speeds. At present what is a 	Policy SDP 51 seeks improvements to Newington Causeway.

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				movement	short walk from the Elephant to Borough tube and the River is made by very few pedestrians.	
137	32	5 - Character Areas		Transport Quarter SPD 51 - Built Environment	<ul style="list-style-type: none"> SPD 51: Built environment. A clear statement needs to be made about active frontages on the east side of London Road. South of the Georgian terrace this is a particularly threatening and yet significant frontage principally owing to the bus stops that run the length of this road. The public realm strategies of LSBU need to focus on bringing the whole of this stretch back to life both by having active frontages at ground level and removing the valley that runs along the length of many of the buildings. Although this is backed up in 5.8.13 a clear statement along these lines is needed in SPD 51. 	SPD49: Land Uses - sets out that development should provide active ground floor uses along the main roads and around the key gateway spaces in the Enterprise Quarter. We have amended the SPD Figure 40 to include active frontages along London Road.
137	33	5 - Character Areas		Rockingham SPD 55 - Built form and public realm	<ul style="list-style-type: none"> 5.9.4. We strongly support the call for public realm improvements on Falmouth Road. We feel this can become an important link for cyclists and pedestrians to the north. 	Support noted
137	34	5 - Character Areas		Rockingham SPD 53 - Land uses	<ul style="list-style-type: none"> SPD 53: Land use. There is a clear community call for improvements to community facilities within the area. Residents on the Rockingham estate feel that they are neglected in local regeneration projects and that commitment to improve at the very least the community centre in the area needs to be made. 	The value of the community centre will be recognised by inserting some text in the 'opportunities' section in the Rockingham character area.
137	35	4 -The preferred option/options	SPD 18 - Open spaces		<ul style="list-style-type: none"> Some work is needed to connect a number of the maps that appear in this document. Our focus here is on figure 16 (the open space network), figure 12 (existing and proposed pedestrian routes) and figure 11 (existing and proposed cycle routes). Some work is needed to ensure that the pedestrian routes fit with the open spaces framework and the cycle network. At present there are issues with the open spaces framework owing to inconsistencies shown below: -in figure 22: indicative proposals for the Heygate Street character area. A green route is indicated along Heygate Street but this green route is absent from figure 16. In 	We have amended the figures in the final SPD to reflect these changes and ensure consistency.

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					<p>addition it needs to continue westwards along Steedman Street and into the Newington estate where it should link up with the green route that runs parallel to and south of Kennington Park Road. -In figure 34: indicative proposals for the Pullen's character area. The green route along Amelia Street continues westwards across Penton Place into Berryfield Road. This is absent from figure 16 in the section west of Crampton Street. This is significant because at present the area in front of the small park that faces the Pullens buildings is a rat run (along Amelia St) and work is needed to make this a safe cycling and pedestrian route.</p> <ul style="list-style-type: none"> •We would very much propose a meeting that seeks to produce a coherent network that coordinates the links between these open spaces, cycling routes and pedestrian routes. This meeting could also discuss the nature of the green routes that are being proposed in the SPD, a draft on which we have suggested in our Introduction and Overall Comments; and could identify existing examples of green routes elsewhere in Southwark and in other places. 	
137	36	Appendix 2- Public Realm strategy(Ent Qtr)			<ul style="list-style-type: none"> • 1.13. Street improvements Newington Causeway. We feel a clear statement is needed as to the nature of the boulevard character and city scale hierarchy for Newington Causeway. More needs to be done with this street than is outlined in the design principles/proposals in 1.13.2. Although the footway needs to be improved and tree planting and lighting is important the core problem with this road is the sheer amount of carriageway capacity and the associated high vehicle speeds. Capacity is constrained further to the north on Borough High Street to a single carriageway and, given the existence of this carriageway reduction, there is no particular reason why the principles of the Walworth Road project should not be adopted and carriageway should be removed (while obviously bus stop provision and space needs to be retained). • At the very least the central section of the road needs finally to be reclaimed as public realm. Paving or grassing it over and planting with trees would begin to give some sense of a boulevard. For vehicle drivers, the street should be designed to a maximum of 20mph. Newington Causeway should no longer be the utter barrier that it currently is to pedestrian movement between the 	<p>These comments will be passed to TfL, and where appropriate nearby development will be required to contribute to improvements.</p>

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					Elephant and London Bridge.	
140	388				<p>The process of developing the Elephant and Castle SPD has inhibited and most likely will continue to inhibit community involvement. The space where the community can make their input has been limited to the public consultation period itself. Firstly, the production of the draft SPD was undertaken with no community involvement, contrary to national planning policy as set out in Planning Policy Statement 1. Paragraph 7 Plans should be drawn up with community involvement and present a shared vision and strategy of how the area should develop to achieve more sustainable patterns of development. Paragraph 43 Community involvement in planning should not be a reactive, tick-box, process. It should enable the local community to say what sort of place they want to live in at a stage when this can make a difference. Effective community involvement requires an approach which: – enables communities to put forward ideas and suggestions and participate in developing proposals and options. It is not sufficient to invite them to simply comment once these have been worked-up. Secondly, the timeframe for adopting the SPD, only one month after the close of public consultation, makes it very difficult for any significant changes to be made. This is contrary to principles of good consultation which require genuine reflection on comments made during the consultation period, and a willingness to engage with respondents and make changes. Both of these limitations on community input are the result of development pressure in the form of the Regeneration Agreement between the Council and the main developer Lend Lease.</p>	<p>Our Statement of Community Involvement 2008 (a statutory document) sets out how and when we will involve the community in the alteration and development of town planning documents and applications for planning permission. National planning laws set out the minimum standards for public consultation. We have gone beyond these standards and have set out how we have engaged with the community, stakeholders and businesses in the preparation of the SPD in the Consultation Report. The preparation of a scoping report was the first stage to assist in the preparation of the SPD and its sustainability appraisal. The Scoping Report was subject to public consultation in January 2011 - February 2011. The scoping report set out the sustainability objectives and indicators that will be used to measure the impacts of the SPD upon sustainable development and it also set out baseline information to draw attention to key environmental, social and economic issues in the area which may be affected by development in Elephant & Castle. Consultees were asked to provide details of any other plans and programmes, sustainability objectives, key issues and baseline information that they considered to be particularly relevant to the preparation of the SPD. We received a number of consultation responses on the Scoping Report. These are set out in the Sustainability Appraisal Appendix 3 along with our officer responses. This stage informed the preparation of the draft SPD. We consulted on the draft SPD for 12 weeks, comprising of 6 weeks informal and 6 weeks formal consultation in accordance with our SCI. In undertaking the consultation programme for the SPD, we have needed to take into account the important roles played by the different groups and communities within the area to find out the best ways of involving people in the consultation. We have worked with established networks and partnerships to try to make sure that people are being involved effectively. The Consultation Report sets out a detailed account of the range of events and meetings held.</p>
140	389	3 - Vision and			The SPD should be based upon a vision which integrates the	The SPD vision needs to be consistent with the Elephant

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		objectives			<p>local neighbourhood level with the borough wide and Pan-London strategic levels. This is required by Planning Policy Statement 1, which has the following to say about vision:- Paragraph 13 (vi) In developing the vision for their areas, planning authorities should ensure that communities are able to contribute to ideas about how that vision can be achieved, have the opportunity to participate in the process of drawing up the vision, strategy and specific plan policies, and to be involved in development proposals. Paragraph 41 One of the principles of sustainable development is to involve the community in developing the vision for its area. Communities should be asked to offer ideas about what that vision should be, and how it can be achieved. Section 3 provides the Mayor's vision and Southwark's vision, but doesn't go on to provide the vision of local residents and traders and other local stakeholders. This 3rd layer of a neighbourhood based vision must be added, otherwise the SPD is not defining our aspirations and will not meet the needs of local people and groups. The change I am seeking is for the neighbourhood vision produced by the Elephant Amenity Network to be inserted as 3.1.5</p>	<p>and Castle vision set out in the Core Strategy, which went through an examination in public and adopted in April 2011. This Vision was developed in consultation with local people and reviewed by a Planning Inspector during the EiP hearings. The Inspector was satisfied that the production of the Core Strategy followed the adopted Statement of Community Involvement (SCI) and the Core Strategy reflected local distinctiveness adequately, (i.e. through the area visions). The Council is supportive of neighbourhood planning. In April 2011 it was announced that Southwark had been selected by the government's Department for Communities and Local Government as one of the neighbourhood planning front runner authorities. The purpose is to test out the principles of neighbourhood planning as set out in the government's Localism Act, will be demonstrated. The Council has been working with a neighbourhood forum in the Bermondsey/London Bridge area as well as the Bankside Resident's Forum to provide support and advice on the preparation of neighbourhood plans. We have added reference to the potential contribution of neighbourhood planning to the area in Section 2 of the SPD. Neighbourhood planning will allow people to come together through a neighbourhood forum and discuss what detailed changes they would like in their areas and prepare neighbourhood visions and policies.</p>
140	390	4 -The preferred option/options	SPD 1- Shopping		<p>The policy to provide new affordable floorspace is welcome. However, the SPD assumes the displacement of small businesses, and says nothing about supporting the existing affordable shopping units, to promote their retail offer, attractiveness and competitiveness so that they are able to stay put and not displaced. This support is required by London Plan Policy 4.9. There is no mention at all of London Plan Policy 4.8 "Supporting a successful and diverse retail sector" which requires support of existing small and independent traders and local shopping parades. Policy 4.8 B (c) requires: Provide a policy framework for maintaining, managing and enhancing local and neighbourhood shopping facilities. The SPD mentions adding diversity and adding a wider retail mix, but does not recognise and support the rich retail diversity that is the Arches, the Shopping Centre and</p>	<p>1. We have amended the supporting text to SPD1 to provide further recognition of the value and contribution of local shops in the area. 2. We have amended the SPD in Section 2 to add further recognition of the cultural diversity that exists in the area, including the diversity of businesses at the Elephant and Castle, in particular, the Latin American presence and their contribution to the local economy. 3. The requirement for the provision of affordable units in new large retail developments over 1,000sqm will help to mitigate the impacts on businesses displaced as a result of development. It is not intended that any monies be passed directly to any individual business to help in relocation, which may breach EU State Aid rules. Where s106 financial contributions are made in circumstances whereby it is demonstrated by the applicant</p>

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					<p>the outdoor markets. I am seeking changes to the wording so as to: - support existing small businesses, including street markets and local shopping parades Rodney Road, New Kent Road, Harper Road and East can afford and employ local people - recognise and support the valuable contribution made by the existing minority ethnic businesses to the variety of retail offers in the area and to cultural diversity by providing the space for the development of social networks and social infrastructure. - provide support for traders at the E&C Shopping Centre for the sustainability of their business, and their ability to return/remain in the centre during redevelopment. - provide a long term commitment in support of small businesses that will contribute to and enhance the distinctive character of the area. Delete the final sentence in SPD paragraph 4.1.7 and replace with a longer term commitment.</p>	<p>that it is not feasible or viable to provide on-site or off-site affordable units, the contributions will be pooled for the locality to provide indirect support for businesses. 4. The SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's. Five years is considered a reasonable amount of time for a business to establish itself. While discounted rent will be appropriate to bring independent retailers into new spaces, once they gain traction and start making money, they will be able to afford to pay more rent. The Council's Economic Development currently funds Business Support advisors which are available to support businesses in the area. The SPD vision needs to be consistent with the Elephant and Castle vision set out in the Core Strategy, which went through an examination in public and adopted in April 2011. This Vision was developed in consultation with local people and reviewed by a Planning Inspector during the EiP hearings. The Inspector was satisfied that the production of the Core Strategy followed the adopted Statement of Community Involvement (SCI) and the Core Strategy reflected local distinctiveness adequately, (i.e. through the area visions). The Council is supportive of neighbourhood planning. In April 2011 it was announced that Southwark had been selected by the government's Department for Communities and Local Government as one of the neighbourhood planning front runner authorities. The purpose is to test out the principles of neighbourhood planning as set out in the government's Localism Act, will be demonstrated. The Council has been working with a neighbourhood forum in the Bermondsey/London Bridge area as well as the Bankside Resident's Forum to provide support and advice on the preparation of neighbourhood plans. We have added reference to the potential contribution of</p>

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						neighbourhood planning to the area in Section 2 of the SPD. Neighbourhood planning will allow people to come together through a neighbourhood forum and discuss what detailed changes they would like in their areas and prepare neighbourhood visions and policies.
140	391	4 -The preferred option/options	SPD 4 - Jobs and Business		There is no reference in this policy to jobs, when there should be mechanisms to ensure that a good proportion of the 5,000 new jobs benefit local people. The change I am seeking is a 30% local jobs target, for those living in the Opportunity Area and immediate surroundings. (immediate surroundings to be bounded by the wards of East Walworth, Newington, Faraday, Chaucer and Cathedral). Without a policy on local jobs, there is no mechanism to ensure that the regeneration is delivering local benefits.	The objective of meeting the provision of 5,000 new jobs is set out in the vision for the opportunity area. This figure is an indicative employment capacity set out in the London Plan for the opportunity area. SPD4 builds upon the vision, and sets out reference to the employment floorspace quantum, which will help to deliver the 5,000 new jobs. The supporting text to SPD4 refers to the adopted Policy 10 of the Core Strategy and the s106 Planning Obligations SPD which requires s106 planning obligations to be used to target training and employment opportunities created by new development towards Southwark's residents. We will monitor the delivery of our planning policies to see if we are meeting our targets and objectives. The Southwark Annual Monitoring Report indicators are used to monitor results. Where necessary, as a result of this monitoring process, we will adjust the implementation of our policies to make sure we meet our objectives.
140	392	4 -The preferred option/options	SPD 5 - New Homes		This policy does not reflect local housing needs at the Elephant and Castle, where there is severe overcrowding and many living in poor housing conditions. The proposed solution to provide more private market housing and reduce the concentration of affordable housing bears no relation to what local people can afford to pay for their housing. That the proposed solution to overcrowding is to build only 10% family housing is a mechanism for displacement of families and the fragmentation of neighbourhoods. The SPD needs to conform to London Plan Policy on 3 bed + housing (at least 30%) and respond to funding regimes that require far more family housing than 10%. This will not be the only change that this SPD and other SPD's are making to Core Strategy policy. The changes I am seeking are:- The policy must mention the huge demand for social rented housing, recognise that for most people this is the only housing that is affordable and therefore have as a policy aim the maximum	Section 2.3.3 of the SPD on challenges and opportunities recognises that there is need for more homes of all types. There is not only a need for social rented housing but also intermediate and private housing. This section of the SPD also recognises the challenge to delivering social housing due to reduction in social housing grant from the Homes and Communities Agency. The SPD provides guidance on the Core Strategy policy requiring a minimum of 10% 3+ bedrooms. The SPD cannot change this policy. With regards to the London Plan, the Mayor has an aspiration through his Housing Strategy to increase the number of family units, especially family homes. The London Plan also refers to boroughs needing to take into account the need for housing choice as well as the need for more affordable family units. However, this is not a policy, and the Core Strategy is in general conformity with the London Plan. With regard to the proposed changes: 1. Social

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					<p>achievable amount of social rented housing. Viability studies will not be permitted to allow affordable housing to fall below the minimum requirement of 35%. The viability studies will determine how much additional affordable housing above the 35% threshold can be achieved. A redefinition of the word affordable to relate to actual modest incomes as part of a review of affordable housing made necessary by changes in central Government policy There needs to be an aspiration of 30% new homes being 3 bedroom plus.</p>	<p>rented housing: The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies. As set out above, section 2.3.3 already mentions the need for all types of housing in the Elephant and Castle opportunity area, not just the need for social rented housing. 2. Viability studies: National guidance through Planning Policy Statement (PPS) 1, PPS12 and PPS3 require policies to have a degree of flexibility to allow for changing circumstances over the lifetime of the plan. They also require policies to be deliverable and implementable. The Core Strategy policy on affordable housing requires as much affordable housing on developments of 10 or more units as is financially viable. As set out in the background paper to the Core Strategy housing policies, our affordable housing viability study (2010) shows that a minimum of 35% affordable housing is a deliverable policy across the majority of the borough over the 15 years of the Core Strategy. However, there may be cases where the policy is not viable, and as set out in the background paper, we allow a financial appraisal to be submitted to justify a departure from policy. This approach is set out in the affordable housing SPDs (both adopted and draft) and applies to the whole borough. The London Plan also advocates this approach. We will therefore continue to require a financial appraisal to be submitted to justify to the satisfaction of the council why the minimum policy requirement cannot be met. 3. Definition of affordable. The definition of affordable housing in relation to planning policy</p>

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						needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London Plan similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing.
140	393	4 -The preferred option/options	SPD 11 - Walking and cycling		There is no vision of a walkable neighbourhood, no detail of what is required to provide a safe environment for pedestrians. Allowing pedestrians adequate time to cross the road safely is an important issue, so is taking care with shared spaces and reducing traffic speed to 20 miles per hour. The changes I am seeking are:- Reference to New Kent Road, to the removal of its subways and to improved safety for pedestrians and cyclists on New Kent Road To enhance the safety of the walking environment, including ensuring crossing times that are adequate for all and do not leave people vulnerable and under pressure when crossing the road. The adoption and enforcement of 20 mph speed limits wherever practical.	Policy SPD 11 adequately covers walking matters. On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings. The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.
140	394	4 -The preferred option/options	SPD 17 - Building heights		This is a partial pro-tall buildings policy which does not conform with either London Plan Policy 7.7 or the Core Strategy vision for the Elephant and Castle which states:- We will set out in detail which sites are appropriate, sensitive and inappropriate for tall buildings through the supplementary planning document. No consideration has been given to the impact of tall buildings on the Elephant and Castle's conservation areas, listed buildings and local character. There should also be a requirement that evidence is produced that the tall building will not have a negative impact on microclimate, wind turbulence, sun-path and shading. The London Plan sees the opportunity area planning frameworks as the place for scrutiny of the appropriateness of sites for tall buildings but there has been no public input into these assessments and therefore no	London Plan policy 7.7 indicates that tall buildings may be appropriate in opportunities areas. SPD 17 states that tall buildings should not harm the heritage assets. The built form policies in the character areas specify specific heritage assets including listed buildings and conservation areas which may be affected and reiterates that impacts should be addressed. As an example of this SPD 27 refers to the need for building heights to take into account heights in the proposed Larcom Street conservation area. It also refers to maintaining the view of St Pauls from Camberwell Road. SPD 17 also states that tall buildings should avoid harmful microclimate effects. SPD 17 has been informed by a characterisation study and a tall buildings study which have been prepared in a manner consistent with CABE and English Heritage advice.

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					consensus. This policy is in need of considerable revision or should be withdrawn.	
140	395	4 -The preferred option/options	SPD 18 - Open spaces		0.61 hectares of open space per 1,000 people is very low, when compared with national standards like that of the National Playing Fields Association. This is a decrease on the existing level of open space of 0.70 ha per 1,000 people which is recognised to be deficient (see paragraph 2.2.4 of the SPD). I am seeking the following changes in accordance with PPS17 and the CABE/ GLA Guidance on Open Space Strategies: To mitigate the decrease in public open space the following measures will be undertaken- open space protection will be extended to small open spaces, including housing amenity space,; all new open space that is provided will be protected and managed as public space	We recognise that the provision of open space in the area is low. We have amended the final SPD to set out a standard of 0.76 per 1,000 population in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate redevelopment will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026. We have also included an additional paragraph (para 4.6.5b) setting out more detail on how we will seek to improve the amenity value of land on housing estates and within the transport network. Further information is also set out in our draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
140	396	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		The appendix details section 106 spend. If fails to provide for any s106 spend on affordable/ social rented housing or on community facilities other than health and education facilities. It should provide for a library/ lifelong learning centre, buildings for use by voluntary and community sector groups, the kind of comprehensive range of facilities promised by the 2004 Elephant and Castle framework document. This SPD policy does not conform with Core Strategy Strategic Policy 14 on Planning Obligations and Strategic Policy 4 on Community Facilities. It also fails to conform with the Planning Obligations SPD. It is wholly inappropriate that the SPD is developing and applying a new s106 policy to the Elephant and Castle. Given the policy requirement to deliver at least 35% affordable housing, and the claims of viability studies that in current economic circumstances 25% affordable housing is the optimum that can be delivered, it is imperative that a significant amount of s106 supports affordable housing. In the current environment, the Council is struggling to deliver the social	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need to improve transport infrastructure. However, with the upgrade to public

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					rented housing component on its development sites. Therefore, it is essential that s106 contributions for affordable housing required by borough planning policy are ring-fenced for social rented housing. SPD 20 states that "strategic transport improvements will be our priority in negotiating planning obligations". The change I am seeking is the deletion of this sentence and the addition of affordable housing, particularly social rented housing, in the opening paragraph of SPD 20.	transport, it will not be possible to deliver the numbers of new homes and new affordable homes anticipated.
140	398				NEW POLICY SPD INTERIM USES To address the concern that large tracts of the Elephant and Castle could become derelict sites and no-go areas, whilst waiting for development to start, there will be support for interim uses which potentially could provide employment and training opportunities, green uses, retail, leisure and community spaces. Interim use can: - put unemployed land and buildings to new and productive uses - develop creative partnerships to deliver a wide variety of uses - give the highest regard to a sustainable Elephant and Castle in the re-use of spaces and materials	The SPD is supportive of the development of interim uses. We have amended Theme 3: Wellbeing: Social and community infrastructure with the objective of providing more and improved educational, health and community facilities which meet the needs of existing and future residents and support interim uses which promote these. Theme 7: Delivery: Making regeneration happen sets out the objective of ensuring that comprehensive redevelopment does not compromise safety and maximises opportunities to make use of vacant sites on an interim basis. The Heygate Street Character Area SPD25 encourages interim uses of development sites.
149	40	5 - Character Areas		Central Area SPD 22 - Transport and movement	I see that the improvements to the Tube station are included as a bullet point in SPD 22 under 'Development should help facilitate the following improvement' . Can you include a similar bullet point in there for the railway station? This might eg be something like: " * Improvements to the access to and from the railway station from the street and from the shopping centre, and its links with the other transport forms of underground and buses. " Then in the 'we are doing this because', this could be explained by a sentence which reflects the need to make it easy and pleasant for pedestrians to use the rail station and to make connections between street and shopping centre and the rail station as part of an integrated transport approach at the E&C. At the moment it feels as if the draft SPD sees the railway only as an obstacle and a barrier to be overcome in planning the built environment, without due attention being given to getting the rail station well integrated into the overall development. I can see that the rail station is mentioned in	Policy SPD 10 seeks improvements to access to the rail station.

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					SPD 23 built environment section, along with the tube station. But the situation at the station is so dire, it needs to be mentioned in SPD 22, just as the tube station is.	
150	307	4 -The preferred option/options	SPD 18 - Open spaces		Thank you for the opportunity to comment on the above planning document. The Friends of Nursery Park would like to submit the following comments. Overall we welcome the recognition (5.3.13) that Nursery Row Park provides a vital open space for the surrounding homes.	Support noted.
150	308	5 - Character Areas		Brandon Street SPD 32 - Natural environment	a) The Friends of Nursery Row Park strongly welcome the commitment (SPD 32: Natural environment) to enhance Nursery Row Park and its nature conservation value - we are strongly in support of the statement that the park is to be protected in its entirety from inappropriate development, in line Core Strategy policy 11, as we think this is critical;	Support noted.
150	309	5 - Character Areas		Brandon Street SPD 32 - Natural environment	b) Whilst we recognise the SPD cannot designate a SINC, we strongly support the statement that the entirety of the park should be protected and should remain as open space (5.3.14)	Support noted.
150	310	5 - Character Areas		Brandon Street SPD 32 - Natural environment	c) We agree that although the current park represents a very valuable reservoir of biodiversity in the area, we agree that there is further scope to improve nature conservation at Nursery Row Park (4.6.3)	Support noted.
150	311	5 - Character Areas		Brandon Street SPD 32 - Natural environment	d) We further support the identification (5.3.8) of the Orb St/Rodney Road junction as a key location where access to the park could be improved.	Support noted.

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				ment		
154	125				Thank you for the opportunity to comment on the draft Supplementary Planning Guidance (SPG)/Opportunity Area Planning Framework (OAPF) for the Elephant and Castle, and its associated documents. This includes its Sustainability Appraisal (SA) Report, Characterisation Study, Urban Design Background Paper, and Public Realm Strategy for the Enterprise Quarter. In general we welcome the approach of the draft SPD/OAPF and the various supporting documents that help informed its development. However after considering its details we have the following headline comments to make on the draft SPD/OAPF. Further detailed comments are provided in the attached appendix.	Support noted.
154	126	4 -The preferred option/options	SPD 16 - Built form		<ul style="list-style-type: none"> • In general we support the approach of the draft SPD/OAPF, subject to further clarifications and amendments to policy wording and supporting text. For example, conservation and enhancement of the areas heritage assets should be seen as part of the story of positive and proactive regeneration of the whole of Elephant and Castle. Only where there is a designation, principally a conservation area, does there appear to be a reference to heritage-led regeneration when managing future change. We would suggest this principle should be reflected across the whole area. In addition policy wording used in the draft SPD/OAPF should be tightened so that it reflects closely national policy and guidance, principally PPS5 and Circular 07/09. 	Support noted. We have proposed changes to SPD16 and the supporting text that where possible development proposals should consider how a heritage asset and its setting can be positively utilised as part of the proposal.
154	127				<ul style="list-style-type: none"> • We welcome the development of evidence base to help inform the management of tall buildings in the Opportunity Area (OA). However there is still a lack of clarity on the overall vision for tall building development in this area and its resulting physical form on the skyline. It is appreciated that the OA is affected by the background areas of key strategic views, and that London Plan policy (Policy 7.12) clearly states that developments in the background should give context to landmarks and not harm the composition of the view as a whole. In addition within panoramas, developments should fit in with the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole. This includes not creating a canyon 	Support noted. The SPD sets out the strategy for tall buildings and guidance while maintaining flexibility in implementation of the policy. This also considers that it is a 15 year plan where many sites are within different ownerships and therefore providing the detail on the form of development would be too prescriptive.

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					effect around strategically important landmarks. It is noted that the background papers appear to give hints when assessing modelling scenarios. However the details of the analysis does not feed into the draft SPD/OAPF in the form of a clear overall vision for the Elephant and Castle in terms of the form of the resulting cluster, the hierarchy of built forms and the contribution it will make to London's wider skyline.	
154	128	4 - The preferred option/options			<ul style="list-style-type: none"> It is important that the draft SPD/OAPF and its associated papers reflect the principles of setting as defined by PPS5, Practice Guide and further expanded by English Heritage's The Setting of Heritage Assets (2011). Essentially that the setting of a heritage can contribute to its significance and that this contribution goes beyond the visual relationship. At present the detail provided focus on the visual aspect of setting and does not explore sufficiently the impact of development upon the significance of heritage assets affected. 	We generally require development to consider the setting of heritage assets. Further policy and guidance on considerations of setting will be set out in a Heritage SPD.
154	129				<ul style="list-style-type: none"> We support the details of the Characterisation Study undertaken. However we would suggest that the Walworth area should be reconsidered as having the potential to be a conservation area. The evidence provided could be easily interpreted as a justification for its designation, especially when the vast majority of the buildings in the character area are of a quality that could potentially be considered as locally listed, or of townscape merit. In addition we would suggest the Victorian group of buildings centred on Ilffe Street and Yard are of such local significance that they have the potential of being locally listed, rather than buildings of townscape merit. 	Support noted. On the basis of the evidence provided we consider that the Walworth Road is currently not suitable for designation as a conservation area. Should any further evidence come forward we would consider the potential for its designation at that time.
154	130	5 - Character Areas		Enterprise Quarter SPD 51 - Built Environment	<ul style="list-style-type: none"> English Heritage's funded Urban Design Framework for St George's Circus should be more clearly referenced and used to inform change in the Enterprise Quarter. At present it has not been explicitly referenced and it is questionable whether it has been used in the development of the evidence base and subsequent draft SPD/OAPF. 	The Urban Design Framework for St. George's Circus was considered when producing the Enterprise Quarter SPD. This in turn has informed the approach set out in the draft SPD/OAPF. We will include reference to this document in the supporting text to Enterprise Quarter Character area policy SPD 51: Built Environment.
154	131	5 - Character			<ul style="list-style-type: none"> Further clarity is required on what would be considered 	As the above ground level measurements of heights of a

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		Areas			acceptable on sites identified for development. Principally in the case of acceptable building heights the draft SPD/OAPF avoids providing a clear limit or range. Yet in the background paper some details are provided that does provide clarity of acceptable heights. However where they are they are restricted to number of storeys. We would suggest heights in metres should be also provided (e.g. AOD and above ground level measurements), for all opportunity sites identified in the evidence base (e.g. Urban Design background paper and Characterisation Study) and draft SPD/OAPF. This clarity would help manage undeliverable expectations and contribute to providing a robust development framework for the area.	building can vary across the different types and ages of buildings, we believe that indicating height ranges in storeys allows sufficient information when discussing building heights. Regarding the provision of clarity of acceptable heights refer to representation 127.
154	156	3 - Vision and objectives			We note that the vision has been developed in consultation with local people and has most likely been carried forward from the Core Strategy. However as demonstrated in the evidence provided the area is rich in historic environment, which is not reflected in the Vision presented in the text. We would suggest that the Vision should be amended to reflect the knowledge gained in preparation of the draft OAPF/SPD, which sees the conservation and enhancement of the areas heritage assets as a key to future regeneration.	We have no scope to amend the vision as this is established in the Core Strategy.
154	159	4 -The preferred option/options	SPD 16 - Built form		In general we support the policy, but would suggest that the reference to the areas heritage assets is expanded to the following: Conserve and enhance the character significance of heritage assets and their settings, and positively utilising their contribution to the character of a place as part of heritage-led regeneration. [see hardcopy of representation for track changes] Making the connection of conserving the areas heritage assets and their significance with positive proactive regeneration is reflective of the principles of PPS5.	Refer to representation 126.
154	165	4 -The preferred option/options	SPD 16 - Built form		Reflecting our comments in response to the Urban Design Background paper and Characterisation Study we would suggest the Walworth Area has the potential of being designated a conservation area. With this in mind we would suggest Walworth's potential for designation should be highlighted in the text at this point.	Refer to representation 129.
154	167	4 -The preferred option/options	SPD 17 -		In general we support the policy, but would suggest that the following changes should be made to provide clarity and	We have proposed changes to the wording of SPD 17 to reflect these points

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			Buildin g heights		ensure compliance with national policy and guidance. all buildings should: Conserve and enhance the Outstanding Universal Value, integrity and authenticity of both the Westminster and Tower of London World Heritage Sites and their settings. Have due regard to the London View Management Framework and other visual frameworks or key views such as those identified in World Heritage Site Management Plans, and Conservation Management Plans. Conserve and enhance the significance of heritage assets and their settings including listed buildings, locally listed buildings, conservation areas, registered parks and gardens, and archaeological remains. [see hardcopy of representation for track changes]	
154	170	4 -The preferred option/options	SPD 17 - Buildin g heights		We would suggest that any application for tall buildings should be accompanied by robust and clear evidence that analyses the impact of the development upon the significance of heritage assets. We would refer you to PPS5 policy HE6 which clear states that: Local planning authorities should require an applicant to provide a description of the significance of the heritage assets affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset. We would strongly advise that this requirement is clearly expressed in this section of the draft OAPF/SPD.	We have set out this requirement in SPD 16.
154	172	4 -The preferred option/options	SPD 17 - Buildin g heights		This is a crucial section in that the details provided seek to set out the findings of the analysis undertaken. Unfortunately the level of direction given is weak and we would suggest that a strong message should be given that tall building proposals that impinge within key views such as the LVMF Serpentine Bridge should be resisted due to their impact upon the Outstanding Universal Value of the Westminster World Heritage Site. This would help avoid raising expectations of the capacity for development of key sites that may fall in the view or setting of the World Heritage Site.	We believe that the wording of SPD17 sufficient to ensure proposals consider the impact of development in the strategic view of the World Heritage Site.
154	175	4 -The preferred option/options	SPD 18 -		It is important to highlight the two London Squares in the area, these being West Square and County Gardens, and	We will include reference to the importance of London Squares and the London Squares Preservation Act 1931 in

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			Open spaces		any spaces/gardens identified by the London's Parks and Garden Trust. Their value should also be reflected in the supporting text to the Figure.	the supporting text of SPD 16. We will identify London Squares preserved by the Act on the Heritage map.
154	176	5 - Character Areas			There is a need for consistency in language in this section across all character areas. In the case of policy wording used in heritage protection it is important to ensure that the significance of heritage assets and their setting is conserved and enhanced. With regards to World Heritage Sites, the Outstanding Universal Value, integrity and authenticity of both the Westminster and Tower of London World Heritage Sites and their settings, should be conserved and enhanced. Building Heights – we would suggest that developments within the strategic viewing corridor from Serpentine Bridge should not cause harm to the Outstanding Universal Value of the Westminster World Heritage and its setting. It is noted that height limits or indications of acceptable height levels for tall buildings are not provided. We would suggest that at this level of plan-making indications can be helpful especially if they are based upon the Council's modelling scenarios. Details of specific character areas include the need for the Walworth Area having the potential historic interest to be a conservation area (SPD35).	We will ensure consistency across policy wording. Regarding building heights and impact in the strategic view, please refer to representation 172. Regarding indication of appropriate heights refer to representation 131. Regarding Walworth Road refer to representation 129.
154	180				We would suggest that the English Heritage funded St George's Circus, London Urban Design Framework (July 2004) (undertaken by Alan Baxter and Urban Practitioners) should be identified and reviewed as part of the development of the Characterisation study and Urban Design background papers.	We have included reference to this document in the SPD / OAPF (Representation 130) and will include reference in the Urban Design background paper.
154	182				We welcome the description and analysis provided. However there appears missing details of the Opportunity Area (OA) as experienced from the south, looking to and across the study area, with key central London landmarks in the background.	Support is noted. We will ensure that the Urban Design background paper includes reference to this.
154	186				We would suggest that the most up to date planning policy documents are referenced. For example the London Plan (adopted July 2011), and the Southwark Plan 2011, which highlights saved policies that need to be considered in conjunction with the adopted Core Strategy. In addition consideration should be given to proposed changes to the	The urban design background paper has set out an overview of the current policy context for urban design and heritage conservation.

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					LVMF SPG (consultation draft July 2011) which introduces a new designated view from Parliament Square, which may have an impact upon the development of the OAPF.	
154	188				Figure 15 It is noted that all designated heritage assets have been identified, plus locally listed buildings. However it is not clear whether any open spaces identified by the London Parks and Garden Trust Inventory or the London Squares Preservation Act 1931 (e.g. West Square and County Gardens) fall within the OA. If so, then these should be illustrated and their details listed.	Regarding London Parks further to updates to policy and guidance of the SPD we will include reference to these spaces in the Urban design background paper.
154	191				In general we welcome the method used for assessing the character of each area. However elements which do not come across and which would be helpful to explore further include the following: A review of open spaces of historic interest which positively contribute to the character of each area. This includes identifying key spaces such as West Square and County Gardens as protected London Squares. In addition further consideration should be given to other spaces that contribute to both the setting of individual/groups of buildings, and/or the quality of the wider townscape. These can be either formal or incidental spaces. •Further clarity on the values associated with heritage assets generated from their settings. As set out in English Heritage's The Setting of Heritage Assets (2011) guidance demonstrates that the setting of an asset contributes to its significance. And as such, understanding of the degree and elements of that contribution needs to be undertaken as part of analysing the character of an area. This includes considering the setting of heritage assets beyond its visual relationship. This type of exercise should be proportionate to the nature of the research undertaken and in the case of the SPD/OAPF we would suggest further consideration should be given to the setting of heritage assets as part of the characterisation methodology.	Regarding London Parks refer to representation 188. Regarding setting of heritage assets, we will ensure that the text of the Urban design background paper includes more information on setting of heritage assets.
154	194				On considering the details of the heritage assets and analysis of the historic interest of the area, we would strongly suggest that the Walworth Road could merit designation as a conservation area. For example the vast majority of the buildings have been identified as either possible locally listed	Refer to representation 129.

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					buildings or buildings with townscape merit. By identifying their value as buildings of historic interest, it could be argued that as heritage assets (as defined by PPS5) their concentration could help justify its designation as a conservation area. We understand that there is local support for this recognition of the importance of the local historic environment.	
154	197				We note that the group of Victorian buildings within the existing conservation area centred on Ilffe Street and Yard have been identified as buildings with townscape merit. We would suggest that due to their relative rarity and local distinctiveness, that they should be recognised as possible locally listed buildings.	We will consider the potential for these buildings to be included in the local list.
154	200				We welcome the approach taken in this section of the Characterisation Study. This in effect is the key stage in which to direct policy interpretation in the SPD/OAPF. We particularly support the explicit link between the development of tall buildings and the need to protect the significance of heritage assets and the wider historic environment. The general structure proposed for defining how each character area is managed is in general welcomed. However we would suggest that elements of the existing environment that are neutral in impact or contribution should be highlighted as well as negative and positive aspects.	We have included this point in the wording of the SPD.
154	203				Specific Building Design Principles; Heights and detailed design - we support the need tall buildings to conserve or enhance the setting of heritage assts. However we would suggest this point should be expanded to the need for proposals to conserve and enhance the Outstanding Universal Value of World Heritage Sites.	This guidance is set out in the wording of the SPD policies. We will ensure that the text of the Urban design background paper has also considered this point.
154	206				Specific Building Design Principles; Heights and detailed design – It would be useful to include details of appropriate building heights (e.g. preferably in metres above ground level and AOD) on specific sites so that terms such as ‘taller’ buildings are not misinterpreted.	Refer to representation 131.
154	211				In general we would suggest that details of the St George’s Circus Urban deign Framework are used to inform the details of the management of the Enterprise Quarter. Specific Building Design Principles; Heights and detailed design –We	Refer to representation 130.

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					note that developments of up to 8 storeys (residential) (6 storeys for commercial) are being promoted for sites fronting St George's Circus. We would suggest that the scale of development considered appropriate here should reflect the significance of the conservation area designation and in particular the historic Georgian townscape qualities of the Circus. Essentially the key buildings that reflect this historic interest and significance are of 3 storeys and therefore promoting the development of opportunity sites to accommodate up to 8 storey buildings could be argued to be contrary to the significance of the existing heritage assets.	
154	213				It should be noted that the County Gardens are protected through the London Squares Preservation Act 1931 and therefore are of historic interest.	We will include reference to this in the Rockingham area guidance in the SPD
154	214				Specific Building Design Principles; Height – It would be useful to clarify what the local context is considered to be in connection with prevailing building heights.	The characterisation study sets out a map and supporting text to establish the context for building heights for the Brandon Street character area.
154	215				Accommodating Change – Point's c and e reinforce the argument that a large part of Walworth Road should be considered as a conservation area. Specific Building Design Principles; Massing and Form – It is important to ensure that new buildings should respect the grain, scale, mass and form of neighbouring buildings. [see harcopy representation for track changes] Para 7.86 – We note that improvements to identified heritage assets and buildings of townscape merit are recognised as a priority. This approach would be strengthened if the area was designated as a Conservation Area, therefore aiding the policy framework in which to manage future development of the opportunity sites.	Regarding potential designation of Walworth Road as a conservation area refer to representation 129.
154	216				Pg117 & 119 There is a duplication of images.	Noted.
154	217				It is noted that the Paper highlights the impact of the new protected vista for the strategic view from the Serpentine Bridge. We would suggest that as the revised London Plan has now been adopted (July 2011) which includes Parliament Square as a designated view, details of the emerging parameters of this view (i.e. viewing corridor) should be highlighted. Early indications relating to the details of this view suggest that the background assessment area	The policy background sets out that a new strategic view of Parliament Square was identified in the Draft London View Management Framework consulted on in July 2011. We consider the potential impact of development in this view in the View Assessment (Appendix 5).

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					will cover much of the Enterprise Quarter. The impact of this designation should be considered in the policy background of this Paper.	
154	218				The summary provided in the table demonstrates a possible misinterpretation of how the setting issues relating to heritage assets should be addressed. Under Section 4.3 – Evaluation of the setting of heritage assets, the details do not demonstrate that the setting of heritage assets has been undertaken in line with the concepts and principles of PPS5 and English Heritage’s The Setting of Heritage Assets guidance (2011). Essential there is a need to consider the elements that surround heritage assets in order to ascertain the contribution these elements make to the significance of the heritage assets. Once understood, then the scale of change proposed and the magnitude of impact upon the significance of the heritage assets can be assessed (i.e. through the plan-making stage). This basic approach should be explicitly included in the preparation of the Background Paper and SPD.	We will ensure that the wording of the background paper sufficiently considers the setting of heritage assets in accordance with the concepts and principles of PPS5 and English Heritage’s The Setting of Heritage Assets guidance (2011).
154	219				Under section 6.4.4 Identification of testing views – it is not clear whether views identified in conservation area appraisals or management plans have been included in the assessment process. We would suggest they should be if not already done so. In addition it is not clear whether the heritage significance within the views has been assessed (i.e. English Heritage’s Seeing History in the View methodology (2011)).	Information on the identification of views is set out in detail in section 6.4.4 and Appendix 5.
154	221				As already highlighted in our response to the Characterisation Study the details and Figure 12 do not capture all open/garden spaces of local historic interest, such as London Squares, and space identified by the London’s Parks and Gardens Trust Inventory. In addition we would suggest parts of Walworth Character Area should be a potential conservation area.	We will include reference to the London Squares and ensure that the local historic significance of open spaces is considered. Regarding the Walworth Road refer to representation 129.
154	222				View 27A (as identified by the LVMF draft SPG – July 2011) should be included on Figure 24 and detailed in the text. By focusing upon Protected Vistas only does not highlight sufficiently that other designated views may have an impact upon the development of the OA.	We will include reference to View 27A in this section.

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154	223				All open/garden spaces of local historic interest, such as London Squares, and space identified by the London's Parks and Gardens Trust Inventory should be identified on figure 26 and detailed in the text. In addition it is not clear how the settings of the assets identified have been assessed. What elements that surround the heritage asset have contributed to their significance?	Refer to representation 221.
154	227				Welcome the identification of all conservation areas both within and outside the OA. However in the details provided it is not clear how the settings of the assets identified have been assessed. What elements that surround them contribute to their significance?	The level of assessment of setting has been proportional to the type of study conducted. Conservation area appraisals provide more information on elements which contribute to the conservation areas significance.
154	229				We would strongly disagree with the conclusion that Walworth Road is not a clear example of an area that would suit conservation area designation. We would consider the opposite view that it has the potential for such designation as demonstrated with the vast majority of the buildings being identified as of being possible locally listed buildings or buildings that are of townscape merit. In terms of the conservation areas discussed it is not clear how the settings of the assets proposed have been assessed. What elements that surround them contribute to their significance?	Refer to representation 129.
154	232				As already expressed with regards to other types of heritage assets it is not clear how the settings of the assets identified have been assessed. What elements that surround them contribute to their significance?	Refer to representation 227.
154	234				We would suggest that the Victorian buildings centred on Illfe Street and Yard should be considered as locally listed buildings. In addition in line with previous comments it is not clear how the settings of the assets identified have been assessed. What elements that surround them contribute to their significance?	Refer to representation 197.
154	242				In general support the principles highlighted. However we would suggest the first point is expanded to include all heritage assets and their settings in the OA and beyond are appropriately conserved and enhanced as a result of development in the Elephant and Castle. [see hardcopy representation for track changes]	Support noted. We will expand wording to reflect this comment.

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154	247				In general we support the principles proposed for each area. However the details of the principles in some cases could be expanded, in the case of heritage assets, by using any relevant management plans. For example the West Square area states a need to conserve and enhance the conservation area and local heritage assets and their settings. This approach is fine as a baseline, but more are specific principles could be developed by using the relevant conservation area management plans to help identify the key principles for the future management of these sensitive areas. Walworth – if further consideration is given to the establishment of a conservation area in the Walworth area, then the conservation and enhancement of this potential designation should be highlighted as an area specific principle. Enterprise Quarter – we would suggest that the principles here should highlight the need to enhance St George’s Circus as a coherent whole, reflecting its historic townscape qualities.	Support noted. We will expand wording to reflect these comments.
154	248				The second paragraph of this section is unclear. We would suggest that any development that appears above the threshold height within the protected vista would be inappropriate and should be resisted.	We consider that the wording of this section sufficiently considers the potential impact of development on the strategic view.
154	249				We note that the text appears to refer to setting issues as a visual matter only. English Heritage’s The Setting of Heritage Assets (2011) which expands upon the principles set in PPS5 and the Practice Guide clearly state that setting is more than being able to see the asset. This important point needs to be recognised in the Paper and carried through to the draft OAPF/SPD.	Refer to representation 218.
154	250				On considering the approach proposed I would assume that within areas considered possibly appropriate for tall buildings (para 6.3.2) that there would be other issues of sensitivity to consider (para 6.3.3). If this is how the two issues are to be considered then this should be clearly expressed as at present the relationship between them is disjointed.	We will expand wording to reflect these comments.
154	251				We welcome the Council’s intention of developing a methodology of modelling tall building options and assessing their impacts on a range of issues. This includes potential impacts upon heritage assets such as the setting of World	Support noted. Refer to representation 127 regarding the identification of a desired skyline. We will ensure that assessment of potential impact on heritage assets in the views assessment is given equal weight.

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					<p>Heritage Sites. A key issue which arises from the analysis undertaken is the need for a balanced approach on the need to conserve the significance of heritage assets against the need to regenerate the Elephant and Castle area. As you will appreciate both needs are not mutually exclusive, but one issues which does need clarifying is the weight of consideration the Council will give to the conservation of heritage assets and their settings without causing harm to their significance through tall building development. This consideration should be balanced against the desired skyline the Council are seeking to develop at the Elephant and Castle. Between the two High Options the analysis suggest either an enhanced cluster approach around the Strata and consented former London Park Hotel development which would be visible in the Serpentine Bridge strategic view or a convexed skyline with taller buildings sculptured around the edge of the strategic view. Regardless of the approach taken we would suggest that both tall and very tall buildings that are above the threshold height of the protected vista would be visible in the view of the World Heritage Site, and as such would both need to be considered against the impact on the setting of the World Heritage Site and its OUV. In both cases we would suggest that neither form of development is permitted where it would cause harm to the integrity, authenticity and OUV of the World Heritage Site, including its setting. It is noted that the key focus of the analysis has been the potential impacts development scenarios would have upon the setting of World Heritage Site's principally Westminster World Heritage Site. This approach is welcome however the impact of tall buildings upon other heritage assets and their settings should be given equal weight and should also influence the modelling of the skyline. This may have been undertaken, but at present the influence of these assets on the modelling is not so apparent. This is highlighted further in the details of the modelling options at various viewing assessment points (as shown in the Appendix). For example TV7 Option 2 and 3 provide cursory commentary of the impact of tall and very tall buildings upon the setting of Elliot's Row Conservation Area. From the illustrations provided I would suggest that the impact could</p>	

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					be moderate at least on the significance of this heritage asset. Elsewhere TV13 suggests that the impact of option 2 on the view of the dome to St Paul's would be moderate. Again the illustrations I would suggest would have major impact upon the viewer's ability to see the current clear sky view of St Paul's dome from this opportune location.	
154	252				English Heritage funded St George's Circus, London Urban Design Framework (July 2004) (undertaken by Alan Baxter and Urban Practitioners) should be referenced.	We will include reference to this document.
154	253				We would disagree with the conclusions of the assessment, and suggest that on balance, the number and diversity of possible locally listed buildings, and buildings of townscape merit justify the area being designated as a conservation area.	Refer to representation 129.
154	254				Walworth Road – We would suggest that the reference to 'substantial alterations' should be considered in the context of changes made to the ground floor frontages. However the upper floors have retained much of their historic and architectural interest to help support its potential as a conservation area.	Regarding alterations, we will include text to reflect this. Regarding potential designation of Walworth Road as a conservation area refer to representation
154	255				We support in general the principles and concepts of the public realm strategy subject to further clarity on the details of the schemes when applied. The text of the strategy is often unclear on this issue (e.g. para 1.11 – where repaving is suggested but no detail is provided in what materials or method of design). A way forward could be to define a standard palette of paving materials for the street surfaces with key public spaces subject to individual detailing, based upon historic and local context. In addition it is not clear whether the English Heritage St George's Circus Urban Design Framework has been used to inform this strategy. For example the St George's circus is seen in the Strategy as a 'gateway' to the Enterprise Quarter. In the Framework St George's Circus is seen as a 'destination', which suggests a different approach in how it should be enhanced and promoted as a key piece of Georgian planned townscape. We would suggest that the Framework should be used as part of developing this Strategy.	This document was too prescriptive and will be deleted as an Appendix of the SPD/OAPF. The main principles are embedded in the policy of the SPD/OAPF. Consideration of palette of materials can be looked at in due course.

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154	256				Under Design Principles/Proposals we would suggest that an aspiration of the Strategy is to develop a good lighting scheme for the Obelisk. This could include exploring the possibility of re-introducing lanterns to the Obelisk. A historical design feature that was subsequently removed.	Refer to representation 255.
161	702				It is considered that the emerging Supplementary Planning Document (SPD) does not reflect the adopted London Plan (July 2011) mindful that the latter document was adopted post publication of the Southwark Core Strategy. As such, we do not consider the document to be 'sound'. The representations aim to ensure that when adopted, the emerging SPD reflects the strategic development Plan whilst acknowledging the Core Strategy requirement to meet varied housing need. This will enable the emerging document to be considered 'sound' in this regard.	The SPD is considered to be in conformity with both the Core Strategy and in general conformity with the London Plan. Detailed comments have been made on all the representations provided.
161	703	4 -The preferred option/options	SPD 8 - Higher education and student housing		Planning Policy Statement 3 (PPS3), in section 9, states, the Government is seeking to ensure delivery of a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community. This is further supported in Paragraph 21 which states 'Local Planning Authorities should plan for a mix of housing on the basis of the different types of households that are likely to require housing over the plan period'. It confirms this would include having particular regard to the accommodation requirements of specific groups. Ministerial Question– CLG Secretary of State's Answer 5th December 2011 This clarifies that off campus student accommodation, whether or not subject to a S106 agreement restricting occupation, should be counted as part of the local housing supply. The Minister stated: - "My right hon. Friend asks an important question, and it is true that in the past housing built for students was not included in the old-fashioned targets, which led to the lowest house building since the 1920s. I am pleased to let him know that under our new system the answer is yes, they are included, and what is more they attract the new homes bonus as well." The emerging SPD places punitive restrictions upon the delivery of student accommodation and unjustifiably prioritises alternative housing need requirement, potentially prejudicing student accommodation delivery. This is not	Comments noted. Please see our response below which addresses each point in more detail.

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					supported by national guidance, nor the Strategic Development Plan (referred to in detail below). The draft SPD is therefore unsound in this regard.	
161	768	4 -The preferred option/options	SPD 8 - Higher education and student housing		I write on behalf of our client Unite Group PLC (hereafter 'Unite') with regard to the above document. Context to Representations It is considered that the emerging Supplementary Planning Document (SPD) does not reflect the adopted London Plan (July 2011) mindful that the latter document was adopted post publication of the Southwark Core Strategy. As such, we do not consider the document to be 'sound'. The representations aim to ensure that when adopted, the emerging SPD reflects the strategic development Plan whilst acknowledging the Core Strategy requirement to meet varied housing need. This will enable the emerging document to be considered 'sound' in this regard. I would also note that representations on behalf of UNITE have recently been submitted in respect of the emerging Affordable Housing SPD. In order to give some context to the representations, I initially refer to current relevant planning policy before responding to the consultation draft document.	Noted. Detailed comments in response to the rest of the representation have been provided. The GLA have confirmed that the guidance on student housing in the Elephant and Castle SPD is in general conformity with the London Plan. We propose to consult on a further draft of the Affordable Housing SPD later this year. We will be looking at all the comments we received on the SPD as part of the preparation of the updated SPD and will be providing officer comments on each SPD.
161	770	4 -The preferred option/options	SPD 8 - Higher education and student housing		Current Relevant Planning Policy National Policy PPS3: Housing Planning Policy Statement 3 (PPS3), in section 9, states, the Government is seeking to ensure delivery of a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community. This is further supported in Paragraph 21 which states 'Local Planning Authorities should plan for a mix of housing on the basis of the different types of households that are likely to require housing over the plan period'. It confirms this would include having particular regard to the accommodation requirements of specific groups. Ministerial Question– CLG Secretary of State's Answer 5th December 2011 This clarifies that off campus student accommodation, whether or not subject to a S106 agreement restricting occupation, should be counted as part of the local housing supply. The Minister stated: - "My right hon. Friend asks an important question, and it is true that in the past housing built for students was not included in the old-fashioned targets,	Noted. Detailed comments in response to the rest of the representation are provided below.

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					<p>which led to the lowest house building since the 1920s. I am pleased to let him know that under our new system the answer is yes, they are included, and what is more they attract the new homes bonus as well.” The emerging SPD places punitive restrictions upon the delivery of student accommodation and unjustifiably prioritises alternative housing need requirement, potentially prejudicing student accommodation delivery. This is not supported by national guidance, nor the Strategic Development Plan (referred to in detail below). The draft SPD is therefore unsound in this regard. Adopted London Plan – July 2011 The London Plan was Adopted after publication of the Southwark Core Strategy and the latter document took into account the policies of the previous, now superseded, London Plan. As the most recent and relevant document, the Council are obliged to have due regard to the London Plan 2011 in the formulation of subsequent policy and guidance. Adopted London Plan Policy 3.8 ‘Housing Choice’ identifies a number of specialist housing needs across London and requires local authorities in both a development control and plan-making capacity to account for all forms of housing need. In this regard, criterion (h) is of specific relevance to these representations. This states: - “Taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that: - (h) strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education agencies and the various specialist providers involved and without compromising capacity for conventional homes.” Crucially Paragraph 3.53 states: - “... If the accommodation is not robustly secured for students, it will normally be subject to the requirements of affordable housing (Policies 3.11-3.14). While student accommodation is accounted as part of the overall housing provision, it should be monitored separately because it meets distinctive needs. Because of uncertainty over future demand/supply relationships the monitoring process must have particular regard to these”. It is clear the adopted</p>	

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					<p>Strategic Development Plan requires the Council to: - (i) ensure student accommodation does not prejudice delivery of conventional housing; and (ii) that where the former is 'robustly' secured for students, it is not subject to affordable housing requirements. At a national level it is demonstrated above that student accommodation comprises part of overall housing land supply and that Boroughs should make appropriate provision to meet identified need. The strategic development plan reinforces this approach by allowing student accommodation where this does not compromise delivery of conventional dwellings. The emerging SPD fails to take account of National Guidance and the London Plan and therefore cannot be adopted as currently drafted. Southwark Core Strategy – Adopted April 2011 Policy CS8 supports the provision of student accommodation whilst balancing the this with other types of housing such as affordable and family units. This is expected to be delivered through the requirement to include 35% provision of affordable units within student schemes, however CS8 subtext states "Through our Strategic Housing Land Availability Assessment we have identified sites that need to be developed to make sure we can meet our housing targets. If these sites come forward without affordable housing we would not be able to meet our affordable housing target." In order to ensure the draft SPD complies with national guidance and the London plan the following representations are made.</p>	
161	771	4 -The preferred option/options	SPD 8 - Higher education and student housing		<p>Representations to Draft SPD As highlighted above, the adopted London Plan clearly sets out that student accommodation proposals should not prejudice conventional housing supply and only make a contribution to affordable housing where the accommodation is not robustly secured for students. The draft SPD fails to reflect the development plan in this regard and cannot therefore be considered 'sound'. Whilst there is a need to meet conventional housing demand across the Borough it is necessary to bear in mind that the annualised housing target for Southwark (London Plan Tables 3.1 and A4.1) includes an element of non self-contained provision. The draft SPD fails to take account of how delivery of this type of accommodation is planned. The</p>	<p>Noted. Detailed comments in response to the rest of the representation have been provided. The GLA have confirmed that the guidance on student housing in the Elephant and Castle SPD is in general conformity with the London Plan.</p>

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					following issues require examination in order to demonstrate that the emerging SPD is unsound: - 1. Conventional Housing Need in the SPD area 2. Student Housing Need across Southwark and in the SPD area 3. Viability Each issue is referred to in detail below.	
161	773	4 -The preferred option/options	SPD 8 - Higher education and student housing		<p>1. Conventional Housing Need in the SPD area It is clear that there is currently need to deliver additional dwellings across Southwark in order to meet the target set out in the 2011 London Plan. Core Strategy Policy CS8 therefore seeks to ensure student accommodation does not compromise capacity for conventional dwellings, as required by Policy 3.8 of the 2011 London Plan. This issue at a Borough-wide level is referred to in detail within our representations to the emerging Affordable Housing SPD (30.09.11). However, the emerging SPD does not reflect the Ministerial confirmation that student accommodation constitutes a valid component of housing supply and it proposes an unduly restrictive approach which does not comply with the London Plan. The London Plan requires a minimum (net) additional 4000 dwellings in the Elephant & Castle SPD/ Opportunity area and as such, the Council have identified through their Development Capacity Assessment (DCA) sites for 5000 net additional dwellings. This clearly exceeds the minimum London Plan requirement and allows the Council confidence that the minimum housing target will be met, allowing for variation in delivery rates. Planning for additional dwellings in the SPD area in order to ensure the housing target is met means there is no requirement to deliver an element of affordable housing as part of student schemes. This was discussed at the Ewer Street Inquiry (Land at Ewer Street, APP/A5840/A/11/2153570) where the inspector concluded an affordable housing contribution was acceptable on the basis that they Council may rely upon windfall sites to meet their housing target. Mindful of the housing supply figures above, it is unnecessary to apply this policy interpretation to the SPD area. Whilst Unite support SPD Theme 2, which seek to address Student housing need whilst ensuring a housing mix is achieved, the SPD policies potentially prejudice this objective and constrains the role of Higher Education Institutions within the SPD area. The</p>	<p>The SPD follows the approach to student housing that is set in the adopted Core Strategy SP8. The Core Strategy policy SP8 is consistent with the London Plan. It was also found sound by a planning inspector. In addition, the GLA have confirmed that the guidance on student housing in the Elephant and Castle SPD is in general conformity with the London Plan. We propose to consult on a further draft of the Affordable Housing SPD later this year. We will be looking at all the comments we received on the SPD as part of the preparation of the updated SPD and will be providing officer comments on each SPD. The Development Capacity Assessment identifies sites that may come forward for conventional housing. It refers to both proposals sites and windfall sites. However it is not exhaustive and there will always be other sites that come forward that have not been identified. Whilst the DCA shows that we estimate around 6,000 (gross) new home could be provided in Elephant and Castle, there is no certainty that all the identified sites will come forward for development. Therefore we continue to rely on windfall sites to meet our housing targets and will continue to apply SP8 within the E&C area. The Core Strategy and London Plan target of 4,000 new homes in the area is a minimum. We also have a very challenging borough wide target of 20,050 homes by 2021 which expressed concern about during the London Plan EiP but now that this has been adopted we need to make sure we are applying our policies in order to meet this higher target. We have placed some restriction on new student accommodation in part of the Walworth Road character area (north of Amelia Street) because there is already a larger concentration of student housing here. This is the only part of the SPD area with this kind of restriction which we think is necessary to ensure there is housing choice to create a mixed and balanced community.</p>

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					<p>principal London Plan policy test is to ensure that student accommodation does not compromise the capacity for delivery of conventional housing (referred to above). Analysis of the DCS and the Housing Background paper clearly demonstrates that the Council can adequately plan for projected conventional housing need. Amendments to the draft SPD policy are therefore required (as detailed below) to ensure the SPD reflects the London Plan requirements in this regard by permitting student accommodation in isolation where this does not compromise the delivery of conventional housing. Through imposition of an effective moratorium on student accommodation in certain character areas within the SPD area north of Amelia Street (there is an allowance for a further 15 units in total, based upon the SPD figures) and a failure to adequately recognise the requirement to meet student accommodation need, the emerging SPD is insufficiently flexible to account for this specialised housing need and is therefore unsound. By demonstrating that the SPD provides for 5000 additional dwellings (of which 35% are required as affordable housing) the Council satisfy the Core Strategy requirement to meet conventional housing need, without reliance upon windfall sites. Placing restrictions upon the delivery of student housing within the SPD area, including a requirement to only allow student schemes as part of conventional housing developments within certain SPD character areas is unnecessary as the Council have demonstrated they can meet and exceed the area-specific housing target. Furthermore, the specific designation of the Opportunity Area at a Strategic Level requires a mix/range of development to encourage significant regeneration of the SPD area. Restricting delivery of specific housing need is contrary to this policy objective. By ensuring any student accommodation proposal does not compromise the capacity to deliver conventional homes, competing housing need requirements within the SPD area can be met. This process can be effectively monitored and managed through the Annual Monitoring process which would ensure the policies are 'sound' as defined within PPS12. Through identification of housing land supply a clear mechanism exists in which to deliver conventional housing, thus meeting</p>	

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					identified need, whilst also ensuring provision of student accommodation in order to meet this form of demand. Whilst there is a need to deliver conventional dwellings, including affordable housing, there remains a statutory requirement to also take account of non self-contained housing delivery. The emerging SPD fails to address this and cannot be considered 'sound' in this regard.	
161	774	4 -The preferred option/options	SPD 8 - Higher education and student housing		<p>2. Student Housing Need Across Southwark The requirement to meet identified student accommodation need within the Borough is set out in detail within CgMs' letter of 30.09.2011 (attached). Therefore only a summary is hereby provided: - There is a dedicated accommodation provision for only 20% (approx.) of the student population, resulting in a clear and un-met identified housing need. The Southwark Student Housing Needs Survey confirms this position, noting demand outweighing supply. • The proportion of privately operated student accommodation is minimal in comparison to the number of university owned bed spaces within Southwark. • The SPD fails to take account of the changing student accommodation provision requirements particularly given the changing context of student accommodation delivery from university-led schemes to direct-let and privately operated schemes. • Mindful of the identified need for student accommodation in Southwark and the punitive approach being pursued by the Council, the draft plan prejudices the Council's ability to meet this form of housing need. The emerging GLA Housing Supplementary Planning Guidance (SPG) provides further detail regarding the London Plan policies. Paragraphs 3.1.48-3.1.51 inclusive refer to the student accommodation element Policy 3.8 'Housing Choice'. Paragraph 3.1.50 states: - "In considering LDF policy approaches to, and proposals for new student accommodation, boroughs should not constrain provision which meets strategic as well as local needs." The draft SPD is contrary to this strategic guidance and cannot be supported in its current form. Therefore a balanced policy approach is required, as there remains a requirement to take account of both conventional and student housing need. The draft SPD requirements to (a) provide 35% of student accommodation as affordable housing and (b) student</p>	<p>We consider that our approach to student housing is balanced. The SPD follows the approach to student housing that is set in the adopted Core Strategy SP8. The Core Strategy was found sound by a planning inspector. In addition, the GLA have confirmed that the guidance on student housing in the Elephant and Castle SPD is in general conformity with the London Plan. The need for new student housing has to be balanced with the significant need in Southwark for more conventional housing, particularly affordable housing and family housing. We want to make sure that there is enough land to meet our wider housing needs therefore we require the provision of affordable housing when developments for all types of housing come forward, including student housing. Our Strategic Housing Market Assessment and our Housing Requirements Study identify the significant need for more family and affordable housing. Student housing traditionally does not contribute towards increasing the supply of either of these types of housing. Many of the sites that come forward as speculative student housing are identified as possible housing sites as part of the Strategic Housing Land Availability Assessment 2009 and our Development Capacity Assessment and are necessary to meet our housing target. We also need the smaller sites under 0.25hectares to come forward as conventional housing to help meet our targets including our affordable housing targets and to meet as much of the housing needs as possible in Southwark. Within the evidence for Core Strategy policy 6 we also identified many of these sites as necessary to ensure we meet our affordable housing target. Provision of student accommodation on these sites will compromise our ability to provide conventional homes, including the significant need for affordable and family</p>

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					schemes should be provided as part of conventional schemes are only appropriate where such schemes compromise the capacity for conventional dwellings and particularly those schemes which are not robustly secured for students, as required by the adopted London Plan. Mindful of the Inspector's conclusion regarding affordable housing provision as part of student schemes (Land at Ewer Street, APP/A5840/A/11/2153570) and as part of a balanced policy approach, it is considered that, where viable, a financial contribution towards affordable housing may be appropriate.	homes.
161	775	4 -The preferred option/options	SPD 8 - Higher education and student housing		3. Viability As referred above, the Council have demonstrated potential delivery of conventional dwellings (including affordable) to exceed the strategic target for the SPD area. On this basis, the requirement within the Housing SPD to only provide a financial contribution in lieu of on/off-site affordable provision is unnecessary. Where appropriate, a viable financial contribution may suitably assist the Council's objective of continuing to meet mixed housing need. Therefore the following considerations require assessment. The CIL Regulations (2010), section 122 states that a planning obligation may only constitute a reason for granting planning permission for the development if the obligation is: (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development. Whilst Appendix 1 of the SPD provides some detail of necessary transport projects for which S106/CIL funding will be sought, it is considered that insufficient evidence at this stage exists to demonstrate the tests above would be met when applied to individual planning applications and to justify the tariff approach advocated within the SPD. The necessary evidence will be produced through the emerging CIL Charging Schedule and therefore the SPD cannot be supported as drafted. Further, the role of the tariff levels set out at Paragraph 4.7.4 is unclear, in particular whether these are in lieu of the Council's existing S106 tariff. Paragraph 4.7.5 requires an 'open book' approach in line with Council policy. Mindful of the recent appeal decision at Ewer Street (referred above)	As already stated above the 4,000 home target for the area is only a minimum and whilst the DCA identifies capacity for over 6,000 (gross) homes there is not certainty that all those sites will come forward. We follow a sequential approach to the provision of affordable housing in accordance with national and regional policy. Therefore we only allow a payment in lieu where it can be shown that affordable housing cannot be provided on or off site, in accordance with PPS3 and the London Plan. We have undertaken an impact of the proposed tariff on the viability of development. This study is published on our website. The study showed that generally the developments tested should be able to provide 35% of homes as affordable housing and provide funding for the tariff. We have also carried out calculations and research to demonstrate that the application of £100,000 per habitable room payment is justified and reasonable. This is set out in two of our studies: Payments in lieu of on-site affordable housing: viability testing, and Southwark student study: implementation. Both of these can be viewed on our website at: http://www.southwark.gov.uk/ldf/evidence We will consider each scheme on a case by case basis and take viability into account when considering applications that do not meet the policy.

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					and the Council's report to committee in respect of the scheme at Steedman Street where the Council's emerging tariff for calculating affordable housing contributions for student accommodation schemes is confirmed as unviable, with the Inspector and the Council accepting significant reductions in the financial contribution payable. It is therefore necessary to amend the S106 Obligations/CIL policy. It is therefore necessary to ensure that where student schemes cannot be robustly justified in terms of prejudicing conventional housing delivery and not secured for use as student accommodation, the trigger for an appropriate contribution is set at a viable level.	
161	776	4 -The preferred option/options	SPD 8 - Higher education and student housing		Conclusion and Proposed Recommended Alterations The requested alterations, as outlined below, will allow the SPD to be considered 'sound' in this regard by reflecting adopted London Plan policy. Further, the alterations maintain compliance with the Core Strategy by (a) meeting identified housing need across relevant sectors and (b) by maintaining a requirement for affordable housing on student schemes that would conflict with identified conventional housing delivery and where these are not robustly secured for students. Both the London Plan and the Core Strategy seek to ensure identified housing needs are addressed and it is thus important to ensure both affordable housing and other forms of housing need are addressed within the development plan and over the lifetime of the plan. The proposed alterations to the SPD will ensure that this can be achieved.	Please see the detailed response to each of the proposed alterations.
161	777	4 -The preferred option/options	SPD 8 - Higher education and student housing		SPD 8 – Recommended alteration to second bullet (additional text denoted by asterisk): - Proposals for student housing will be supported in line with Policy 8 of the Core Strategy, *and with Policy 3.8 of the London Plan where it is demonstrated the scheme does not comprise delivery of conventional housing.*	Core Strategy policy 8 clearly sets out our approach to student housing. The Affordable Housing SPD provides more detailed information on the application of this policy in relation to affordable housing. It would not be appropriate to add this detailed wording to policy SPD 8.
161	778	4 -The preferred option/options	SPD 20 - S106 Planni		SPD 20 - Recommended alteration comprising an additional paragraph (additional text denoted by asterisk): - *S106 contributions will be subject to individual scheme viability and an "open book" approach required where required	Viability is a material planning consideration. It is not considered that a further reference to viability in SPD 20 would improve the policy.

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			ng obligati ons and the commu nity infrastr ucture levy		contributions compromise scheme viability.*	
161	779	5 - Character Areas		Heygat e Street SPD 25 - Land uses	SPD 25 Recommended alteration to fourth bullet (additional text denoted by asterisk) comprising: - Any student accommodation or serviced apartments proposed should be provided as part of a mix which includes general needs housing (Class C3 use) *where the proposal would compromise conventional housing supply.*	It is not considered necessary to amend this paragraph. The purpose of the SPD is to ensure that Elephant and Castle is an area with mixed and balanced communities with a variety of different housing types and uses. This is particularly important on the key development sites in the area where we are aiming to encourage a mix of uses. This point is already covered in the Core Strategy policies.
161	780	5 - Character Areas		Walwo rth Road SPD 33 - Land uses	SPD 33 - Recommended alteration to fifth bullet (additional text denoted by asterisk) comprising: - Student housing development at the northern end of the character area (north of Amelia Street) will not be supported *where this would prejudice conventional housing supply.*	It is not considered necessary to amend this paragraph. The area described already has a very high concentration of student homes. By identifying this concentration the SPD aims to ensure that the character area has a range of housing types and tenure to help promote a mixed and balanced community. This point is already covered in the Core Strategy policies.
161	781	5 - Character Areas		Rail Corrido r SPD 37 - Land uses	SPD 37 - Recommended alteration to sixth bullet (additional text denoted by asterisk) comprising: - Developments for student accommodation which take the number of bed spaces past 700 will not be supported in the northern part of the character area (north of Amelia Street) *where this would prejudice conventional housing supply.*	It is not considered necessary to amend this paragraph. The area described already has a very high concentration of student homes. By identifying this concentration the SPD aims to ensure that the character area has a range of housing types and tenure to help promote a mixed and balanced community. This point is already covered in the Core Strategy policies.
161	782	4 -The preferred option/options	SPD 8 - Higher educati on and student housin g		I would appreciate early dialogue with the policy officer dealing with these representations in order to discuss in detail the comments and recommended alterations. Please do not hesitate to contact either me or Alun Evans should you have any queries	Noted. A summary of the key comments and officer responses is available on our website from 8th March 2012.

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162	370				Thank you for your letter dated 23 December 2011 inviting the Highways Agency (HA) to comment on the Draft Elephant and Castle Supplementary Planning Document (SPD) / Opportunity Area Planning Framework (OAPF) Consultation. The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the consultation and do not have any comment at this time.	It is noted that the HA have no comments.
165	553	4 -The preferred option/options	SPD 5 - New Homes		In response to the draft Elephant and Castle SPD, we feel that a number of key issues would need to be considerably more robust. Housing All housing is ultimately 'affordable' to someone, rendering the term meaningless. Commitment to maximum social-rented housing, which is the only truly 'affordable' housing to many Southwark residents, has to be clear and unequivocal, to reflect the abilities of those on low and modest incomes. A way to do this would be through amending the requirement to ensure majority of the 35% affordable homes are social-rented.	Definition of affordable. The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. Social rented housing: The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). Section 2.3.3 of the SPD on challenges and opportunities recognises that there is need for more homes of all types. There is not only a need for social rented housing but also intermediate and private housing. This section of the SPD also recognises the challenge to delivering social housing due to reduction in social housing grant from the Homes and Communities Agency.
165	554	4 -The preferred	SPD 5		Another serious concern, especially in the light of recent	Our Core Strategy policy is for a minimum of 10% 3 +

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		option/options	- New Homes		proposals Lend Lease presented for the Heygate and Leisure Centre redevelopment, is the amount of family homes to be provided. Larger proportion of family homes are essential for a healthy community, which in turn positively impacts the 'health' of economy, environment etc.	bedrooms. Where a scheme cannot meet this policy, the applicant will need to justify to us why the scheme is acceptable as a departure from policy. As background, we consistently deliver around 10% of new development as 3+ bedroom plus housing, as set out in our Annual Monitoring Report.
165	555	4 -The preferred option/options	SPD 11 - Walking and cycling		Transport We think it is vital to discourage car use within new developments, as it negatively impacts on pretty much every single aspect of our lives. Adopting 20mph across the entire opportunity area would be a significant step towards improved safety for pedestrians and cyclists. Establishing a network of car-free pedestrian and cycling routes would be another. Creating opportunities for local goods and service production would minimise the demand for motorised vehicles transit, transforming the area and having a major positive impact on community cohesion, quality of life and local economy.	The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this. Policy SPD 11 covers walking and cycling adequately.
165	557	4 -The preferred option/options	SPD 4 - Jobs and Business		Local economy We support the submission made by the Latin American businesses and organisations. In addition, we think it is important to give priority to local small and independent businesses and services, as it is precisely the local and independent businesses that define an area and that are key contributors to its economic prosperity.	The SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through SPD4 we promote flexible new business space to accommodate a range of unit sizes to help meet the needs of SMEs and to enable businesses to remain in the area as they grow. SPD1 recognises the importance of small shops in the opportunity area and the contribution they make to the local economy. We have also amended the supporting text to SPD1 to provide further recognition of the value and contribution of local shops in the area. We have also amended the SPD in Section 2 to provide further recognition of the cultural diversity of the businesses that exist in the area, in particular, the Latin American presence and the important contribution they make to the character, retail offer and local economy of the area.
165	560	4 -The preferred option/options	SPD 4 - Jobs and Business		The five year lease support is not enough and there would need to be a longer-term commitment from the Council.	Five years is considered a reasonable amount of time for a business to establish itself. While discounted rent will be appropriate to bring independent retailers into new spaces, once they gain traction and start making money, they will be able to afford to pay more rent. The imposition of a rent

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						cap beyond the five year period as set out in SPD1 is not considered appropriate as it would be too prescriptive and it raises concern on how this could be monitored effectively, how enforceable it would be and how it would relate to other occupational costs such as the landlords operating expenses, service charges and business rates. The Council's Economic Development currently funds Business Support advisors which are available to support businesses in the area.
165	562	4 -The preferred option/options	SPD 4 - Jobs and Business		There needs to be evidence of much stronger Council's commitment to continued support of local businesses, through recognition of the significant contribution by small market units and traders on Rodney Road, New Kent Road, Harper Road and East Street; support of the current local businesses operating in the shopping centre, ensuring they are able to return and remain in the redeveloped centre;	We propose to address this comment by providing additional detail within the supporting text to SPD highlighting the valuable contribution small shops make to the local economy, local employment and also to sustainable travel. Policy SPD 1 sets out the requirement for large retail schemes to provide a percentage of new floorspace as affordable retail units, to help mitigate the impacts on those businesses which are displaced as a result of development. Units will be made available in the first instance to existing businesses in the opportunity which have been displaced as a result of development. We have retained flexibility in the policy in terms of
165	564	4 -The preferred option/options	SPD 18 - Open spaces		Environment Improving existing open, public and green spaces is essential, as is connecting them into a coherent green network. In this context, pockets of spaces on housing estates are vital and need to be recognised and protected as such	We have an additional paragraph (section 4.6.5b) setting out more detail on how we will seek to improve the amenity value of land on housing estates. Further information is also set out in our draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/200272/evidence_base/1611/environment
165	567	4 -The preferred option/options	SPD 18 - Open spaces		Policy protection of new public open spaces is needed to ensure they remain public and open.	Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces. Open space is protected using the Saved Southwark Plan policies 3.25 to 3.27 which state what types of development would be considered appropriate on Metropolitan Open Land, Borough Open land and Other Open Space.
165	568	4 -The preferred option/options	SPD 18 -		The council should encourage public management of public spaces, as creation of exclusive, publicly inaccessible green	SPD 15 sets out how development will be required to green the environment by maximising the retention of

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			Open spaces		spaces would have a negative impact on social, economic and environmental health of the area.	existing trees, ensuring streets and spaces are generously landscaped and incorporating Sustainable Urban Drainage Systems (SUDs) in the public realm. Our draft Open Space Strategy has identified Elephant and Castle as an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces. Further information on the how we will improve the quality of open space provision in the borough, including through the increased involvement of local community groups, is set out in our draft Open Space Strategy which is currently out for consultation and is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
165	569	4 -The preferred option/options	SPD 19 - Energy , water amd waste		As mentioned before, air pollution and heavy traffic are big concerns. Both can be resolved and we would welcome council's commitment to rigorous assessment of any proposed developments	Other planning policies require that air quality is considered in the assessment of new developments.
165	571	4 -The preferred option/options	SPD 19 - Energy , water amd waste		Demolition of structurally sound buildings has been proved to be the most costly, unpopular and unsustainable solution to the regeneration. We would like to see evidence that the council is committed to minimising the negative environmental, social and economic impacts through encouraging refurbishment and re-use (including provision of housing).	The purpose of the Elephant and Castle SPD is to provide a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The vision for Elephant and Castle states that the area will be a leading example for sustainable development. It will meet the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality. A key theme of the SPD is Theme 6 Natural Environment: Sustainable use of resources, which sets out objectives to; <ul style="list-style-type: none"> • Promote a network of high quality open spaces which have a range of functions including recreation, children's play, sports and food growing. •Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes. •Reduce the impact of

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						<p>development on the environment, minimising greenhouse gas emissions and enabling adaptation to climate change and managing pollution, waste and flood-risk. Sustainable development is a borough-wide issue. Core Strategy policy 13 sets how we will require all development to require as little energy as possible to build, we will also require applicants to demonstrate how they will avoid waste and minimise landfill from construction. Our Sustainable Design and Construction SPD also sets out additional guidance for reducing the amount of raw materials used over the lifetime of a development. The priorities are; •Existing buildings on a site should be adapted and reused as much as possible. It may be possible to achieve other environmental objectives (such as improving energy efficiency) by small additions and adaptations to the fabric (such as new window fittings and extra insulation). •Where the adaptive reuse of the whole building is not appropriate, developments should investigate reusing parts of the existing building. •Demolition materials should be reused on-site where possible, such as for aggregate, fill or landscaping, or as part of new structures. •Where additional building materials are required, the use of recycled materials is preferred and these should be from sustainable or local sources •Demolition materials or surplus materials not required for the development should be collected for reuse and recycling in other building schemes.</p>
165	573	4 -The preferred option/options	SPD 9 - Community facilities		<p>Community facilities This particular aspect has been a key concern for us during the Core Strategy preparation and subsequent Examination in Public, as we believe there needs to be a much stronger commitment to protecting and nurturing the existing community facilities. Encouraging development of new ones through, for example, facilitating refurbishment and re-use of existing facilities and commitment to a transparent Community Asset Transfer policy would be welcomed, as provision of community spaces in Southwark is chronically low.</p>	<p>The protection of community facilities is covered in Southwark Plan policy 2.1. The policy states that we will not grant planning permission for development that would lead to the loss of a valued facility, unless replacement provision was to be made, or an alternate facility nearby would continue to support the same functions. For clarity, a cross-reference has been added to SPD9. Community Asset Transfer is not an issue that would be dealt with directly in planning, but the SPD does emphasise that the council is keen to work with partners and the local community to deliver regeneration in the Elephant and Castle.</p>

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165	574	4 -The preferred option/options	SPD 9 - Community facilities		There is little in the draft SPD to indicate that the council is committed to protecting and supporting existing community facilities, such as Crossway Church, Cooltan Arts, the Elephant Hotel and others, and would need to be clearly defined.	The definition of community facilities provided in the 'fact box' is purposely broad and covers a wide range of facilities. The protection of community facilities is covered in Southwark Plan policy 2.1. The policy states that we will not grant planning permission for development that would lead to the loss of a valued facility, unless replacement provision was to be made, or an alternate facility nearby would continue to support the same functions. For clarity, a cross-reference to the Southwark Plan has been added to SPD9. Reference to Crossway Church has been added to the Heygate Street character area section. A sentence reflecting the presence and value of faith communities in the opportunity area has been added to Section 2 of the SPD.
165	575	4 -The preferred option/options	SPD 9 - Community facilities		The 2004 framework document promised a 'comprehensive range of social, education, health and leisure facilities', including a library/learning centre, secondary school and an energy centre. It is not clear why these are no longer proposed.	The SPD refers to the provision of a range of facilities directly in policy guidance and in the infrastructure plan in appendix 1. The level of detail reflects the fact that this is a 15 year plan and the SPD needs to be flexible enough to accommodate changes to policy, legislation, funding and local need. SPD 7 refers to the provision of a new leisure centre. The proposed redevelopment is currently at the design stage and a planning application is expected in Spring 2012. The provision of education and health facilities will be subject to ongoing discussion with the Council's school place planning team and NHS Southwark, respectively. There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work. A range of community facilities will be supported as part of the redevelopment of the Heygate estate. Specific facilities, such as a library, will continue to be discussed, with firmer details being set out as planning applications for the redevelopment are submitted. SPD19 sets out that all developments should consider the feasibility of connecting to a Combined Heat and Power (CHP) system. Where a new system is required, this would usually be provided in

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						an on-site Energy Centre. As noted in SPD9, the community facilities needed to underpin growth in the area will be kept under review over the lifetime of the SPD.
165	576				Finally, Peoples Republic of Southwark fully supports the comments submitted by Elephant Amenity Network Latin American businesses and organisations and the Walworth Society.	Comments noted
166	661	3 - Vision and objectives			There is strong support for the regeneration of the area	The support for rejuvenation is noted.
166	662	4 -The preferred option/options	SPD 10 - Public Transport		How will the change in traffic for London Rd/ St George's Rd/ Westminster Bridge Rd impact on traffic movements, congestion, pollution, safety, road crossings etc? How will they impact on the Cathedral and other heritage assets in the area? Heritage assets need protecting	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
166	663	4 -The preferred option/options	SPD 1- Shopping		How would the additional retail impact on Waterloo's improving retail centre? Waterloo residents welcome improvements to retail at the Elephant, which is the major shopping centre in London South Central, and would be pleased at the concept of improving retail on the streets connecting to the Elephant such as London Rd, they do not want to see a negative impact on the vitality or viability of Lower Marsh & The Cut shopping centre in Waterloo.	In its own retail study, the council tested a couple of growth scenarios at Elephant and Castle. This concluded that growth should not harm neighbouring centres. However, this would need to be tested in more detail. Applicants for large scale retail proposals will need to submit a retail impact assessment which identifies impacts on neighbouring centres.
166	664	4 -The preferred option/options	SPD 10 - Public Transport		We want to see pedestrian access to the overground station improved – currently you must go up in the shopping centre, then down into the ticket office, but then up again to the platforms, through an unpleasant tunnel. We need integrated public transport!	The Council will work with Network Rail to secure improvements to the station.
166	665	4 -The preferred option/options	SPD 7 - Sports facilities		Will the swimming pool have real disabled access i.e. more than the minimum required by DDA? A strategic approach is needed given that 3 swimming pools are proposed in the wider area (Doon St, Vauxhall, Elephant) but none of them have proposed extended disabled facilities such as a rising floor.	The leisure centre is currently at the design stage and no planning applications have been submitted. However it is anticipated that the learner pool will have a moveable floor for full disabled access. The eventual facility will be fully compliant with the Equality Act 2010 and the Disability Discrimination Act to ensure that access arrangements and the facilities and services that are on offer are appropriate and meet the needs of disabled people. It is the aspiration of the leisure centre project that access to the centre and pool will meet Olympic requirements.

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166	666	4 -The preferred option/options	SPD 5 - New Homes		The lack of affordable housing in the tower beside the swimming pool is unacceptable – providing more affordable housing in some faraway part of the SPD area is not sufficient to ensure creating mixed and balanced communities, as required by national and regional policy.	Our policy for affordable housing is set out in the Core Strategy and the saved Southwark Plan, with further guidance in the draft and adopted affordable housing SPDs. The policy and guidance sets out that the minimum amount of affordable housing should be 35% affordable housing, and as set out in the affordable housing SPDs, where this policy cannot be met, the applicant needs to submit a financial appraisal to justify why a departure from policy is necessary. In the case of the leisure centre site, as with all schemes, we would require a financial appraisal to justify why affordable housing cannot be provided. The affordable housing SPDs set out guidance that there may be some exceptional circumstances where a scheme delivers exceptional community benefits over and above the standard section 106 contributions and that in these cases we may review the levels of affordable housing required on the site if it can be satisfactorily demonstrated that there is a need of such facilities. A financial appraisal would also be required to demonstrate how this justifies the policy requirement of affordable housing not being provided.
166	667	5 - Character Areas		Heygate Street SPD 25 - Land uses	The density of the proposed housing for the Heygate is alarmingly high, higher than the existing estate. One indication is that the existing estate affords plentiful green spaces between buildings (albeit not always useful); the proposal to create one green space at the centre of the estate will not satisfactorily address the need for open space of the new 2,500 households. Our understanding is that there is evidence that the best way to redevelop the estate would be to retain the maisonettes at the centre of the estates, but these are proposed for demolition, although new maisonettes will be built in the new development. This is wasteful at best.	Our Core Strategy sets out our policies on density. This cannot be changed through the SPD. The policy on density is applied alongside our other policies including policies and guidance on design, amenity space and dwelling sizes to ensure that new development is of an appropriate density and high quality design. Appendix 1 of the SPD also sets out further information on implementation, including an infrastructure plan to ensure that the supporting infrastructure (to include transport, leisure facilities, community facilities and open spaces) to support the increased population.
166	668	4 -The preferred option/options	SPD 1- Shopping		There seems to be room in the policy for affordable business units to allow developers to avoid building these adjacent to the other retail units, but could build them elsewhere. This would not be appropriate – we want mixed business areas: the policy needs tightening to ensure that developers cannot simply pay s106 to avoid this obligation.	The sequential approach is an accepted planning principle in national, regional and local policy. If a financial appraisal demonstrates to our satisfaction that the required affordable units are not financially viable on-site, we may allow off-site provision or a pooled contribution.

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166	669	4 -The preferred option/options	SPD 2 - Markets		There appears to be no specific policy protecting the market stalls. Furthermore, public spaces should be improved for the market to thrive, but references to improved public spaces talk of benefit to public transport users and others, but does not specify the market traders.	The SPD supports the continued operation of markets, including East Street market, and also the provision of new markets in the area. Markets can help enliven town centres, reinforce the identity of an area and help provide a more varied shopping experience. Markets also contribute towards promoting community cohesion and A new market square will be provided to the east of the railway viaduct (SPD 2). The Council is developing a Street Trading and Markets Strategy which will provide further emphasis on improving the operation of East Street market.
166	670	4 -The preferred option/options	SPD 11 - Walking and cycling		There appears to be insufficient provision of designated cycle routes around the shopping centre and throughout the Heygate area.	Plans within the draft SPD showing cycle routes are indicative only. We will require the redevelopment of the Heygate Estate to be highly permeable to cyclists, though this does not necessarily mean that cycle routes should be designated.
166	671	4 -The preferred option/options	SPD 19 - Energy , water amd waste		We would like to see the Combined Heat & Power/ District Heating system prioritised and developed more fully	This is a borough-wide issue. Core Strategy policy 13 requires all new development to be designed and built to minimise greenhouse gas emissions across its lifetime. This will be achieved by applying the energy hierarchy; 1 Be lean: use less energy 2 Be clean: supply energy efficiently 3 Be green: use renewable energy Which prioritises the use of CHP over other low and zero carbon technologies. In line with Core Strategy policy 13 we will also expect all major developments to set up and/or connect to local energy generation networks where possible. Further information is also set out in our Sustainable Design and Construction SPD.
166	672	5 - Character Areas		Heygate Street SPD 26 - Transport and movement	Pedestrian connectivity east-west through the central area and Heygate site seems good.	Support noted.
166	673	4 -The preferred option/options	SPD 17 - Buildin		There is a lot of concern about tall buildings. These are often out of scale, impacting on other areas – the Strata impacts on views and sense of scale from Waterloo Bridge onwards.	SPD 17 has been informed by a characterisation study as well as a tall buildings study. These have been carried out in accordance with English Heritage and CABE guidelines.

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			g heights		At their best they must cluster together as in the City and create a sense of place, but the new LVMF has rendered the concept of a cluster impossible. Either Southwark should work to water the LVMF down or abandon the idea of a cluster around the whole central area, and instead focus a cluster around the Strata/ 360 degree permission/ swimming pool proposals to the south side. Even there it is likely to have a significantly damaging impact on West Square and other Conservation Areas in Southwark and in Kennington/ Lambeth. Retaining the current position of tall buildings to the north, south, east and west of the Elephant but not actually at the transport and retail hub would fail to meet the requirements established by CABE/EH, and would create a series of large discrete windswept spaces between randomly spaced tall buildings – repeating the mistakes of the past There seems to be a fundamental contradiction between the aspiration to resolve the mistakes of the past by creating a built environment on a human scale whilst so strongly advocating a random assembly of tall buildings. There is also concern about the inflationary process of tall buildings: an absolute height needs to be established through a proper urban design study.	The council tested the impact of a number of tall building options in order to identify the areas in which tall buildings would be inappropriate, where they may be appropriate and where they would be sensitive. This has been reflected in the SPD with areas which may be appropriate for tall buildings defined. Relevant sensitivities, including those in Lambeth, have been listed. For example, tall buildings proposed in the Enterprise Quarter will be obliged to consider their impact on the Walcott Sq conservation area as well as on St Thomas Hospital. The council did not consider it appropriate to put a cap on building heights. The strategy pursued in the SPD provides some flexibility to allow for the fact that tall buildings may be built over the 15 year timeframe of the plan on and sites in different ownerships, while ensuring that their form and relationships to other buildings are coherent and considered.
166	674	4 -The preferred option/options	SPD 14 - Transport mitigation		One overall objective should be the reduction of traffic in the area – contrary to the Mayor's view, which should be challenged.	The Council's planning policy is required to be "in conformity" with the Mayor's planning policy. The reduction of traffic on the main roads as an objective in our SPD would be contrary to the Mayor's policy.
166	675	4 -The preferred option/options	SPD 11 - Walking and cycling		We would be delighted to see the roundabout removed/ peninsularised, and we support the removal of the subways: returning everything to ground is a fundamental principle	Earlier work by TfL has shown that the removal or peninsularisation of the northern roundabout is not feasible if it is still to serve its role as junction of a number of main roads.
166	676	3 - Vision and objectives			The whole area needs a mix of uses and a mix of affordable and private dwellings to create a mixed and balanced community.	Core Strategy policy 5 requires both affordable and private homes to be provided in the opportunity area.
190	220				These representations are submitted to Southwark Council (the "Council") on behalf of our client Lend Lease in respect of the Elephant and Castle Supplementary Planning	Support noted. Specific representations have been considered and detailed responses provided

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					<p>Document / Opportunity Area Planning Framework (the “draft SPD / OAPF”). These representations have been prepared by DP9 in consultation with the design teams for the following Lend Lease schemes in Elephant and Castle: Heygate Masterplan; Phase 1 (Rodney Road); and St. Mary’s (the land adjacent to the Fusion Leisure Centre). The Heygate Masterplan and Phase 1 schemes are located within the Heygate Street Character Area, whilst the St. Mary’s scheme is located within the Central Character Area. These representations are made in respect of all three sites. The adopted SPD will be an important policy tool with which the Council and its partners can coordinate growth and shape development over the plan period and we support the role it will play in revitalising the Opportunity Area.</p>	
190	225				<p>As you are aware Lend Lease and its design teams have been engaged in an extensive series of pre-application meetings with the Council. These representations reflect our discussions. Whilst we support the strategic objectives for the Opportunity Area, there are a number of detailed comments we have on the draft SPD / OAPF, these are set out in the table below. The purpose of these comments is to achieve consistency and flexibility in the SPD/ OAPF. In addition to this letter, we enclose a Tower Study, prepared by MAKE Architects, to support the detailed representations to Policy SPD 17 Building Heights, and specifically paragraph 4.5.16 which suggests an approximate height to width ratio for tall buildings which we do not support. Our reasons are set out in more detail below and within the enclosed Tower Study. The table below sets out our detailed representations in relation to the text of the draft SPD / OAPF. Extracts from the draft SPD / OAPF are included where necessary, with changes to show the alterations being proposed. Where relevant, the text to be deleted has been struck through and the new text underlined. This is explained by the key below: Representation Key Text in Italics only - Direct quotes from draft SPD / OAPF Struck out text - Text to be removed from the draft SPD / OAPF Text underlined - Lend Lease suggested text for inclusion in the draft SPD / OAPF</p>	<p>Support for strategic objectives noted. Specific representations have been considered and detailed responses provided.</p>

Objec tor Ref	Rep Ref	Section	Main Policy	Chara cter Area	Details of Representation	Officer Response to Representation
190	231	2- History, Elephant and Castle today, challenges and opportunities			Reference should be made to the agreement between the Council and Lend Lease in respect of the Leisure Centre site. "The regeneration of the area is already well-underway. Over 1,200 new homes have been built in the opportunity area over the last 5 years, the southern roundabout has been removed and St Mary's churchyard has been re-landscaped. The council's Regeneration Agreement with Lend Lease in respect of the Heygate Estate and agreement in respect of the Leisure Centre site as well as a recent cooperation agreement with St. Modwen, the owner of the shopping centre, will deliver a transformation of two three of the key sites over the next ten years." Reason To reflect the latest position in respect of the three sites and the Regeneration Agreement in paragraph 7.5.8.	Reference to the Council's agreement with Lend Lease in respect of the Leisure Centre will be added to paragraph 7.5.9 in the leisure section in the infrastructure plan.
190	233	2- History, Elephant and Castle today, challenges and opportunities			We support the themes for development in the Opportunity Area, however we consider Theme 5 should acknowledge the role that tall buildings play in creating a townscape that is of an appropriate status for a major centre.	One of the objectives is to create a positive identify for the area which reflects its status as a major destination. It is considered that this adequately covers the point made.
190	236	4 -The preferred option/options	SPD 1- Shopping		We support the objective to strengthen and consolidate the position of Elephant and Castle and Walworth Road as a major town centre in the borough's retail hierarchy. This will be achieved by promoting retail development at the Shopping Centre site, and within the Heygate Masterplan. "SPD 1: Shopping ... • Provide strong links between the shopping centre and Walworth Road, creating a continuous high street at the northern end of Walworth Road and provide active ground floor uses on the Heygate development site. • Provide strong links between the Shopping Centre and new retail on the Heygate development site via one or more of the railway arches. ..." Reason To ensure the Heygate development site is well connected to the Shopping Centre to establish linked shopping trips and journeys.	Support noted. We agree that permeability through the arches should be improved. We consider that this is adequately covered by SPDs 11 and SPD 22 and Figure 19.
190	238	4 -The preferred option/options	SPD 1- Shopping		Whilst we acknowledge the requirement to provide a percentage of retail units as affordable, we consider the leasing strategy should be determined by the Developer and that it is unreasonable to set tenant profile hierarchy, this element of the policy should be deleted.	We consider we have provided sufficient flexibility in the SPD on the affordable retail requirement. We have stated our preference for affordable units to be made available in the first instance to displaced businesses to ensure impacts on these businesses as a result of redevelopment

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						are appropriately mitigated. Further consideration of the end tenancy of the units would be undertaken at the planning application stage. Where it is demonstrated by the applicant that it is not feasible or viable to provide on-site or off-site affordable units, s106 planning contributions will be sought to mitigate impacts and they will be pooled for the locality to provide indirect support or provision. Indirect support could include public realm or town centre management initiatives which will themselves, indirectly, support the small units remaining in the centre, especially where these are affordable and accommodating independent retailers.
190	239	4 -The preferred option/options	SPD 5 - New Homes		Reference should be made to Core Strategy Strategic Policy 6 – Homes for people of different incomes. “SPD 5: New homes • Development in the opportunity area will provide a minimum of 4,000 net new homes between 2011 and 2026, including at least 1,400 affordable homes. Most of these homes will be delivered on proposals sites. • In accordance with Core Strategy Strategic Policy 6, development should provide as much affordable housing as is reasonably possible whilst also meeting the needs for other types of development and encouraging mixed communities. This will be done by requiring as much affordable housing as is financially viable. The Council will seek We will apply our Core Strategy policies to ensure that at least 35% of homes are affordable within the Opportunity Area and at least 35% are private and that a range of sizes of homes are provided.” Reason To be consistent with the Development Plan and to acknowledge that individual site constraints and circumstances could result in a lower provision of affordable or private housing, subject to viability testing.	This point referred to in the proposed change is already covered in existing policy and guidance. However, we have added in further wording for clarification from Core Strategy policy 6 into the fact box to include " Requiring as much affordable housing on developments of 10 or more units as is financially viable". The Core Strategy sets the policy of a minimum of 35% affordable housing and a numerical target of 1,400 affordable homes within the Elephant and Castle opportunity area. Our evidence in our Affordable Housing Viability Study (2010) and our studies looking at housing need justify this approach for the lifetime of the Core Strategy. The housing background paper which supports the Core Strategy sets out that a financial appraisal can be submitted to justify a departure from this policy if it is not viable on a specific site. Our Affordable Housing SPDs (both draft and adopted) provide further detailed guidance on requiring a financial appraisal to justify this. We will continue to follow this approach.
190	244	4 -The preferred option/options	SPD 5 - New Homes		The noise levels required for new homes should be amended to reflect World Health Organisation (WHO) guidelines. The criteria for bedrooms and external spaces reflects WHO Guidelines and British Standards, however the criteria for living rooms does not reflect the Opportunity Area’s central London location and requires noise levels aimed at preventing sleep disturbance. This is not considered appropriate for a living room and should be increased from	We are proposing to amend SPD 5 to refer to the 35dB standard.

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					30dB LAeq to 35 dB LAeq. “• All new homes will be expected to be designed to attain the following internal noise levels: -- Bedrooms- 30dB LAeq, T* and 45dB LAfmax. -- Living rooms- 35 0 dB LAeq, T* (*T = Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00). • External amenity areas shall be designed as far as reasonably practicable to attain the following noise level: -- 55dB LAeq, 16hr† († = 16 Hours between 07:00-23:00).” Reason To accord with WHO Guidance and British Standards.	
190	246	4 -The preferred option/options	SPD 10 - Public Transport		Whilst we acknowledge a route for the Cross River Tram should be safeguarded, clarity is sought over its location to ensure that it does not impact on the strategic objectives and development aspirations of the Opportunity Area.	The safeguarded route will not compromise the strategic objectives or development aspirations of the OA.
190	257	4 -The preferred option/options	SPD 11 - Walkn g and cycling		We support the objectives of Policy SPD11, specifically the use of new landmarks and views to help direct pedestrians to key locations and public spaces and facilities. The nature of the St. Mary’s scheme will play an important role in drawing visitors to the new Leisure Centre.	Support noted.
190	259	4 -The preferred option/options	SPD 12 - Parkin g		We support paragraph 4.4.10 which acknowledges that car-free development may impact on the viability of development and the saleability of new homes. Accordingly, we suggest the following amendments are made to the Policy SPD 12 text: “• All development in the central activities zone (CAZ) should be car-free, aside from an adequate provision of parking for disabled persons and for car club spaces. ,unless it can be demonstrated that car-free development would impact on the viability of the scheme or the saleability of the residential units. • Outside the CAZ, car parking should be minimised and car free developments will be supported.”	Viability can be considered as a reason to depart from any policy and so there is no reason to specifically state so here.
190	261	4 -The preferred option/options	SPD 15 - Public realm		“SPD 15: Public realm • We will work with TfL, developers and the community to transform the quality of the public realm in the opportunity area, ensuring that it: -- Contributes towards a hierarchy of different types of streets and spaces. - - Prioritises pedestrian and cycle movement and creates places in which people will want to linger. -- Helps create a sense of place and reinforces to encourage the positive development of the area’s character. -- Is inclusive, well lit,	We have amended the wording in the bullet point of SPD15 to read address the concern.

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					<p>overlooked and which feels safe at different times of the day and in the evening. -- Uses high quality and durable materials and street furniture and reduces existing street clutter where possible. -- Supports adaptation to climate change, helps reduce the urban heat island effect, supports biodiversity, reduces micro-climate impacts and greens the environment by maximising the retention of existing trees, ensuring streets and spaces are generously landscaped and incorporating Sustainable Urban Drainage Systems (SUDs).” Reason To ensure that development achieves the strategic objectives for the Opportunity Area.</p>	
190	262	4 -The preferred option/options	SPD 16 - Built form		<p>“SPD 16: Built form Development proposals should: • Be of high density, appropriate to their location, existing building form and massing and the index of public transport accessibility (PTAL). • Help to create a sense of place and distinctive neighbourhoods, reinforcing elements of the existing environment which have good character. • Conserve and enhance the character of designated heritage assets and their settings unless it can be demonstrated that the development proposal meets the criteria specified in Policy HE 9 of PPS5. • Retain locally listed buildings wherever possible. • Consider the retention of buildings which are identified as having townscape merit or ensure that the design, scale and massing of replacement buildings reinforces the character of the surrounding townscape. • Provide an appropriate sense of enclosure, helping create well defined streets and public spaces. • Introduce a finer grain of development by: -- Creating blocks which pedestrians and cyclists find easy to move around. -- Creating an interesting and varied roofline. -- Reducing the Design buildings of an appropriate massing of buildings to create a human scale of development at street level. -- Interacting with the streetscape through providing active ground floor frontages with frequent windows and entrances and active ground floor uses in appropriate locations. • ...” Reasons To be consistent with Planning Policy Statement 5. To be consistent with the London Plan. A reduction in massing is not and should not be the only option to develop a human scale. It should be acknowledge that alternative treatments could achieve a similar effect.</p>	<p>We already have a policy on density in SPD 5 and Core Strategy policy 5. We generally require development to consider the setting of heritage assets. Further policy and guidance on considerations of setting will be set out in a Heritage SPD. We have changed the wording in SPD to consider that the design buildings of an appropriate massing of buildings to create a human scale of development at street level.</p>

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190	263	4 -The preferred option/options	SPD 16 - Built form		<p>"Non-residential frontages Non-residential frontages should: • Provide a strong identifiable street address. • Where appropriate provide a minimum floor-to-ceiling height of 4m at ground floor. • Incorporate generous window sizes or areas of glazing. If security shutters are needed, these should comprise lattice shutters, located internally. Solid and perforated roller shutters will not be acceptable. • Retain features which reinforce character and contribute positively to the host building and wider context. • Where appropriate contribute to a consistent building line. • Ensure that signage design responds to the scale of the street. • Incorporate flexibility in the design, which permits the space to be fitted out for multiple uses and makes it easy to adapt for other uses in the future without fundamental restructuring or rebuilding work." Reason There may be instances where it is not appropriate for floor to ceiling heights to be 4m at ground floor. As an example, should a small retail unit be placed into the face of the building with a depth no more than 2m, a floor to ceiling height of 4m would be inappropriate. Whilst we support the principle of a consistent building line, this is not always appropriate and/or achievable and the policy should acknowledge this.</p>	The wording in this policy sets out a general principle. Any deviation from this general principle should be justified within a Planning Application. We have changed the wording in SPD16 to read: Floor to-ceiling heights at ground level should be generously proportioned
190	265	4 -The preferred option/options	SPD 17 - Building heights		<p>Figures 14 and 15 are considered ambiguous and should be titled 'illustrative' to acknowledge this. It is not clear whether tall buildings are restricted to gateway zones outlined in blue, or whether sites elsewhere in the Heygate, for example fronting the roundabout and in the centre of Elephant and Castle, are suitable for tall buildings, which we contend is the case. As an example, the St. Mary's site is not within a gateway zone, yet it is acknowledged as being suitable for a tall building at paragraph 5.1.6. In addition, there is inconsistent colouring on Wansey Street (dark shaded yellow). This is not acknowledged in the key and should be removed or clarified.</p>	The gateways are not intended to identify particular sites. The dashed ellipses' are indicative. The text in Figures 14 and 15 has been amended to clarify that they are indicative. The yellow shading denotes the listed buildings.
190	268	4 -The preferred option/options	SPD 17 - Building heights		<p>We support the recognition that outline applications may be acceptable for tall buildings, although reference to the content of a Design Strategy and parameter plans should be clarified as set out below. "SPD 17: Building heights Tall buildings in the opportunity area will help signal its</p>	Figures 14 and 15 show the principles of the council's strategy with regard to tall buildings. It is not considered that the word "illustrative" would improve the policy. It is a principle that heights should diminish moving away from the tallest points. Adding the word "generally" would not

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					regeneration. In accordance with the illustrative strategy shown in Figures 14 and 15. The tallest buildings should act as focal points in views towards the Elephant and Castle along main roads and strengthen gateways into the central area. Moving away from the tallest points, they should generally diminish in height to manage the transition down to the existing context, with scope for taller elements at significant local gateways or landmark locations. They should be used to add interest to London's skyline and when viewed in a cluster, should be articulated to ensure that they do not coalesce to form a single mass	make this clearer. Likewise adding references to local gateways and landmark locations would create confusion and weaken the focus and intent of the policy.
190	272	4 -The preferred option/options	SPD 17 - Building heights		Tall buildings should: <ul style="list-style-type: none"> • ... • Help reinforce the hierarchy of spaces and streets in the area; the amount of public space provided at ground level will be expected to be proportionate appropriate to the height of a building. [1] • ... Reason [1] – Without greater clarity, the term 'proportionate' is not considered suitable and could leave to prudentially oversized areas of public space at the base of towers that will not contribute positively to the local townscape. The word 'appropriate' is therefore suggested. 	"Proportionate" implies a relationship between height and the size of the public realm in a way that the word "appropriate" does not. Moreover the policy is not prescriptive and does not specify a particular ratio. It is not considered that the change would improve the policy.
190	273	4 -The preferred option/options	SPD 17 - Building heights		<ul style="list-style-type: none"> • ... • Achieve visual separation from adjoining development around the base of the building. [2] Reason [2] – This is considered over prescriptive and does not reflect site by site characteristics. 	This is considered an important principle which applications should seek to address. It is important that tall buildings are perceived as distinct elements which relate to the street, rather than as extrusions of other buildings or podia.
190	274	4 -The preferred option/options	SPD 17 - Building heights		<ul style="list-style-type: none"> • Within the identified key views, demonstrate a considered relationship with other tall buildings and building heights in the immediate context; cumulatively, tall buildings should not coalesce visually to form a single mass. [3] Reason [3] – The inclusion of the text 'within identified key views' is suggested as there is likely to be some overlap and coalescence in some views where there is a cluster of tall buildings. This should be reflected in policy. 	The policy identifies a general principle that proposals should not form a wall of development. Proposals will need to address impact of buildings on the cluster of tall buildings in a number of local and more distant views. It is not considered that the proposed amendment would improve the policy as "identified key views" are not defined and could generate confusion.
190	277	4 -The preferred option/options	SPD 17 - Building heights		<ul style="list-style-type: none"> • Be slender and elegant with regard to the width-to-height ratio; they should be attractive city elements with a strong geometry when viewed from all angles and the tops of buildings should be well articulated and recessive. [4] Reason [4] – This bullet point is considered overly prescriptive and should be deleted, or reference should be 	SPD 17 has been amended. The height to width ratio has been changed to 1:4-1:6. It has also been clarified that it is an important consideration where buildings will have a significant impact on the skyline.

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					made to the EH-CABE Guidance paragraph 4.1.5 which states: "The architectural quality of the building and its scale, form, massing, proportion and silhouette, facing materials and relationship to other structures. The design of the top of a tall building will be of particular importance when considering the effect on the skyline..."	
190	279	4 -The preferred option/options	SPD 17 - Building heights		<ul style="list-style-type: none"> The skyline and relationships between buildings should help reinforce the character and identity of the area and contribute positively to or not create harmful impacts on London's skyline, when viewed locally and in more distant views. [5] Reason [5] – To be consistent with PPS 5. 	Policy 3.20 of the Southwark Plan requires tall buildings to have a positive impact on London's skyline. London Plan policy 7.7 also indicates that where appropriate, tall buildings should enhance London's skyline. This is reiterated in paragraph 7.27 of the London Plan which states that: "Ideally, tall buildings should form part of a cohesive building group that enhances the skyline and improves the legibility of the area, ensuring tall and large buildings are attractive city elements that contribute positively to the image and built environment of London".
190	281	4 -The preferred option/options	SPD 17 - Building heights		<ul style="list-style-type: none"> Allow adequate sunlight and daylight into streets, public spaces and courtyards unless such impacts are shown to be outweighed by other benefits generated by the development. [6] Reason [6] – To acknowledge positive impacts of development that could outweigh potential harm. 	Designing to allow sunlight to enter streets and courtyards is an important principle of urban design. Where a developer considers that this is not possible, it would need to be demonstrated that there are material considerations which preclude it.
190	282	4 -The preferred option/options	SPD 17 - Building heights		<ul style="list-style-type: none"> Avoid harmful microclimate and shadowing effects or adverse affects on local amenity unless such impacts are shown to be outweighed by other benefits generated by the development. [7] Reason [7] – To acknowledge positive impacts of development that could outweigh potential harm. 	The wording is consistent with London Plan policy 7.7 which states that: "should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference
190	285	4 -The preferred option/options	SPD 17 - Building heights		<ul style="list-style-type: none"> Demonstrate an exemplary standard of design, provide high quality accommodation which significantly exceeds minimum space standards and promote housing choice by providing a mix of unit types." [8] Reason [8] – The term 'significantly' is considered too vague, overly prescriptive and unjustified. 	This wording is consistent with our adopted Residential Design Standards SPD.
190	287	4 -The preferred option/options	SPD 17 - Building heights		"Form of application Outline applications may be acceptable for tall buildings providing that the following information can be supplied: <ul style="list-style-type: none"> A design strategy which: -- Specifies parameter plans containing descriptions and plans of: -- Plot layout. -- The spaces between plots. -- Vertical massing (maximum and minimum heights and their distribution). -- Quantum of floorspace (maximum and minimum). -- 	The reference to public and private open space has been amended. However, an understanding or circulation routes is considered essential to understanding how a development will function.

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					Vehicular, pedestrian and cycle access routes. -- Circulation routes. -- Hard and soft pPublic and private open space. -- Contains 3 dimensional wire-line analysis of the maximum parameters which tests the proposals in appropriate views. • A design and access statement which provides illustrative material showing how the maximum parameters might take effect and which describes the relationship of each plot and its proposed development with the surrounding context.” Reason To allow sufficient flexibility for outline planning applications.	
190	288	4 -The preferred option/options	SPD 17 - Building heights		“... However, the existing character of parts of the west, south and east of the wider opportunity area comprises low scale residential development, conservation areas or open spaces. It may not be appropriate to These areas cannot accommodate significantly taller development in these areas, however proposals will be considered on a case by case basis in accordance with the principles outlined above.” This is considered ambiguous and should refer specifically to these areas and their settings and be assessed in relationship to existing and emerging tall building context and design best practice.	The council has undertaken a characterisation study which indicates that generally heights in the wider opportunity area are lower scale. The character area policies provide further guidance of building heights throughout the opportunity area.
190	289	4 -The preferred option/options	SPD 17 - Building heights		“The width to height ratio of tall buildings should be approximately between 1-8 and 1-12. Reason It is not considered appropriate to set a defined height to width ratio for tall buildings that does not take into account individual site characteristics, surrounding context and key views. We enclose with these representations a Tower Study, prepared by MAKE Architects, which reviews a number of precedent schemes to demonstrate that the proposed ratio is unachievable yet the schemes are considered successful in delivering high quality tall buildings.	SPD 17 has been amended. The height to width ratio has been changed to 1:4-1:6. It has also been clarified that it is an important consideration where buildings will have a significant impact on the skyline.
190	290	4 -The preferred option/options	SPD 17 - Building heights		“The base of tall buildings should be permeable and they should not appear as extrusions from podia.” Reason This is considered overly prescriptive in relation to the specific design of a tall building.	This is considered an important principle which applications should seek to address. It is important that tall buildings are perceived as distinct elements which relate to the street, rather than as extrusions of other buildings or podia.
190	291	4 -The preferred option/options	SPD 18 - Open		“SPD 18: Open spaces • Our strategy is to provide open space as part of high quality green infrastructure (shown indicatively in Figure 16) for residents and visitors to enjoy.	This is a recommendation set out in our draft Open Space Strategy and it will be for the developer to demonstrate why this cannot be delivered due to site constraints

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			spaces		To do this we will: ... -- Expect major residential developments to provide opportunities for food growing. Reason This is considered overly prescriptive and does not take into account site constraints.	through the planning application process.
190	292	4 -The preferred option/options	SPD 18 - Open spaces		"... Use street trees to green streets and reinforce planting where trees are integral to the historic townscape. Streets should have at least 60% canopy cover. Where this is constrained by the presence of utilities or other services, it may be resolved through suitable street design such as build-outs or median strips Where this cannot be achieved, the Council will weigh the benefits of the proposals against any loss." Reason The policy should recognise site constraints and acknowledge that 60% canopy cover is not always achievable, even when incorporating suitable street design.	This is considered overly prescriptive for the SPD. The Council will assess the benefits of the proposal as part of the planning application process.
190	293	4 -The preferred option/options	SPD 19 - Energy , water and waste		"Consistent with Core Strategy policy 13, development must meet high environmental standards helping to reduce the impact of development on climate change. This includes ensuring that developments cut CO2 emissions by at least 44% beyond the requirements of the Building Regulations (2008)." Reason To provide clarity that this requirement is consistent with Code for Sustainable Homes targets Level 4.	This has been amended in the final SPD. The 44% reduction in CO2 emissions is applicable to the 2006 Building Regulations.
190	294	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		The strategic transport tariff levels are significantly more than what would normally be required through Section 106 negotiations and will impact on the viability of development. Accordingly, we support the viability testing of Section 106 Planning Obligations and CIL payments for schemes within the Opportunity Area, although we consider this should be specifically referred to within the Policy and the supporting text should reflect the latest discussions being held between TfL, LBS and LL. We acknowledge the hierarchy of planning obligation negotiations, where Crossrail and strategic transport improvements take priority.	The level of the tariff reflects the cost of the infrastructure which is required. Viability is a material planning consideration. It is not considered that a further reference to viability in SPD 20 would improve the policy.
190	295	5 - Character Areas		Central Area SPD	We support the Leisure Centre site being recognised as being appropriate for a tall building. This would raise the profile of Elephant and Castle and act as a focus for	Support noted.

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				21 - Land uses	regeneration. We support the introduction of appropriate active uses at ground floor, especially on the existing Leisure Centre site abutting Newington Butts.	
190	296	5 - Character Areas		Central Area SPD 22 - Transport and movement	We support the opening up of the railway arches and creating an east west link. These are important measures in ensuring the Opportunity Area has strong pedestrian and cycle links and will facilitate linked shopping trips between the Heygate Masterplan site and the Shopping Centre.	Support noted
190	297	5 - Character Areas		Central Area SPD 23 - Built Environment	“SPD 23: Built environment Public realm • ... • Development on the leisure centre site will be expected to address the approach from the shopping centre and the transport interchanges as well as St Mary’s churchyard and the approach from the south which is a major catchment area for leisure centre users, whilst providing active uses at ground level... Building heights • All proposals for tall buildings should: -- Use the tallest elements of development to help define the illustrative gateways into the central area shown on Figures 14 and 15...” Reason To acknowledge the importance of the southern approach to the Leisure Centre site. Figures 14 and 15 are ambiguous and should be labelled illustrative to allow sufficient flexibility.	We consider the policy addresses this point adequately.
190	298	5 - Character Areas		Central Area SPD 24 - Natural environment	“SPD 24: Natural environment • Whilst acknowledging existing constraints, development should facilitate improved links between St Mary’s churchyard and the proposed town park on the Heygate development site, as shown in Figure 19.” Reason Policy should acknowledge the existing difficulties in improving direct views and physical links due to the existing viaduct which blocks Heygate Park to north of Walworth Road. Potentially a more direct link could be made through the shopping centre site. Tall buildings on Heygate and St. Mary’s sites would provide markers for both open spaces as an aid to orientation between the parks.	This is considered overly prescriptive for the SPD. The Council will assess the site constraints as demonstrated by the developer as part of the planning application process.
190	299	5 - Character Areas		Heygate Street SPD	“The Heygate estate is now mostly clear and ready for demolition. There is the opportunity to regenerate the area with a mixed use development. Key to the success of this project will be creating new east-west and north-south routes	The redevelopment of the Heygate Estate will provide an environment that is highly permeable for pedestrians and cyclists.

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				25 - Land uses	through the area, as well as providing much better links through to the shopping centre.” Reason To acknowledge the importance of all routes through the Heygate Masterplan site.	
190	300	5 - Character Areas		Heygate Street SPD 25 - Land uses	We support the identified redevelopment opportunity presented by the Heygate estate and the proposed range of uses. “Our strategy for the Heygate Street character area is to: • Use the redevelopment opportunity of the Heygate development site to create a vibrant new quarter at the heart of the Elephant and Castle. This will be achieved via the phased delivery of an outline planning application for the Heygate Masterplan and detailed planning application for the Phase 1 Development. ... • Provide a tall building at the northern end of Walworth Road which together with Strata helps define a gateway into the central area. Buildings on the Heygate estate and 50 New Kent Road development sites should help consolidate a cluster of tall buildings which takes advantage of excellent public transport services, contributes towards creating a neighbourhood of character and which manages the transition from the tallest point of the cluster down to lower scale development in the Brandon Street and Walworth Road character areas. The cluster of tall buildings must not harm heritage assets preserve those elements of the setting that make a positive contribution to or better reveal the significance of the heritage asset. ...” • Provide a viable district CHP/communal heating system for the Heygate development site which has the potential to link to the shopping centre, and leisure centre and other external buildings where feasible. Reason To be consistent with PPS5. To allow sufficient flexibility for a range of energy efficiency measures to be considered.	We have amended the second bullet point under Strategy (para 5.2.5.) to read: • Provide around 3000 new homes in the character area including approximately 2,500 homes through a phased development on the Heygate development site. 'Viable' is a material planning consideration so there is no need to include this in the wording of the strategy. We have amended the last bullet point under Strategy (para 5.2.5.) to read: • Provide a district CHP/communal heating system for the Heygate development site which has the potential to link to the shopping centre, and leisure centre and other external buildings where viable.
190	301	5 - Character Areas		Heygate Street SPD 25 - Land uses	We support the range of uses identified in Policy SPD 25 and support their being no defined commitment to floorspace quantum, although acknowledge that there will be a significant net increase in residential units across the character area. This provides sufficient flexibility over the plan period and allows proposals to reflect changing demand for uses. “... • Where appropriate interim use of development sites will be encouraged provided that	SPD 25 indicates that interim uses are acceptable in principle. Whether they are appropriate for a particular site would be addressed through the planning application process.

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					proposals have an effective management plan and a plan to demonstrate that such uses will be safe and secure.” Reason To provide sufficient flexibility.	
190	302	5 - Character Areas		Heygate Street SPD 25 - Land uses	“Retail use should help define the character of new neighbourhoods. Walworth Road has a high street character. However there is currently a gap in the frontage between the Old Town Hall and the railway viaduct. Redevelopment of the Heygate estate provides an opportunity to reinstate retail uses in this stretch of frontage. Such space should reflect the importance of this location in the town centre. Larger format stores would be appropriate, with which could include generous floor-to-ceiling heights to give a retail use an appropriate presence in the streetscene.” Reason This is considered overly prescriptive and does not allow sufficient flexibility to allow a range of development typologies that respond to individual site characteristics and context.	The text is simply pointing out that Walworth Road is considered to be a suitable location for larger format stores and floor to ceiling heights should be generous. This is not considered to be overly prescriptive. SPD 25 requires the provision of a retail strategy to explore a strategy for the Heygate development site in more detail and ensure that the approach is coherent.
190	303	5 - Character Areas		Heygate Street SPD 26 - Transport and movement	Bus standing should be considered over the wider Borough area in conjunction with Transport for London to determine the most appropriate location for bus standing.	SPD 10 covers this.
190	304	5 - Character Areas		Heygate Street SPD 27 - Built environment	“Built form Blocks • ... • Internal courtyards and communal amenity spaces should be designed for a range of activities, including seating areas, play spaces and community planting. Landscaping should be of high quality and encourage biodiversity through tree planting/retention, water features and habitat creation. Courtyards should be at ground rather than podium level where possible unless there are clear benefits to justify a raised courtyard. “Materials • Development should use materials which are high quality, durable, robust and sustainable. The choice of materials, colour and finishes should be complementary to and reinforce local identity; other than on tall buildings, building facades should be predominantly brick or masonry and should generally be designed to create continuity and	The wording in this policy expresses a general principle. Any deviation from this general principle should be justified and demonstrated within a Planning Application. The aim is to create an environment which uses high quality materials and where appropriate the traditional materials that have been used in the area.

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					consistency with adjoining developments.” Reason Specifying materials such as brick and masonry is overly prescriptive and does not allow for future architectural development.	
190	305	5 - Character Areas		Heygate Street SPD 27 - Built environment	“Heritage • Development should: -- Conserve or enhance In accordance with PPS5, preserve those elements of the setting of the Old Town Hall by ensuring that development around the proposed Walworth Square has a consistent height which reflects the height of the Old Town Hall. that make a positive contribution to or better reveal the significance of the Old Town Hall.” ... Building Heights ... • Generally dDiminish in height moving away from the tallest points to manage the transition to surrounding building development, with scope for taller elements at significant local gateways or landmark locations .” Reason The policy, as currently drafted, suggests that any changes in building heights will detract from the setting of the Old Town Hall. We disagree with this and suggest the policy should reflect the provisions of PPS5.	The wording in this policy expresses a general principle. Adding the word ‘generally’ does not add any clarity to the policy nor does it clarify the principle. Similarly the suggested wording ‘with scope for taller elements.....’ does not add any clarity. We have showed where we consider to be gateway locations in SPD 17.
190	306				We request that we are kept informed with the progress of the draft SPG / OAPF, including the changes resulting from Appendix 3: Schedule of buildings which have the potential to be locally listed.	You are on the Planning Policy team's database and will be kept informed.
194	716	5 - Character Areas		Walworth Road SPD 35 - Built form and public realm	The Metropolitan Police's property at 2-16 Amelia Street is identified as an opportunity site within the Walworth Road Character Area. The MOPC/MPS support its inclusion and identification for redevelopment for a mix of uses when the existing policing use is relocated. Policy SPD35 'Built form and public realm' states that development in the Walworth Road Character Area must take into account the context and the building heights of the area, and that development should be between 3 and 5 storeys along the majority of the frontage of the road. It is considered that in respect of the above site a higher building could be accommodated on this site, which would still fit in with the street scene. A number of tall buildings have been built to the north and west of the site.	Our strategy on building heights has been informed by a characterisation study. This study concluded that consistent heights on the frontage of Walworth Road are a key part of its character. SPD 39 indicates that it is more appropriate that taller elements are located close to the viaduct.
194	720	5 - Character Areas		Walworth Road	Possible Locally Listing of The Tankard Public House, 176-178 Walworth Road The above property is identified as a building that may potentially be locally listed (Figure 27:	The building concerned was identified during a building audit of the area. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in

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				SPD 35 - Built form and public realm	Heritage assets in the Walworth Road character area). This lies directly adjacent to the policing facility at 2-16 Amelia Street referred to above, which is identified as an opportunity site. No justification is provided as to why it should be locally listed however and it is considered that a local listing designation is not warranted. It will also potentially prejudice the development potential of the neighbouring opportunity site.	itself locally list them. Later in the year the Council will be consulting a Heritage SPD and a borough-wide local list will be formally consulted on as part of that process. At that point, there will be an opportunity to make representations on individual buildings, prior to the finalisation and adoption of the list.
209	790	3 - Vision and objectives			We welcome the detailed thinking that has gone into the construction of this SPD and can see considerable potential for improvement in the health of the population. Comments concentrate on trying to maximise the health outcomes of regeneration. They have been provided in relation to SPDs in part 4 on the assumption that any changes made as a result of them will feed through to the other relevant parts of the document as needed	Support noted
209	791	3 - Vision and objectives			Social Cohesion: There is little said in this document about communities and how plans will work to facilitate community integration and social cohesion over the period of regeneration. Greater density and a more heterogenous population can pose challenges to these objectives if change is not well managed and if housing development encourages a rapid turnover of short term residents. Issues to consider and incorporate explicitly are: <ul style="list-style-type: none"> o Ensure that health and planning are integrated at the early stage of plan making and programme preparation o Ensure active involvement of communities, especially vulnerable and hard to reach in the development of policies and proposals. o State clearly how Health Impact Assessment will be used to achieve the most favourable possible impact on the health of the existing and new population and to ensure that health inequalities are reduced. o Support designs that allow for social interaction /sharing of community facilities 	Noted. The vision for the SPD makes clear that our ambition is that regeneration in Elephant and Castle will ensure that the area becomes a more attractive, desirable place to live, for both existing and future residents. As set out in our consultation report, we have carried out extensive consultation throughout the preparation of the SPD to engage local residents, businesses and organisations, to ensure that the SPD reflects their views about the current area and the changes that they want in the future. We have carried out a sustainability appraisal (SA) to examine some of the potential impacts of guidance in the SPD. The potential health impact of the SPD was one of the issues covered in the SA. We work closely with NHS Southwark to ensure that there are sufficient health facilities in the area to meet demand for services. There are no short term concerns, although we have noted a longer term need for enhanced facilities in the Enterprise Quarter. We will continue to monitor the situation as development takes place. In addition, a number of policies in the SPD were assessed in the SA as being beneficial in terms of health and well-being. This includes the promotion of active travel, improvements to open space and guidance for the Heygate Street character area, which includes the

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						creation of a new park as part of the Estate's redevelopment. The SPD supports the provision of community facilities as part of a mix of uses to support new housing developments. Guidance on public realm in SPD15 states that we will deliver high quality spaces, which will allow for social interaction. Further guidance on public realm and open spaces is provided in the character areas sections.
209	792	3 - Vision and objectives			Mention is made of the creation of new public space. Does consideration need to be given to the ownership status of new public space created by developers? In some developments, control (and presumably maintenance) is in the hands of private landowners who control security, access, and rules of entry e.g. chaining up bikes that are thought to be inappropriately parked. It is clearer for local communities if public space belongs to the Council. If any new public space is in fact privately owned then this needs to be made clear as do any relevant rights and responsibilities	Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces. The detail of ownership and maintenance will be agreed through the planning application process. However, our draft open space strategy recommends the site fore protection as open space. Open space is protected using the Saved Southwark Plan policies 3.25 to 3.27 which state what types of development would be considered appropriate on Metropolitan Open Land, Borough Open Land and Other Open Space.
209	793				Following on from this, it is important that there be clarity as to where responsibility lies for the planting/maintenance/cleaning of new open space/amenity area around residential/business schemes. It is possible that in some areas there will be quite complex patterns of ownership of plots of land but regardless of ownership it is important that the public realm as a whole be well cared for, free of litter etc. Boundaries between publicly owned and privately owned land need to be clear and care taken to avoid left over patches of land which become neglected due to uncertainty over ownership	Detailed matters such as landscaping will be considered as part of the planning application process. In line with policy 12 of the Core Strategy, we will require a design and access statement to be submitted with all development proposals. The design and access statement is required to demonstrate how the proposed landscaping refers to the treatment of both public and private spaces. In order to meet the guidance set out in our Design and Access Statements SPD, the design and access statement should include an explanation of the purpose and function of the landscaping including stating the amount of outdoor space and whether it is private or public space as well as an explanation of the commitment to maintaining the landscaping.
209	794				The Public Health Outcomes Framework has now been issued by the Department of Health (January 2012) and will be relevant to this and other planning documents as Councils will need to work within this framework. Appendix One summarises the outcomes, domains and public health	Noted.

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					indicators most relevant to spatial planning. Regeneration schemes will need to contribute to improved performance on these objectives and indicators. This material may be relevant to updating the sustainability appraisal and refining indicators	
209	795	2- History, Elephant and Castle today, challenges and opportunities			Provide date of unemployment data and ensure it is up to date as things are changing quite rapidly and not, as yet, for the better	Our Employment Background paper and Background Information Paper provides some information on employment data. Moreover, through the Annual Monitoring Report we review key employment indicators annually.
209	796	4 -The preferred option/options	SPD 1- Shopping		'Ensure that new retail and business opportunities generate around 5,000 new jobs' The number of new jobs is almost equal to the number of people in the area on key out of work benefits. Some of these jobs will be necessarily be filled by commuters with specific skills. However often physical renewal of cities, accompanied by growing economic prosperity, has not led to benefits in terms of employment for those living in regeneration areas. It is important to learn from this and ensure that all aspects of the regeneration are linked to employment opportunities for local people. The 2009 All Party Parliamentary Report How Local Communities Can Gain Employment from Regeneration promotes five factors that have emerged from the evidence that could help to link regeneration to employment opportunities for local people: • Planning agreements to secure commitment to local employment objectives. • Partnerships between local authorities, employment agencies, further education and employers at the pre-development stage. • Forecasting all possible employment opportunities and working to develop bespoke training programmes for local residents. • Targeted employment strategies to link training to employer demand. • Creating long term opportunities, jobs with career prospects, and ongoing support for employees. Employees who live locally who walk or cycle to work also can add greatly to the sustainability of the scheme as well as offering opportunities for improved health. More needs to be added to address these issues so that the document moves beyond the purely aspirational and specifies more clearly how the disadvantaged local population can be helped towards	he SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's.

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					employment, perhaps by developing SPD 4 and outlining succinctly how the E and C will fulfil the objectives of the Economic Development Strategy (2010) particularly 1, 2 and 3 (there is generally better coverage of objectives 4 and 5) 1. Tackle the barriers to work faced by priority groups 2. Increase business and employer engagement 3. Raise skills for sustained employment 4. Support existing businesses 5. Develop key business district)	
209	797	4 -The preferred option/options	SPD 1- Shopping		Although there is mention of fast food in relation to the opportunity areas in section 5, and a statement of intent not to allow more than 5% of units to be A5 outlets, it would be helpful if it can be reiterated as a statement of principle in this SPD. It may not be straightforward to operationalise (i.e. deciding on how to count the total number of units) so there may need to be more clarity on this calculation. We hope to see NICE Public Health guidance followed: 1. Use bye-laws to regulate the opening hours of take-aways and other food outlets, particularly those near schools that specialise in foods high in fat, salt or sugar. 2. Use existing powers to set limits for the number of take-aways and other food outlets in a given area. Directives should specify the distance from schools and the maximum number that can be located in certain areas. (Prevention of cardiovascular disease, PH guidance 25 We also hope to see an express stipulation that there should not be clustering of A5 units.	SPD 33 provides a strong statement of intent that no more than 5% of units should be in hot food takeaway use. We are proposing to amend SPD 33 to address clustering of A5 units.
209	798	4 -The preferred option/options	SPD 2 - Markets		We welcome the support for markets and recognise that a wider council strategy may help to deal with some of the problems and issues facing Southwark's markets. Markets have an important role in the provision of affordable fresh foods as well as offering opportunities for (self) employment and it will be important that the provision of good quality fresh food is supported. Can any lessons be learned from the management of the successful street market in Lewisham High Street (Monday to Saturday) which sells fruit, vegetables and flowers, with only a small range of non-perishable goods?	Comments noted.
209	799	4 -The preferred option/options	SPD 4 - Jobs and		Need to ensure that new business space incorporates healthy design principles – energy and water efficiency; natural lighting as much as possible; minimal reliance on air	The SPD sits within the Local Development Framework of planning documents which are all used to assess new development. SPD 19 Energy, water and waste sets out

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			Business		conditioning; are linked to walking and cycling networks with adequate safe cycle storage and during building design or refurbishment, ensure staircases are attractive to use and clearly signposted to encourage people to use them. If mechanical ventilation is used, responsibility for maintenance and servicing needs to be clear.	that development will be required to meet the highest possible environmental standards, in line with our Core Strategy and the London Plan, including targets based on the Code for Sustainable Homes and BREEAM. Our adopted Sustainable Design and Construction SPD sets out minimum design requirements in new buildings which must met.
209	800	4 -The preferred option/options			Little is said here as to how the housing should reach a high quality. The section either needs extension or there needs to be clear cross referencing to another document which sets out what is expected. The stipulation that noise pollution be minimised in homes is welcomed, given the likely density of some of the new developments and the volume of traffic on the major roads in the area. Getting around these two issues may well be challenging in design terms. One option is to make use of multiple light-wells and courtyards around the home, bringing light and views to bedrooms and living areas. Internal courtyards can also private 'green viewing areas' from many areas of the home, something important in this area of open space deficiency. The amount of natural lighting in kitchens and living rooms should be maximised. Windows should always be openable, but if mechanical ventilation is used, it is important that it is installed, maintained and serviced regularly to a very high standard. Air filters should comply with European guideline EN13779. Communal staircases should be inviting to use and offer a chance for residents to meet in a pleasant atmosphere and lifts should not be presented as the default choice. If schemes are to be health impact assessed, there is a good starting point in Healthy design principles for use in the Health Impact Assessment of mixed residential developments (Birley and Birley, 2007) available at http://www.apho.org.uk/resource/item.aspx?RID=44149	This point is addressed in SPD5. We also cover the points raised within our Residential Design and Design and Access SPDs.
209	801	4 -The preferred option/options	SPD 18 - Open spaces		Where high density homes are created, particular thought will need to be given to the welfare of children and young people living there in terms of safe open spaces for play and opportunities for social interaction.	SPD 18 sets out how we will expect new development to provide adequate play facilities for children and young people. In some instances, S106 contributions may be secured where children's play provision cannot be provided on site.
209	802	4 -The preferred	SPD 6		The emphasis on the development of arts, culture, leisure	Support noted. The SPD has recognised there is an

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		option/options	- Wellbeing - Social and community infrastructure		and entertainment is welcomed, as is the recognition that the offer needs to be considered carefully to avoid unforeseen detrimental impacts. There is scope for developing event, gallery and performance space which could perhaps link to other recognised theatres and galleries and build audiences who might have otherwise travelled out of the area. It would be important to ensure that community and voluntary groups can also derive benefit from such new resources and that if charges are levied, they are within the means of the groups.	opportunity to build upon the positive reputation of the Elephant and Castle as a creative area, improve its arts and cultural offer and strengthen and diversify the evening economy. We have amended SPD6 to include further encouragement of strengthening links with the two learning centres (London College of Communication and London Southbank University) and the wider arts scene. The Council actively promotes and supports cultural events through various communication channels, such as the Council's Events webpage on the Council's website. The Arts and Culture team also offer support and resources to organisations and community groups throughout the area to help them deliver activities, events and workshops. One example of partnership working is with the Southwark Arts Forum who provide a range of networking, advice and information services to its members.
209	803	4 -The preferred option/options	SPD 6 - Wellbeing - Social and community infrastructure		The recognition of the need to provide a wide range of activities appealing to many sections of the population (both existing residents and incomers) is welcomed, as is the acknowledgement that not all entertainment needs to revolve around alcohol and the need to prevent any loss of amenity for local people. The community safety aspects of the further development of a night time economy also needs to be mentioned, particularly with the current financial pressure on Policing and Safer Neighbourhood Teams. Are there implications for careful development control and the imposition of conditions designed to minimise any community safety problems? Opportunities for natural surveillance and use of discreet security measures where necessary will need to feature generally in the design, Some parts of the Elephant and Castle already have higher levels of crime (based on the data in http://maps.met.police.uk/?areacode=00BE) as often happens in areas that are good transport hubs. One aim in regeneration need to be to see offending of all kinds decline – a possible indicator?	Support noted. We set out in SPD6 that we will assess the contribution that new proposals for arts culture, leisure and entertainment have in the area by taking into account the impact on safety, security and residential amenity. Our Saved Southwark Plan policy 3.14 - Designing out Crime sets out a list of solutions which should be incorporated into new development, in order to improve community safety and crime prevention.
209	804	4 -The preferred option/options	SPD 7 - Sports		The proposal for leisure facilities is welcomed however it will be important to ensure that they are accessible to local residents on more limited incomes as well as new and	The pricing arrangements of the leisure facilities are beyond the control of planning and therefore beyond the scope of the SPD. However, the new leisure centre will be

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			facilities		perhaps more affluent populations. Another possibility to maximise access to opportunities for physical activity is to ensure that robust open air gym equipment, (e.g. the kind of thing shown on http://fresh-airfitness.co.uk/category/all-products/), permanent outdoor table tennis tables etc are installed in parks and open spaces whenever possible.	a Southwark Council facility and the Council will work to ensure that pricing is appropriate to meet local needs. Core Strategy policy 11 requires new play facilities to be delivered as part of new developments sites or funded indirectly through s106 planning obligations and/or community infrastructure levy. Outdoor gym equipment and other play facilities could be installed in parks and open spaces where there is a particular local demand for these sorts of improvements. Over the spring we will be updating our community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. The community project banks will help us to determine our priorities for spending money that is gathered through s106 planning obligations and/or community infrastructure levy.
209	805	4 -The preferred option/options	SPD 9 - Community facilities		'The need for new community facilities will be kept under review over the lifetime of the plan. We will work with providers such as Southwark NHS as well as landowners to identify appropriate sites if new facilities are needed. This aspect has been commented on by Jackie Malone/Malcolm Hines in a separate submission. As well as dedicated health premises, it is also important to note the fact that increasingly ill and disabled people will be cared for within their own homes. This change in patterns of health and social care may need consideration in planning and spatial terms. Care will need to be taken that space intended for the voluntary and community sector is adequate and affordable – the sector potentially has an important role to play in helping promote social inclusion and develop social capital as the area undergoes substantial change.	Noted.
209	806	4 -The preferred option/options	SPD 9 - Community facilities		Community resources such as such as allotments (where there is an allotment society) community gardens and city farms need to be mentioned here. Walworth Garden Farm is an important local resource and it is not mentioned anywhere - maybe because, like Pashley Park, it lies outside the main opportunity area. As these green spaces are so close perhaps they also need to be considered as they will also play a part in serving the needs of the expanded population in the area. Green space which also supports a range of	We have added a reference to Walworth garden farm and Pasley park into paragraph 5.5.9 of the final SPD. Further information on all types of open space including allotments and city farms is also set out in our draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy

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					training and community development needs (as do city farms and community gardens) is much to be welcomed and may be able to play a longer term role in developing the green infrastructure of their area as well as adding to residents' amenity and helping to boost social capital and cohesion.	
209	807	4 -The preferred option/options	SPD 11 - Walkng and cycling		The aims of this SPD are welcomed as a major aim for the whole regeneration scheme needs to be making active forms of transport more enjoyable, safe and convenient for people. Detailed comments have been provided by Southwark Living Streets following walkabouts (http://southwarklivingstreets.org.uk/elephant/) and it is important to ensure that this very detailed feedback is considered. With walking and cycling, a precise and fine-grained approach is needed in looking at proposed routes to ensure that they are as attractive and facilitative as possible and not blighted by a dangerous or unappealing feature. The scale of the existing traffic on the major roads around the E and C is, however, daunting and there will need to be a lot of sustained work with Tell to improve things and close monitoring of accidents (particularly those involving pedestrians and cyclists), air quality, modal shift etc. The 2009 DfT Annual Road Traffic Census Counts of major road links within Greater London with an annual average daily flow estimate of greater than 10,000 vehicles includes the A215 (57,133 vehicles per day); A2 (46290 per day) A 201 (16,850 per day) and A 302 (16479).	Support noted. The SPD and other planning and transport policies of Southwark and TfL already address the further comments.
209	808	4 -The preferred option/options	SPD 11 - Walkng and cycling		Given the number of new people living in the area it is important to ensure that there is a real improvement in air quality which in some areas of Southwark is known to fall below European guidelines. Chronic exposure to air pollution is linked to cardiovascular and cardiopulmonary events as well as asthma, cancers and other health effects. Increasing obesity, a public health issue in Southwark both for adults and children, may make people more vulnerable to air pollution. The young and old are most vulnerable to poor air quality. One course of action that needs to be considered is developing walking or cycling routes down side streets/greenways rather than busy arterial roads. A recent study conducted by Sustrans showed that the air quality on	This is a borough-wide issue and is addressed through Core Strategy policy 13 which states that we will set high standards and support measures for reducing air, land, water, noise and light pollution. The purpose of the Elephant and Castle SPD is to provide a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The vision for Elephant and Castle states that the area will be a leading example for sustainable development. It will meet the highest possible environmental standards including through the use of sustainable approaches to reducing waste and controlling noise and air quality We monitor air quality in the borough through our Annual Monitoring

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					<p>London Greenways (safe, quiet routes through parks, green spaces and lightly trafficked streets) was significantly better than on adjacent busy roads. Levels of NO2 were measured on the New Kent Road and the Surrey Canal greenways route. The levels on the New Kent Road were 150% above EU limits, while the greenway was also above these limits but less than 50% so a somewhat healthier proposition. http://www.sustrans.org.uk/assets/files/london/1201_AQ%20on%20London%20Greenways_Press%20Release_Final.pdf Air quality is only mentioned once in the SPD (on P.28) and there either needs to be more specific detail in this SPD or a cross reference to where more precise guidance can be found. The Southwark Draft Air Quality Strategy and Action Plan (V4- 31/12/10) says: 'areas due for significant regeneration such as the Elephant and Castle, Old Kent Road, London Bridge and Bankside are subject to the highest concentrations of PM10 and NO2 in the borough. By prioritising areas such areas, we will develop specific policy and development guidance to ensure that exposure to pollution is minimised. Where is this specific guidance? (Although the impact of traffic emissions is the main source of pollution, the assessment and control of dust impacts during construction also needs considering as dusts contribute to airborne particulate matter as well as to dust soiling.) As there are monitors in the area it will be important to ensure that the data they yield regarding levels of pollution is checked and that over the life of the regeneration work, levels diminish.</p>	Report and we are working to secure a new air quality monitoring station at Elephant and Castle which would measure background air quality for Central London and this should be working from April 2012.
209	809	4 -The preferred option/options	SPD 11 - Walking and cycling		As well as increasing car clubs coverage, does consideration need to be given to expanding the Mayor of London's cycling scheme within the area?	The Council supports the use of car clubs. We have one of the highest numbers of on-street car club spaces among London Boroughs, and will normally require developers to include provisions for car clubs within their Travel Plans. The Council is separately lobbying for the southward extension of the Mayor of London's cycle hire scheme.
209	810	4 -The preferred option/options	SPD 13 - Servicing and delivery		The concept of servicing also needs to consider access by health and social care staff and domiciliary carers. Increasingly in adult social care vulnerable/older people continue to live at home. However this means that there are many more visits from community health and social care	The Council's own social care staff and health service staff visiting people in the community are able to park on-street close to their clients. The Councils Sustainable Design & Construction SPD covers standards for waste storage within new developments.

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			es		professionals and domiciliary care staff, some of whom may not be able to use public transport/bicycles in order to deal with their caseload. Acknowledgement of this shift in philosophy and practice of health and social care to more community based home visiting services needs to be accommodated explicitly within the planning framework. If a move is to be made towards fortnightly collections, even where there may be an option of weekly food waste recycling, consideration needs to be given to preventing smell and nuisance as food contaminated containers; disposable nappies etc may be placed in bins. This is particularly relevant for high density areas as a lot of rubbish is likely to be generated. The larger bins too required when collections are less frequent are also unsightly and can clutter the area outside properties. Perhaps there needs to be some co-ordination with Veolia and other rubbish contractors to work out ways of preventing nuisance/fly tipping etc.	
209	811	4 -The preferred option/options	SPD 14 - Transport mitigation		Also a need to ensure that there are attractive and convenient walks/cycle ways to the local schools and where necessary contributions are sought to improve them. Active transport to schools needs to be explicitly considered within the travel plans prepared by developers of residential schemes	Improvements to pedestrian links are sought through a number of SPD policies.
209	812	4 -The preferred option/options	SPD 15 - Public realm		Both of these SPDs are welcomed as they help set a framework in which some of the past mistakes in town planning may not be repeated. Provision of high quality paving materials, design of surface layout and well-designed street furniture such as railings, benches, bins and tree grills can help to create an environment that enhances the everyday experiences of shoppers, pedestrians etc and may well provide a boost for the retail and business sector. Use of the streetscape manual will help in providing consistency across the borough – a surfeit of local distinctiveness could well land up messy and bitty. If public art (and given the fact that the London College of Communications, part of the University of the Arts is in the middle to the opportunity area, perhaps it will be) is to be deployed it needs to be well thought out, well-placed and agreeable to the local	Support noted. We agree. The purpose of the SPD is to coordinate an overall vision and framework within which planning applications from a variety of different leaseholders and developers can be assessed to attain good quality design and consistency within that framework. The principles set out in the SPD intend to ensure that the quality of the public realm is of a high standard, implemented well and conform to other standards set out such as in our Design and Access SPD.

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					population. The Antony Gormley and Zandra Rhodes bollards in Peckham work less well than they might because of unsympathetic and careless positioning. The recommendation that the Urban Forester be contacted at an early stage is also welcomed – lollipop trees that are put into schemes as an afterthought are unlikely to be successful in any respect. Given the long term challenge of climate change it is important to plant trees that will grow and thrive long term and bring benefit to future generations. The public realm needs to be hospitable and safe for children, push chairs, wheel chairs, people who have sensory or physical disability.	
209	813	4 -The preferred option/options	SPD 18 - Open spaces		This SPD is also welcomed. “Spaces that are softer, greener, more organic and natural will store water and are critical to modifying urban temperatures.” (CABE, Public space lessons: Adapting public space to climate change, p.2) In addition too there are the well-attested benefits to human health and well-being, biodiversity and property prices! It would be good to audit developments more clearly in order to ensure the contribution they make to green infrastructure and to keep track of the cumulative impact of regeneration in what is recognised to an area of overall open space deficiency. A toolkit was developed for Northwest Development Agency's Sustainability Policy for the Built Environment which helps developers to determine their 'Green Infrastructure Score' and potential interventions to maximise the benefits that green infrastructure can provide. It has potential to be used in planning policy and to aid discussion on green infrastructure between planners and developers here. (available at www.ginw.co.uk/climatechange/gi_toolkit)	Noted.
209	814	4 -The preferred option/options	SPD 18 - Open spaces		Some research also points to the benefits of ‘green views’ provided from buildings – in a built up and heavily trafficked area, consideration of this design aspect is also important.	SPD 27 sets out approach for the Heygate Street Character area which includes using breaks or openings to allow views into communal gardens.
209	815	5 - Character Areas			'Maintain the area as a predominately residential area' – however more mention could be made of the very valuable and interesting asset that area has in its three yards of Victorian live/work units: Clements Yard, Iliffe Yard and	We recognise the contribution of the yards to the character and life of the area. We have drawn attention to them in para. 5.6.2 of the SPD.

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					Peacock Yard. http://www.pullensyards.co.uk/ ; http://www.iliffeyard.co.uk/ The yards and their businesses are a vital part and contributor to the arts within the Borough of Southwark and are owned by the Council. Care will need to be taken that the re generation of the area does not lead to artists and artisans being priced out of this area	
209	816	5 - Character Areas			'The public realm within the university campus is considered to be generally of poor quality' Given that London South Bank University offers a range of courses in the environment, planning and regeneration, is any kind of collaboration with the University possible to improve this state of affairs?	We have flagged in the SPD that there is considerable scope for improvement. LBSU are also aware of this and will seek to address it through their estate management plan.
209	817				The identification of suitable sustainability indicators within the Sustainability Appraisal Framework to ensure issues can be effectively measured and monitored has been an iterative process and taken into consideration comments made in the consultation process. a. Important: Indicators should measure something significant to the achievement of the sustainable development aims of the Plan. These are translated into the main policy areas of the Plan and must fit within the main policy framework. Indicators should assist in the identification of the need to review a strategy, policy or proposal. b. Supported by readily available information: The data necessary to support the use of the indicator must be available. This may be of a technical nature. c. Capable of showing trends over time: Data over a reasonable time scale is required (e.g. 5 - 10 years) to enable trends to be identified. Data must be available during the Plan period. d. Easy to understand and communicate: Any indicator should be readily understood by non-specialists so that the wider community can understand it's relevance to sustainable development and the Local Development Framework With this in mind, some outline information about the indicators for the new Public Health outcomes framework is presented here as it may furnish some indicators that fit the above criteria and can be incorporated in to the monitoring of the regeneration. Healthy lives, healthy people: Improving outcomes and supporting transparency The Public Health Outcomes Framework has now (23.1.12) been issued by the Department of Health. The two major outcomes are: 1.	Support welcome. We will consider including some of the indicators referred to in future Annual Monitoring Reports.

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					<p>Increased healthy life expectancy taking account of health quality as well as length of life 2. Reduced differences in life expectancy and healthy life expectancy between communities Within this over-arching framework, a set of supporting public health indicators has been developed, grouped into four domains, that help focus understanding of how well we are doing year by year nationally and locally on those things that matter most to public health, which we know will help improve the outcomes stated above. Much of the data is available on a small area basis and thus enables the effects of regeneration to be monitored in order to ensure that improvement happens where it is need These indicators are grouped into four domains each with a set of suggested indicators that will enable cross cutting work in councils to address these issues: these are listed below together with selected indicators that are more relevant to spatial planning</p> <p>Improving the wider determinants of health Objective: This involves making improvements against wider factors that affect health, well-being and health inequalities</p> <ul style="list-style-type: none"> • Children in poverty • School readiness (Placeholder) • 16-18 year olds not in education, employment or training • People with mental illness or disability in settled accommodation • Employment for those with a long-term health condition including those with a learning difficulty/disability or mental illness • Killed or seriously injured casualties on England's roads • Violent crime (including sexual violence) (Placeholder) • The percentage of the population affected by noise (Placeholder) • Statutory homelessness • Utilisation of green space for exercise/health reasons • Fuel poverty • Social connectedness (Placeholder) <p>Health improvement Objective: People are helped to live healthy lifestyles, make healthy choices and reduce health inequalities</p> <ul style="list-style-type: none"> • Low birth weight in term babies • Child development at 2-2.5 years (Placeholder) • Excess weight in 4-5 and 10-11 year olds • Diet (Placeholder) • Excess weight in adults • Proportion of physically active and inactive adults • Recorded diabetes • Alcohol-related admissions to hospital • Self-reported wellbeing • Falls and injuries in the over 65s <p>Health protection Objective: the population's health is protected from major incidents and other threats while reducing health</p>	

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					<p>inequalities • Air pollution • Public sector organisation with board approved sustainable development management plan</p> <p>• Comprehensive agreed interagency plans for responding to public health incidents (e.g. fire, flooding, heat wave, excessively cold weather/snow, terrorist activity, pandemic, mass casualties for any reason etc) Healthcare, public health and preventing premature mortality Objective: Reduced numbers of people living with preventable ill health and people dying prematurely, while reducing the gap between communities • Mortality from causes considered preventable • Mortality from all cardiovascular diseases (including heart disease and stroke) • Mortality from cancer • Mortality from liver disease • Mortality from respiratory diseases • Excess under 75 mortality in adults with serious mental illness (Placeholder) • Suicide • Health-related quality of life for older people (Placeholder) • Hip fractures in over 65s More detail at:</p> <p>http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_132358</p>	
218	937				<p>1.1 I have lived in the area since 1977 and have been the MP for the Elephant and castle since 1983. 1.2 I have always taken a great interest in this key site within the borough and have supported the many initiatives to improve both the Elephant and Castle itself and the surrounding area. It is a great source of pride that this is effectively the hub of South London. This has always meant that one of the major challenges is to ensure the best integration of transport use and the safest and best transport intersections. Pedestrians and cyclists have traditionally felt least comfortable at the Elephant and Castle and this must be remedied as a priority. In addition, easy, clean, safe and dry routes for changing between train and bus and underground need to be provided. In general terms, surface road crossings are safer and more pleasant and therefore preferable. This obviously requires low vehicle speeds and sufficient crossing time for the numbers involved.</p>	Support for improvements to the northern roundabout, including the removal of subways and their replacement with surface crossings is noted.
218	938	4 -The preferred option/options	SPD 9 - Comm		<p>I note the growing number of residents in the Borough and Bankside community council area (Cathedrals and Chaucer wards). The GLA predicts that the size of the population will</p>	<p>There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be</p>

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			unity facilities		almost double in Walworth and increase by around 40% in Borough and Bankside by 2029. It therefore is necessary for the plan to go into detail and commitments about -the modelling, provision and location of future additional school places and schools, and -the modelling, provision and location of new and improved health facilities	necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work. We work closely with NHS Southwark to ensure that there are sufficient health facilities in the area to support demand. We will continue to review the need for new or improved health facilities as new development takes place. There are no proposals for new health facilities in the short to medium term. Further detail is set out in the infrastructure plan in section 6.5 of Appendix 1. The infrastructure plan has been amended to reflect a potential need for enhanced facilities in the Enterprise Quarter in the longer term as development takes place around South Bank University.
218	939	4 -The preferred option/options	SPD 19 - Energy, water and waste		1.4 All the regeneration of the Elephant and Castle should seek to reach the best environmental and ecological standards so that it becomes recognised and respected for this characteristic as well as all others	The purpose of the Elephant and Castle SPD is to provide a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The vision for Elephant and Castle states that the area will be a leading example for sustainable development. It will meet the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality. A key theme of the SPD is Theme 6 Natural Environment: Sustainable use of resources, which sets out objectives to; <ul style="list-style-type: none"> • Promote a network of high quality open spaces which have a range of functions including recreation, children's play, sports and food growing. • Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes. • Reduce the impact of development on the environment, minimising greenhouse gas emissions and enabling adaptation to climate change and managing pollution, waste and flood-risk. Sustainable development is a borough-wide issue. Core Strategy policy 13 sets how we will require all development to require as little energy as possible to build, we will also require applicants to demonstrate how they will avoid waste and

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						minimise landfill from construction.
218	940	4 -The preferred option/options	SPD 9 - Community facilities		The municipal buildings at the top of the Walworth Road were previously Southwark Town Hall (The Old Town Hall). This building, and the building adjacent to it with the inscription 'The heath of the people is the highest law' should be retained for public and community use. The civic and municipal history associated with Southwark Town Hall should not be lost.	Noted. The building in question is a Grade II Listed Building and so subject to a high level of protection. In addition, as a community facility, it is protected under policy 2.1 of the Southwark Plan. A cross reference to this policy has been added to SPD9 on community facilities.
218	941	4 -The preferred option/options	SPD 11 - Walking and cycling		It is key to the success of the Elephant and Castle that road and street signs for pedestrians and all sorts of vehicular traffic should be clear and informative and all streets and buildings clearly marked	We have amended the reasoned justification for SPD 11 to refer explicitly to the need for good signage.
218	942	4 -The preferred option/options	SPD 16 - Built form		Existing views of the Millennium Eye and the ability to hear Big Ben are welcome characteristics of the area. These should not be lost	The following SPD policies address this point adequately: SPD 11: Walking and cycling refers to existing and new landmarks and views which help direct pedestrians to key locations, public spaces and major roads, as well as providing good quality wayfinding signs. SPD 17: Building heights which says that tall buildings should conserve the Outstanding Universal Value (OUV) of World Heritage sites and have due regard to the London View Management Framework (LVMF). This regard is not exclusively visual and would include all aspects of a World Heritage Site – such as the Palace of Westminster including Big Ben.
218	943		SPD 1- Shopping		2.1 One of the challenges is to make sure the retail and social centre which is the shopping centre is made as attractive as possible. This requires a policy to encourage both a good range of national brand shops but also the diversity of shops and cafés and restaurants and bars and businesses which reflect the very mixed nature of the crossroads which is Elephant and Castle. It is very important that the new development feels home to and gives opportunities for the Irish, Bangladeshi, African, Latin American, Caribbean, Eastern European and other communities in addition to the native Brits. It is a real pleasure and privilege to have LSBU, and the University of the Arts (London College of Communication) at the Elephant. These further education institutions should be encouraged to offer the maximum possible use of their facilities to the wider	SPD1 refers to supporting 'large 'anchor tenants' and also the promotion of a wider mix of retail uses in the shopping centre. The supporting text provides explanation of the existing situation (i.e. there is currently a low proportion of comparison goods shopping at Elephant and Castle) and that the provision of new shopping floorspace will help consolidate the role of Elephant and Castle as a major town centre and provide more choice for the borough's residents, enabling them to shop locally as opposed to travelling outside the borough to shop. SPD6 supports more arts, culture, leisure and entertainment uses to be provided in order to support a more lively and vibrant town centre, and importantly, increase its attraction to a wider catchment We have amended the SPD in Section 2 to add further recognition of the cultural diversity that exists in the

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					public and the other facilities designed at the Elephant should be built to accommodate prospective use by students at these and other universities, colleges and schools. Communities of mixed residents, including students	area, including the diversity of businesses at the Elephant and Castle, in particular, the Latin American presence and their contribution to the local economy. In relation to the London College of Communication and London Southbank University we have amended SPD6 to include further encouragement of strengthening links with the two learning centres and the wider arts scene. We have amended the supporting text to SPD6 to provide recognition of the importance of fostering partnerships between the educational institutions, local arts organisations and community groups in order to help broaden access to, participation in and understanding of the arts within the wider community, as the area physically develops. We have acknowledged that a vibrant arts, leisure and cultural scene, will bring employment, engage students, local people and visitors, and create opportunities for training and learning.
218	944		SPD 2 - Markets		2 Market stalls around the Elephant as well as in East Street are a great asset and should be retained and encouraged.	We have added additional text to SPD1 to provide further recognition of the value and contribution of local shops in the area. SPD2 recognises the importance of street markets and their contribution to providing a more varied shopping experience as well as providing local employment.
218	945	4 -The preferred option/options	SPD 1-Shopping		Charlie Chaplin was born in East Street and lived in Kennington, both very near to the Elephant and Castle. There is a great opportunity to commemorate and celebrate Charlie Chaplin's life at the Elephant, particularly in film. The regeneration should include a location for the regular showing of Charlie Chaplin films and potentially to host a Charlie Chaplin film festival. It is important to mark, commemorate and celebrate other local notables as well-Michael Faraday and the Brownings come to mind. Manor Place baths should be retained. 2.4 Established existing pubs should be retained and supported wherever possible. 2.5 Rents and prices need to reflect the capital, resources and ability to pay of a mixed community of working people, and not price out self-employed local residents, small local businesses and local residents and families from using all the facilities. 2.6 The developments at the Elephant should	1)The SPD has recognised there is an opportunity to build upon the positive reputation of the Elephant and Castle as a creative area, improve its arts and cultural offer and strengthen and diversify the evening economy. This is set out in SPD6. We have amended SPD6 to include further encouragement of strengthening links with the two learning centres (London College of Communication and London Southbank University) and the wider arts scene. We have amended the supporting text to SPD6 to provide recognition of the importance of fostering partnerships between the educational institutions, local arts organisations and community groups in order to help broaden access to, participation in and understanding of the arts within the wider community, as the area physically develops. We have acknowledged that a vibrant arts, leisure and cultural scene, will bring employment, engage

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					<p>maximise the availability of and adequate number of good-quality and well-signed public conveniences. 2.7 Good local maps for regular visitors and tourists alike should be located throughout the area.</p>	<p>students, local people and visitors, and create opportunities for training and learning. The Council actively promotes and supports cultural events through various communication channels, such as the Council's Events webpage on the Council's website. The Arts and Culture team also offer support and resources to organisations and community groups throughout the area to help them deliver activities, events and workshops. 2) The Manor Place baths site has been used as one of the Council's waste depots. It is now closed. The Council's new waste management facility on Old Kent Road will be opening in 2012 and the depot will no longer be needed. We have set out in the SPD Rail Corridor character area guidance that the redevelopment of the depot for a residential-led mixed use scheme will provide a good opportunity to integrate new buildings and streets on to the site and promote new connections into the existing surrounding development. SPD39 sets out that the Manor Place baths building should be retained as part of any redevelopment. It is a Grade II listed building which will need to be conserved and enhanced in any redevelopment of the site. We have also identified that there is an opportunity to undertake a sympathetic conversion of the former swimming pool building at the rear. 3) SPD1 promotes a vibrant balance of uses in the centre and in protected shopping frontages and promotes easily accessible convenience facilities. We acknowledge the importance of maintaining local shops as these have a range of benefits for the areas, including allowing people to shop locally on foot and thereby reducing carbon emissions, provide easy access for low income groups, the elderly and those without cars, and they also provide local employment and keep money in the local economy. Our Saved Southwark Plan policy 1.10 is also used to assess development proposals, and it protects small scale shops and services (including pubs) located outside of town centres and protected shopping frontages unless it is not the only one of its kind within a 600m radius and its loss would not harm the vitality and viability of nearby shops or shopping parades. 4) In relation to rents of shop units, we acknowledge that different types of retailers</p>

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						<p>can afford different levels of rent, and certain types of retailers can be “priced out”. In these instances, independents seeking retail space have to consider lower value areas of a centre and this can result in multiples and independents being located in separate areas. Therefore, the SPD recognises the importance of promoting affordable shop units for independent retailers and small enterprises. SPD1 requires at least 10% of new floorspace (GIA) in large retail developments (including refurbishments) over 1,000 sqm to be made available as affordable space to provide suitable premises for SMEs who have been displaced as a result of development, for new business start-ups or independent retailers. Rents should be discounted by not less than a total reduction of 40% below market rate averaged over a 5 year period. By requiring affordable units, this will help strengthen the retail offer, attractiveness and competitiveness of the centre 5) The SPD will be used alongside our Saved Southwark Plan. Policy 1.7 ‘Development within town and local centres’ sets out new developments for retail or other town centre uses will need to provide amenities for users of the site such as public toilets, where appropriate. 6) SPD11 ‘Walking and Cycling’ promotes new development to use existing and new landmarks and views to help direct pedestrians to key locations such as transport interchanges, public spaces and major roads, as well as providing good quality way-finding signs that follow the principles of Legible London. We have also added additional supporting text to SPD11 to highlight our vision to provide a network of pedestrian and cycle routes through the area, with appropriate provision of signing and physical infrastructure, connecting to existing and proposed networks in the surrounding area.</p>
218	946		SPD 7 - Sports facilities		The area obviously needs community and social facilities. I have made clear in a separate submission my views on the future of the leisure centre. In summary, I support the re-provision of a leisure centre at the Elephant, and the present one does indeed need to be replaced. The new centre should be big enough and its hall should also be big enough for tennis and other ball sports as well as major	Noted

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					community events. The council should work with LSBU and LCC in particular to maximise the available sports provision in and around the Elephant accessible both to students of these institutions and to the community	
218	947		SPD 9 - Community facilities		2 I am also concerned that the place of faith communities and their buildings is not recognised as properly within the document as a local asset and that this issue should be addressed in a submission version of the SPD/OAPF	Southwark Council recognises the difficulties which faith groups experience in finding suitable premises. We are proposing to amend section 2 of the SPD to clarify that there are a range of faith communities in the opportunity area and that the current and future needs of these groups need to be taken into account as development takes place over the plan period. Policy SPD 9 provides a framework to consider impacts on faith premises. Places used in connection with worship are referred to in the list of community facilities in the "fact box" in SPD9. We are proposing to add a cross reference to Southwark Plan policy 2.1 to reflect the fact that we protect valued community facilities.
218	948		SPD 16 - Built form		I support the proposed new conservation areas in Larcom St and Elliotts Row and I support the extension of protection of buildings to include locally listed buildings. I believe that the Council should assess the possibility of a wider conservation area covering the Walworth Road to reflect the rich array of historic buildings.	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
218	949		SPD 5 - New Homes		4.1 It was always made clear that the demolition of the Heygate Estate would lead to the building of as many social housing units in the new development or on the so-called 14 early replacements sites. I stand by this strategy. At the end of this redevelopment there should be no fewer socially rented properties on the site of the former Heygate Estate and the so-called early housing sites added together than there were on the original Heygate. The greatest need and demand in my constituency is for affordable rented housing and this must remain the council's priority. 4.2 I accept that private residential development is often needed to cross-subsidise this and to help pay for it. The council's current	The Saved Southwark Plan designation for proposals site 39P sets out the uses required within the Elephant and Castle Core Area. It sets out there should be "no fewer than 5,300 mixed tenure new homes, including 1,200 to replace those lost through the demolition of the Heygate Estate". This designation is still our adopted policy. We have updated our development capacity assessment (DCA) and our housing background paper to include information about what has been built and what we think will come forward. The DCA is a tool that we use to estimate the potential housing capacity of development sites that may come forward in the future. The research that has informed the

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					<p>policy is for 35% of new housing to be affordable. This should be upheld absolutely in the replacement of Heygate housing. The council should not regard this as a green light to deliver only housing at between 66% and 80% of market rents in this area, but should seek to provide as much as possible accommodation at the traditional lower social housing rental levels. I also feel strongly that affordable housing should be provided on site within new developments. 4.3 New housing should not be built in locations where they would adversely impact on lawful activities of pre-existing lawful businesses with planning permission. It is not acceptable that residents moving in later into an area of mixed use can then object to existing businesses in ways which could threaten the viability of those businesses. 4.4 All new homes should provide good quality accommodation and 10% should be the minimum target for new affordable housing with 3 or more bedrooms.</p>	<p>background paper update shows that between April 2005 and March 2011, 1170 new homes were built in the Elephant and Castle Opportunity area, of which 122 have been social rented homes and 217 intermediate). Furthermore, the Heygate replacement programme, once completed, will provide an additional 600 homes (some of these have already been built). It is predicted that 512 of these will be affordable (422 social rent and 90 intermediate). Our development capacity assessment estimates suggests there is capacity for 6,400 new homes in the opportunity area by 2026. Based on our current planning policies we expect 2,145 of these to be affordable homes (1,020 social rent and 1,125 intermediate). This means that 7,000 homes could be delivered in the opportunity area between 2011 and 2026, with around 2,650 of these being affordable (1,560 social rent and 1,215 intermediate). Our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. These minimum space standards are approximately 10% larger than our previous standards and will help us to ensure the new development provides an adequate amount of space to create good living conditions. This is a minimum policy and we encourage developers to exceed this minimum where possible. Also, the policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible.</p>
218	950		SPD 8 - Higher education and student housing		<p>4.5 I know that there are worries about an overconcentration of student accommodation in the area around the Elephant & Castle and in the north of the borough. Any student accommodation should be part of a strategically approved plan and speculative generic student accommodation on windfall sites should be discouraged. 4.6 The council should work with the universities, colleges and schools to make sure there is enough appropriate student accommodation in the appropriate place at the appropriate price.</p>	<p>Section 4.3 of our residential design standards SPD sets out that planning applications for student accommodation need to be accompanied with evidence that there is an identified need for this type of housing in order to discourage speculative schemes. We have updated "we are doing this because" section of SPD 8 in the Elephant and Castle SPD to cross reference to this section of the residential design standards SPD. The SPD is seeking to work with and help develop the two local universities at Elephant and Castle, as they make a strong contribution to</p>

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						the local economy.
218	951		SPD 9 - Community facilities		5.1 In addition to my concerns about local school places, I am equally anxious to ensure that local residents are properly served by local health facilities. I am concerned that the SPD/OAPF lacks detail when it comes to how increased NHS demand will be met. 5.2 With the potential for up to 6,000 new homes, including more family sized housing, I am concerned about the lack of new school provision, particularly of primary schools, within the plan. With many local schools already at capacity, I strongly urge the council to look again at providing more school places through the SPD/OAPF. The same principles should apply to nursery provision	We work closely with NHS Southwark to ensure that there are sufficient health facilities in the area to support demand. We will continue to review the need for new or improved health facilities as new development takes place. There are no proposals for new health facilities in the short to medium term. Further detail is set out in the infrastructure plan in section 6.5 of Appendix 1. The infrastructure plan has been amended to reflect a potential need for enhanced facilities in the Enterprise Quarter in the longer term as development takes place around South Bank University. There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work.
218	952		SPD 18 - Open spaces		6.1 I am supportive of the creation of new or improved open spaces, such as those at Nursery Row and St Mary's Churchyard, which have been established under the previous council administration. Where new space is created it must be publicly accessible at all times. 6.2 I also believe that there are opportunities to increase the number of 'play streets' in the area following the example of streets such as Liverpool Grove and the excellent work by local people around Mason Street and Chatham Street. 6.3 I am all too aware of the low level of green space provision and strongly support -the creation of a new green park on the site of the Heygate Estate to preserve as many as possible of the existing mature trees; -investment and improvements in existing underused or poor quality green spaces in the opportunity area such as those on the Heygate, the Gaywood Estate and in the middle of the northern roundabout; -the creation of a network of high quality and innovative green links and routes building on existing green assets such as trees and developing new links and routes; and -that when development is considered, any open space that is created should benefit both new and existing	Support noted. Further information on improvements to the quality of open space and the provision of new open space is also set out in our draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy

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					residents.	
218	953		SPD 10 - Public Transp ort		7.1 I support the plans to remodel the northern roundabout to create a more pedestrian and cycle friendly environment, and support removal of the subways at the northern roundabout and their replacement with surface crossings, and the reinforcement of the network of cycle and key pedestrian links. I am not persuaded of the plan to convert London Road into a public transport only corridor and introduce two-way traffic movement in St George's Road. Together with colleagues from the GLA and Southwark Council, I have recently taken up with TFL the dissatisfaction with the current two-way public transport use of London Road, which has met with opposition from local residents and London Road businesses alike.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
218	954		SPD 12 - Parkin g		7.3 I support plans to limit the number of car parking spaces in new developments as part of wider work to reduce carbon emissions within the borough.	Support noted.
218	955		SPD 13 - Servici ng and deliveri es		7.4 Careful consideration should be given to the impact on the residential amenity of existing properties of servicing points located in narrow side and back streets within new developments.	We agree. SPD 13 states that developments must be adequately and safely serviced. This element of proposals would need to be addressed through a transport assessment which is a requirement with large developments.
218	956	4 -The preferred option/options	SPD 11 - Walkn g and cycling		7.5 As part of encouraging cycling and increasing the use of public transport by new residents, I suggest that where feasible (and consistent with pedestrian safety) the Council and TFL look at installing segregated cycle lanes on existing main roads, and look again at the possibility of future-proofing the area to allow for a 'light-tram' type system to extend mass transit south towards Camberwell and Peckham	While cycling infrastructure is appropriate in some places, the Council hopes to make all streets safe for cycling through a variety of measures, together with free cycle training for residents and workers in Southwark. A route for the "Cross River Tram" is safeguarded within the SPD.
218	957				8.1 The ambition of Elephant and Castle regeneration should be a vibrant mixed community where the established and new people and communities can live and thrive but in the best possible urban environment. There must be a net gain of social housing. The Elephant and Castle could be the most warm and welcoming hub of activity in South London, drawing on its history and yet with the best of science and	The support for regeneration is noted. In accordance with the Core Strategy, at least 35% of new homes should be affordable. Regeneration will result in a net gain in affordable housing.

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					design for the future. I look forward to continuing engagement with the people and communities of my constituency, and councillors and council officers, as this plan is agreed and implemented	
226	41	5 - Character Areas		Walworth Road SPD 34 - Transport and movement	Walworth Road I was on the Project Board for the Walworth Project and am a regular user of the shops and street in Walworth. The scheme has been a great success. It needs to be extended to the north and south, by narrowing the carriageways as has been done in the core section of the road. This will have the following advantages: (1) Making it safer and pleasanter to cross, thus also improving trading for the retail outlets on both sides of the road. This will be particularly important at the southern end with the redevelopment of the Aylesbury and at the northern end with the new retail development proposed to the north of the old town hall. (2) Encouraging people to walk between the Walworth Road and the Elephant and Castle, thus enhancing regeneration and reducing pressure on buses; and (3) Reaping all the other advantages seen in the existing scheme. The road needs trees. The original proposal included planting in the median strip at the southern end, and this should be done.	Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.
226	42	4 -The preferred option/options	SPD 11 - Walking and cycling		The northern roundabout This is a terrifying and dangerous street environment. It needs to be fundamentally changed on the following lines: (1) made into a cross roads rather than a gyratory; (2) if that is ruled out for any reason, the roundabout needs to be reconfigured to reduce traffic volumes and ensure slower vehicle speeds; (3) the slower speeds need to be constrained to 20 mph, as is appropriate for a town centre with large numbers of pedestrians, shoppers, bus passengers and cyclists	Policy SPD 11 proposes considerable work for the northern roundabout, together with improvements to crossing facilities on New Kent Road.
371	431	4 -The preferred option/options	SPD 11 - Public Transport		Thanks for the opportunity to comment on the SPD for the Elephant and Castle; I have some comments with regards to cycling and walking in the area. The Elephant and Castle area is currently blighted by the persistence of fast, heavy motor traffic on the inner ring road which essentially constitutes an inner urban motorway. The attractiveness, safety and liveability of the area could be improved if much more attention was paid to providing safer and convenient	The final design of the changes to the northern roundabout will include enhanced provision for cyclists. The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings.

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					<p>facilities for pedestrians and cyclists and promoting modal shift away from motor vehicles and towards improved public transport capacity. The Elephant and Castle (Northern) Roundabout is the most dangerous junction in London for cycling, by TfL's own figures. As a barrier between much of the Borough and central London it should be a priority location for designing in safer cycling facilities and making sure that pedestrians and sustainable forms of transport are placed at the heart of the design of the interchange. Proposals to alter the use of St Georges Road and London Road should incorporate segregated cycling routes. The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and traffic free. Choice is important for pedestrians. I'd like to see much better pedestrian surface crossings than are currently in place on the Northern Roundabout AND the retention of some of the subway underpasses for pedestrians. These obviously need upgrading. The fast gyratory which runs up St Georges Road also needs addressing as part of a traffic and speed reduction package for a much wider area. This is the only way to achieve better safety and encourage more cycling and walking. The area has to be increasingly seen as a residential and business destination in its own right - not simply as a fast route through for heavy motor traffic. I'm sorry that I haven't had time to make more detailed comments but I hope these observations will be noted.</p>	
437	927				<p>We welcome the opportunity to respond to the consultation on the above document. Better Bankside is the third BID in the UK, the second in London and the first south of the river. A Business Improvement District (BID) is an independent, business-owned and led company, which seeks to improve a given location for commercial activity. Better Bankside's members are the 460 companies in the BID area who pay its annual 'levy'. Many of these are heavily involved in the governance of the company. Our response to the draft SPD/OAPF will focus mainly on the following issues which relate directly to areas of our core work at Better Bankside: • Public realm and Bankside Urban Forest • Travel Planning • Employment and Enterprise Our response will also mainly</p>	<p>Support for regeneration is noted. We have responded in detail to all comments made by Better Bankside.</p>

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					relate to the Enterprise Quarter, Rockingham and Central Areas of the draft SPD/OAPF. Public Realm and Bankside Urban Forest Better Bankside works on behalf of a wider partnership of local and strategic agencies to co-ordinate Bankside Urban Forest. Bankside Urban Forest is a long term strategy to improve the public realm between the riverside and Elephant and Castle. It works in partnership to deliver high quality improvements to the network of streets and open spaces in the area, spreading the benefits of regeneration away from the riverside. We welcome the emphasis put on the need for a high quality public realm and network of public spaces within the Draft SPD/OAPF, and references within the draft documents to linking with Bankside Urban Forest initiatives. Below are some observations and suggestions about how the vision and ambition of the Draft SPD/OAPF might be strengthened	
437	928		SPD 14 - Transport mitigation		<ul style="list-style-type: none"> • General: 20 mph We agree with the points raised by Southwark Living Streets in their response to this consultation in relation to 20 mph speed limits. These are vital to liveability and sustainability and we can see no mention of 20mph speed limits in the SPD. We feel that given that it is official Council policy (at least on its own roads) to limit vehicle speeds to 20mph then it is important that this is stated in the SPD as this will drive the design of streets in the future and will come to include the more main arterial roads. 	The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.
437	929		SPD 15 - Public realm		We suggest that the ambition for the public realm within the SPD area can be strengthened by including key aspects the Mayor of London's Great Outdoors manifesto for public space, which lists a range of criteria that successful and thriving public spaces should deliver. We also feel that this strategic policy should also reference and reinforce the emerging All London Green Grid strategy. Elephant and Castle has an important geographic location – between the larger open spaces south of the Borough and the River Thames, opportunities for green links, that support a variety of uses need to be maximised across the SPD/OAPF area to ensure that future development knits into surrounding neighbourhoods and green infrastructure networks. We	The principles set out in the SPD intend to ensure that the quality of the public realm is of a high standard, implemented well and conform to other standards set out such as in our Design and Access SPD. SPD 16 Built Form refers to high quality design and the use of appropriate and attractive materials. The wording in this policy will be changed to state that developments should consider the impact on neighbouring character areas as well as their own, and that edge conditions of developments integrate well with adjacent surroundings. We will also amend SPD 15 to make clear the distinction between public and private space. Our Design and Access Statement SPD provides guidance to developers and the wider community on how

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					would also like to see more clarity on what that hierarchy of streets and spaces is, and how they interface with neighbourhoods around the SPD/OAPF areas, and also how future developments contribute to that hierarchy. Further emphasis should be placed on the quality of design of streets and public spaces within the SPD/OAPF areas, as we feel the ambition in terms of design quality is not clearly enough stated within the draft document	to prepare design and access statements for proposed developments in Southwark. Design and Access Statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: • safety • security • accessibility • the relationship between buildings and their surroundings
437	930	4 -The preferred option/options	SPD 16 - Built form		Again we would suggest here that the need for quality of design of buildings within the SPD/OAPF areas be explicitly stated. How developments integrate into the existing and surrounding neighbourhoods will be key to their success. We feel that there is too much detail given in relation to Non-residential frontages in this policy which perhaps might hinder diversity and interest in commercial facades at street level.	The principles set out in the SPD intend to ensure that the quality of the public realm is of a high standard, implemented well and conform to other standards set out such as in our Design and Access SPD. SPD 16 Built Form refers to high quality design and the use of appropriate and attractive materials. The wording in this policy will be changed to state that developments should consider the impact on neighbouring character areas as well as their own, and that edge conditions of developments integrate well with adjacent surroundings. We will also amend SPD 15 to make clear the distinction between public and private space. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and Access Statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: • safety • security • accessibility • the relationship between buildings and their surroundings
437	931	4 -The preferred option/options	SPD 18 - Open spaces		We suggest that this policy could be strengthened by setting key targets for increasing green cover in the SPD/OAFP area in line with Mayoral Policies relating to Green Infrastructure and the Draft All London Green Grid SPG. Better Bankside is currently undertaking a Green Infrastructure audit of the Bankside Urban Forest (which includes some of the Enterprise Quarter area), which will identify gaps and opportunities for increasing GI within the area). We suggest	We set out in SPD 18 how we will expect all development to improve the overall greenness of places, through measures such as living walls and roofs and high quality landscaping. SPD 18 also states how we will expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest. SPD 18 also sets out how we will promote strategic green routes across the opportunity area. Our open spaces strategy sets

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					that such an approach for the wider Elephant and Castle SPD/OAPF may be beneficial in terms of benchmarking existing green infrastructure and setting targets for increasing this in line with London Plan policies.	out further information on green links in the borough. Our Core Strategy strategic policy 13 sets environmental targets for residential and non-residential development. The increase in green infrastructure including consideration of improving levels of biodiversity will be measured through code for sustainable homes and BREEAM assessments.
437	932	5 - Character Areas		Enterprise Quarter SPD 49 - Land uses	We feel that a strong vision statement is needed to describe the ambition for the Enterprise Quarter will develop over the coming years. This is a key area within the SPD/OAPF which sits between the wider Borough and Bankside areas and the centre of Elephant and Castle. As such we welcome the aspiration to improve permeability throughout this area through working with Bankside Urban Forest and other local initiatives.	The Character Area guidance for the Enterprise Quarter provides a section on 'Opportunities' and a section on our strategy for the area. This sets out the basis for the guidance policies for the area.
437	933				We would expect to see a reference to Cycle Superhighway 7 here, in particular highlighting ways that improvements to the public realm can interface with and support its use. Further detail we would like to see in relation to the cycling infrastructure include signed east/west cycle routes across the Enterprise Quarter areas, increased cycle parking provision, and the opportunity to create cycle-based business premises (e.g. an Elephant and Castle Cycle Hub for residents, commuters, students etc.	The exact route of the proposed Cycle Superhighway 6 has not yet been determined and so it was considered inappropriate to include even an indicative line on the figure. We have amended SPD 11 to refer to improvements to signage as well as a convenient and safe route between Walworth Road and the Rockingham Estate.
437	934	5 - Character Areas		Enterprise Quarter SPD 51 - Built Environment	We suggest this section could be strengthened by setting out a stronger vision for the public realm and built environment of the Enterprise Quarter. We feel that neither the Draft SPD/OAPF document, nor its Appendix 2 sets this out clearly enough. We echo comments made above in relation to SPD 15: We suggest that the ambition for the public realm within the whole SPD area can be strengthened by including key aspects the Mayor of London's Great Outdoors manifesto for public space, which lists a range of criteria that successful and thriving public spaces should deliver. We also feel that this strategic policy should also reference and reinforce the emerging All London Green Grid strategy. We would also like to see more clarity on what that hierarchy of streets and spaces is, and how they interface with neighbourhoods around the SPD/OAPF areas. Further emphasis should be placed on the quality of design of streets and public spaces	SPD 51 provides a strong set of principles to guide improvements to the public realm in the Enterprise Quarter. We have however deleted appendix 2 as it is considered to be too detailed for this document. The guidance in the SPD will need to be read in conjunction with other council planning documents, such as the Design and Access SPD which explains how developers and designers should approach the design of public spaces. SPD 51 is reinforced by the more general principles in SPD 15 which seeks to ensure that improvements are rooted in the character of the area and that basic issues such as the need to reduce street clutter, ensure that places are overlooked and support adaptation to climate change are addressed. We have taken the All London Green Grid SPG into account in preparing the SPD as well as in our Open Spaces Strategy that we are currently consulting on. We have referred to

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					within the SPD/OAPF areas, as we feel this is not clearly enough stated within the draft document	the Open Spaces Strategy in SPD18. SPD 18 also seeks to deliver green links which are key part of the Mayor's strategy in the Green Grid SPG. We have considered the interface with areas outside the opportunity area through for example the open space strategy set out in SPD 18. We have also drawn attention to the need to link into existing programmes outside the opportunity area. In the strategy for the Enterprise Quarter, we refer to the aim of linking to the Urban Forest.
437	935				We welcome these policies but feel that there is room to strengthen them to support small businesses and business start ups through greater availability of affordable business space and incubator units. Business start-up and density statistics show that Southwark underperforms. There is a concern that small businesses look elsewhere for affordable accommodation. There is also an issue in the disconnect between the jobs that become available and the skills profile of those who are economically inactive within the Borough. We hope you find these comments useful and would be happy to discuss them in more detail as you progress the SPD/OAPF in coming months.	SPD1 requires at least 10% of new floorspace (GIA) in large retail developments (including refurbishments) over 1,000 sqm to be made available as affordable space. Affordable space will be secured through s106 planning obligations attached to planning permissions. We have amended SPD4 to also include support for the provision of incubator space. The SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's.
462	49	2- History, Elephant and Castle today, challenges and opportunities			I am writing to oppose and object to the Council's proposal to include our shopping parade as a potential development site (number 30) and requesting its removal from proposed SPD document. These retail amenity shops provide daily essential needs and services to local residents including many elderly residents who live on opposite and nearby estates unable to travel further for their basic needs. The Council's past planning policies have helped destroy all other small local shops (see photo 1&2) on this over a mile long road. (see enclosed map 1) This has denied and deprived local community of their basic local amenities and reduced choice. There are absolutely no other small shops left on this road. Any new development, will probably make any replacement shops unaffordable to the existing local businesses. We are urging and requesting the protection of these last remaining	We have removed site (reference 30) 98-104 Rodney Road from the list of potential development opportunity sites in the opportunity area and Figure 6. We have amended the supporting text to SPD1 to provide further recognition of the value and contribution of local shops in the area. The Stead Street Proposal site (51P) is designated through the Southwark Plan and the SPD needs to be consistent with the saved policies in the Southwark Plan. SPD 12 sets out that all development in the Central Activities Zone (CAZ) should be car-free, unless robust evidence is provided to justify off-street spaces. This is justified through the high public transport accessibility in the opportunity area, and also to meet sustainability objectives of reducing congestion and pollution

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					<p>long established local affordable shops from ongoing harmful development. Please find enclosed petition of approximately 2600 signatures collected by local community, traders and residents objecting to the proposed loss of these only remaining amenity shops on Rodney Road. Local residents also submitted these petition signatures to Walworth Community Council meeting. (see enclosed community council minutes) and many demonstrated on two consultation days, (see enclosed photo A&B) The Council planning policies have also destroyed many other thriving long established local shopping parades nearby. (see enclosed photo 1 to 8). The shopping parade sites in photo 1 to 5 has been boarded up and been left in derelict state for more than five years awaiting some sort of redevelopment> SOME OF THE DESTROYED LOCAL CAMENTITY SHOPPING PARADES 1. Rodney Road SE17 2. Thurlow Street SE17 3. Manor Place SE17 4. New Church Street SE5 5. Newington Causeway SE1 6. Westmorland Road SE17 7. Old Jamaica Road SE16 8. Spa Road SE16 Many people have lost their jobs after being forced to move from these shopping parades. Seven people were forced by the Council to lose their jobs in just one butcher's shop on now demolished Westmoreland Road shopping parade. (see photo 6) Eleven people are employed on our four Rodney Road Shops. Local shops provide desperately needed local employment. They minimise the need to travel far for daily essentials. The proposal to include this site in the SPD are in breach of national planning policies that protect amenity shops from unnecessary developments. The successive Secretary of State for Communities and Local Government have spoke out to the protect local shops that binds local communities together. (see enclosed ministerial foreword of Hazel Blears and the speech made by Planning Minister John Healey). The Council fail to take in to account local views and benefits of what is there. Instead they propose grandiose scheme which destroy local communities rather than promoting policies which support local people. The permanent lose of business and employment sites for many housing-led developments, has a negative impact and add to local unemployment and poverty levels. The Council has</p>	

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					<p>introduced severe parking restrictions around shops and businesses. However, has allowed the multinational chain stores to own acres of car parking areas for their customers. The Council should force these large stores to allow free shoppers parking. The proposed lose of the only well used local car parking facilities in Stead Street (see enclosed photo) for housing development will also bring much hardship to many surrounding businesses, trader, tradesmen, residents and especially for the customers who visit the long established East Street market. The degradation of local shops, the high street and businesses in the face of the economic slowdown, made worse by unfair competition from the supermarkets, results in further social costs in the local area. In the current economic climate the council should focus on the real issues affecting local communities and businesses. The Council needs to focus on supporting existing vibrant local economy which than results in sustainable communities which a sent of belonging.</p>	
462	861	4 -The preferred option/options	SPD 5 - New Homes		<p>government has given local authority a green light to build council housing, (barking and degenham council has recently build several council houses with funding from government) this is better option than using a private developer for delivery of better and affordable social housing. no high-density housing in this densely populated areas (creating negative impact on quality of life for existing population and putting more pressure on local services) no gentrification, (this is happening now in the core area) regeneration to benefit existing local tenants, people, community and businesses</p>	<p>Southwark consistently delivers some of the highest amounts of affordable housing in London. We are constantly looking at ways in which we can deliver more affordable housing, including working with the HCA, registered providers and private developers. In addition we are currently building two "Council Own Build Schemes" at Lindley Garages, Peckham Park Road and at Brayards Estate, Brayards Road. We received funding from the HCA for both of these schemes. Our Core Strategy sets out our policies on density. This cannot be changed through the SPD. The policy on density is applied alongside our other policies including policies and guidance on design, amenity space and dwelling sizes to ensure that new development is of an appropriate density and high quality design. Appendix 1 of the SPD also sets out further information on implementation, including an infrastructure plan to ensure that the supporting infrastructure (to include transport, leisure facilities, community facilities and open spaces) to support the increased population. The SPD's vision sets out the aim to improve Elephant and Castle for both existing and new residents. Policies such as those on affordable housing and affordable retail space will help to</p>

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						ensure that existing residents and workers can benefit from Elephant and Castle's regeneration.
462	862	4 -The preferred option/options	SPD 4 - Jobs and Business		Protection of existing businesses, office spaces and employment sites that helps to tackle rising unemployment and poverty levels (large numbers of employment sites has been lost to ongoing housing developments) lack of small-scale workshops that provides employment, business start-ups and learning skills protection of character pubs, local amenity and high street shops (see planning and housing committee report on cornered shops, London's small shops and the planning system July 2010 and mary portas's declining high street's report) , the long established east street market , retaining and improving the elephant and castle shopping centre with it's diversity of traders and few of the remaining green spaces , mature trees (many trees lost due to housing developments) and children's play areas (recent report of children , obesity and nowhere left to play).	SPD 4 promotes the provision of business space. Moreover, we are proposing to amend it to give explicit encouragement to incubator base. We propose to provide additional detail within the supporting text to SPD highlighting the valuable contribution small shops make to the local economy, local employment and also to sustainable travel.
462	863	4 -The preferred option/options	SPD 10 - Public Transport		severe parking restrictions and the proposed loss of well used stead street car parks are a major problems for normal functioning of local and surrounding businesses including the east street market that will have a major impact and decline to local economy and jobs. on TFL roads the mayor has allocated parking bays outside shops and businesses. This helps the traders and the customers. Council needs to implement a similar policy to help sustain local economy and businesses public transport alone is insufficient (as it is getting expensive) to sustain the regenerated elephant and castle. all regenerated major town centres have been allocated ample parking areas to help boost local business. jobs and economy car shopper will simply not visit the newly regenerated elephant and castle town centre, creating another possible white elephant. improving the adding more safe cycle lanes and docking stations lack of secure cycle docking stands (many are forced to chain them to railings) lack of motorcycle parking bays speed humps and traffic calming measures causes more pollution, costing, traffic congestion and noise (vehicles slowing down accelerating), serious risk and injury to a cyclists, motorcyclists and a major problems for emergency services like police, fire brigade or	A study has shown that the parking displaced by the closure of the Stead Street car park can be accommodated in other on-street parking places. The Council is seeking to reduce reliance on the private car and to make alternative modes of transport more attractive. Unrelated studies have indicated that a relatively low number of visitors to shopping streets in London arrive by car. Policy SPD 11 requires the introduction of more cycle parking stands. The need for and form of traffic calming will be reviewed as adjacent development sites are considered.

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					ambulance, Cars swirling in order to avoid humps causing more accidents many councils have now removed them a need to move away from stone-age traffic calming and towards better more effective and modern solutions like the flashing warning signs (one on John Ruskin street) have prove to be a success in speed enforcements options.	
462	864	3 - Vision and objectives			Elephant and castle should be a place where everyone wants to visit. a place where there is arts, culture, entertainment, cinema, hotel, leisure centre, library, shopping and market place,	We agree. This is established in the vision for the area.
463	552	4 -The preferred option/options	SPD 1- Shopping		In the section (4.1.6 -4.1.8) I request that the entire sentence, "If this is not feasible.....borough." is removed. The entire policy statement is self-contradictory if this sentence is left in.	The sequential approach is an accepted planning principle in national, regional and local policy. If a financial appraisal demonstrates to our satisfaction that the required affordable units are not financially viable on-site, we may allow off-site provision or a pooled contribution.
463	556				As with the earlier Scoping Report, I find many sections of the SPD to be sketchy. The document fails to detail how or when policies are to be implemented. Much of the document reads like a series of wish lists.	The level of detail reflects the fact that this is a 15 year plan and mechanisms for delivery may change or need to be adapted at different stages of implementation. In many cases, the plan will be implemented as a result of negotiations on individual planning applications. Section 6: Implementation gives further detail on current delivery mechanisms.
463	559	4 -The preferred option/options	SPD 2 - Markets		This policy needs detail and explicit commitments	This is further supported in Policies 25 (new market square) and Policy 29 (explore opportunities to improve East Street market).
463	563	4 -The preferred option/options	SPD 5 - New Homes		The entire regeneration is only happening because an estate of 1200+council owned, social rented homes, many of which were large maisonettes, has been decanted. The Core Strategy Policy 6 and Saved Southwark Plan Policy 4.4 states that "...at least 35% of homes must be affordable." But because of the source of the development land, a much higher percentage than this minimum must be stipulated in the SPD. Further and again in recognition of the source and also of local need, all of those units should be social rented. The so-called "intermediate" affordable category is of course completely unaffordable in any accepted definition of that word. (Although an attempt has been made in the SPD document on page 40 to show the convoluted background to	The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot

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					<p>the current controversy of unaffordable “affordable” housing, it remains misleading). I submit that in the revised document, whenever one of the different versions of “affordable” housing is referred to, it should be formatted thus –“this category affordable at an annual salary of £xxx”. It seems to me this is the only way in which readers could understand what price range is being referred to and whether it is at all relevant to local need.</p>	<p>change our policies. Appendix 1 of the SPD on implementation sets out some key committed developments underway to help deliver more affordable housing. We have also updated our housing background paper and our development capacity assessment to show how much affordable housing we expect to come forward up to 2026. The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. Within the Affordable Housing SPD we set out the income thresholds at which social rented and intermediate housing should be affordable.</p>
463	570	4 -The preferred option/options	SPD 11 - Walking and cycling		<p>I support a policy promoting both walking and cycling and any consequent reduction in vehicle movement and pollution in the area. However I still submit that the borough should develop a Walking Strategy. For example your Fig 12, Existing and Proposed Pedestrian Routes, I find puzzling. What are these routes meant to achieve? Where did they come from and who devised them? Any policy purporting to be for walkers needs to be fully consulted on. In particular every attempt must be made to discover the needs and the views of the elderly, the vulnerable and those with small children. I also submit that for safety, cyclists and pedestrians should be segregated and further that there should be signage throughout the area that, in line with borough policy, pedestrians have priority. (There is a very large sign to this effect right in the middle of the newly calmed and shared Exhibition Road). Regarding the potential closure of the northern roundabout subways, I submit that this should not be attempted until it can be proved that sufficient safe crossings, all allowing enough time for the</p>	<p>Support noted. The figures showing walking and cycling routes are indicative to complement the objective of Policy SPD 11. On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings.</p>

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					vulnerable to cross roads safely, can be put in place. (It is quite obvious that on TfL crossings near the Elephant at the moment, this is not the case).	
463	579	4 -The preferred option/options	SPD 18 - Open spaces		I disagree completely with the statement here that park provision in the SPD area should be 0.61 ha per 1000 population. I submit that this is discriminating against the residents of our area. According to the recently produced Southwark Open Space Strategy, the borough standard for park provision is 0.76 ha per 1000! In the SPD area, provision is expected to fall to 0.56 ha per 1000 by the 2020s as a result of population growth. Difficult though it may be, every effort must be made to improve on this dismal policy and I submit that it must be redrafted. The open space deficiency is especially serious in this SPD area with our shocking health and child obesity statistics.	There is limited opportunity for the provision of new open space in the borough, the draft Open Space Strategy sets out the Council's approach to improving existing open spaces as well as seeking to secure new open space where possible. We recognise that the provision of open space in the area is low. We have amended the final SPD to set out a standard of 0.76 per 1,000 population in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate redevelopment is a significant opportunity which will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026 and this has been recognised in the SPD.
463	580	4 -The preferred option/options	SPD 18 - Open spaces		It is relevant here to consider a means by which extra green space might be achieved. Under 4.6.2 is a brief discussion on a policy to develop green routes through the area. Many of these seem mainly to be cycling commuting routes and I fully support extra greening on these routes with street tree and accompanying planting. I also support any attempts that are planned for calming traffic on these routes in the interest of cyclist and pedestrian safety. But the routes seem to have been plotted for longish, direct journeys through the SPD area – possibly with final destinations outside the SPD area or even the borough. It should also be possible to link existing parks and green spaces up in a far more concentrated way, often using off road, indirect – possibly even winding – tracks. The object would not be for commuting but simply to access more green space. These links could be via sections of housing estates, detours to take in special trees or frontage plantings etc. The aim should be to increase the amount of green space useable by the interested public but also colonisable by species previously constrained within park boundaries. Many of these	Our vision for Elephant and Castle includes providing a new and improved street layout including public open spaces which allows those who live and work in the area to move around easily and safely. SPD 15 sets out our approach to encouraging public realm that greens the environment by maximising the retention of existing trees, ensuring streets and spaces are generously landscaped and incorporating Sustainable Urban Drainage Systems (SUDs). SPD18 states that we will ensure that development uses street trees to green streets and reinforce planting where trees are integral to the historic townscape. SPD 18 also sets out how we will promote strategic green routes and expect all development to improve the overall greenness of places. SPD 11 sets out how we will provide a high quality network of pedestrian and cycle routes in the opportunity area by ensuring that Development in the opportunity area Provides convenient, direct, safe, and attractive pedestrian and cycle links and promotes links between new and existing public and open spaces creating a network of spaces. We have included an

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					<p>green linkages could be achieved relatively inexpensively, yet the completed landscapes of at least two parks linked by greenways would be, in many ways, far more valuable than simply the sum of the parts. It might be possible in some instances to decommission sections of quiet road, or widen pedestrian areas for planting so that new small sections of parkland could be achieved. I have not made a serious study of the possibilities for examples in the area but a few that come to mind are: 1. East of Newington Causeway, it should be possible to link Newington Gardens with Dickens Fields, Swan Street Open Space, the two London squares and possibly on again to Tabard Park and the Tabard Estate landscapes to the gardens on Pilgrimage Street and Hankey Place. 2. From St Mary's Churchyard, it should be possible to wind a quiet green way through Oswin Street to Lamdash Street, (which potentially could be decommissioned), and on through Orient Street to West Square, then on again through Geraldine Street to Geraldine Mary Harmsworth Park. 3. I noticed somewhere in the plans an interesting proposal to provide new plantings in the streets around Crampton School. If these could be linked through from Pullens Garden, via the Hampton St area to the safe road crossing leading to Churchyard Row and St Mary's Churchyard, I believe a much more valuable complex would result. It has been noted by other organizations involved in drawing up similar projects in recent years that particular data sets would aid the choice of such routes. (See CABI/Design Council, The Green Information Gap, 2009). And indeed if such a data set had been available, the recent All London Green Grid draft might have been able to offer some more valuable proposals for north Southwark than what they were able to come up with. Southwark would do well to start accumulating such data for future use. But much can be done now using aerial views and consulting with local space users.</p>	<p>additional paragraph (4.6.5a) in the final SPD setting out further detail on the potential characteristics of green routes. In line with SPD 18 we will promote strategic green routes as set out Figure 16. However these routes are indicative and do not preclude the possibility of other routes coming forward. The council already uses Greenspace Information for Greater London as an important resource for monitoring biodiversity and informing policies in relation to open space and wildlife.</p>
463	581		SPD 18 - Open spaces		<p>The policy statements on trees in the area that may be lost due to development concern me. (I don't really understand how you assess lost canopy cover by new tree stem girth. I imagine a similar canopy could only be achieved after mature trees have been removed by planting a great many more new young trees than the numbers lost? Easier to lose</p>	<p>SPD 15 sets out our approach to requiring development that supports adaptation to climate change, helps reduce the urban heat island effect, supports biodiversity, reduces micro-climate impacts and greens the environment by maximising the retention of existing trees. We have amended the reference in SPD 18 to state that where trees</p>

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					as few as possible)? I completely disagree that replacement trees should be planted outside the area of loss and submit that this should be changed. This is particularly relevant to us in the SPD area. A glance at the rather horrifying PM10 and NA2 concentration maps in the background papers demonstrate that it is the Opportunity area that is most heavily polluted by fumes and particulates. What on earth would the situation be like here if we lost significant numbers of our mature Heygate Forest trees? There is a great deal of scientific evidence of the ameliorating action of trees on such concentrations. (e.g. Bealey, 2007, 'Estimating the reduction of urban PM10 by trees', and Forestry Commission, 2008, 'New toolkit measures health benefits of trees'). I submit that any replacement plantings should be as close to the area of loss as possible.	are lost, they should be replaced by new trees on site.
464	462	3 - Vision and objectives			General Points 1. There must be a section in the document that expresses the commitment to ensure that, where the boundary of the Opportunity Area (OA) is drawn along the centre of a street/road, there is due care and attention given to the impact on the homes, neighbourhoods and local retailers that happens to be situated immediately opposite the opportunity area and dedicated opportunity sites. For example, the intended improvement to public facilities such as, public realm and street improvement should not stop on one side of the street just because the OP blue line runs through the middle of the street.	The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. We have amended the wording to SPD 16 to ensure that proposals consider the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.
464	463	4 -The preferred option/options	SPD 18 - Open spaces		2. There ought to be a section in conjunction with the tree retention/replacement guidance, that stipulates that and how the local community should be involved in exploring/defining where replacement trees should/could be planted	Detailed matters such as landscaping are consulted on as part of the planning application process. Further information on how this is carried out is set out in our Statement of Community Involvement which is available to view online at; http://www.southwark.gov.uk/info/856/planning_policy/1238/statement_of_community_involvement_sci
464	464	4 -The preferred option/options	SPD 18 - Open spaces		. The requirement for tree replacement in the circumstances where tree retention is not possible, should be more explicit to ensure that any tree that has to be felled is replaced such that the new trees will bring equal or improved contribution to the environment, as there is a concern that the general wording that defines aspirations for tree replacements may	SPD 18 sets out how we will expect development to retain and enhance trees and canopy cover wherever possible. We will also require a tree survey to be submitted with all development proposals where trees are affected both on and adjacent to the site. The tree survey should be carried out by a qualified arboriculturalist and should identify; •

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					be too open for negotiations to the detriment of trees not being replace.	Trees selected for retention • Trees to be removed • The precise location for the erection of protective barriers and any other relevant physical protection • The construction exclusion zone (CEZ). Further information is set out in our sustainable design and construction SPD.
464	466	4 -The preferred option/options	SPD 16 - Built form		4. Stronger directives/guidance is needed with regards to the requirement of developments to bring a positive contribution to the immediate street scape as well as to the overall town scape. Both in terms of quality of design and quality of construction and building materials. This statement comes from the fact that in recent years there has been a number of buildings(two good examples can be found located between New Kent Road and Munton Road) that may meet all the internal spatial standards on paper, but the external design has only added features that signals that the street is a dangerous place that needs heavy duty fencing and gates the area is of such low merit that it does not matter how the buildings contribute to the local town scape and skyline so it does not matter if the roofs are adorned with little extrusions(most likely the lift overrun) that looks like after thoughts and makes the street scape look chaotic and ill considered. that the street is of such 'low rent' that it does not matter how the junction between one building plot design and another is resolved	Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings
464	467	4 -The preferred option/options	SPD 1- Shopping		5. With reference to the spirit of the SPD's ambition to improve the public realm, street scape and shopping experience, it is imperative that there is a section that sets out how existing local shops and retailers will be encouraged/assisted in finding ways of : dealing with waste in such a way that the shopping streets are not peppered with large wheelie-bins which are both unsightly, smelly, unhygienic and is inevitably accompanied by difficulty to keep that part of the pavement clean and free from 'droppings' from people passing by. dealing with the up keep of the shopfronts and in particular the junction between one shop front and another as the various cables and gaps that often appear between the shops as the collective impression of these 'in between ownership and responsibility' - features results in a negative experience of the public realm.	The principles set out in the SPD intend to ensure that the quality of the public realm is of a high standard, implemented well and conform to other standards set out such as in our Design and Access SPD. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings

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464	468	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		6. The funding of many of the intended improvements that the SPD aspires to, seems to rely on S106 money. The SPD needs to be clear how it will prioritise the spending of S106 money, in the case there is not enough S106 money for all improvement aspirations. The SPD also needs to be clear how the S106 money will be distributed across the OA and where required across the OA border such that it reflects fairly in terms of spend on an area to compliment/compensate in proportion to the intensity of redevelopment and increase in local building mass density.	<p>We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds:</p> <p>http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area.</p> <p>http://www.southwark.gov.uk/info/200152/section_106/147</p>

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						9/current_section_106_agreement_detail
464	469	5 - Character Areas		Heygate Street SPD 28 - Natural environment	7. The new park intended to be created in the centre of the Heygate Estate should be truly a new public open green space. That is to say that it should belong and be owned by the public for the indefinite future such: that it can't be closed to the trespassing public the way, say Paternoster square can be that it can't be under surveillance by private companies that have the right to enforce rules beyond common law the way security at More London can prevent people from photographing with a tripod that it can't be re-appropriated for building purposes the way Elephant park has been and the way most of the Heygate Estate green spaces that the public could enjoy from the walkways will be.	Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces.
464	470	4 -The preferred option/options	SPD 18 - Open spaces		8. There should be a description that explains what the different kinds of open space definitions are. That is to say what is Metropolitan Open Land, Borough Open Land, Other Opens Green spaces and what laws are related to these different definitions in terms of ownership, protected publicness and openness, etc.	Open space is designated as metropolitan open land (MOL), borough open land (BOL) and other open space (OOS). Open space that is designated as MOL, BOL or OOS will be protected using saved Southwark Plan policies 3.25-3.27. Definitions are available on our website as part of the glossary to the Southwark Plan.
464	472				9. Add a list of all the key documents that are mentioned in the SPD-text and/or needs to be read in conjunction with this SPD, e.g. the Core Strategy, the Residential Design SPD, Affordable Housing SPD, Sustainable Design and Construction SPD, Street Scape Design Manual, Open Spaces(not sure if that is the correct name) SPD, Code for Sustainable Homes, BREEAM, Life Time Homes, Housing Quality Indicator, etc.	An up to date list of the council's plans and documents can be found on the councils website at; http://www.southwark.gov.uk/ All of the relevant local development framework documents can be viewed here; http://www.southwark.gov.uk/info/856/planning_policy
464	474	2- History, Elephant and Castle today, challenges and opportunities			Specific Section points Section 2 It would be more honest to note that, although it is the common misconception that most of the surrounding area of Elephant and Castle was bomb damaged, record shows that the area adjacent to Elephant and Castle that is now the Heygate Estate was actually bomb damaged beyond repair. However it constituted of mainly poor tenement houses that were demolished, rather than refurbished, in order to create more and improved homes for people of mainly low income.	We note your comments. Our section on History (section 2.1 of the SPD) provides a broad overview of the area's past which is adequate for the purpose of this document.
464	475	2- History, Elephant and Castle today,			This section should also include a paragraph that charts the history of Crossway Church.	Detailing the history of individual community facilities is too detailed an issue for the SPD. However, reference to Crossway Church has been added to paragraph 5.2.1 of

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		challenges and opportunities				the Heygate Street character area. A broader reference to the important role of local faith communities has been added to Section 2 of the SPD.
464	477	2- History, Elephant and Castle today, challenges and opportunities			Fig 6. Elephant Park and play area ought to be indicated on this map as well as the tree rich path and play are through the centre of the Heygate Estate. Why are they not indicated on this map?	Elephant Road Park, including the play area and links through the Heygate Estate are not protected open space. These spaces make up part of the Elephant and Castle Core Area, proposals site 39P and will be included as part of the development for this site.
464	479	2- History, Elephant and Castle today, challenges and opportunities			2.2.17 It should be mentioned if these GP surgeries are full or to what extent they have further capacity to accept new patients.	This information is contained in the infrastructure plan in section 6.5 of Appendix 1. Dialogue with NHS Southwark indicates no need for new health facilities in the short to medium term, although a likely longer term needed in the north of the opportunity area around South Bank University. This situation will be monitored as development takes place.
464	481	2- History, Elephant and Castle today, challenges and opportunities			2.3.3 it would be good if it could be added to the last bullet point: 'New homes should provide a high standard of accommodation, including generously sized rooms' , whilst ensuring that existing resident's home-qualities are not adversely affected.	The amenity of existing residents is already covered by existing policy 3.2 - protection of amenity - in the Southwark Plan, and guidance in our Residential Design Standards SPD which ensures there is good design including sufficient space between developments.
464	484	2- History, Elephant and Castle today, challenges and opportunities			2.3.6 It would be incorrect to only blame the 'monolithic' buildings mentioned in this paragraph as the sole perpetrators of creating a 'hostile public realm'. With reference to notes 4 and 5 above, please add two paragraph between 2.3.6 and 2.3.7 that deals with: the fact that in recent years there has been a number of small to medium developments in the area which have not sufficiently contributed to the improvement of the general impression of a 'hostile public realm' and that these do not set good precedent for future developments and that measures will be taken to make these recent developments make improvements to their contribution to the public realm. the fact that the existing urban fabric that accommodates small/local shops and retailers is not easily adaptable to ensure that waste bins do not remain permanently on the pavement outside the shop and the maintenance of the shopfronts may not be entirely straight forward due to type of ownerships and rental agreement, factors that contribute to a hostile public realm. the fact that New Kent Road is more or	Noted. We are working with TfL to bring forward the improvements as expediently as possible.

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					less a motorway, where the green - man sequence is so short that in many circumstances the green man starts blinking whilst you are still crossing. This means that you are still crossing whilst the red light for the cars have changes to a blinking amber, which in turn means that if a car or motorcycle is approaching the traffic light at that point then they are very likely to speed up rather than stop. Now picture a mother with a buggy and two children on either side of her with shopping. A bus has stopped in the inner lane, she starts walking but a slow as the speed of a toddler, a vehicle in the outer lane is approaching the traffic light, slows down enough as the driver knows the amber light will start blinking soon. and just as the family becomes visible at the side of the bus the driver in the outer lane prepares to press the accelerator. The fear that this scenario or similar might happen is a very strong contributing factor to creating a 'hostile public realm'.	
464	486	3 - Vision and objectives			Section 3 3.2.9 add to second bullet point: and do not adversely affect the home environment of existing residents.	Our Core Strategy, saved Southwark Plan policies and residential design standards SPD set out how we will ensure new development will not adversely affect existing residents in the area.
464	488	4 -The preferred option/options			Section 4 As the general public's experience of a place is very much influenced by the signals that are sent out by a well looked after or not well looked after shop fronts and associated street scape, it will be very important to establish a way in which some of the profits from the shops (or those who gain from letting shops to others) can be channeled back into the upkeep of the shop fronts and the street scape.s	The SPD supports the improvement of shops fronts in the area. For example part of the strategy for Walworth Road is to reinforce the character by improving shop fronts and redeveloping buildings which are of low architectural quality. The Council has a programme called 'Improving Local Retail Environments' (ILRE) which provides funds to improve shop fronts and the public realm in shopping parades in the borough. The shops for improvement have already been chosen in each of the borough's Community Council areas for the current ILRE funding stream. There will be opportunity in the next funding stream to address more shop fronts in the area.
464	489	4 -The preferred option/options	SPD 1-Shopping		4.1.15 How will the intention of this paragraph reconcile with the desire to create multiple pedestrian through connections between Elephant Road and the Elephant and Castle shopping centre?	We will try to achieve a balance between promoting the use of the railway arches for small business and community use, in line with Southwark Plan policy 1.5, and improving linkages throughout the central area. Both issues are important for the regeneration of the Central Area.

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464	490	4 -The preferred option/options	SPD 8 - Higher education and student housing		4.3.8 It seems students from Guy's Hospital and Kings College live in the area so these two institutions should probably be mentioned in this paragraph too.	The SPD is seeking to work with and help develop the two local universities at Elephant and Castle, as they make a strong contribution to the local economy. These are the two universities we are continuing to work with and so it is not appropriate to mention other universities within this section.
464	491	4 -The preferred option/options	SPD 9 - Community facilities		SDP9: It would be great if the intention to review the need for community facilities during the lifetime of the plan could be defined as a review being done on a proactive level rather than finding out what is needed once it is needed as it always takes time to create the provision and this might have a negative effect in particular if it is a community facility that is needed for your children, elderly and otherwise vulnerable people.	Through monitoring the rate at which development comes forward in the area and by working closely with partner organisations, such as NHS Southwark, we aim to ensure that community facilities are delivered as the need arises rather than retrospectively.
464	493	4 -The preferred option/options	SPD 11 - Walking and cycling		4.4.5 It may seem severe but unless drivers are forced to drive slowly then they will drive as fast as they can. For example, Harper Road has a number of sleeping policemen and other traffic calming measures, but these seem to only cause many drivers on that road to drive even more recklessly, by swerving in between the road humps, parked cars, central island and cyclist. So the word 'encouraged' really ought to be replaced by forced in this paragraph.	Noted.
464	494	4 -The preferred option/options	SPD 11 - Walking and cycling		Fig 12 Add a link, East-West, through the Heygate Estate that connects Victory Park with St Mary's Churchyard	Figure 12 has been removed since a number of respondents thought that it was confusing. The transport and movement maps in the Section 5 provide a more detailed picture of key routes in each of the character areas. Figure 22 shows a number of links through the Heygate estate between Victory park and the shopping centre. The precise alignment of these links will be considered in greater detail as planning applications are received for the redevelopment of the Heygate Estate and the shopping centre and with regard to the approved scheme at 50 New Kent Road.
464	495	4 -The preferred option/options	SPD 15 - Public realm		4.5 SPD 15: the reference that the public realm in the OA will be transformed (presumably for the better) is a bit worrying. There should be an added sentence that ensures that streets and neighbourhoods that are situated outside the OA	The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The edges of the character areas are indicative and are not meant to imply a

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					boarder but that will nevertheless be affected by the developments in the OA, will also enjoy the benefits, such as public realm and street scape improvements.	sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to reflect this. The wording in SPD16 has also been changed to ensure that development considers the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.
464	496	4 -The preferred option/options	SPD 16 - Built form		SPD 16: an interesting variety of roof lines should not allow for justification of ill conceived lift over-runs/plan/communal stair enclosure, all ow which often have a permanently light safety light that adds to the unnecessary light pollutions at night.	This is a subject which is too detailed to be dealt with in the SPD. Our Residential Design Standards SPD deals with matters such as these.
464	497	4 -The preferred option/options	SPD 18 - Open spaces		4.6 SPD 18: the SPD needs to be clear as to what is inappropriate and what is appropriate development with regards to the protection of the various Open Land/Spaces.	This is a borough-wide issue and is covered by the Saved Southwark Plan policies 3.25 to 3.27 which state what types of development would be considered appropriate on Metropolitan Open Land Borough Open land and Other Open Space.
464	498	4 -The preferred option/options	SPD 18 - Open spaces		4.6.2 Please define what a public Park Provision means.	Public park provision is the amount of public park per 1,000 population over a given area. Further information is set out in the draft Open Space strategy which is currently out to consultation and is available to view online at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
464	499	4 -The preferred option/options	SPD 18 - Open spaces		4.6.4 There should be mention of a mechanism that allows for local people and communities to participate in the decision making of where tree replacement and new trees are planted and what kind of species are planted.	Detailed matters such as landscaping are consulted on as part of the planning application process. Further information on how this is carried out is set out in our Statement of Community Involvement which is available to view online at; http://www.southwark.gov.uk/info/856/planning_policy/1238/statement_of_community_involvement_sci
464	500	4 -The preferred option/options	SPD 20 - S106 Planning		4.7 SPD 20: please see note 6 under the heading general notes above.	Detailed responses have been provided.

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			obligations and the community infrastructure levy			
464	501	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		4.7.7 As the Heygate site is proportionally one of the largest opportunity sites and the master-planning/design work well on the way towards a planning submission, it should be made clear in the SPD how the demand for S106 and/or CIL contributions will be implemented.	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible

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						<p>than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details</p>
464	502	5 - Character Areas			<p>Heygate street Character Area 5.2.3 In this paragraph it would be good to indicate that it will not be acceptable to see a repetition or derivative of the poor design and building quality approach that the two developments west of Surdaw House with regards to their sightless/insignificant contribution to the streetscape and townscape, as elaborate on 'General Note' nr 4.</p>	<p>We set out in the SPD that buildings should be of high design quality. The purpose of the SPD is to coordinate an overall vision and framework within which planning applications from a variety of different leaseholders and developers can be assessed to attain good quality design and consistency within that framework. The principles set out in the SPD intend to ensure that the quality of the buildings and the public realm is of a high standard, implemented well and conform to other standards set out such as in our Design and Access SPD. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings</p>
464	504	5 - Character Areas			<p>Add a section between 5.2.3 and 5.2.4 describing the Urban character of the areas that boarder onto the site. This is important as almost the whole site is defined as an opportunity site which means that this opportunity site/character area has to recognise what is on the other side of the road in order to contribute in a positive way to the areas and neighbourhoods opposite/surrounding the character areas edges. · To the East (Balfour Street,</p>	<p>The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The</p>

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					<p>Henshaw Street, Chatham Street as well as a row of town houses along New Kent Road) and to the South (Wansey Street and the Peabody Estate on Rodney Road) there is housing stock of significant townscape merit. Most parts of these neighbourhood are quiet residential streets. · To the West (Walworth Road (and the Strata Tower), Elephant Road and the Railway) there are some historical buildings in need of repair mixed with recent development of lesser townscape merit. The northern part of Walworth road is dominated bus and car traffic, however the impact on the pedestrian environment is somewhat alleviated by the large mature trees on the Heygate estate site. Some of the variety of retail units he the railway arches offer a small respite to the general experience of the public realm on Elephant Road which is dominated by, inconsistent foot way and cars parked in such a way that it is difficult to pass by, creating a general sensation of that this edge to the character area has suffered neglect for some time · To the North (New Kent Road and the roads that lead of New Kent Road, e.g. Meadow Row, Falmouth Road and Harper Road) the edge of the character are is dominated by the motorway that New Kent Road is. The Neighbour hoods on the other side of New Kent Road is predominantly residential where the streets benefit form large mature trees lining the streets and a good amount of residential green space among the buildings. There are also a row of local shops to the North East of the Character area and a large secondary school. · In this paragraph the townscape merits of the buildings along Balfour Street, and the streets that leads of Balfour Street, e.g. Henshaw Street and Chatham Street. This neighbourhood should be indicated to have similar townscape merit as those on Wansey Street and as such should be put forward to be a proposed conservation area.</p>	<p>wording paragraph in paragraph 1.4.4 has been changed to reflect this. The wording in SPD16 has also been changed to ensure that development considers the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.</p>
464	505	5 - Character Areas			<p>5.2.4 As a note that there should also be a east – west green link that connects St Mary’s Church Yard with Victory Park. The opportunity to create a pedestrian link between Victory park and Harper Road should be explored as part of the design assessment for Surdaw House (this link do not necessarily need to be represented by a gap between buildings, but could be a ground floor passage way through</p>	<p>A potential green link between St Mary’s Churchyard and Victory Park and on to Harper Road is already shown in figure 16 of the SPD. The links identified on Figure 16 are considered to be the most appropriate routes providing safe and convenient access from Victory park into the wider area.</p>

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					the new development, so that not too much of the New Kent Road noise do not filter through to the Park and not too much valuable floor space is lost above.	
464	506	5 - Character Areas			5.2.5 Second Bullet Point: It should be clear where the 500 homes will be created within the character area as most of the area is occupied by the Heygate Estate Opportunity site and this is intended to 'only' have 2500 homes squeezed onto it. Given that only 200 homes can fit onto the 'Phase 1' site, it is highly doubtful that 500 homes can be fitted onto the remaining Surdaw House opportunity site. Perhaps the 500 extra homes should be found a place for elsewhere in the overall OA.	We have updated our development capacity assessment (DCA) and our housing background paper to include information about what has been built and what we think will come forward. The DCA is a tool that we use to estimate the potential housing capacity of development sites that may come forward in the future. The research that has informed the background paper update shows that between April 2005 and March 2011, 1170 new homes were built in the Elephant and Castle Opportunity area, of which 122 have been social rented homes and 217 intermediate). Furthermore, the Heygate replacement programme, once completed, will provide an additional 600 homes (some of these have already been built). It is predicted that 512 of these will be affordable (422 social rent and 90 intermediate). Our development capacity assessment estimates suggests there is capacity for 6,400 new homes in the opportunity area by 2026. Based on our current planning policies we expect 2,145 of these to be affordable homes (1,020 social rent and 1,125 intermediate). This means that 7,000 homes could be delivered in the opportunity area between 2011 and 2026, with around 2,650 of these being affordable (1,560 social rent and 1,215 intermediate.)
464	507	5 - Character Areas			Seventh Bullet Point: Rephrase to include for an East-West Pedestrian link: 'Introduce a choice of North-South and East-West routes through the Heygate site to the neighbourhoods beyond the character area edges.	The text in paragraph 5.2.5 has been amended to reflect the comment.
464	508	5 - Character Areas			Ninth Bullet Point: add bullet point below the ninth bullet point stating: Where existing trees are going to be replaced by new trees, utmost effort has to be made for the replanting to occur within the plots site boundaries, to avoid a situation that the plots are entirely built up to the edge and the only trees we are left with in the area are street trees. Street tree planting, streetscape improvement and general public realm improvement should be included in new design proposals in addition to onsite planting. Replacement trees should be of	We have amended bullet point 8 to state that "Where trees are lost, they should be replaced by new trees within the existing site boundary of the proposal and in addition to any proposed street trees."

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					such age and be given sufficient space to grow into healthy mature trees with in a period that allows the existing residents to enjoy the new semi mature trees within a few years.	
464	509	5 - Character Areas		Heygate Street SPD 26 - Transport and movement	5.2.16 Does this mean that there will be more bus routes with different numbers or does it mean that bus 343 will run more frequently. The SPD should be clear how this intention will affect the areas further south on Rodney Road. If this paragraph is a subtle way of indication that some bus routes currently directed down Walworth Road may be redirected down Rodney Road then I will state my objection to this here and now.	Bus service planning is a function of TfL, but both the Council and TfL recognise that enhanced bus services (in whichever way these are delivered) are required to support development at Elephant & Castle.
464	511	5 - Character Areas		Heygate Street SPD 27 - Built environment	SPD27: Public Realm Add a sub bullet point to the sixth bullet point stating: -The tree line along the Western side of Balfour Street should be completed by planting of trees within the site boundary of the Phase 1 site's Balfour street edge.	Balfour street is identified as a potential green link on figure 16 of the SPD. In line with SPD 18 we will promote this is a strategic green route and use street trees to green the street.
464	512	5 - Character Areas		Heygate Street SPD 27 - Built environment	Add a seventh bullet point stating: The bordering residential streetscape should be enhanced in equal measures across the whole street, not just on the side of the street that the new developments will occur on.	The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to reflect this. The wording in SPD16 has also been changed to ensure that development considers the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.
464	513	5 - Character Areas		Heygate Street	Heritage Add to second sub bullet point of the first bullet point: so that it reads: -Conserve and enhance the setting of the potential Larcom Street and Balfour Street conservation	We currently do not have enough supporting evidence to how that Balfour Street should be designated s a Conservation Area. Larcom Street is a self-contained,

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				SPD 27 - Built environment	area, in particular by.....	tightly-knit area of development largely centred around the church. Enlarging this could weaken the strong and compact character of the area.
464	514	5 - Character Areas		Heygate Street SPD 27 - Built environment	Building heights Add a tenth sub bullet point of the first bullet point: so that it reads: -Balfour Street and Balfour Street neighbourhood.	We consider that this point is covered by the bullet which reads: "Diminish in height moving away from the tallest points to manage the transition to surrounding built development." Development proposals on the Heygate and elsewhere will need to address this criteria.
464	515	5 - Character Areas		Heygate Street SPD 27 - Built environment	Fig 21. Should indicate that the terrace houses on Balfour Street, Henshaw Street and Chatham Street as 'Proposed Conservation Area' and/or 'Possible Locally Listed Buildings'	We currently do not have enough supporting evidence to how that Balfour Street should be designated as a Conservation Area. Later in the year the Council will be consulting a Heritage SPD and a borough-wide local list will be formally consulted on as part of that process. At that point, there will be an opportunity to make representations on individual buildings, prior to the finalisation and adoption of the list.
464	516	5 - Character Areas		Heygate Street SPD 27 - Built environment	Fig 22. There should be a proper indication of the continuation of the East-West route through the Heygate Estate Opportunity site, linking St Mary's Churchyard Open Green Space with Victroy Park Open Green Space and beyond into the adjacent neighbourhoods on either side. There should be a indication of a complete green route along Balfour Street, Victory Place, Henshaw Street, Brandon Street, Rodney Road, New Kent Road, Walworth Road There should be indication of the proposed pedestrian routes across the part of Opportunity site 18 that is bounded by Victory Place, Balfour Street and Rodney Road. There ought to be an indication of a potential pedestrian link between New Kent Road and Munton Road at the west side of Surdaw House (perhaps one of the above mentioned paths through a building block, to ensure that the noise from New Kent Road don't adversely affect Victory Park)	Figure 22 highlights the need for a network of routes throughout the Estate, with a central hub created around the new park and stronger links running north-south and east-west. The individual routes are at this stage indicative and their precise layout will be determined when planning applications are submitted for the redevelopment of the Heygate Estate.
464	517	5 - Character Areas		Heygate	5.2.20 Please refer to SPD 17 and associated paragraphs that follows.	Detailed comments have been provided.

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				Street SPD 27 - Built environment		
464	518	5 - Character Areas		Heygate Street SPD 28 - Natural environment	SPD28 SPD should indicate who will pay and organise the increase of the canopy cover to counteract the urban heat-island effect.	SPD 18 sets out how we will expect development to retain and enhance trees and canopy cover. Where trees are lost, they should be replaced by new trees which result in a net improvement in canopy cover as measured by stem girth. If this is not possible, s106 planning obligations will be sought to improve tree planting elsewhere in the opportunity area. Valuation of trees will be calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology.
464	520	5 - Character Areas		Heygate Street SPD 28 - Natural environment	Add a paragraph 5.2.24 elaborating on the need for street lighting and furniture should be of such variation that not all open public (green) spaces are too light up in the evening as this creates an artificial environment where inner city children only associate darkness with a negative place rather a place where nature can be explored in the moonlight or in the 'borrowed' light from adjacent buildings or streets. It is also important that sufficient amount of street furniture as well a dedicated play-area equipment is of such variation and inspiring design that they encourage spontaneous play whilst walking through the urban grain so that the experience of young people growing up in the area becomes positively unique and memorable. These interventions into the public realm do not have to be super clever, a good example of a place that has contributed to improving the experience (for children, young adults and grown adults alike) of walking along New Kent Road is David Copperfield's Gardens.	Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings
464	521	5 - Character Areas		Heygate Street SPD 25 - Land uses	The below summary may be a repetition of some of the notes above but I thought it would be important to include my summary of one of the workshop that I participated in during the EAN SPD-review day two Saturdays ago. Character area : Heygate Street Before we started a conversation about the dominating subject of Opportunity site nr 18 (Heygate Estate), we went outdoors to look at the two recent	The purpose of the SPD is to put in place strategic guidance for the opportunity area. SPD 16 requires development to provide an appropriate sense of enclosure and create well defined streets and public places. It also notes that buildings should interact with the streetscape providing active frontages etc. In preparing planning proposals developments are required to submit design and

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					<p>development sites located between New Kent Road and Munton Street as these sites would represent similar context to that of Opportunity site 17 (Surdaw House). These two development may comply to some of the sentiments expressed in the SPD in terms of : provision of affordable housing and the specific standards applied to design of residential units, however both buildings fail on one of the key prerogatives of the OAF-SPD, namely that of bringing general improvement to the urban environment, both physically and experientially, through re-development. For example: · The forecourt on the New Kent Road side is fenced and gated in such a way that it appears to be a high security industrial unit rather than a residential entrance. The result is that the design signals that this is a dangerous area where the potential of some form or another of a crime happening is very likely. · The facade material on one of the building-block is brick, which is highly promoted in the SPD, however the bland and uniform colour of the brick and the poor design detailing of the parapet result in that the building look bland and of not particularly good quality which in turn signals the same about the area. · The facade material on the other building-block is a rain-screen made up of multi-coloured tile pattern that appear to be inspired by an army camouflage. This particular aspect to the design may or may not make it into the architectural press, however the fact that a cheap/nondescript treatment to the side walls makes the 'fun' front facade only look gimmicky. As far as we could ascertain it may be that one of these side facades will remain as is for the foreseeable future. The other side faces onto Opportunity Site 17. · More importantly this building also fails some of the key aspirations of the SPD of creating a 'new (better) identity' for the Elephant and Castle area, by the fact the building as a whole signal no coherent thinking, where the most prominent/noticeable part of the building is also the worst contribution to the urban grain, namely the lift over run/plant box on top of the building which only contributes to the streetscape and the urban context by adding to the already chaotic/unplanned/ill-considered street and roof scape on New Kent Road. · Unfortunately these points are only negatives, but they help to illustrate that if the purpose,</p>	<p>access statements which describe the design process. The council's Design and Access SPD provides further guidance on how architects and designers should consider materials, layout, boundary treatment etc.</p>

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					for which the planning guidance is developed, is going to be achieved, then has to be more precise guidance about the areas where one aspect of design crosses over another, i.e. the edge conditions. These negative aspects of two small scale developments also illustrate that it is equally important that the planning guidance and its demands are held to as strictly when it concerns small to medium size developments as when it concerns larger developments such as the Elephant and Castle shopping centre and the Heygate Estate.	
464	522	5 - Character Areas		Heygate Street SPD 25 - Land uses	A key issue that arose from the conversations was the fact that proportionally a very large part of the area defined as the Heygate Street Character Area is an opportunity site. This means that a lot of the planning guidance that relate to how a new development fit in to/ do not have an adverse effect on the surrounding and improve upon the current context 'within the character area' becomes less relevant compared to how the developments on the large opportunity site nr 18 (Heygate Estate) will affect the neighbouring character areas and the areas that border onto the opportunity site as well as those streets/neighbourhood that are outside of the OAF-boarders yet that faces the Heygate estate opportunity site. The SPD therefore needs to be clearer : · how the intended improvement of the built, social and economic environment on the Heygate Estate opportunity site will have an equally positive effect on the surrounding neighbourhoods and the existing residents home environment and existing retailers business prospect. · how it will ensure that the new development does not become a 'gate community' whether physically or perceptively to the surrounding community, in that current residents in the area may 'self-exclude' themselves due to social or economic circumstances.	The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary and another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. We are proposing to amend the wording to SPD 16 to ensure that proposals consider the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings. We are proposing to amend SPD 15 to clarify that public realm should be defensible and inclusive.
464	524	5 - Character Areas		Heygate Street SPD 28 - Natural environ	Some of the following points may already be covered in the SPD but they were raised/emphasise as important aspects that needs to be included in the guidance for the Opportunity site 18 (Heygate Estate) to ensure that the new development brings a positive impact on the wider area: The New Park - · The terms under which the park is created is very important and the SPD must be clearer how the park will be a properly	Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces.

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				ment	public, i.e. not the kind of public space that has been created at More London or at Paternoster Square, where there are strict rules about what the public are allowed to do and not to do and the spaces are under overt surveillance by private security firms, all of which makes the otherwise nicely designed spaces feel like private land that is temporarily/charitably opened to the public, but are spaces that at any given point be rescinded. The park must become a truly Public Park and Public Open Green Space.	
464	526	5 - Character Areas		Heygate Street SPD 25 - Land uses	<p>Community Facilities -</p> <ul style="list-style-type: none"> The community spaces/facilities that currently exist on the site should be listed and there should be a clear description as to how these facilities/functions will be re-instated for public use in the new development, e.g. the purpose built Crossway Church, the community spaces in the building located between Rodney Road and Brandon Street. In addition to reinstating the existing community facilities, it was felt that a variety of cultural facilities should be incorporated in the amount that reflect to the projected increase in population. The new Library at Canada Water was mentioned as an example where a new community facility, although very welcome and much appreciated already, has had the negative repercussion of causing two other libraries to be closed in the borough in order that the new Library could be paid for. One of the closed libraries was located a substantial bus journey away from the new library which means that one community has gain a library at the expense of another community loosing the same facility. It was felt that it is important the SPD stipulates that demand for and provision of a community facility will not cause a reduction in facilities elsewhere. There should be adequate (possibly purpose designed/built) space for one (or more) GP practice(s) that ensures that the current GP facilities in the area do not come under further strain and that may even alleviate the seemingly oversubscribed existing GP facilities. There should be adequate (possibly purpose designed/built) space for a NHS dentist (group) practice 	<p>We have information relating to location of community facilities but to list all of the current and potential functions of each would be too detailed for the SPD and would not necessarily reflect the role of these facilities over the plan period. Reference to the presence of Crossway Church has been added to the Heygate Street character section. SPD9 includes arts and cultural facilities within the description of community facilities. The policy sets out that we will work with a range of organisations to ensure that a variety of community facilities are delivered to underpin population growth. The circumstances under which community facilities will be allowed to be lost are covered in saved Southwark Plan policy 2.1. Each proposal will be considered on an individual basis on its merits. A cross reference to this policy has been added to SPD9 to make our stance clearer. Discussion with NHS Southwark indicates no need for new health facilities in short to medium term, although a likely longer term needed in the north of the opportunity area around South Bank University. This situation will be monitored as development takes place.</p>
464	527	5 - Character Areas		Heygate Street	Design of residential (private) units - the design of the residential units should be such that new residents remain for a long time so that a genuine amalgamation of existing	We cannot prevent new private homes becoming buy-to-let, but we can seek to improve the homes and area so that people who buy the properties want to live in the

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				SPD 27 - Built environment	and new communities can happen. That is to say the new units should avoid becoming by-to let properties or places that people buy and sell soon afterwards in order to make a quick profit.	opportunity area. The SPD vision sets out that we want to facilitate the regeneration of the Elephant and Castle into a more desirable place for both existing and new residents. The guidance within the SPD, as well as the overarching policies in the Core Strategy and the saved Southwark Plan seek to ensure that new homes are built to a high quality design and that development improves the area. In particular this includes SPD16 on built form and the guidance on built form and public realm within each of the character area sections for residential (private) units. Our residential design standards SPD also provides detail guidance on ensuring high quality new homes.
464	529	5 - Character Areas		Heygate Street SPD 25 - Land uses	Commercial units - · the kind of commercial / retail units should include a greater variety than just affordable shop units to medium to large scale destination stores, for instance there could be some live-work units which encourages local production of goods. There should also be an assessment to see if some light industry units could be incorporated, which could offer an added kind of employment opportunity to the currently suggested kinds of shop/retail units. · as the SPD mentions that all the new shops and retail units represent new employment opportunities, it was discussed if there was a way of stipulating in the planning requirements that these new employment opportunities should be made available (perhaps through training schemes if the job description requires specific skills) to people who live locally and how there could be some form of arrangement that encourages people who live locally that are currently out of work to seek for these new positions. · It is imperative that existing local business such as those along New Kent Road (diagonally opposite Surdaw House), Rodney Road (Opportunity site 30), Harper Road opposite Dickens's Square Park, etc	The strategy for the Heygate Street character area includes the promotion of a mix of business, leisure and community uses, contributing to a vibrant town centre. SPD25 also promotes the railway arches to be used for a range of A, D and B class uses, which can include light industrial uses. Proposals for the Heygate site will need to include a land-use strategy setting out how the scheme will achieve the SPD objectives and strategy for achieving a mixed used town centre, which will include space for a range of business uses. The SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's.
464	531	5 - Character Areas		Heygate Street SPD 28 - Natural	Public realm, planting and Trees - · the design of the public realm has to be of the highest design and quality standard with as much variety of 'greening', planting, soft landscaping and informal social opportunities as possible. The public realm is where communities meet and mix in a more genuine way than in shops and in leisure facilities (as specific people	SPD 15 sets out how we will work with TfL, developers and the community to transform the quality of the public realm in the opportunity area, ensuring that prioritises pedestrian and cycle movement and creates places in which people will want to linger. We will also seek to ensure the public realm is inclusive, well lit, overlooked and which feels safe

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				environment	<p>choose to use specific shops and leisure facilities, it is therefore less likely that community members from a great variety of backgrounds and circumstances will mix and meet in these kinds of environment) · On Fig 22. there should be a proper indication of the continuation of the east west route through the Heygate Estate Opportunity site into the adjacent neighbourhoods. Fig 22 only shows an dual arrow that stops inside the main part of the Heygate Estate Site. This arrow should at least continue across to Victory Park to the east and through to St Mary's Church Yard to the west. · On Fig 22. there should proposed pedestrian routes across the part of Opportunity site 18 that is bounded by Victory Place, Balfour Street and Rodney Road. · On Fig 22. there should be a indication of a complete green route along Balfour Street, Victory Place, Henshaw Street, Brandon Street, Rodney Road, New Kent Road, Walworth Road · On Fig 22. there ought to be a pedestrian link between New Kent Road and Munton Road at the west side of Surdaw House (perhaps one of the above mentioned paths through a building block, to ensure that the noise from New Kent Road don't adversely affect Victory Park) · With reference to the City of London's SPD concerning trees, CAVAT measuring of the public asset that trees are and the objective of increasing the tree canopy as a good example of more precise wording that is needed in the OAF-SPD on the subject of increasing the tree canopy, i.e. what kind of species, in particular large tree species, will in fact contribute to the increase of the collective tree canopy. · Tree replacement directives/requirements and strategy has to be incorporated into the SPD in more precise terms and define precise requirements/conditions. · Building blocks - · It was recognised that we don't know what the updated master plan looks like, but it was noted that the SPD ought to contain the public's aspirations/comments, so one of the aspects that should be added in the SPD is that the arrangement of the building blocks, if derived from the 'proposed routes' across the site, will create an overtly gridded/blocky area which is in great contrast to the inner London urban grain. there is concern that this 'Blocky' area will feel as 'monolithic' as the concrete blocks that are being replaces. It is therefore</p>	<p>at different times of the day and in the evening. Figure 22 shows a green link east to west route through the Heygate Estate Opportunity site. It is not considered necessary to extent the arrow through Victory Park although the continuation of the green link through the park is implied. Figure 22 has been amended to show a link from Victory Place, Balfour Street and Rodney Road. A green link is already identified along Balfour Street, Victory Place, Henshaw Street, Brandon Street, Rodney Road, New Kent Road. The links identified on Figure 22 are considered to be the most appropriate routes providing safe and convenient access from Victory park into the wider area. We have amended SPD 18 to state that replacement trees should result in a net improvement in canopy cover as measured by stem girth at the time of planting. Where S106 contributions are sought using the CAVAT methodology, this will be in addition to funds negotiated for other infrastructure such as children's play provision and public realm in line with our S106 toolkit. SPD 16 sets out our approach to ensure development provides an appropriate sense of enclosure, helping create well defined streets and public spaces. We will introduce a finer grain of development by: -- Creating blocks which pedestrians and cyclists find easy to move around. -- Creating an interesting and varied roofline. -- Reducing the massing of buildings to create a human scale of development at street level. -- Interacting with the streetscape through providing active ground floor frontages with frequent windows and entrances and active ground floor uses in appropriate locations.</p>

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					suggested the SPD should encourage designs of the blocks that incorporates small pedestrian passage ways/short cuts, these could even be combined into small shopping arcades.	
464	533	5 - Character Areas		Heygate Street SPD 27 - Built environment	Tall buildings - · the mitigation of wind tunnel effects and other negative impacts of the ground micro climate that a tall building can have must be strongly enforced through the SPD. · three should be thorough investigation into making the vertical city elements somehow publicly available, i.e. creating a public viewing gallery/exhibition space/museum of urbanism at the top of one of the tallest buildings in the developments so that the general public can access a view of their city from high up. · The scale of the developments on site 15(Elephant and Castle Shopping Centre), and nr.18 (Heygate Estate) are likely to be of such a scale that it affects the whole of London in some aspects and it was raised that it is important that this impact do not have a negative impact on the London skyline and do not jeopardise any UNESCO heritage sites. (The example made was the possible impact that the Shard might have on the Tower of London as a UNESCO world heritage site)	SPD 17 states that tall buildings should avoid harmful microclimate impacts and this will need to be addressed in planning applications. SPD 17 also refers to the fact that developments must have regard to the London View Management Framework which protects views and vistas across London. Specific mention is made of the avoiding negative impacts on the outstanding universal value of the Houses of Parliament World Heritage Site.
464	535	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		S106 money and continuous contribution to the local community - · Referring to the positive description (at the beginning of the day) of how Tate Modern (the Tate) have managed to continue to actively bring contribution to the local community, it was felt that the size of the Heygate Estate site is large enough that there should be thorough review into the amount of community contribution that should be earmarked, beyond S106 money, for long-term contribution to the local community/improvement to the local environment. · The SPD should also be clear as to how much S106 funds will come from the various developments and what it is likely to be spent on as there are references to the use of S106 money for many different items in the SPD, but it is never clear if there will be enough S106 funds available or which items will be prioritised of other aspirations. · There is a strong impression that most if not all S106 money from the Opportunity site nr. 15(Elephant and Castle Shopping Centre), nr. 16(50 New Kent Road) and nr.18 (Heygate Estate) will be spent on upgrading the	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding

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					Railway, Tube and some of the Major Roads. This was felt to be unfair as improvement on major London Infrastructure elements should be funded mainly from other resources and not at the expense of improving the urban and living environment of the local community, in particular as there seem to have been under investment in these major infrastructure elements for many years.	infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
464	537	5 - Character Areas	SPD 1- Shopping	Central Area SPD 21 - Land uses	Character area : Central Area Many of the concerns for the Heygate Street Character area applies to this area too. However, the main concern was how the intended changes to the shopping centre would impact on the socio economic aspects of the community that currently use the shopping centre.	Alongside the preparation of the SPD we prepared an Equalities Impact Assessment (EqIA). We identified in the EqIA that the redevelopment parts of the Elephant and Castle may have an impact on the displacement of local businesses from the shopping centre and surrounding area. This may have a disproportionate impact on black and ethnic minorities of which a larger percentage work in the existing SME businesses. To help mitigate this potential impact, the SPD supports the provision of new business space that must be designed flexibly to accommodate a range of unit sizes to help meet the needs of the local office market and SME businesses and to enable businesses to remain in the area as they grow. In the EqIA we identified that there may be conflict between the need for provision of larger retail units to encourage a wider mix of retailers into the area and maintaining the existing smaller units for local businesses. Policy SPD 1 sets out further guidance on how development will need to

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						provide a range of shop unit sizes, including affordable retail units for existing tenants in the area who have been displaced, new business start-up or independent retailers. The SPD also supports the continued operation of markets and also the provision of new markets in the area. Markets can help enliven town centres, reinforce the identity of an area and help provide a more varied shopping experience. Markets also contribute towards promoting community cohesion and a new market square will be provided to the east of the railway viaduct (SPD 2).
464	540	5 - Character Areas		Central Area SPD 23 - Built Environment	Draper House should be mentioned in the SPD.	Draper House is mentioned in the SPD on page 57 as one of the identified tall buildings in the opportunity area and in Figure 18 as a buildings of townscape merit as it provides an appropriate sense of enclosure to junctions.
464	542	5 - Character Areas		Central Area SPD 23 - Built Environment	The intended improvement to the exterior spaces around the shopping centre was generally viewed as positive, however there should be more focus on greening the area and certainly partially green northern roundabout should be made more green both on the centre isle as well as all around it. There is plenty of public realm, ground and air space throughout this area to plant large tree species which will contribute to softening this intensely trafficked area visually, dampening the noise impact all the traffic junctions have as well as countering the degree of fumes emitted.	This point is adequately addressed in SPD 18: Open Spaces.
464	544	5 - Character Areas		Central Area SPD 22 - Transport and movement	Some people feel there should be some flexibility in terms of the intended future of the pedestrian subways as the amount of time a person would have to wait to cross the different traffic-light crossings would potentially increase the pedestrians journey time, add to the discomfort in terms of standing close to noisy traffic and inhaling fumes. Nor is it clear if the rearrangements of the traffic lights and pedestrian crossings would entail that the paths across the central isle would have to be omitted in which cast the distance a pedestrian would have to cover to get past the roundabout appears to be radically increased.	On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings.
464	547	4 -The preferred	SPD		Sustainability It was felt that is was not clear the council's	The purpose of the Elephant and Castle SPD is to provide

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		option/options	19 - Energy , water amd waste		and its partners commitment is towards sustainability in terms of the viability of demolishing buildings (that carry a carbon foot print) in order to build again (adding more carbon foot print).	a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The vision for Elephant and Castle states that the area will be a leading example for sustainable development. It will meet the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality. A key theme of the SPD is Theme 6 Natural Environment: Sustainable use of resources, which sets out objectives to; • Promote a network of high quality open spaces which have a range of functions including recreation, children's play, sports and food growing. •Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes. •Reduce the impact of development on the environment, minimising greenhouse gas emissions and enabling adaptation to climate change and managing pollution, waste and flood-risk. Sustainable development is a borough-wide issue. Core Strategy policy 13 sets how we will require all development to require as little energy as possible to build, we will also require applicants to demonstrate how they will avoid waste and minimise landfill from construction.
464	549	4 -The preferred option/options	SPD 19 - Energy , water amd waste		It was also not clear how waste and refuge is dealt with in relation to sustainability.	This is a borough-wide issue. Our approach to waste and refuge is set out Core Strategy policy 13 which states that we will; •Increase recycling and composting, minimise waste, reduce landfill and make more use of waste as a resource. •Require applicants to demonstrate how they will avoid waste and minimise landfill from construction and use of a development. •Meet the London Plan waste apportionment target set for Southwark. We are building a state of the art resources centre at Old Kent Road to help us meet this target. Further information is also set out in our Sustainable Design and Construction SPD.
465	50	4 -The preferred option/options	SPD 5 - New		1. 10% wheelchair (SELHP standard) – there is evidence recently to suggest that high numbers of these units may be	The requirement for a minimum of 10% wheelchair housing is set out in saved Southwark Plan policy 4.3, and is based

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			Homes		difficult to let. Our experience in other Boroughs eg Lewisham is that units cannot easily be let. This would amount to 400 full wheelchair standard and in particular has a detrimental cost implication for the private sale dwellings because of the increased size/build cost. If the 10% target is maintained, we suggest it is applied to affordable only. Building private sale to this increased floor area pushes up the build cost significantly and it is difficult for a developer to recover it.	on the policy in the London Plan. The SPD cannot amend this policy. The target applies to all housing, but does not specify whether it should be provided in the affordable or private housing. The applicant can decide which tenure is most suitable for delivering the wheelchair units. Furthermore, saved Southwark Plan policy 4.5 encourages the provision of affordable wheelchair units but requiring one less affordable habitable room for every affordable housing unit which complies with the wheelchair design standards.
465	1121	3 - Vision and objectives			Vision Basing the SPD around a larger shopping centre that will attract high quality retailers is only achievable if you can turn E&C into a destination. As there will be no increase in vehicle access (rightly so), this can only be achieved by significantly increasing the private residential element which will mean resolving the tube interchange. Anything short of an underground ticket hall will be short changing the scheme.	We recognise the importance of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity. We have set an additional S106 tariff for strategic transport improvements. We recognise that it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk.
465	1122	4 -The preferred option/options	SPD 4 - Jobs and Business		Increasing retail provision must be undertaken in-line with increasing private residential provision as the 'spend' will not materialise from elsewhere. There is a significant oversupply of retail premises at E&C and on Walworth Road at present which has resulted in the fall in quality of the retail offer, just count the betting shops, pawn brokers and payday loan merchants.	Local planning authorities have very little control over uses such as betting shops, pawnbrokers and pay-day loan shops. This is because often these uses do not require planning permission. Uses such as betting shops, pay-day loan shops, banks, estate agents and travel agents are categorised in the same "use class" (A2, financial services). Planning permission is not required for changes within the same use class. There is also a permitted change of use to A2 uses from a restaurant, pub or cafe. The council recently responded to a government consultation arguing that betting shops should be placed in their own use class which would give the LPA more control. However, this would require a change to the planning regulations
465	1123	4 -The preferred option/options	SPD 5 - New Homes		A higher proportion of homes should be 3+ bedroom. If the proportion of existing affordable homes in the SPD is in excess of 35% then this should be reduced.	Policy on housing mix is established in the Core Strategy. The SPD cannot change policy in the Core Strategy. The Core Strategy requires large developments to ensure that at least 10% of homes have 3 or more bedrooms in the opportunity area. 10% is the minimum which should be provided and we encourage developers to provide more

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						family housing where possible across a range of tenures. Policy on affordable housing is established in the Core Strategy. The SPD cannot change policy in the Core Strategy. In accordance with the Core Strategy, the SPD states that at least 35% should be affordable and at least 35% should be private. Where developers propose less than 35% affordable housing, we require a financial appraisal to ensure that the maximum viable amount of affordable housing is provided. Policy on affordable housing is established in the Core Strategy. The SPD cannot change policy in the Core Strategy. In accordance with the Core Strategy, the SPD states that at least 35% should be affordable and at least 35% should be private.
465	1124	4 -The preferred option/options	SPD 14 - Transport mitigation		The recent high-profile improvements to Walworth Road have created a safer and more free-flowing main road which has also improved the environment for shoppers and visitors. The planting of street trees has helped to improve the look and feel of the road. I agree and would like to see the original proposal for the Walworth project completed to extend the work as far as Wyndham Road.	Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.
465	1125	4 -The preferred option/options	SPD 19 - Energy, water and waste		Only if it can be achieved without significant increased cost	Core strategy policy 13 sets high environmental targets for new development. Developers will need to justify why these targets cannot be met due to site constraints and/or financial viability through the planning application process.
465	1126	5 - Character Areas			Existing conservation areas provide ready made 'character areas' which would benefit from extension	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas.
465	1127	5 - Character Areas		Walworth Road SPD	Extension of the Walworth Project pavement widening to the south down Camberwell Road.	Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter

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				34 - Transport and movement		of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.
466	582				I have lived in this area for over 6 years and in that time, seen it change but not develop. There is a reason I bought in Elephant and Castle - it's because I like it. The developments that are happening here make it difficult to achieve a community for the short term future, however, in the longer term, that is what I would like to see achieved. The SPD is some way to making that happen, however, not if we don't achieve real social benefit and meet the needs of the existing community, which I include myself in.	The SPD tries to look at development and its impacts in the round to ensure growth and regeneration are coordinated and to help ensure that they are sustainable.
466	583	4 -The preferred option/options	SPD 5 - New Homes		·At least 35% affordable housing throughout the opportunity area. ·A higher proportion of 3 bedroom plus homes. ·less student homes - with sensible counting of proposed stock - including Oakmayne development!?	The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies. In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and

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						Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. With regard to student homes, SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is already a larger concentration of student housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities.
466	584	4 -The preferred option/options	SPD 11 - Walkn g and cycling		<ul style="list-style-type: none"> · The Walworth Rd project needs to be completed. · Streets and roads should be designed and designated as 20mph maximum to encourage walking and cycling. · The TfL roads and especially the northern roundabout at the E&C and the New Kent Rd need to be made far safer for pedestrians and cyclists. 	We are working with TfL to develop the design for the northern roundabout. While measures to "humanise" it and other main roads are a key priority for the council, we must recognise that it is a strategic part of the Transport for London Road Network and as such we cannot compromise traffic capacity. The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this. Where appropriate funding will be sought from adjacent developments to improve road safety. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.

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466	585	4 -The preferred option/options	SPD 1- Shopping		<p>· Traders at the E&C Shopping Centre need be able to remain in the centre during redevelopment and return afterwards. · Recognise the important contribution of small retail units and street markets to providing goods that local people can afford and as local employers. · Recognition of the contribution of minority ethnic businesses to the variety of retail offers in the area. · Recognition that in the longer term the Arches can fully transform into a thriving Latin Quarter for London. · Affordable retail units for only 5 years is not enough.</p>	<p>1. Applicants proposing large scale retail development will need to identify through a Retail Impact Assessment the impacts upon existing employment and propose mitigation measures to help address impacts. Affordable space will be secured through s106 planning obligations attached to planning permissions. A legal agreement will set out the nature of the obligation i.e. provision on-site, provision off-site (i.e. to another appropriate site under the applicant's control), or a financial contribution. In those cases where physical provision results the developer would build the units; and in a suitable location, to be agreed as part of the scheme. Their size would be limited by condition or a clause in the obligation. Thereafter, a condition or clause in the legal agreement would restrict the unit as affordable space only. Where off-site physical provision results, a developer could build new units or refurbish existing vacant units and retain ownership as anticipated with on-site provision. 2. We have added additional text to SPD1 to provide further recognition of the value and contribution of local shops in the area. SPD2 recognises the importance of street markets and their contribution to providing a more varied shopping experience as well as providing local employment. 3. We have amended the SPD within Section 2 to add further recognition of the cultural diversity that exists in the area, including the diversity of businesses at the Elephant and Castle, in particular, the Latin American presence and the contribution to the local economy and retail offer. 4. We have added additional text to SPD4 which acknowledges the Latin American presence in the railway arches and the contribution the businesses make to the area, however it would not be appropriate to have a preference for any one ethnic group to occupy business units in the area. 5. Five years is considered a reasonable amount of time for a business to establish itself. While discounted rent will be appropriate to bring independent retailers into new spaces, once they gain traction and start making money, they will be able to afford to pay more rent.</p>
466	586	4 -The preferred option/options	SPD 17 - Buildin		The SPD must demand evidence that tall buildings will not have a negative effect on micro-climate.	SPD 17 states that tall buildings should avoid harmful microclimate effects. This would include effects on sunlight and wind patterns. Developers would need to demonstrate

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			g heights			this in submitting applications.
466	587	4 -The preferred option/options	SPD 15 - Public realm		Landscape must be accessible and the split between public and private space needs clarification. Spaces must be well designed to encourage people to meet and linger outdoors	SPD 27 sets out how we will require internal courtyards and communal amenity spaces to be designed for a range of activities, including seating areas, play spaces and community planting. We will require landscaping to be of high quality and encourage biodiversity. SPD 15 sets out how we will prioritise pedestrian and cycle movement in the public realm and create places in which people will want to linger. Detailed matters such as landscaping will be considered as part of the planning application process. In line with policy 12 of the Core Strategy, we will require a design and access statement to be submitted with all development proposals. The design and access statement is require to demonstrate how the proposed landscaping refers to the treatment of both public and private spaces. In order to meet the guidance set out in our Design and Access Statements SPD, the design and access statement should include; •An explanation of the purpose and function of the landscaping including stating the amount of outdoor space and whether it is private or public space •An explanation of the relationship between the landscaping and the surrounding area •An explanation of the commitment to maintaining the landscaping •An explanation of how the landscaping improves the safety and security of the development, for example by not creating dark or heavily shaded areas, and defensive planting using “anti-social” plants such as holly, roses, sloe and hawthorn to deter the use of shrubberies as hiding places •An explanation of how the landscaping improves access for all and meets the needs of disabled or less mobile people, for example by providing benches as rest places and incorporating ramps •Consideration of including a planting schedule, planting plan and a hard landscaping plan as well as an explanation of why hard and soft landscaping materials have been selected •Consideration of landscaping for outline planning applications, with landscaping as a reserved matter. The applicant does not need to provide specific information on landscaping, but does need to explain and justify the principles that will

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						inform later landscaping decisions
466	589	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		The benefits of S106/Community Infrastructure Levy (CIL) payments from developers. Making sure money is spent in the area. · Spend on community priorities such as green routes, social rented housing, affordable retail and improvements to community facilities need to be ringfenced.	<p>We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need to improve transport infrastructure. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds:</p> <p>http://www.southwark.gov.uk/info/200152/section_106/148</p>

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						1/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
466	590	5 - Character Areas		Walworth Road SPD 35 - Built form and public realm	Create a Conservation Area along the length of the Walworth Road.	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
466	591	4 -The preferred option/options	SPD 18 - Open spaces		Green walls - proposals must demonstrate viability and long-term sustainability. Many systems have a constant need for automatic irrigation, a high maintenance demand and are prone to failure - they are eco-bling, rather than sustainable technology	SPD 27 sets out how we will require landscaping to be of high quality and encourage biodiversity through tree planting/retention, water features and habitat creation. Detailed matters such as landscaping will be considered as part of the planning application process. In line with policy 12 of the Core Strategy, we will require a design and access statement to be submitted with all development proposals. The design and access statement is required to include an explanation of the commitment to maintaining the landscaping.
466	592	4 -The preferred option/options	SPD 18 - Open spaces		0.61 hectares per person is very low, and the deficiency is compounded by major roads and railways which are barriers to access. [Compare the National Playing Fields Association's '6 Acre Standard', or 2.43 ha per 1000 population, although this cannot always be achieved in cities]. Every opportunity must be taken not only to create high quality and robust new open space, but to improve existing spaces and the links between them. Small incidental spaces, such as those on housing estates, can make an enormous contribution. The SPD should include the improvement [with the community] of these spaces, and should give them protection through policy. These should be specifically named as one of the categories of community projects eligible for Sec 106/ CIL funding.	We recognise that the provision of open space in the area is low. We have amended the final SPD to set out a standard of 0.76 per 1,000 population in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate redevelopment will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026. We have also included an additional paragraph (para 4.6.5b) setting out more detail on how we will seek to improve the amenity value of land on housing estates and within the transport network. Further information is also set out in our draft

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						Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
466	593	4 -The preferred option/options	SPD 18 - Open spaces		New public open space provided should be designated as such and protected by policy for the long tern New space provided by development for public access should be managed as public space where people are welcomed, not as private space where the presence of the general population is merely tolerated.	Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces.
466	596	4 -The preferred option/options	SPD 18 - Open spaces		Replacement of trees lost to development - clarification required of replacement 'by new trees which result in a net improvement in canopy cover as measured by stem girth'. On day one, or over several years? We welcome the intention to use the CAVAT methodology for evaluating trees and calculating contributions, but any such contribution for tree replacement must be in addition to, not instead of, a developer's other commitments in terms of providing landscape spaces and play or community facilities	We have amended SPD 18 to state that replacement trees should result in a net improvement in canopy cover as measured by stem girth at the time of planting. Where S106 contributions are sought using the CAVAT methodology, this will be in addition to funds negotiated for other infrastructure such as children's play provision and public realm in line with our S106 toolkit.
466	598	1- Introduction and background			The transport infrastructure should not be upgraded at the cost of other local needs, such as affordable housing and community facilities. S106 contributions should be used to benefit the local community, rather than relief the budget pressures of other organisations, such as TfL. It secures this money because it is a powerful organisation, rather than the intrinsic merit of the schemes it proposes, necessary as they might be.	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need to improve transport infrastructure. The policy context to s106 planning obligations is changing. In 2010 the government introduced

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						<p>a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds:</p> <p>http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area.</p> <p>http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details</p>
466	599	3 - Vision and objectives	SPD 5 - New Homes		<p>The specific commitment made in the 2004 Elephant Regeneration SPD to reprovide the 1200 social rented homes lost from the Heygate estate should be retained and repeated here and elsewhere in the SPD as appropriate Mr. Abbott, head of the Elephant Regeneration team, reported that only 527 of the Heygate replacement homes will be delivered by the early housing site programme (Elephant housing workshop on 31 Jan). This leaves a considerable shortfall that will not be met by the redevelopment of the Heygate footprint, which will only give 300 social rented units (that is if they are not to be affordable rent). The SPD should also outline how the shortfall of between 400 and 700 social rented units will be met.</p>	<p>The Saved Southwark Plan designation for proposals site 39P sets out the uses required within the Elephant and Castle Core Area. It sets out there should be "no fewer than 5,300 mixed tenure new homes, including 1,200 to replace those lost through the demolition of the Heygate Estate". This designation is still our adopted policy. We have updated our development capacity assessment (DCA) and our housing background paper to include information about what has been built and what we think will come forward. The DCA is a tool that we use to estimate the potential housing capacity of development sites that may come forward in the future. The research that has informed the background paper update shows that between April 2005 and March 2011, 1170 new homes were built in the Elephant and Castle Opportunity area, of which 122 have been social rented homes and 217 intermediate).</p>

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						Furthermore, the Heygate replacement programme, once completed, will provide an additional 600 homes (some of these have already been built). It is predicted that 512 of these will be affordable (422 social rent and 90 intermediate). Our development capacity assessment estimates suggests there is capacity for 6,400 new homes in the opportunity area by 2026. Based on our current planning policies we expect 2,145 of these to be affordable homes (1,020 social rent and 1,125 intermediate). This means that 7,000 homes could be delivered in the opportunity area between 2011 and 2026, with around 2,650 of these being affordable (1,560 social rent and 1,215 intermediate).
466	600	3 - Vision and objectives	SPD 3 - Hotels		The SPD should distinguish between the various kinds of affordable housing and detail here how many of each type the regeneration will provide. This is particularly important now that the new category of 'affordable rent' has been introduced. The phrase 'affordable housing' is now applicable to such a wide range of incomes (£0 - £60k pa) that its use obscures whether or not the poorest are having houses provided for them.	The fact box on affordable housing sets out information on the different types of affordable housing. We have updated the fact box to fully cross reference to the Affordable Housing SPD, which provides more detailed guidance on affordable housing. We will be consulted on an updated Affordable Housing SPD later this year to take into account changes to the delivery and types of affordable housing. More information can be viewed on our website at www.southwark.gov.uk/ahspd
466	603	4 -The preferred option/options	SPD 5 - New Homes		The ambition to achieve 35% affordable housing has been undermined by the masterplan agreement with Lendlease for 25% affordable housing. Lendlease will be building 2400 of the 4000 new homes, and their representative at the housing workshop, mentioned above, made it clear that its outline planning application would be for 25% affordable housing, not 35%; to compensate other developments in the area will necessarily have to provide more than 35% affordable housing. It seems very unlikely this will occur, both in the light of the planning permissions granted at the Elephant over the past 10 years and Southwark's own judgement that 65% free-market housing is needed to ensure a development's viability. The SPD should state how this problem is to be overcome, so that the 1400 target will be reached.	Our policy for affordable housing is set out in the Core Strategy and the saved Southwark Plan, with further guidance in the draft and adopted affordable housing SPDs. The policy and guidance sets out that the minimum amount of affordable housing should be 35% affordable housing, and as set out in the affordable housing SPDs, where this policy cannot be met, the applicant needs to submit a financial appraisal to justify why a departure from policy is necessary. For all schemes, including the Heygate, we would require a financial appraisal to justify why affordable housing cannot be provided. The affordable housing SPD sets out guidance that there may be some exceptional circumstances where a scheme delivers exceptional community benefits over and above the standard section 106 contributions and that in these cases we may review the levels of affordable housing required on the site if it can be satisfactorily demonstrated that there is

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						a need for such facilities. A financial appraisal would also be required to demonstrate how this justifies the policy requirement of affordable housing not being provided.
466	608	4 -The preferred option/options	SPD 7 - Sports facilities		The development that will provide the Leisure Centre will not provide any affordable housing, an example of affordable housing losing out for S106 funding to competing priorities. The SPD should say what measures will be adopted to ensure that the ambition to achieve 35% affordable housing will not be undermined by other S106 demands.	We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need for new leisure facilities and also the need to improve transport infrastructure.
466	610	4 -The preferred option/options	SPD 8 - Higher education and student housing		To all appearances the amount of student accommodation has already reached saturation point in the opportunity area and much has been built that does not provide affordable housing. The SPD should consider whether a complete moratorium on student housing is desirable.	SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is already a larger concentration of student housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities. Our view is that the Core Strategy policy will enable a balance between student and other types of housing, whilst SPD 33 will ensure there is no an over-concentration in the Walworth Road character area. Within other parts of the opportunity area, student housing may be acceptable, subject to the Core Strategy policies as we do not think there is an over-concentration of student housing in other parts of the opportunity area and as the two local universities both have expressed a need for more student accommodation.
466	612	4 -The preferred option/options	SPD 9 - Community facilities		The commitment to new community facilities is completely empty of any concrete proposals. The 2004 framework document promised 'a comprehensive range of social, education, health, and leisure facilities', including a library/lifelong learning centre, secondary school and an energy centre. This SPD should explain why these are no longer proposed – surely something is possible out of a	The SPD refers to a range of facilities directly in policy guidance and in the infrastructure plan. The level of detail reflects the fact that this is a 15 year plan and the SPD needs to be flexible enough to accommodate changes to policy, legislation, funding and local need. SPD 7 refers to the provision of a new leisure centre. The proposed redevelopment is currently at the design stage and a

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					£1.5bn budget?	<p>planning application is expected in Spring 2012. The provision of education and health facilities will be subject to ongoing discussion with the Council's school place planning team and NHS Southwark, respectively. There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work. A range of community facilities will be supported as part of the redevelopment of the Heygate estate. Specific facilities, such as a library, will continue to be discussed, with firmer details being set out as planning applications for the redevelopment are submitted. SPD19 sets out that all developments should consider the feasibility of connecting to a Combined Heat and Power (CHP) system. Where a new system is required, this would usually be provided in an on-site Energy Centre. As noted in SPD9, the community facilities needed to underpin growth in the area will be kept under review over the lifetime of the SPD.</p>
466	613	5 - Character Areas		Rockingham SPD 53 - Land uses	<p>The Rockingham character area, which consists almost entirely of the Rockingham estate, is poorly served by the SPD. While the aspiration to improve the area is expressed several times there are few concrete proposals and without these the area will lose out in the competition for S106 funds. Most of the proposals focus on movement through the estate, rather than improving the estate itself. SPD 55 'Built form and public realm' is no doubt necessary, but seems of little relevance, given that there is only one development site identified in the area (the Hand in Hand pub). The SPD should consider whether there is a case for the Rockingham having some priority for S106 funds and whether some S106 funding can be directed there from developments in the further north of the borough.</p>	<p>The council recognises that the community facilities are in need of improvement and have flagged this in the SPD. I We have also stated that we will explore opportunities to fund this work. This could include directing s106 contributions or in the future funding raised through the infrastructure levy (CIL) towards this project. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over</p>

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						the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects.
466	615	4 -The preferred option/options	SPD 18 - Open spaces		The SPD should amplify on the value of the large green spaces and ensure that it is adequately protected by policy.	SPD 18 sets out how we will maintain and improve a network of open spaces that have a range of functions and continue to protect metropolitan open land (MOL), borough open land (BOL) and other open space (OOS) from inappropriate development. Open space that is designated as MOL, BOL or OOS will be protected using saved Southwark Plan policies 3.25-3.27. Our AMR indicates that we these policies are very successful at restricting new development on protected open space. New open spaces that are provided through development such as the public park on the Heygate site will be considered for protection and this can be taken forward through the site allocations development plan.
466	616	4 -The preferred option/options	SPD 9 - Community facilities		The SPD should amplify on the value of the community centre and the many groups who use it and make concrete proposals for improving the centre and supporting the user groups	Noted. Specific reference to the community centre will be added to the Rockingham character area section.
466	618	5 - Character Areas		Rockingham SPD 54 - Transport and movement	Figure 43 This shows one of the proposed pedestrian routes going through two blocks of flats on the Rockingham estate (Wickstead and Arrol) without deviation. Is this a true representation of the proposal?	The link in figure 43 is indicative and demonstrates the need for an improved link that runs roughly from east to west through the Rockingham character area.
468	450				Note; In general I'd like to commend the Council for trying to open out this process in a genuine way. More time between, say, adoption and walkabouts and submission of responses would have helped me a great deal though I appreciate time is very short in this case and that more time very often has no concrete significance. My concern in the circumstances is	Noted. We have set out in our consultation statement how we have used the feedback from all of our consultation events to inform the content of the final SPD. We are proposing to upload a summary table of the comments we have received and how we have taken these into account on the 8th March 2012. This is prior to publishing the final

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					<p>that though I have myself given extensive 'live' feedback and heard much more of that, the weight of verbal or annotated-map type responses is slight and open to reinterpretation (esp. important when elements of place and its character have been missed over years and may yet still be missed after a first introduction/encounter/illustration). This concerns me when I am personally very hard pressed for time to respond with the proper degree of care and brevity in written form. SO I would urge that you give perhaps more weight than you may be able to as it were 'get away with' to those verbal submissions, personal feedback, etc. I write this knowing that everything that matters has been conveyed fully and in detail in those contexts at the cost of a significant amount of private time. A great deal of that – most notably with regard to the Heygate Street Character Area and it's north and north easterly reaches – is not in the present version of the SPD and will be very noticeable if it remains absent in the next or final version. So I lament the absence of any proper period of final scrutiny of the next/final version for the simple, commonsense reasons alone. Finally, I have had sight of quite a lot of other feedback and have deliberately allowed my focus to fall upon subjects and areas that have been neglected in the feedback. I've used bold less for emphasis that in place of a summary list of points.</p> <p>CONTENT OF GENERAL RESPONSES</p> <ol style="list-style-type: none"> 1. 35% social housing, focus on socially rented crucially important. 2. Clear ambitious statements of principle required, pragmatism to follow. 3. OA defined by lethal motorways which need serious curtailment to end abuse of residents. 4. The borders of the zone, policy application, need addressing, principles extended e.g. Heygate Street Character Area. 5. Car-free regeneration/development vitally important in principle and in practice. Test: Phase 1. 6. Amenity/commerce/employment and local lists e.g. Heygate Street Character Area. 7. Section 106; down the tube, minimising consequences e.g. Heygate Street Character Area and public realm. 8. Trees/Canopy/Urban Forest/ Green Infrastructure; as if you really mean it, teeth, details; large species trees and canopy cover. 9. Overall; raise ambition; unique eco zone to include green economic zone, joined-upness please! 10. Public park 	<p>SPD and consultation statement after which point there will be 5 workings days for people to review the document before it is taken to Cabinet for adoption.</p>

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					/ publicness of 'public' park. Absolutely critical test of Regen and Interim Use.	
468	451	4 -The preferred option/options	SPD 5 - New Homes		GENERAL RESPONSES 1. I'd like to underscore the importance of holding to the commitment to 35%+ social housing with a very heavy emphasis being put on socially rented housing in the area and in particular in the northern/central activities/zone 1 part of the OA. This is what it means to be a civilised people and place. It's critical to the property urban fabric of the future that a diverse social mix is maintained and nurtured generously.	Noted. As set out in the SPD, the Core Strategy and the saved Southwark Plan the policy is a minimum of 35% affordable housing, with a split of 50% social rented housing and 50% intermediate housing. As set out in both the adopted and the draft affordable housing supplementary planning documents, any departure from this policy needs to be justified to the satisfaction of the council through a financial appraisal.
468	452	3 - Vision and objectives			2. Clear and ambitious statements of principle: The OA has two defining features; on the one hand classic 'inner city' urban forms; motorways, massive housing blocks and extensive social housing estates. On the other is its green infrastructure at the heart of which lies Zone 1's only unofficial Forest, containing at least 450 trees planned and planted by your very capable predecessors and now under threat from the weakness of resolve and short term developer greed. I'll come to the latter in detail, but the continued existence of large species maturing trees of the right kind in the footprint of the regeneration zone is essential. It is also a mark of civility, when viewed over any meaningful stretch of time. It ALREADY EXISTS and must be protected, nurtured, enhanced. The test is not in policy announcements or reluctantly ceded/worded targets – majority/much as possible/etc. – but in intention and implementation. The current document lacks teeth and exactitude in wording, suggesting a lack of actual resolve and an intention to dodge around difficult decisions to accommodate the appetite of partner developers, I'm afraid. The point of a document of this kind is that it DOESN'T have to be practical. Pragmatism may come in the application and implementation, if necessary. This guidance document should enunciate clear and ambitious principles in anticipation of future need and perceptions. When it comes to ecological/environmental elements this is well researched, widely available to resource, most urgent and a matter of irrefutable principle.	LDF documents should be able to pass the tests of soundness as set out in Planning Policy Statement 12, this includes ensuring that the policies are deliverable. SPD 18 sets out how we will expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest.
468	453	5 - Character	SPD	Heygat	3. The OA is defined by motorways which ruin it's character	Where appropriate funding will be sought from adjacent

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		Areas	11 - Walking and cycling	Heygate Street SPD 26 - Transport and movement	<p>in several obvious ways. The real barriers to movement are the all-negative motorways of the TfL system – not the flawed but deliberate housing blocks on the Heygate (witness the result of removing them!). They are poisonous, mortally dangerous, significantly out-dated and express utter contempt for every resident in the area. I recognise that the inner ring road will remain, but you ought to enforce a mature and far-sighted approach to the passage of commuter traffic through residential areas by insisting on proper pedestrian and cyclist friendly crossings in profusion and a 20 MPH limit on ALL roads. Wherever possible, traffic should be discouraged from driving or rather speeding through and from parking in this quarter of Central London. I urge you to take a bold and visionary approach to this, to hold to principle rather than cede to short term advantage or convenience. I suggest that this is your duty as planners in fact. While everyone talks incessantly about the northern roundabout, to tragically little effect too I note, no-one ever mentions the lethal ravine/wall of the New Kent Road. This SPD ought to make provision to transform the stretch of the NKR between Carpenter's Arms and the northern roundabout or it will fail to knit in to the regen everything and everybody north of NKR [as per your ref in 5.2.4 to 'creating new north-south routes' p79]. It requires thinking out of the box, which I believe is your specific job, but/ so it also requires courage. I note your aspiration in SPD 256 in this regard, esp. re; Harper Road connectivity, welcome it, hope to witness its implementation -especially when Phase 1 requires it.</p>	developments to improve road safety and the public realm on the Transport for London Road Network.
468	454	5 - Character Areas		Heygate Street SPD 27 - Built environment	<p>4. The borders of the zone need addressing. I don't mean that lines need to be redrawn necessarily (potentially infinite of course) but that you need to articulate the relationship between each side of the line, detail what the line means in practice. Heygate Street Character Area: I live on chronically overlooked Balfour Street which is unique in the entire SPD/OA area; being on the edge of the regen footprint, the OA and in being the only place where any of this is underway –with Phase 1 of the regen thrusting ahead towards detailed planning submissions without consideration/in direct abrogation of principles in this document let alone elsewhere.</p>	<p>The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to reflect this. The wording in SPD16 has also been changed to ensure that development considers the impact</p>

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					<p>Balfour Street exemplifies the problem in that the SPD -as well as much developer verbiage- claims that new developments must respect –‘respond to’, ‘considered’, ‘transition down to the existing context’, ‘enhance’, ‘prevailing heights [generally 3 storeys]’- existing built context. This is being abrogated at Phase 1, where a disproportionate density dump is still planned, with grotesquely outsized buildings being shoved opposite EXISTING Edwardian and Victorian buildings which should at a minimum be locally listed if not part of a proposed conservation zone [far more qualified for the latter than the Larcom Street area, in fact, at least with respect to Henshaw Street itself] of approximately half their height. This is an outrage in itself, but makes a mockery of LA planners and this document -even with its ignorance of the place made horribly obvious here. Specifically; a kind response to this would be to ‘blame’ the line, which runs on the west side of Balfour Street thus excluding that side from the planning strictures which would make the new development relate to the existing built context. As planners I ask you whether such cheap sleights are what motivate you? Or do you think you ought to tackle this thorny but naturally just issue at this opportunity? I want to suggest that you articulate the relationship over the line as you do within the line; that is, that new developments will respect existing built context where the OA ‘line’ runs lengthways along a street so that no convenient loopholes can be exploited as in the case of Balfour Street where the case is so very obvious. Your policy is meaningless if it does not take on this issue and add some bite in to it. There should be a presumption that where the line dissects a street like this the same policy as applies within the line would apply on the facing street and immediate context. Local listing; given the weakness of policy here, I want also to strongly suggest that the buildings on the east side of Balfour Street, including the Balfour Street Housing Co-Op, the end terrace 87-91 linked to the entirety of Henshaw Street, the Vicarage and the north-side of Chatham Street are at the very least locally listed. Conservation status; further I would like you to consider and honestly address the issue of when the area that I will call Henshaw Street Character Area is to</p>	<p>on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally list them. Later in the year the Council will be consulting a Heritage SPD and a borough-wide local list will be formally consulted on as part of that process. At that point, there will be an opportunity to make representations on individual buildings, prior to the finalisation and adoption of the list.</p>

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					<p>be considered for conservation status. I strongly recommend that you mention the prospect of this in this document at the VERY LEAST. Avoiding it will reveal weakness at the heart of your intentions. Either those viz. locally listed buildings of architectural and amenity value are sincere and based upon clear principle. Or they are not but instead based on lobbying or ignorance of the place. If based on principle then I will expect local listing to extend along the east side of Balfour Street in this SPD, bearing in mind that its writ is to run for 15 years. Personally I have doubts about owning property in a conservation zone but I concede that there is a strongly principled argument in favour of it. Local listing might be the minimal but sufficient solution. The purpose of this consultation is partly to inform these kinds of obvious (in this case developer-friendly) lapses, is it not? I expect to see a significant revision of expressed intention and inclusion of the Henshaw Street Character Area/potential Conservation Zone – or at least local listing as described – in the final document.</p>	
468	455	4 -The preferred option/options	SPD 12 - Parking		<p>5. Car-free; another issue of critical importance in general is your long and oft-stated policy that this quarter of central London [now also a central activities zone, one of the best served public transport hubs in the whole of London] is and remains a car-free regeneration zone. Your business partners are pushing for a 25% provision of car ownership in this car-free regeneration zone. The response is and should be very simple -with the exception of disabled provision at 10% and some allowance for car sharing clubs and perhaps electric cars. Indeed I don't see a need for a conversation at all. This draft SPD rehearses a car-free principle but you will capitulate to commercial pressure when you engage the economic viability test. I know this. You know this. Lend Lease know this. Everyone knows this. So though I would urge you to resist, when you choose otherwise I urge you to think to the future and at least not allow/encourage new car infrastructure. That is, since you will capitulate to your business partners, I'd urge that any access routes created are not roads but shared surface, brick paved or raised platforms etc. -apart from those very short runs to service large-scale retail/podia on NKR/ WR. This way, in 2025 it will</p>	Support noted.

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					<p>be possible to say that though Southwark's planners did not have the guts/wisdom to hold to their existing car-free commitment they did at least signal the ethical, philosophical, political, social, health, well-being and ecological obviousness of the truth which is that cars should be actively discouraged from this part of central London for the simple reason that everything is easily within walking, cycling or extensive public transport reach. Car-free development merges with other SPD aspirations and obligations towards a sustainable, healthy place with well-being at its core. It overlaps perfectly with stated intentions to enhance pedestrian and cycling and other healthy uses of the space. To build for cars in this century is shameful and grotesque but specially so when the OA is where it is located here. Phase 1 is going to detailed planning with 25% car provision planned, and that site will be accessed from a quiet leafy street with a SINC at one end of it, extensive existing green links running in every direction, very popular for pedestrian and cycling uses. To surrender to your developers on this issue on this street in 2012 undoes every good intention expressed in your document. It would be, will be, pitiful. It is entirely up to you. Phase 1 is the test of your resolve. Please locate some!</p>	
468	456	5 - Character Areas		Heygate Street SPD 27 - Built environment	<p>6. Amenity/commercial/jobs; as well as congratulating you on your provisional survey of buildings scheduled for local listing and suggesting you extend that properly according to your own principles, I want to add a note on local amenities. I'm unapologetic about focusing on the so-called Heygate Street Character Area, when almost nobody appears to know or care about it and that neglect is long felt and self-evident. Heygate Street Character Area. I urge you to take into the same consideration the retail outlets along Harper Road, the ones along Rodney Road and the ones on New Kent Road [between NKR and County Road]; all of which are essential local amenities as well as employers, though it's true that there is not a high turn-over of staff and most of the familiar faces travel considerable distances by public transport to do these jobs. However, there are two local employers in the Character Area which need your protection too; the car screen unit on Rodney Place and car-related unit on NKR, a</p>	<p>We want to ensure that there is adequate provision of affordable retail space with a mix of uses that are suited to both large and small retailers. The shops on Harper Road and New Kent Road are currently within protected shopping frontages. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally list them. Later in the year the Council will be consulting a Heritage SPD and a borough-wide local list will be formally consulted on as part of that process. At that point, there will be an opportunity to make representations on individual buildings, prior to the finalisation and adoption of the list. The purpose of the SPD is to coordinate an overall vision and framework and intends to get away from a piecemeal approach.</p>

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					<p>site [Surdaw House No. 17 p20 fig 6] which is ear-marked for future development; a mortifying thought given the wretched history of [directly] related infill in the area. One small point here is that I urge you to consider a traffic-noise sensitive route through the Surdaw House site when it comes to development there -as your stated policy would suggest is necessary. Locally listing these amenities is vital to slow or prevent the random/piecemeal approach to development that has had such a catastrophic effect on Muntun Road and which now threatens the NKR run of shops [north-side]. The complete absence of rigour, principle or dare I mention quality [short term fix only defers the very substantial issue of housing for further 20-30 years; pathetic! Think Spa Green Estate, Finsbury in the Great Depression; no excuses. Well, ok we don't have Lubetkin but LL have been working with Arup -albeit not Ove!] in these infill developments has and will continue to undermine all the efforts expended elsewhere. It must STOP! I would go so far as to state that the LA has long abandoned responsibility for planning in these areas and the buildings which it has given approval to; all along Muntun Road over 10-15 years being one truly pitiful example, or the disgusting [non-compliant] aberration on the corner of Balfour Street and Henshaw Street from about a decade ago, the eyesore at the corner of Browning Street from recent years, make this obvious to all - not least the architects and developers gearing up to develop the regen footprint. One way to raise standards, or to obtain standards, would be to locally list the buildings I suggest and I urge you to do that immediately. There are other candidates for local listing of course, but one that deserves special attention is Erlang House on Blackfriars Road; an elegant example of its kind, a good, functional building to this day. Another is the important cluster of Victoriana at the north west end of Walworth Road.</p>	
468	457	4 -The preferred option/options	SPD 20 - S106 Planning obligati		<p>7. Regen benefits/106 monies. I know that most of the Section 106 monies will literally disappear down the tube and regard this as an obscenity given central government's failure of responsibility for decades in this respect [my direct experience of that failure dates back 25 years, having paid once I will now pay again]. I know that the LA has fought</p>	<p>We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate</p>

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			ons and the commu nity infrastr ucture levy		hard on this front but it is still a matter of profound shame. The issue is how to minimise the consequences. One of those is to hold to a proper proportion of socially rented new housing in the footprint itself as well as the OA. Another is at least as important. 106 monies are usually used for public realm improvements. There seems to be a lack of clear thinking here in the SPD, in that there is almost no point in building lots of new housing, including new social housing, if the place they are built in remains so poorly served. If, as soon as new and existing residents step outside their homes to look for family, friends, education, employment, fun, medical services etc. they encounter an unchanged and seriously neglected public realm riddled, for one thing, with deadly motorways, ridiculous existing and unused road capacity in place of proper provision for walkers, cyclists, the very young or old, and those with limited mobility.	improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
468	458	5 - Character Areas		Heygate Street SPD 28 -	Public realm; Heygate Street Character Area; I will use Phase 1, Balfour Street as an example of this problem. Balfour Street and its immediate vicinity has seen almost nothing whatsoever contributed by the LA to its public realm in the 20+ years I've lived here. The road was resurfaced	While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally list them. Later in the year the Council will be consulting a Heritage SPD and a borough-wide local list will be formally consulted on as part of that process. At that point, there will

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				Natural environment	<p>with a couple of speed 'bumps', almost comically. There was some small adaption made with Barclay's Bike scheme monies. Four trees were offered as a gesture of apology for the extensive loss of trees at Phase 1 [albeit explicitly not linked to the loss and imminent replacement of those trees] and were accepted as an apologetic recognition of an appalling lack of consultation on the Phase 1 plans/process. Green link improvements to the south-east, generated by the commitment of nearby residents, were welcome but stop at Balfour Street! That's it! To proceed after decades of neglect, followed by years of abandonment since the late 90s and especially since 2008 and then to have suffered such abusive behaviour from the LA during the foreshortened process of demolition and to end up without significant improvements, over and above anything done within the site's red lines, would be an abuse too far. It would mock all talk, however vague it has become, of regeneration. Instead, it would disgrace all concerned within the Local Authority. I and many others applaud the intention in this document to develop green links, green routes, green corridors [three quite distinct thing sin fact] and Balfour Street is a prime -if not the prime- example in the entire OA of where this can mean something and mean the most. This is something that the LA ought to be planning immediate full and proper consultation on during 2012 and/or alongside the planning application, over and above anything that Lend Lease must be required to restore, recompense and deliver within the site itself in terms of replacement large species trees on Balfour Street. Such links would formalise existing informal ones in every direction, between two SINCS [Nursery Row is a SINC in all but formal recognition] but crucially to the north where there is such an obvious and actual dog-leg link and continuation with Harper Road and its tree-lined under-exploited widths towards London, Southwark, Millennium, Blackfriars and Waterloo Bridges. The obvious actuality of this very popular and convenient link has plainly never been realised within the Council. However, anyone buying off-plan at Phase 1 [a clear reality] will immediately see this link and its proximity to the City as well as the rest of Central London. If you add to that sophisticated-if-obvious analysis a desire to</p>	<p>be an opportunity to make representations on individual buildings, prior to the finalisation and adoption of the list. The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to reflect this. The wording in SPD16 has also been changed to ensure that development considers the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings. As a result, areas such as Balfour Street which border onto specific areas of development such as the Heygate, will also benefit from developments and improvements.</p>

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					avoid the motorways that cut through the Elephant and Castle, there is a clear and urgent need to enhance, well!; see, recognise, understand and then begin to enhance the existing green corridor that Balfour Street represents. NB See p. 87 figures 21 and 22. Two really obvious lapses; 1. The absence of local listing on Balfour Street, Henshaw Street, and Chatham Street vs. proposed local listing of Rodney Road Estate. I demand a clear explanation of this absurd lack of consistency and its correction. 2. The missing green link or route along the length of Balfour Street and any cognisance of the link eastwards that John Maurice Close already represents to Searle's Road, linked parks and to Tower Bridge Road with its tree-lined avenue!	
468	459	4 -The preferred option/options	SPD 18 - Open spaces		8. Trees/Canopy/Urban Forest/Green Infrastructure; I'd better come to this essential and centrally important issue in this deprived and polluted part of London. Again, I thank you personally and applaud your taking on board my own feedback on trees and the embedding of CAVAT in this SPD which is a proper but also bold move. It sends out the right signals, especially given how weak those signals have been until very recently! I am aware of varying policy take-up of CAVAT as a mechanism of valuation and that some other authorities are or may be slower to take their responsibilities as seriously as Southwark have in this respect. However, it is all about implementation and that is a test of your will. So in general I would ask you to take an approach towards the wording and provisions on trees and green infrastructure that presumes you genuinely subscribe to the intentions contained in the London Plan for example to protect/ preserve/ nurture/ enhance trees in particular but also green infrastructure [green spaces, biodiversity, green links, canopy cover, continuousness of canopy, protected species, recognition of eco systems etc.] and actually want to ensure that those intentions are fully implemented so that you and residents with you can be proud of having led by example on these issues. Put simply; please act as mean it. Do not use the word legacy lightly, since we all benefit in the OA from a rich legacy from the 1970s which is currently under threat from extreme short-sightedness. This is any easy accusation to make in a sense, difficult to elaborate or make watertight. I	SPD 18 sets out how we will expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest. This is our first principle for all development proposals and we will seek to retain as many trees as possible in the area.. SPD 18 states that where trees are lost, they should be replaced by new trees which result in a net improvement in canopy cover as measured by stem girth. If this is not possible, s106 planning obligations will be sought to improve tree planting elsewhere in the opportunity area. We will also require a tree survey to be submitted with all development proposals where trees are affected both on and adjacent to the site. We have set out in SPD 18 how we will use street trees to green streets and reinforce planting where trees are integral to the historic townscape. Streets should have at least 60% canopy cover. This approach is in line with the policies set out in the London Plan, including Policy 5.10 urban greening and policy 7.21 trees and woodlands. There are currently no plans to prepare an SPD in relation to trees specifically, additional guidance is set out in the council's sustainable design and construction SPD and we may review this guidance further through the forthcoming Development Management DPD.

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					<p>will try to give some concrete examples. Firstly, I'll point to the elephant [!] in the SPD as it were; the regeneration and its footprint which contains a 450 tree maturing forest. If these are the wrong trees in the wrong place then that applies to St James' Park and almost all other successful green/tree/forested areas of London. It's true that the forest can be deepened and broadened in terms of species, in particular with native tree species, however there is plenty of scope for that in surrounding and linked areas, streets, new green links/routes/corridors. At present, this is being used as a way around the destruction of hundreds of trees in the regen footprint which would magically enable biodiversity targets to be met because they could be replaced with decorative ones. This is a disgusting sham. I urge you to write an SPD in relation to trees and green infrastructure AS IF LEND LEASE WERE NOT YOUR BUSINESS PARTNERS AND A MASSIVE REGENERATION WERE NOT UNDERWAY CENTERING ON AN UNAKNOLEDGED FOREST. Negotiations can begin thereafter, but I strongly urge you to break the pattern of surrendering before the fact*. (*If you feel this is unfair, I draw you attention to the evaluation of the forest at £700,000 by the LPA prior to its 'sale' to a private developer, who under intense pressure from the local community were forced to undertake a proper CAVAT survey which came out with values almost identical to those achieved by the same local community; c £15,000,000. That process recognised that the LA had massively and shamefully ignored and so undervalued the Forest at the heart of this very document. Shall I go on?) .I Urge you to formally acknowledge the acceptance of the London Plan in this SPD and its provisions on trees and canopy cover in particular. . I urge you to abandon the kind of sleights there are in your Tree Strategy, good and radically improved though it is, whereby the replacement value of trees using the CAVAT mechanism ONLY APPLIES TO TREES WITH TPOS, according to the testimony of your own Urban Forester, Oliver Stutter. . I urge you to be explicit in this document that every tree's value will be recognised by CAVAT and replacements valued by the same method. (The High Court held that a 'tree' is anything which ordinarily one</p>	

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					<p>would call a tree. (Bullock v Secretary of State for the Environment (1980) 40 P&CR 246). . I urge you to state unequivocally that in Southwark you will formally recognise the assumption in law regarding TPOs which is that a LA is already presumed to be protecting publicly owned trees as if they were TPO'd and/or that CAVAT is the measure that will apply to every single one without fail. . I urge you to be explicit about how any and every redevelopment or development will be held to these standards of valuation for green assets, that every tree, not 'those of a certain age', not 'as many as possible', not 'a majority of mature ones', but every tree will be protected as if it had a TPO (I know these are limited in their effect too. Again; the High Court held that a 'tree' is anything which ordinarily one would call a tree. (Bullock v Secretary of State for the Environment (1980) 40 P&CR 246) because no trees should be destroyed without publicly available reports from more than one source on the health of that tree. In exceptional circumstances where a single tree is to be destroyed, the replacement value of it will be calculated using CAVAT without fail or sleight and replacements MUST BE PROVIDED WITHIN THE SITE OR WITHIN SIGHT OF IT in all but the rarest of circumstances. . I urge you to rule raise your standards so that every existing large species tree is required by you to be replaced by another/more large species tree. To meet London Plan and other objectives, canopy cover can only be achieved with large species trees. There are not enough of them. So along with planting more large species trees those that exist, for example in the heart of the regen footprint and all around it, must be protected, preserved and enhanced and/or, if proven necessary on a tree by tree basis with more than one professional opinion sought and with extensive tree by tree consultation with residents and concerned parties, must be replaced using CAVAT valuations with equivalent trees. That is; with large species trees. . I urge you to rule out any possibility that a 50 year London Plane, or Lime or Sweet Chestnut can in any circumstances whatsoever be replaced with non large species trees. Three cherry trees do not an Oak tree make... a bunch of silver birch saplings in a concrete box in the ground do not a canopy replace... . I urge</p>	

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					<p>you to explicitly refute any suggestion that decorative trees, green roofs and green walls have any replacement value for trees lost. All are welcome (and green roofs where food is grown have their own benefits) if insignificant additions to tree canopy requirements and replacements. Context; I would compare your SPD on trees with, for example the City of London's. The City only has some five times as many (private and publicly owned) trees as Southwark has in Elephant and Castle Urban Forest alone, but then it also has a very low density of residents too. The City does not propose to embed CAVAT in its tree policy but it is otherwise far more ambitious and EXPLICIT than Southwark in its tree policy. It specifies that not only will it meet London Plan objectives for canopy cover but it will specifically aim to increase large species trees in its Borough by 5% by 2019. Further, it specifies that large species trees must be replaced by large species trees when threatened during development work and defines what that means too – all of which exactitude is missing in Southwark's SPD. I believe that Southwark are deliberately avoiding any tough aims, provisions or wordings in order not to upset its current [but by few means guaranteed future] business partner. If you are not doing that then you need to be much more specific in all these regards. The intention should be that it must be very difficult indeed to destroy a single large species tree anywhere in the Borough and specifically and especially within the OA. Where those large species trees form a woodland, by your own definition, which the E&C forest does, or notable clusters, where CAVAT values are high because trees were planned, are highly accessible, do actually ameliorate noise, pollution and other health problems, or where they offer continuous and extensive canopy cover it should be almost impossible [as with a listed building] to destroy a single tree, let alone trees in their tens, or as you are presently perfectly content to allow, in their hundreds. If a single mature large species tree worth hundreds of thousands of pounds using the smallest government department's own mechanism, must be destroyed then the cost for destroying it MUST be significantly high. CAVAT values need to be translated into</p>	

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					<p>significant ratios of exchange so that developers have to think very hard before they take the easiest, cheapest, most short term course of action and cut them down. Those replacements, should destruction arise, need to be set at the highest value imaginable. Please take a lead in this respect. You know the issues perfectly well; I urge you to act accordingly... Replacement trees should not, like those 'affordable' houses, be transferred miles away to the leafy less-densely populated south of the Borough – or even the further reaches of the OA I would suggest, unless absolutely necessary and with resident's genuine agreement. If a single large species tree is to be destroyed, the replacement must be planted within the same site, in this case within the footprint of the regen site, commonly understood and defined at about 11 hectares. [E.g. large species trees already destroyed at Phase 1 MUST BE replaced within the site as per your policy here of establishing a net increase in canopy cover. The cost to the/any developers is minuscule, the benefits for existing and new residents priceless.] If this proves actually impossible then they must be replaced with natural human eyesight of the site. If that proves impossible, as in this footprint-wide instance it might, then they must be replaced with a continuous linkage to the site. That is, in this case, if a tree must be destroyed it should be replaced in the proposed park or along old streets, or along new routes. If not then there is extensive linked green infrastructure as well as completely treeless streets, that will accommodate replacement large species trees. If this does not absorb all the replacements then they should radiate out from the heart of the regen footprint along green links, routes, corridors starting at its centre and working out. Be ambitious!!! Why not in this case, work towards the river bridges as was once envisioned? E.g. Southwark Bridge Road; not a single street tree for most of its course, yet its a major cycle route and is not a major transport route. It is the only bridge with cycling infrastructure in central London and its road is uselessly wide and barren. This is a perfect example and argument against any loose talk about where replacement trees should be required to go. If so many large species trees are destroyed that their large species replacements cannot be</p>	

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					<p>accommodated within the site, or contiguous to it -in Steedman Street or Meadow Row or filling in gaps in various streets surrounding the footprint like Balfour Street for example- and within the OA then start planting along Southwark Bridge Road. Replacement Trees. The trees in the existing E&C urban forest are the right trees and they are mostly in the right place. However, to avoid any more sleights on the issue of large species I urge you to adopt the list of large species trees specified by the CIRIA in its own paperwork, namely; alder, ash, beech, elm, horse chestnut, lime, oak, plane and walnut I'm aware that some of these species are not considered appropriate for high density London contexts, or that there are diverging views on the subject. What is important is that the large species trees are able to grow to full height [i.e. 15 metres plus] and body and provide the canopy cover which is so vital for all of us. Again, this is another argument in favour of retaining existing maturing, fully articulated large species trees in the middle of the OA site and of adding more of those species beyond it. But I would point out that recently developments on Cheapside have funded the planting of two of these native species; Oaks and Beech, in the street. . Finally; I urge you to think these policies through in a joined up way. So that where there are existing trees, where there will be the new trees already explicitly required and where replacement trees may have to go, there should be green links/ routes/ corridors for pedestrians, baby buggies, mobility scooters, cyclists etc. While this strikes me as exceedingly obvious as a principle to take forwards it is also important to point out that there are places where the provision should be distinct. Green links as such, have usually meant meandering, off-road pedestrian linkages 'round the houses', no? So it's inappropriate to force bicycles along those kinds of routes. Elsewhere, where proper cycle lanes have for so many years been required and must now be built, there is usually plenty of space for pedestrian use too. The rub comes wherever they come together to negotiate either retail clusters or the crossing of motorways in the OA, i.e. at NKR. Here the crossings therefore MUST be the most accommodating presently conceivable to all users of these healthy life</p>	

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					affirming green links/routes/corridors.	
468	460	4 -The preferred option/options	SPD 18 - Open spaces		<p>9. Overall on the trees/green infrastructure issue, I hope that Southwark can/will realise, understand and fully embrace how it could turn this new town centre into a place of real character by making it not 'one of' the most sustainable but why not London's best, most ambitious green zone? This can be achieved at minimal cost, is absolutely right and would finally add in much needed colour, character and purpose to a vacuous regeneration process at very little cost and significant improvements in well-being. The material required, the means and timescales are all relatively minor in cost. The benefits are now quantifiable and significant. If I ask you what is the purpose of this regeneration, or if I ask you how you would articulate the ethics of this regeneration what would you say? I don't think either of these questions has been or can be answered in all honesty. By turning it into a uniquely forward thinking green centre, including a green economic zone for instance, you would achieve both of those weighty and ambitious things. It would be to your enormous, indeed lifelong credit if you were willing to do so. Doing so would grant a coherence to all the disparate policy drives and the varying economic contexts and the demands and requirements even hopes of existing residents and workers as well as visitors and passers by in one economical, unique and future-proof way. It immediately offers a handy clutch of good and clear objectives that could run through all elements in the SPD and regeneration and answer all questions about why you are doing this and not doing that? It would establish a set of clear values, ones that are very widely shared and which are beyond dispute Armed with such a single, simple, clear goal and its natural corollary of values, a set of imperatives would clarify and, for example, the idea that Lend Lease at present still intend to chainsaw a small forest down to build shops in the belief that shops solve all humanity's problems might obtain the degree of skeptical scrutiny it so obviously requires. So please celebrate the provisions you have here already to recognise the forest at the heart and along many limbs of the OA and find the dignity to build on those provisions in the ways I suggest. If you do so, you would directly impact every single resident's</p>	<p>The purpose of the Elephant and Castle SPD is to provide a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. Theme 6 of the SPD, Natural environment: Sustainable use of resources sets out a number of objectives including to;</p> <ul style="list-style-type: none"> • Promote a network of high quality open spaces which have a range of functions including recreation, children's play, sports and food growing. • Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes. <p>SPD 18 sets out our approach to green infrastructure which include maintaining and improving a network of open spaces and providing new open spaces such as the public park as part of the Heygate redevelopment. We will also promote strategic green routes and expect all development to improve the overall greenness of places, and expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest. The London Plan vision for the area also states that there is scope to create a series of connected public open spaces complemented by environmental and traffic management improvements.</p>

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					lives to the better in ways that you know very clearly and well and which are incontrovertible. Why you would not do this? What competing objectives override well-being, health, ecological sanctuary etc?	
468	461	5 - Character Areas		Heygate Street SPD 28 - Natural environment	<p>10. Public Park/ publicness of 'public' park The SPD and regen masterplan refer to the creation of a new and much-needed public park through/ in the regen footprint and OA; SPD 18 p 60. I think you will know why I applaud that and may be aware of my having done so repeatedly. It is the beginning of the solution and a good start on some of the things outlined above. Of course it needs to be toughened and expanded, and I am certain that both will be achieved. Certain that the who, how, when, where questions will be answered collectively and no longer in a top-down way as has been the case until very recently when resident-led bottom-up pressure forced this major rethink of the disastrous masterplan agreement. However, it is of critical importance that the publicness of this proposed public park is real. That is, Lend Lease are using the offer of a public park as a sweetener to get this massive masterplan full of contentious elements through by appealing to a notion of giving something to the community. If that park is not fully and properly public then this is a further con/ wheeze/ sleight. So, it is essential that the publicness of the park is made explicit in the SPD and in any approved masterplan. Southwark must not create yet another private 'public' park, like the private you must be fully aware of that. I refer you to the proposed river park and it's failure to offer anything remotely convincing as public space. I refer you to ongoing fierce debates about Paternoster Square and advise you not to attempt to create another Paternoster Square in the Elephant and Castle urban forest. Such a model is wholly and entirely rejected I've heard planning officers and civil servants state that the LA would 'take back' into public responsibility and ownership any such park. This is an obvious sleight, even if a well intended one. Lend Lease have for months been using a transparent buzz word; 'safety'. They want the heart of their regen to be safe, as safe perhaps the Heygate Estate is at present according to police statistics if not to police yarn/mythology. 'Safety'</p>	<p>Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces. Further information on how we will improve the quality of open space provision in the borough, including through the increased involvement of local community groups and promoting interim uses, is set out in our draft Open Space Strategy which is currently out for consultation and is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy</p>

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					<p>means private in this lingo. I know that and so do you. It is essential that this is confronted in the SPD and beyond because this is not an approach that will work. The park will either be public OR it will be private. It cannot be both. This one must be public The related issue is maintenance and here I think the issue deepens. I'm not sure if it's the role of an SPD to specify anything on this particular subject but I am sure that it should not avoid it because that will be to cede to the privatising of a speciously named 'public' park. I would suggest that while new residents and new retailers/businesses will probably pay service charges sufficient to cover maintenance of the park, existing residents must be an equal party to whatever body makes these kind of decisions now and in the future. That would generate a situation whereby, over time, new residents would bed in to the community and be more likely to understand the place and the requirements of publicness better, even if they and not existing residents will be paying the service charges. Existing residents have already paid far more than service charges for years mounting to decades... I would urge you to face up to this issue now, in some form in the SPD because it won't go away and is a guarantee of very significant friction to come. I personally commit to helping lead protest on this score and issue because it is right and therefore it is necessary. The public park needs to be described as a park with the same characteristics and, for the sake of a better term, bylaws as any other public park in Southwark and London and open at all times as it is now. You must stand on principle to prevent the retailers dictating how the public park might be used. There is no conflict between safety and publicness. Or if there is any potential for that it is exactly the same potential as conflict between safety and Southwark. This is an issue of the utmost importance and this SPD is the place to address it in large-scale principle at least. I expect to find it in the final document. Example/elaboration; a quick example of the implications of this is Interim Use which I'm glad to see finally acknowledged by Southwark in this document. Interim Use is there for obvious public amenity and welfare reasons as well as those of natural justice. If the park is truly public then there is no reason why the existing</p>	

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					open space cannot [with detailed exceptions around specific short-term demo work and nothing more] remain open to the public as it is now, allowing Interim Use, the growing of food, recreation, exercise and access to peace -as well as scrutiny/monitoring of the trees and Forest. If the park is intended to enshrine publicness then the principle is clear and can be achieved pragmatically with the local community. If it is in fact to be privatised, with all sorts of obscene by-laws [no photography with tripod, etc.] then there is no principled logic to Interim Use and I am certain that abuses will continue and be consolidated throughout the process as a result. You won't like this logic I know because it's messy. Messy is what democracy and accountability is. Messy is what the ethics of regeneration requires. Seek to avoid it and you will feel the consequences with a London-wide level of scrutiny and bad publicity at the very least for years to come.	
518	37				As you will be aware the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008, Regulation 2 (2) (d) lists The Coal Authority as a Specific Consultation Body across the whole of England. In the interests of efficient use of resources as your administrative area lies wholly outside of the current defined coalfield, it is not necessary to specifically consult The Coal Authority on your emerging planning policy documents. Please accept and retain this letter as the formal consultation response of "No Observations" from The Coal Authority for the purposes of meeting your procedural consultation requirements. Please note that from the date of this letter we will not respond individually to any development plan consultations that you may send in the future.	Noted
545	99		SPD 5 - New Homes		By way of background, SOUHAG represents all Registered Providers who own, manage and/or are developing social, intermediate and shared ownership housing in Southwark. We include more than 20 separate organisations and between us we own and manage over 11,000 homes in the borough, with a development programme of many more. We have kept our response brief and, hopefully, to the point. This means we have not always included detailed explanations as to why we hold a particular view, but if you	Noted.

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					would like further explanation or clarification on any point, please let me know.	
545	100		SPD 5 - New Homes		<p>1. SOUHAG notes that most of the proposals relating to housing and to affordable housing in particular are already covered by existing policy in the Core Strategy and saved Southwark Plan, so not open to consultation. For this reason, our comments are brief. 2. SOUHAG welcomes the commitment to new social and affordable housing as part of the SPD. Notwithstanding point 1 above, SOUHAG do want to state that we do not think the requirement to develop homes for private sale on all sites of 10 units or more is workable. Many sites in this area are already marginal, and this restriction would make them unviable. There is no reason why this approach should not work on larger schemes, including regeneration schemes, but not on small schemes (which are likely to be one block of flats). We think that if this requirement is to be introduced, the site size threshold should be increased to 20+ units. There should also be some flexibility on a site by site basis – we acknowledge that in some part of the Area homes for private sale are viable, but in others they are probably not. This requirement would definitely deter some RPs from developing in the area. It is likely that many private homes would simply be sold as buy-to-let (particularly in these lower value areas) and the problems this can bring have been well documented. We would argue that housing allocations policy is a better way to create a mixed community, without reducing the supply of affordable housing. We agree that a diversity of tenure is a good aim, but do not think trying to ‘force’ private home ownership will work in all areas. We suggest that there should be flexibility to consider other options within the proposed 35% housing for sale, such as allowing an RP to develop it as some form of low cost home ownership.</p>	<p>The site size threshold should be increased to 20+ units: The Core Strategy set out the policy on a minimum percentage of private housing, including the reasons and evidence for the policy. This this cannot be changed through an SPD. However, we are looking at this issue as part of our preparation on the Affordable Housing SPD to see whether there is further guidance that we can provide on implementing this policy. We note that SOUHAG have also responded to the 2011 draft Affordable Housing SPD, and we will be looking at your response and providing an officer comment to the response when we publish the next version of the Affordable Housing SPD. We propose to consult on the updated Affordable Housing SPD in spring 2012. For the time being, as has previously been discussed at SOUHAG (Southwark Housing Association Group) an applicant needs to submit evidence to us on a case by case basis as to why the element of private housing isn't viable. We would encourage you engage in our pre-application process as early as possible.</p>
545	101		SPD 20 - S106 Planning		<p>3. The higher rate S106 Infrastructure Tariff (and future CIL) are a concern, especially if this is in addition to the levy from the GLA. This will have an impact on viability of schemes and the level of affordable housing may suffer as a result.</p>	<p>We have undertaken an impact of the proposed tariff on the viability of development. This study is published on our website. The study showed that generally the developments tested should be able to provide 35% of homes as affordable housing and provide funding for the</p>

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			obligations and the community infrastructure levy			tariff.
545	102		SPD 5 - New Homes		4. The proposed internal and external noise level limits are welcomed.	Support noted.
609	38	4 -The preferred option/options	SPD 4 - Jobs and Businesses		From BBI's point of view, the Elephant and Castle presents a unique opportunity for us as a borough to get things right. There needs to be provision of small business incubation units to cater for all types of businesses, especially at a time when youth unemployment is a major problem in our borough. This will provide opportunities for the unemployed Southwark citizens to explore self employment of various kinds for self jobs creation. Therefore, a mix businesses premises catering for different kinds of business interests such automobile services, creative digital marketing and communications services, catering and hospitality services provisions, just to name a few, will certain go a long way in meeting the expectations of South citizens who often believe they always lose out on regeneration programmes such the Peckham Programme one of few years a go.	The requirement to provide new business space in a range of unit sizes is set out in SPD4. We have amended the supporting text to also recognise the contribution which incubator space can have on enabling small enterprises to grow.
610	39	4 -The preferred option/options	SPD 16 - Built form		I got this email from the Elephant & Castle project. I would say do not use any more of that dirty glass (as used in the Shard) it look absolutely awful as if the windows have never been cleaned. It certainly does not reflect the seasons (which I believe it is meant to) as our weather system is mostly grey skies and therefore it is not appropriate. Even in the sun it still just looks like dirty glass. Also I would say be careful about balconies. It used to be that people would sit/stand in their balconies for fresh air. Nowadays balconies are no more than dumps with washing lines tied from ear to ear of the balcony, bikes, even mattresses etc lying in them for ever. Of course the Environment Agency should take action	SPD 16 , 27 and 31 all refer to high quality design and the use of appropriate and attractive materials. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and Access Statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: • safety • security • accessibility • the relationship between

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					<p>against these people who make the environment look filthy for everyone but in this day and age where to being allowed to destroy the environment is "power to the people" nonsense it is for the planning committees to only pass plans where this sort of nonsense does not prevail in the first place.</p>	<p>buildings and their surroundings</p>
611	43	4 -The preferred option/options	SPD 10 - Public Transport		<p>I am a local resident who does not own a car and therefore use public transport, mostly buses, for most of my travel requirements. In the SPD, reference is made to 'overcrowding and poor reliability of bus services at some times, congestion caused by the high number of buses at bus stops' and 'the need to improve bus, tube and rail facilities'. Elsewhere in the document there are repeated references to the need to take into account the impacts of changes on well-being and health, safety, security and residential amenity, and the current situation where we have 'a traffic dominated road network that severs neighbourhoods and creates hostile public realm'. The plans for the built environment specifically require that they should 'promote a high quality public realm that is safe, secure and attractive', and 'conserve and enhance the historic environment'. 'Limitations on traffic will reduce pollution' as well. So how does ail of that square with changing London Road to bus-only operation and St George's Road to two-way operation for all other traffic? To take an easy one first: reduced pollution? By increasing hugely the number of vehicles going along (and sitting stationary belching fumes in the absolutely guaranteed huge traffic jams in both directions on) St George's Road? I don't think so. Another easy one: 'a traffic dominated road' and 'a hostile public realm' - that will be exactly the description for St George's Road. This road is largely residential, with schools and a museum as well. Increasing the number of cars driving along it will make it a much more dangerous place for the large numbers of parents and children who have to use it. At present the buses, while noisy and polluting, do have the significant effect of taking up half the road and have a very definite slowing effect on the rest of the traffic. The SPD repeatedly refers to the need to reduce congestion of both buses and passengers at stops. This will not be served by putting all the</p>	<p>The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.</p>

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					<p>stops on one road. For a start, it will merely mean that the tail-backs of buses are twice as long, with doubling of pollution levels (even with some 'hybrid' buses - not all are, or will be, that type). Secondly, there will be even more stops to confuse passengers. At present there is at least some logic to the location of stops - the westerly routes (Lambeth/Westminster bridges) are on the more westerly road (St Georges) and the more easterly (Waterloo/Blackfriars bridges) are on the more easterly road (London). For the even more easterly (London) bridge, one takes the next easterly road. I really hope you are not proposing to bring in a situation where buses in one direction (eg towards Parliament Square) go from different stops along the road, thereby effectively reducing passenger choice for those of us not able to sprint between stops when we realise that the next bus to where we want to go will be going from the stop 50 yards up the road. Congestion of passengers will not be eased, but most certainly exacerbated, by having all the stops on one road. A long line of bus stops is no use at all to passengers - it will just be a solid wall of buses inching forward and groups of people will have to inch along with them, until such point as the driver decides to stop and allow them to board. There will be large numbers of people trying to find the correct stop from a vast array, and they will be obstructing the equally large numbers of people who are rushing to get to the bus which has opened its doors 100 yards up from where it should be, in the endless line of waiting buses. Are you going to make the pavements wider to improve pedestrian space? How will that provide more space for buses to pull alongside? The argument that this change will bring the majority of services within a short walk of the Bakerloo line and Newington Causeway does not have any strength at all: the distance around the corner (or up Princess Street) from St George's Road is negligible, and putting stops all along London Road would probably mean that some are actually further away from the Underground than they are now. The SPD is quite definite that housing should not be too close to major roads, and new dwellings are not permitted where they only have windows onto a main road. That is the case for a significant proportion of the</p>	

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					<p>existing flats on St George's Road: why is it acceptable for existing residents to be subjected to a further reduction in air quality and noise, if new ones must not be so treated? Lastly, exactly how does this proposal 'promote a high quality public realm that is safe, secure and attractive', and 'conserve and enhance the historic environment' in St George's Road? As far as I can see it will turn one of the few tree-lined residential streets in the area into an urban dual-carriageway of cars and lorries which will be alternately stationary or revving the engines madly to leap away from the traffic lights, with concomitant increases in noise and pollution levels. That is very definitely not either a high quality public realm or an enhancement to the historic environment. Later.... Someone has just pointed out to me that the SPD is not actually clear whether the buses which currently run along St George's Road would be moved to London Road. I make no comment on the readability of a document which I, with only 5 years of postgraduate education, may have misunderstood. If the proposal is for the existing bus routes to remain on St George's Road, and 'simply' to add in all the other vehicular traffic from London Road, it moves matters from unacceptable to unbelievable. You would be increasing the levels of pollution, congestion, and noise on a residential road to appalling levels - I would imagine quite possibly illegally high in at least the cases of noise and pollution at peak times - and catastrophically reducing the quality of life for all those living, attending school, or walking to the museum or cathedral, along the road. There can be no adequate counterbalance to such a major loss of already limited amenity. Please do not make this inappropriate and deleterious change. A better solution would be to improve signposting for where you can find buses in which directions, and to provide better waiting space for passengers. Continued mixed bus and other vehicle use for both roads is a far better balance in terms of noise, pollution, traffic speeds, danger to pedestrians, and general amenity for those who use and live along the roads.</p>	
612	44	4 -The preferred option/options	SPD 10 - Public		I am a resident living on St Georges Road and it has been brought to my attention that Southwark are considering changing the traffic flow to make it two way. I believe this	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would

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			Transp ort		would have an impact on me and the other residents of St Georges Road. It is much more of a residential road than London Road and the increase in traffic would make it noisier, dirtier and more dangerous. There is a constant flow of traffic on this road and if it is two way traffic it will become even more congested. I don't see why the current system cannot stay the same with one way traffic in both St Georges Road and London Road which allows both roads to take the share of heavy traffic. The change would not make the road any safer to either pedestrian or cyclist. I believe the cost of changing the road signs/ road markings would be huge and far outweighs any sort of planned improvement. Is there going to be a proper consultation with the people who are going to be affected by this proposed change.	only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
613	45	4 -The preferred option/options	SPD 10 - Public Transp ort		I recently heard about plans to divert all vehicular traffic apart from buses on to St George's Road, making it two-way, leaving London Road for buses only. This seems like a very bad idea to me. For one thing, St George's Road is largely residential, and you'll be putting a huge amount of traffic on to it. There are several schools along that street, as well as the park and the cathedral, so it would become much more dangerous for pedestrians too. Also, it was only a few years ago that you spent a huge amount of money changing the configuration of London Road to provide a northbound bus contraflow. If you replan the whole thing now, that seems like a great deal of money down the drain at a time when, presumably, you don't have a whole lot of spare cash.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
614	46	4 -The preferred option/options	SPD 11 - Walkn g and cycling		In relation to the E&C SPD, I would like to make the following 2 key comments: 1. There is a need to complete the Walworth Rd project by making Walworth Rd single carriageway in each direction (with adequate bus stopping spaces). This should be applied in the northern section between Amelia St and the E&C; and in the southern section by the Gateway Estate. It is very important to encourage journeys on foot between Walworth and the Elephant and thus reduce the pressure on public transport. Currently very few people make this journey on foot even though it is only a five minute walk. Making these sections quieter and slower and more attractive for pedestrians - with much wider	Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to

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					<p>pavements - will have a huge payback for Walworth as well as the E&C/Heygate regeneration. 2. The severance caused by TfL roads, especially the northern roundabout at the E&C. The northern roundabout at the Elephant and Castle is currently the most dangerous single location in the whole of London for road casualties. While the planned removal of subways will help, more is needed to humanise this area. There is insufficient detail on this specific location in the current proposals from TfL. I would like to see included: * A reduction in the capacity of the road layout and speed of motor vehicles by A) Adopting and enforcing 20mph speed limits in the area. This is a town centre area with huge numbers of pedestrians, especially people waiting for buses. B) Removing the wide lanes and high-capacity that indicates the area as being for motor vehicles and not people. The whole approach needs to be based on the principal of Shared Space, as evidenced currently in many cities across Europe and Asia.</p>	<p>refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street. The SPD proposes considerable work to improve the northern roundabout. The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.</p>
615	70				<p>We are instructed on behalf of Ministry of Sound to submit representations to the 'Elephant and Castle Supplementary Planning Document/Opportunity Area Framework' (hereafter 'The SPD'). Ministry of Sound is a major business presence and employer in Elephant and Castle and contributes greatly to the economic vitality of the defined 'Opportunity Area'. Ministry of Sound is supportive of the Council's aims to regenerate Elephant and Castle. However, it is vitally important that the Council recognises the local and strategic importance of Ministry of Sound's business to the Borough, Elephant and Castle and London generally by adopting a development framework that provides for the continued vitality and success of Ministry of Sound and other existing businesses alongside balanced and sustainable growth. The SPD is intended to replace the 'Elephant and Castle Enterprise Quarter Supplementary Planning Document (2008)', which is considered deficient in a number of respects, not least in its encouragement for a 'city-wide scale landmark tall building' of predominantly residential use on the Eileen House site directly opposite Ministry of Sound. The Council's subsequent refusal of a planning application made by Englewood Limited for a 44-storey building of</p>	<p>The comments are noted.</p>

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					predominantly residential use on this site (09-AP-1940) has shown this land-use strategy for the site to be ill-considered and deeply flawed. The SPD acknowledges that the 'Enterprise Quarter SPD' is becoming out-of-date (Paragraph 1.3.3) and it is essential, therefore, that the Council takes this opportunity to formulate a more realistic and deliverable planning policy framework that facilitates development which is both compatible with the established character of the area and can be accommodated without threatening the livelihood of important, existing businesses such as Ministry of Sound	
615	71				Background Ministry of Sound is the world's most famous nightclub situated in the heart of Southwark. It is a multifaceted entertainment and media business employing over 200 people from its offices in Gaunt Street. The nightclub is at the heart of the brand and business, but the business also incorporates the world's largest independent music company and an events organisation that stages parties for over 1 million people per year amongst many other operations. Ministry of Sound has been based in Elephant and Castle since its establishment in 1991. The club has global appeal and plays a major role in attracting people and investment into the Borough and Elephant and Castle. Ministry of Sound also plays a significant role in the local community including hosting events for local pensioners, anti gun/knife events and organising many education initiatives. Ministry of Sound currently has an unrestricted 24 hours a day, 7 days a week licence. Its standard opening hours are currently, Friday 10pm-7am, Saturday 10pm-7am, Sunday 2pm-7am (during the summer) and Tuesday 10pm-3am (during term-time). The club is also frequently used for private hire events, which can take place on any night of the week and during the daytime. The club has a capacity of more than 1280 people, with most arriving and leaving the club over the course of the night. Ministry of Sound is a successful and thriving business, which has given the Borough and Elephant and Castle a national and international profile. It is the key contributor to the creative and cultural life of the area.	MoS's operating hours etc. are noted.
615	72	2- History,			Paragraph 2.1.5 Ministry of Sound is disappointed that the	The focus of this section is the historic development of the

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		Elephant and Castle today, challenges and opportunities			Council has chosen not to recognise the significance of its arrival in Elephant and Castle in 1991 and its own positive contribution to regeneration when recording the history of the area. In this period, Ministry of Sound has expanded from a nightclub operation into a major international media business with over 200 employees giving Elephant and Castle an identity and profile, which has helped act as a precursor to subsequent regeneration in the area	area, including its establishment as a town centre and post-war redevelopment. The final paragraph illustrates that the regeneration is moving forward. The section comprises a brief summary and is not intended to be read as an exhaustive account of the area's history.
615	73	2- History, Elephant and Castle today, challenges and opportunities			Paragraph 2.2.1 It is surprising that the Council has chosen not to specifically identify Ministry of Sound as one of the key land-uses in the area. Given its commercial and cultural significance, the reference to "commercial uses around Newington Causeway" should be expanded to specifically refer to "entertainment uses and Ministry of Sound".	This is a very short paragraph identifying major land uses. It's purpose is not to highlight uses on individual sites but to give a brief overview.
615	74				Figure 5 Ministry of Sound is shown on the indicative land use' plan at Figure 5 within a "predominantly commercial (including retail, office, warehousing and services)" area. The list of uses should be extended to include "nightclub	A reference to leisure and entertainment uses has been added to Figure 5.
615	75	2- History, Elephant and Castle today, challenges and opportunities			Paragraph 2.3.2 Ministry of Sound supports the Council's recognition that attracting further employment related investment into the area, particularly for local small and medium sized enterprises (SMEs), is one of the major challenges and opportunities to achieving a successful regeneration vision for Elephant and Castle	Support noted.
615	76	2- History, Elephant and Castle today, challenges and opportunities			Paragraph 2.3.3 Paragraph 2.3.3 should also state that the delivery of new homes must be compatible with existing land uses, especially in areas such as the Enterprise Quarter, which the Council has identified as an important concentration of education and employment uses	It is not considered necessary to amend this paragraph. Existing policies are already in place to ensure that as well as delivering new homes to help meet housing need and our housing target, we also protect other uses where appropriate and encourage supporting infrastructure. In addition saved Southwark Plan policy 3.2 - Protection of amenity, already sets out that planning permission will not be granted where it would cause loss of amenity to present and future occupiers.
615	77	2- History, Elephant and Castle today, challenges and opportunities			Paragraph 2.3.4 The Council has acknowledged that ensuring the "wellbeing" of social and community infrastructure is an important element of its overall regeneration vision for Elephant and Castle. The London South Bank University and London College of Communication are specifically identified in this context, but	A reference to the MoS has been added to paragraph 2.3.4.

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					Ministry of Sound is not. Given the significance of Ministry of Sound to the area's social and community infrastructure, it should also be expressly recognised in Paragraph 2.3.4. It is disappointing that the contribution Ministry of Sound continues to make to the "wellbeing" and creativity of the area has been completely overlooked by the Council. If the Council genuinely wants to build on the existing strengths of the area, it must recognise the existence and role of Ministry of Sound in the local economy and acknowledge the importance of maintaining its future "wellbeing".	
615	78	2- History, Elephant and Castle today, challenges and opportunities			Paragraph 2.3.8 The "delivery" mechanism for "making regeneration happen" must acknowledge the importance of ensuring that regeneration and development is compatible with the established land-use character of an area and would not compromise/harm existing business interests and important existing cultural resources such as Ministry of Sound.	The focus of this paragraph is the mechanism for helping deliver growth. The policies in the SPD provide more detailed guidance on how growth can be accommodated and mitigation measures which will be necessary.
615	79	3 - Vision and objectives			Paragraph 3.2.5 Consistent with its observations above, Ministry of Sound supports the Council's stated "Theme 1" to "renew business space in the area and encourage the development of an enterprise culture and inward investment by providing more opportunities for local people and small and medium sized businesses (SMEs)". Ministry of Sound considers that this theme is so fundamental to the regeneration of Elephant and Castle that it should be applied to the entire Opportunity Area, not just the "town centre". In this respect, it is important to highlight how the Council's own 'Employment Land Review (2010)' identifies significant demand for Class B1 office floorspace in the Borough up to 2026 and that Elephant and Castle can help to meet local demand for smaller and medium sized office premises. As there has been no significant, modern office development within the Elephant and Castle area for the past 10 years, it is vitally important that the future regeneration framework throughout the SPD prioritises the opportunities afforded by existing and surplus office accommodation to meet the increasing demands of small and medium sized enterprises in order to encourage further growth and investment in this sector.	The entire opportunity area is identified as a town centre on the adopted Proposals Map. Policies on business space set out in the SPD would apply to the whole opportunity area. Policy SPD 4 of business space is consistent with policy in the council's Core Strategy and saved Southwark Plan policies. We have amended SPD 4 to provide more support for incubator space.

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615	80	3 - Vision and objectives			Consistent with its observations in respect of Paragraph 2.3.3 above, Ministry of Sound requests that a reference be added to "Theme 2 - High quality homes: Providing more and better homes" that new homes need to be compatible with, and not threaten, existing land uses that are economically, culturally and creatively important to the future wellbeing of the area.	It is not considered necessary to amend this paragraph. Existing policies are already in place to ensure that as well as delivering new homes to help meet housing need and our housing target, we also protect other uses where appropriate and encourage supporting infrastructure. In addition saved Southwark Plan policy 3.2 - Protection of amenity, already sets out that planning permission will not be granted where it would cause loss of amenity to present and future occupiers.
615	81	3 - Vision and objectives			Paragraph 3.2.7 Consistent with its observations in respect of Paragraph 2.3.4 above, the Council must recognise the importance of Ministry of Sound to the Borough and particularly, Elephant and Castle and include as one of its core "wellbeing" objectives the need to "support Ministry of Sound as a major cultural interest in the area".	We have amended theme one to refer to the desirability of supporting arts and cultural facilities. There are a number of cultural facilities in the area and it would not be appropriate to refer to the MoS specifically.
615	82	3 - Vision and objectives			Paragraph 3.2.11 Consistent with its observations in respect of Paragraph 2.3.8 above, Ministry of Sound requests that reference be added to "Theme 7: Delivery: Making regeneration happen" to ensure development is compatible with the established land-use character of an area and would not compromise/harm existing business interests and important existing cultural and creative resources, such as Ministry of Sound.	It is not considered necessary to amend this paragraph. Existing policies are already in place to ensure that as well as delivering new homes to help meet housing need and our housing target, we also protect other uses where appropriate and encourage supporting infrastructure. In addition saved Southwark Plan policy 3.2 - Protection of amenity, already sets out that planning permission will not be granted where it would cause loss of amenity to present and future occupiers.
615	83	4 -The preferred option/options	SPD 4 - Jobs and Business		SPD4: Jobs and Businesses/Paragraph 4.1.13 Ministry of Sound welcomes the Council's stated policy objective under 'SPD4: Jobs and Businesses' to support the provision of new and flexibly designed business floorspace. However, the Council should attach a greater priority to maximising the opportunities available from existing, surplus office space. Accordingly, one of the stated objectives of the policy should be to "maximise the opportunities to recycle existing, vacant office space to help meet the needs of the local office market and SME businesses".	We have set out an objective in Theme 1 of SPD to renew business space in the area and encourage the development of an enterprise culture and inward investment by providing more opportunities for local people and small and medium sized businesses (SMEs). SPD4 reaffirms this objective by requiring existing business floorspace to be retained, unless replaced by an alternative town centre use in accordance with Policy 1.4 of the Saved Southwark Plan. We acknowledge the importance of retaining business space as it provides valuable employment opportunities for local people and contributes to Southwark's economy.
615	84	4 -The preferred option/options	SPD 5 - New Homes		SPD5: New Homes/Paragraphs 4.2.6, 4.2.7 It is vitally important that Ministry of Sound's future existence and continued association with Elephant and Castle is not	The first suggested change is not considered necessary. We refer to the need to consider design and layout in paragraph 4.2.6. Paragraph 4.2.7 specifically refers to the

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					<p>threatened by poorly planned and ill-conceived residential development. The proposed Eileen House development is one such example of bad planning which has threatened Ministry of Sound's existence and the future of this site clearly needs to be rethought with a greater awareness of Ministry of Sound in mind. The future of the proposed Eileen House development is currently uncertain with the Mayor having recovered the planning application following the Council's resolution to refuse planning permission. One of the Council's four recommended refusal grounds related to the deficiency of the scheme in noise amenity terms in providing for openable windows, as opposed to sealed windows, which it was considered would be likely to result in noise disturbance from Ministry of Sound and potentially impact negatively on the operation of its business. However, Officers confined their assessment of this planning application simply to whether an acceptable internal living environment could be achieved for future occupiers of this proposed development in sound insulation terms. The draft SPD suggests that the Council is now proposing to extend this assessment to consider whether it is practical to separate new noise sensitive development from major noise sources by using non-residential space as a buffer or orientating windows and balconies away from potential noise sources (Paragraph 4.2.6). This is consistent with the Mayor's own policy on noise (Policy 7.15B, London Plan 2011), which advises local planning authorities to consider the practicality of other noise mitigation measures such as distance, screening or internal layout in preference to sole reliance on sound insulation. Notwithstanding this, the draft SPD still proposes to confine a noise and amenity assessment of a new residential development according to whether it meets the defined noise standards set out in draft Policy SPD5 and provides "appropriate sound insulation". Ministry of Sound is extremely concerned that the Council's position in this respect is inconsistent with the approach advocated in the London Plan. As currently drafted, Policy SPD5 is a deficient mechanism for assessing the acceptability of new residential development in these terms. Ministry of Sound requests that it be amended to incorporate</p>	<p>Enterprise Quarter and the need to ensure that future occupiers do not suffer loss of amenity from sources including the MoS. The need to consider design and layout is also reiterated in policy 49. Open-able windows provide residents with greater control over ventilation, heating and cooling which are considered important aspects of a high quality residential environment. The guidance in Southwark's Sustainable Design and Construction SPD indicates that non-open-able should only be considered for the worst affected locations, e.g. very close to busy roads and for first and ground floor units and that dual aspect flats are preferred in these locations. The wording as currently proposed ensures that residents have control over their own environment. By closing windows they can ensure that good levels of sound insulation are achieved (although the SPD notes that other measure would also be required in such circumstances such as mechanical ventilation). The council does not consider that a requirement that windows are sealed would improve residential amenity.</p>

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					the following underlined insertions: • New noise sensitive development should be separated from major noise sources wherever practical through the use of distance, screening or internal layout in preference to sole reliance on sound insulation. • All new homes will be expected to be designed to attain the following internal noise levels with sealed windows... For consistency, Paragraph 4.2.6 (last sentence) should be amended as follows: “However, this may only be effective when windows are sealed and so should be used in conjunction with other solutions, such as mechanical ventilation”.	
615	85	4 -The preferred option/options	SPD 6 - Wellbeing - Social and community infrastructure		SPD6: Arts, culture, leisure and entertainment Ministry of Sound is pleased that the Council has recognised its business as part of the creative hub of the area (Paragraph 4.3.1). One of the primary planning objectives of the draft UDP is protecting the future wellbeing of these uses and Ministry of Sound is fully supportive of this approach. Ministry of Sound therefore requests that this be recognised as a key planning objective in draft Policy SPD6 through the following underlined insertion: • Proposals that threaten the livelihood of existing arts, cultural, leisure and entertainment uses will be resisted, unless appropriate mitigation measures can be taken to secure the continued existence of those uses.	It is not considered that the proposed amendment is appropriate for the objectives of the document. Rather it reads as a policy criterion. The SPD notes elsewhere that residential use should not harm the reasonable operation of surrounding businesses. This is considered to cover the point adequately.
615	86	4 -The preferred option/options	SPD 16 - Built form		SPD16: Built Form Consistent with its observations above, Ministry of Sound requests that draft Policy SPD16 be amended to incorporate the following underlined insertion: • Development proposals should: - Seek to reduce noise by separating new noise sensitive development from major noise sources wherever practical through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation.	The focus of SPD16 is urban design. We have addressed issues relating to land uses in SPD5 and SPD6. Paragraph 4.2.6 in SPD5 discusses sensitivities relating to the juxtaposition of residential and commercial uses and notes that careful consideration should be given to the design and layout of development to ensure that future occupiers have a satisfactory standard of amenity. We have also drawn attention to this issue in paragraph 5.8.10 in SPD49. An additional reference to the relationship between residential and commercial/night club land uses is not considered necessary in SPD16.
615	87	4 -The preferred option/options	SPD 17 - Building heights		SPD17: Building Heights Ministry of Sound is not opposed to tall buildings per se, but the Council must appreciate that a key factor in determining the acceptability of such a building must be the impact it could have on the future wellbeing of established businesses in the area. Poorly designed	We have addressed issues relating to land uses in SPD5 and SPD6. Paragraph 4.2.6 in SPD5 discusses sensitivities relating to the juxtaposition of residential and commercial uses and notes that careful consideration should be given to the design and layout of development to

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					schemes promoting incompatible land uses should be resisted, as should those that would displace employment floorspace capable of being adapted to meet the needs of SMEs, and those that would fail to meet both London Plan and Council policy objectives and related standards on affordable housing, noise attenuation and quality of accommodation. Ministry of Sound requests therefore that draft Policy SPD17 is amended to incorporate the following underlined insertion: • Tall buildings should: - Be planned to demonstrate a considered relationship with other adjoining land uses and ensure that new noise sensitive development is separated from major noise sources wherever practical.	ensure that future occupiers have a satisfactory standard of amenity. We have also drawn attention to this issue in paragraph 5.8.10 in SPD49. An additional reference to the relationship between residential and commercial/night club land uses is not considered necessary in SPD17, the focus of which is building heights.
615	88	5 - Character Areas		Transport Quarter SPD 51 - Built Environment	5.8 Enterprise Quarter The Council's own definition of this area reflects the concentration of education and employment uses in this part of Elephant and Castle, including Ministry of Sound. Ministry of Sound is also a major commercial entertainment venue and through all of its business interests forms part of the wider creative hub in the area. Although not acknowledged by the Council, Ministry of Sound forms part of the area's heritage and its iconic status as the world's most famous nightclub has given Elephant and Castle a national and international profile. Ministry of Sound asks that this contribution be explicitly recognised in the SPD. The Council has identified a number of strategy objectives for the area which Ministry of Sound is supportive of, including the need to continue supporting the economic and business function of the Enterprise Quarter and ensuring that new development provides appropriate opportunities for existing and future SME businesses. In this respect, it is important that the established land-use character and future wellbeing of existing businesses in the area is maintained. Ministry of Sound accepts that there may be opportunities to introduce new residential development into the area. However, this should not supplant other established uses, which contribute to the economic vitality and wellbeing of the area. New development must be carefully and sensitively planned so that the livelihood of these businesses is not threatened. The Eileen House site is identified in the Council's 2008 Enterprise Quarter SPD as being suitable for a 'city-wide scale landmark tall building', despite it being located outside	Support for the council's approach to less prescriptive guidance for tall buildings is noted. In section 5.8.7, we set out a strategy for the Enterprise Quarter. This strategy refers to the need to reinforce the heritage of the area, supports the economic and business function of the area and the activity of London South Bank University. The council will support residential use in the area, subject to policies set out in the SPD.

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					<p>the defined 'Core Cluster' area (where such buildings are encouraged) and furthermore, the 'Secondary Cluster' where 'tall, landmark buildings' of lesser scale are considered appropriate. Ministry of Sound notes that the Council is not proposing to maintain the detailed design guidance for the Eileen House site set out in its 2008 SPD in its draft replacement SPD. Instead, the draft SPD simply states that: "there may be opportunities to introduce taller buildings along Newington Causeway" (Paragraph 5.8.15). Ministry of Sound welcomes the less prescriptive approach now being taken towards development on the Eileen House site in the draft SPD. Ministry of Sound also welcomes the recognition under draft Policy SPD49 (Land Uses) that in determining the acceptability of any new residential development within the Enterprise Quarter, the Council will have regard to "the distribution of land uses", the need to ensure that the "orientation and design of buildings" is "considered carefully to ensure that future occupiers have a high standard of residential amenity" and finally, "to ensure that residential use does not harm the reasonable operation of surrounding businesses". In this respect, Ministry of Sound strongly believes that the regeneration strategy for the Enterprise Quarter should be geared towards consolidating and maintaining the future wellbeing of the existing businesses in the area, while also providing for balanced and complementary growth. Residential development should not be introduced at all costs. This is simply bad planning and Ministry of Sound is pleased that the Council is now affording a greater priority to supporting the economic, business, educational and creative functions of the area and ensuring that new development provides greater opportunities for existing and future SME businesses. A new vision for the area is needed that respects the heritage status of the area, positively provides for the future growth of London South Bank University and encourages new employment development to meet the needs of SME businesses. Residential development can be a complementary part of this process of change, but it should not be pursued at the expense of the other identified needs in the area. In resolving to refuse planning permission for the proposed Eileen House</p>	

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					development, the Council has provided a clear statement that an alternative vision needs to be found for the redevelopment of this site, which does not result in a building of sub-standard design and quality and does not threaten the future livelihood of Ministry of Sound's business.	
615	89	5 - Character Areas		Transport Quarter SPD 51 - Built Environment	SPD51: Built Environment Having regard to the above, Ministry of Sound requests that draft Policy SPD51 be amended to incorporate the following underlined insertion: Built form • Development should: - Seek to reduce noise by: (i) Minimising the existing and potential adverse impacts of noise on, from, within, or in the vicinity of development proposals. (ii) Separating new noise sensitive development from major noise sources wherever practicable through the use of distance, screening, or internal layout in preference to sole reliance on sound insulation. - Be planned to complement existing land use and ensure the wellbeing of existing business interests. Building Heights • Tall buildings should: - Be of exemplary design and provide a sufficiently high standard of living accommodation to justify the density and height of the building.	This principle is described in SPD5. Further detail on this is set out in para 4.2.6 (under section 4.2 High quality homes: Providing more and better homes). This is consistent with our guidance in the Sustainable Design and Construction SPD. Exemplary Design is covered under Fact Box in the same section, 4.2.
615	91				Summary Ministry of Sound welcomes the opportunity to comment on the Council's proposed new planning framework for the area. It is important that the Council's vision for the Enterprise Quarter is realistic, deliverable and complementary to existing development in the area. The focus for new development in the Enterprise Quarter should be geared towards building on the existing creative strengths of the area, which are centred on LSBU and other established businesses such as Ministry of Sound. There is an identified need to provide further employment floorspace for SMEs and in resolving to refuse planning permission for the proposed Eileen House development the Council has clearly conceded that an alternative vision is needed for this site. Ministry of Sound would welcome the opportunity to engage Officers of the Council on this alternative vision. We trust these representations are helpful in the meantime, but if there are any questions arising, please do not hesitate to contact the undersigned.	Representation noted. Detailed responses are provided for each of MoS' representations.
617	47	4 -The preferred	SPD		I wish to comment as a user on the draft SPD for the	The Council will work with Network Rail to secure

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		option/options	10 - Public Transport		Elephant & Castle in relation to the transport sections and the rail station in particular. The station needs a complete upgrade..including -a lift to all platforms -an accessible entrance on Elephant Street without steps. -a waiting room on Platform 1 -through trains from Sevenoaks to Bedford all day , without some terminating at Kentish Town. -a coffee shop within the station -toilets? I pass through the station daily going to West Hampstead.	improvements to the station.
618	1102	4 -The preferred option/options	SPD 5 - New Homes		Important that affordable homes are affordable for existing residents wishing to buy a property in the area where they've spent the majority of their life.	The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies.
618	1103	4 -The preferred option/options	SPD 8 - Higher education and student housing		There seems to be plenty of student housing already. There is a very large transient population in the Elephant and Walworth that is already making an impact in the area. There needs to be focus on families.	With regard to student homes, SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is already a larger concentration of student housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities. With reference to family homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core

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						Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible.
618	1104	5 - Character Areas		Walworth Road SPD 33 - Land uses	Would prefer independent shops down the Walworth Road (ran by local people... including students... cafes, community spaces, amongst bigger stores. Would like the majority of bigger stores at the Elephant and Castle centre.	In relation to rents of shop units, we acknowledge that different types of retailers can afford different levels of rent, and certain types of retailers can be "priced out". In these instances, independents seeking retail space have to consider lower value areas of a centre and this can result in multiples and independents being located in separate areas. Therefore, the SPD recognises the importance of promoting affordable shop units for independent retailers and small enterprises. SPD1 requires at least 10% of new floorspace (GIA) in large retail developments (including refurbishments) over 1,000 sqm to be made available as affordable space to provide suitable premises for SMEs who have been displaced as a result of development, for new business start-ups or independent retailers. Rents should be discounted by not less than a total reduction of 40% below market rate averaged over a 5 year period. By requiring affordable units, this will help strengthen the retail offer, attractiveness and competitiveness of the centre
618	1105	5 - Character Areas		Pullens SPD 43 - Built form and the public realm	Preserving, enhancing... not changing	SPD 43 sets out our approach to ensuring development conserves or enhances the Pullens estate conservation and its setting.
618	1106	4 -The preferred option/options	SPD 16 - Built		Sounds great.	Support noted.

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			form			
618	1107	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		Don't really understand this bit	As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects.
618	1108	5 - Character Areas			East street	East Street market is considered under SPD 2, markets and within the guidance set out for Brandon Street character area.
619	48	4 -The preferred option/options	SPD 9 - Community facilities		None of the existing primary care facilities in the area could cope with the increase in population envisioned in this document. I think it is important in terms of infrastructure that we continue to look at E&C in two parts, whilst a lot of effort is planned to reduce the traffic barriers that carve up this area, it will still remain a major transport hub and access from those living north of E&C and those living south may continue to be problematic. If we could commission a large facility next to the main transport hub, the need for 2 sites would reduce, but this is unlikely to be offered due to	SPD9 sets out that we will work closely with NHS Southwark to ensure that there are sufficient primary care facilities in the area to support population growth. This will be an ongoing process that we will monitor throughout the lifetime of the SPD as development takes place. References will be added to the Enterprise Quarter section (paragraph 5.8.11) and to the infrastructure plan (paragraph 6.5.24) to note that new health facilities will be supported if a need arises over the longer term. We cannot require the provision of a new health facility through the

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					<p>affordability factors. The document does recognise the need for new health facilities but importantly no sites have been identified for health. Given that the Heygate was supposed to be the site of a new health centre for the Southern part of E&C it is not clear why a site for health is no longer listed for this area. We now have no sites being earmarked for us. Also, the council owned Manor Place Depot is going to be released for redevelopment. This could be an opportunity for relocating the local gp practices to purpose built accommodation. Could health be listed as a possible use on the site. The northern part of the E&C makes no mention at all re the need for new health infrastructure. The document is vague about what is planned by LSBU re the vacant sites by St Georges' circus. Given the continued need to move Princess Street practice to a bigger location plus the new population growth, could a site for health be included as a requirement for the enterprise quarter.</p>	<p>SPD because we cannot use this document to allocate sites for specific uses. The Manor Place Depot is allocated in the Southwark Plan as a housing site and we are unable to amend this allocation through the SPD.</p>
620	978				<p>Please find below a written submission for the Elephant and Castle SPD from Rodney Road Residents Association (Peabody Estate). Our association represents the tenants and residents of the Peabody Estate, Rodney Road, East Walworth, London. In total, there are 140 homes on our estate and over 250 residents. Due to the close proximity of our estate to the redevelopment site, we have a number of concerns about how the developments will affect both the immediate area that borders our estate as well as the wider locality.</p>	<p>Noted. We have provided a response on each comment made.</p>
620	979		SPD 3 - Hotels		<p>We feel the 'Vision and Objectives' needs more emphasis on improving the quality of life and the built environment for existing residents.</p>	<p>The overall vision for the borough is set out in the adopted Core Strategy within a number of Themes and Strategic Objectives including Theme 1: Improving individual Life chances and Theme 2: making the borough a better place for people, and Strategic Objective 2E, A live able public realm. The issues raised are addressed adequately within the Core Strategy Themes and Objectives. As the Core Strategy is an adopted document it is not possible to change the wording in it. The vision set out in the SPD comes from the Core Strategy vision and has the same intentions to provide a high quality and attractive public realm and better quality of life for communities.</p>

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620	980		SPD 5 - New Homes		The ambition to build over 4000 new homes is clearly too high on a site of this size. This excessive density is exacerbated by the space given over for the planned new park, which requires more homes to be built on the rest of the site. Please note that even half of this proposed density would be a considerable increase in the number of homes on the former Heygate Estate. We feel that to meet the stated aims of the project to regenerate the area, the density of the site needs to be greatly lowered especially in the more 'residential' areas – those around Rodney Road and Brandon Street in particular. Please bear in mind the purpose of the project is to improve the area for the people who live there, and it is not an excise in massing.	Our Core Strategy sets out our policies on density. This cannot be changed through the SPD. The policy on density is applied alongside our other policies including policies and guidance on design, amenity space and dwelling sizes to ensure that new development is of an appropriate density and high quality design. Appendix 1 of the SPD also sets out further information on implementation, including an infrastructure plan to ensure that the supporting infrastructure (to include transport, leisure facilities, community facilities and open spaces) to support the increased population.
620	981		SPD 17 - Buildin g heights		Section 4.5.13: We understand the requirements with regard to protected views, but would also like to stress the need to consider important views of local assets. We would like to point out that the proposed tall buildings in Phase One (Rodney Road) site would greatly compromise views of such local assets including the locally-listed Peabody Estate which provides key views from all sides, as well as Victory Place school	SPD indicates that proposals must manage the transition in heights from the tallest elements of development, which will be towards Walworth Road, to the lower scale development in surrounding neighbourhoods. All proposals will need to conserve or enhance the significance of locally listed buildings.
620	982		SPD 17 - Buildin g heights		SPD 17 / Section 4.5.17: We agree the taller buildings should be concentrated towards Walworth Road and New Kent Road, but feel that the SPD should recognise that, elsewhere, the heights of the buildings need to respect the local area. The 12 or 14-storey building proposed for Phase One for instance is clearly out of keeping with the area. This site is really a separate area of the redevelopment and we feel that the maximum height of the buildings on the site should be below that of the Peabody Estate which is the tallest residential structure in the surrounding context. This site, which borders a local school (Victory Place school) is an ideal site for attractive low-rise development.	Support noted. SPD indicates that proposals must manage the transition in heights from the tallest elements of development, which will be towards Walworth Road, to the lower scale development in surrounding neighbourhoods.
620	983		SPD 19 - Energy , water and waste		Section 4.6.10: Residents on our estate are greatly concerned about the proposed generator / boiler on Brandon Street. We feel having a noisy and unsightly generator is not inkeeping with this clearly residential area	Saved policy 3.2 of the Southwark Plan will help to ensure that planning permission for development will not be granted where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site.

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620	1005	3 - Vision and objectives			Section 3 of the SPD needs more emphasis on improving the quality of life and the built environment life for existing residents	A key purpose of the SPD is to ensure that regeneration benefits existing residents. This is expressed explicitly in the vision for the area.
620	1006				The ambition to built 4000 new homes is clearly too high on a site of this size, especially if a space is required for a new park. Even half of this density would be a considerable increase in the number of homes on the former Heygate Estate.	The target of 4000 new homes comes from the London Plan. Not all of these will be on the Heygate development site. The target will be met from sites across the opportunity area. The opportunity area is large and includes the Enterprise Quarter, Rockingham, West Square, Brandon, Walworth Road etc.
620	1007		SPD 19 - Energy , water amd waste		Section 4.6.10 Residents are greatly concerned that the proposed generator / boiler on Brandon Street will be noisy and unsightly. If it is required, it should be located in a less clearly residential area.	Saved policy 3.2 of the Southwark Plan will help to ensure that planning permission for development will not be granted where it would cause loss of amenity, including disturbance from noise, to present and future occupiers in the surrounding area or on the application site.
620	1008		SPD 12 - Parkin g		Parking spaces should be reduced to lessen the traffic in the area and encourage people to use public transport and cycle	Noted. SPD 12 supports car-free development in much of the opportunity area.
620	1009		SPD 17 - Buildin g heights		: I agree the tall buildings should be concentrated towards Walworth Road and New Kent Road, but elsewhere the heights of the buildings need to respect the local area. The 12-storey building proposed for Phase One is out of keeping with the area. The density for this site should be significantly reduced.	Support noted. We already have a policy on density in SPD 5 and Core Strategy policy 5. We will change the wording in SPD 16 to consider that the design buildings of an appropriate massing of buildings to create a human scale of development at street level.
620	1010			Heygat e Street SPD 27 - Built environ ment	The Rodney Road / Phase One site is really a separate area and should be regarded as a low-rise residential space. Under current plans it is a 'density dump' - the density of the site should be well below the average density of the overall regeneration area.	Policies on density are set out in the council's core strategy. In addition to complying with policy on density, proposals need to show that the scale and height of buildings is appropriate for the area.
621	1117	5 - Character Areas		Central Area SPD 21 - Land	Should be an area that competes with the rest of central London and not an outer borough area. Increase the at surface level environment such as shops around the entire area especially as Peronet house, making it more like Metro Central at ground level.	Our vision for the area is to redevelop Elephant and Castle into an attractive central London destination. SPD 1 sets out how we will seek to provide active ground floor uses on the Heygate development site and SPD 16 states that we will ensure development interacts with the streetscape

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				uses		through providing active ground floor frontages with frequent windows and entrances and active ground floor uses in appropriate locations.
621	1118	5 - Character Areas		Heygate Street SPD 25 - Land uses	The entire length I feel should have shops	Our strategy for the Heygate Street character area is to provide a range of retail opportunities including large format stores on Walworth Road and New Kent Road frontages and smaller affordable units on secondary routes, contributing to the objective of increasing the appeal of the Elephant and Castle and consolidating it as a major town centre
621	1119	5 - Character Areas		Brandon Street SPD 29 - Land uses	The entire length I feel should have shops	Our strategy for the Brandon Street character area is to maintain the area as a predominately residential area, with some supporting local pubs, small shops and the school and church, and some light industrial use.
621	1120	5 - Character Areas		Enterprise Quarter SPD 51 - Built Environment	Making it more open to the public and less a University only area, changing the public realm increasing the number of shops etc	SPD 49 sets out how we will improve the provision of new town centre uses to increase activity in the area and complement the university use. A range of retail (A class use), business (B class use) and leisure (D class) uses will be allowed in railway arches. And residential use can be introduced provided that it will not harm the reasonable operation of surrounding businesses.
622	1109	4 -The preferred option/options	SPD 16 - Built form		How did the proposed leisure centre tower get approved with it contravenes the SPD instruction "cumulatively, tall buildings should not coalesce visually to form a single mass"? The new building will coalesce with Strata when viewed from most points within the Serpentine / Westminster viewing corridor. Does the Council take into consideration the financial difficulties new developments will impose on existing residents? I.e. 100 existing homes in Strata will be forced into negative equity when the leisure centre building goes up outside their window. Will the Council assist when the banks revalue the flats and ask residents for another £20k - £50k?	The application for the Leisure Centre site has not been submitted yet. The planning application when it is submitted will be determined using the policies in the Core Strategy, saved Southwark Plan and the forthcoming Elephant and Castle SPD.
622	1110	5 - Character Areas		Rail Corridor	Will the Latin community be recognised for their status in this area?	We are proposing to amend the SPD in Section 2 to provide further recognition of the cultural diversity of the

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				r SPD 37 - Land uses		businesses that exist in the area, in particular, the Latin American presence and the important contribution they make to the character, retail offer and local economy of the area. We are also proposing to make amendments provide more clarity about business space within arches and further along the railway viaduct.
623	1111	3 - Vision and objectives			While I agree with that the area needs regeneration I am concerned that by limiting the number of social housing, an aspiration stated in the objectives, you will fundamentally change the area for the worse, alienating existing residents. I do not want to see the Elephant and Castle shopping centre turned into the South London equivalent of the Brunswick centre. That would not meet the needs of the local community that already lives here, only the yuppies you plan to move into the new housing!	Policy on affordable housing is established in the Core Strategy. The SPD cannot change policy in the Core Strategy. In accordance with the Core Strategy, the SPD states that at least 35% should be affordable and at least 35% should be private. Where developers propose less than 35% affordable housing, we require a financial appraisal to ensure that the maximum viable amount of affordable housing is provided.
623	1112	3 - Vision and objectives			Renewal of an area should not primarily be based on retail. Moving in more big brand named shops to the area will not in anyway improve the lives of residents. While in the short term it may provide jobs as this current recession has shown retail work is precarious at best. Having only 10% family sized homes is a pitifully low figure.	SPD 25 states that development proposed for the Heygate development site must provide a retail strategy which, among other things, demonstrates that retail provision will reinforce the function of Walworth Road as a shopping high street. It also requires a retail impact assessment which would identify and mitigate if appropriate, impacts on existing shops at Elephant and Castle and in neighbouring centres, such as Peckham and Camberwell. We have amended the reasons to the policy to address this issue. Policy on housing mix is established in the Core Strategy. The SPD cannot change policy in the Core Strategy. The Core Strategy requires large developments to ensure that at least 10% of homes have 3 or more bedrooms in the opportunity area. 10% is the minimum which should be provided and we encourage developers to provide more family housing where possible across a range of tenures.
623	1113	4 -The preferred option/options	SPD 4 - Jobs and Business		While I support improvement to East Street Market I do not agree with setting up a rival yuppie market next to the train station	Noted. We propose to set out further detail in the supporting text to SPD 2 on supporting existing and new markets in the area as a source of local employment and food.
623	1114	4 -The preferred option/options	SPD 5 - New Homes		35% "affordable homes" is misleading. That does not mean 35% of homes will be social housing, the main need in this area. This low figure for social housing will result in a radical	The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3

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					change in the character of the area, forcing some people out. It is scandalous that a 100% social housing estate is being knocked down to make way for yuppie flats! NO NO NO	defines what is meant by affordable housing for planning policies, and the London Plan similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies.
623	1115	4 -The preferred option/options	SPD 16 - Built form		You cannot conserve distinctive neighbourhoods and preserve heritage assets by building massive, ugly buildings all over Elephant and Castle. The last two points are incompatible	We disagree. SPD 16 sets out our approach to creating a sense of place and distinctive neighbourhoods by reinforcing elements of the existing environment which have good character. This does not preclude the ability to conserve and enhance the character of heritage assets and their settings.
623	1116	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community		This question does not explain what S106 actually is! Further to this however the council should not be able to compulsorily purchase land and buildings in order to railroad its plans through.	Further detail on S106 is set out in the SPD itself and in Core Strategy strategic policy 14. The council also has an adopted S106 planning contributions SPD which sets out how we will collect contributions for infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. The Council is legally entitled to purchase land for regeneration under the Planning and Compulsory Purchase Act 2004

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			infrastructure levy			
624	60	4 -The preferred option/options	SPD 10 - Public Transport		It has come to my attention that you propose diverting traffic away from London Road onto St Georges Road. I strongly object to this on a number of grounds. (a) by having 1-way traffic on both St Georges and London Road, the traffic flows much smoother. Any changes to this would create 'rat runs' through the conservation area of West Square, Imperial War Museum and their surrounds, thus impacting the well being of residential neighbourhood and increasing risks for the children at the Primary School. (b) St George's Road has other established schools, the Cathedral and other institutions where young children attend. The risk to these children from traffic accidents will undoubtedly increase as a consequence of your proposal. (c) St Georges is a residential area, whereas the London Road is pre-dominantly the Southbank University Campus and business premises. The reduction or restriction of traffic in a manner that is detrimental to the well being of the majority of residents cannot be right. I cannot understand how this change can happen without any consultation and agreement. I would like to know the cost that this change is likely to incur and the payback period of any benefits calculated, given my comments as above.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
625	1011		SPD 5 - New Homes		I think more homes should be open to those who work, im 28 and still live at home because im not getting offered any places on the housing list and cant afford to rent privately, please bare in mind hard working young (ish) people need affordable housing too and should be given some priority	Comment noted. The SPD aims to provide new homes and facilities for everyone who lives and works in the Elephant and Castle area. However, planning documents do not affect how the Council allocates housing to people on the register.
625	1012		SPD 12 - Parking		lif you are going to increase shops surely it makes no sense not to have a bigger car park, it would affect my decision to come to elephant if i was not able to park!	The shopping centre currently contains a car park for 140 cars and our policies would not necessarily require its removal in a future redevelopment. There will be a large increase in demand for shopping facilities from people in new residential developments which are within walking distance of the shopping centre. Improved cycling and public transport facilities will widen the catchment area.
626	61		SPD 10 -		I a resident of St Georges Buildings on St Georges Rd Southwark and I am writing to object to the proposed re	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for

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			Public Transp ort		direction of traffic from London Rd to St Georges Rd. St Georges rd is mainly a residential area and having lived here for 13 years i would like to impress on you that the traffic noise and pollution is already not acceptable, without the addition of further vehicles using the road. Will there be a proper consultation with the residents? I only heard about this proposal from a neighbour! In the interests of the residents of St Georges Rd I would like to see this proposal reconsidered.	which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
627	51	4 -The preferred option/options	SPD 10 - Public Transp ort		I was recently alerted to your plan to make London Road a bus only lane and convert St Georges to 2 way traffic. The reason for doing so according to your document was to address the bus-on-bus congestion in the area, however I am not at all sure how that would actually work in practice. Please could you explain this to me or advise me as to where I might access the TfL report that you refer to which suggests it.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
627	1054	3 - Vision and objectives			Your vision includes poorly communicated road changes, when further information was requested it was not given. I do not agree with effectively endangering children	The vision for the area is set out in the core strategy. We have amended the plan to note that any changes to London Road and St Georges Road would require further investigation and consultation.
627	1055		SPD 1-Shoppi ng		Instead of just making new retail spaces, please improve the shopping centre provided. This was originally planned but downgraded to a new lick of paint. SPD 2: Instead of putting in new market squares improve the existing ones.	SPD 21 makes it clear that we support a remodelling or redevelopment of the shopping centre. The SPD supports the continued operation of markets, including East Street market, and also the provision of new markets in the area. Markets can help enliven town centres, reinforce the identity of an area and help provide a more varied shopping experience. Markets also contribute towards promoting community cohesion and A new market square will be provided to the east of the railway viaduct (SPD 2). The Council is developing a Street Trading and Markets Strategy which will provide further emphasis on improving the operation of East Street market.
627	1056		SPD 3 - Hotels		: We are advised of traffic and parking issues in the area, how would a hotel improve this, what is the demand for such a development.	We consider the hotels can make a valuable contribution to the mix of uses at Elephant and Castle. They may also help relieve pressure in other areas such as Bankside. The GLA's 2006 Hotel Need study estimated that Southwark would need to provide around 2,500 new hotel beds by 2026 to help meet demand. All large developments will

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						need to provide a transport assessment to identify and mitigate impacts on transport.
627	1057				: I support the retention of existing business space and use of the railway arches for business and community use, but not the addition of new business space unless there is a clear demand.	Support noted. Southwark is projected to have an increase of 34,000 jobs over the period 2011-2031. Through its evidence base, the London Plan sets an indicative employment capacity of 5,000 new jobs for the Elephant and Castle Opportunity area over the period 2011-2026. Our Employment Land Review (ELR) (2010) identifies that over the Core Strategy plan period (15 years) there will be general demand for around 25,000- 30,000 sqm of new office floorspace to meet the needs of the local office market which is outside the SE1 area. The ELR suggests that there are a considerable and growing number of Small and Medium Enterprises (SMEs) that create 'localised' demand for B1 floorspace. The analysis of this market showed that, although there is a supply of premises that could accommodate some of this demand for B1 office floorspace, the quality of these premises does not meet the needs of potential occupiers.
627	1058				Please complete the projects already approved and sat as building sites at the moment. E.g. SE1 360 building site.	Noted. The Council aims to implement planning permissions on its own land within a specific timescale, however there may be reasons for delay. The Council cannot control the implementation of planning permissions where the site is privately owned. Planning permissions expire after 5 years and this normally encourages site owners to start construction or risk having to apply for a new permission.
627	1059		SPD 9 - Community facilities		There are existing arts, sports and community facilities in the area which could be upgraded and improved rather than simply replicated, Adding better and different facilities would be beneficial to the area. There has already been new student housing in the area, it would be beneficial to keep this in proportion.	Improvements to existing arts, sports and community facilities are very much supported by Core Strategy policy 4 and by saved policies in the Southwark Plan. SPD9 on Community facilities has been amended to include a reference to Southwark Plan policy 2.1, which protects well valued community facilities. Opportunities to improve existing facilities will be considered alongside the need to provide new facilities, the need for which will be monitored as new development takes place in the opportunity area. Our Core Strategy sets out that we are committed to delivering a range of housing in the borough. In particular, Core Strategy policy 8 sets out that 35% of student

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						housing schemes will need to be affordable housing, to help improve the housing mix. This is reflected in SPD policy 8.
627	1060		SPD 10 - Public Transport		: The public transport only London Road leads to two way transport on St Georges Road with heavier traffic volumes on this and other roads leading to the roundabout. This will increase traffic on residential areas and no supporting evidence has been offered regarding any benefit.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
627	1061		SPD 12 - Parking		: It is odd to suggest an increasing residence in the area while decreasing car parking. Many people have cars in London and do the majority of traveling within the city by public transport. We already pay a high price for parking, congestion charge for simply moving our cars. This is short sighted, better to improve public transport than to banish cars.	Our policies aim to both improve public transport facilities and ensure that development does not make congestion worse. Through the SPD we are seeking to secure key improvements, particularly to the northern line station, but also to the frequency and reliability of buses and the interchange between the various modes of public transport.
627	1062		SPD 13 - Servicing and deliveries		: Servicing and deliveries and transport mitigation: what do these things even mean? SPD11 TG: How are you going to reduce the barriers for walking and cycling? I cannot agree to such blandly laid out suggestions.	The SPD sets out key principles which will guide development. Elements such as improvements to east-west movements are shown graphically on the maps which accompany the document. Planning applications will need to demonstrate that they have addressed these issues.
627	1063	4 -The preferred option/options	SPD 11 - Walking and cycling		If the South Bank University feels that making Keyworth Street is an improvement then I am in support, as this mostly affects them. Not sure what distinctive neighbourhoods you actually intend to preserve but retaining some of the nicer aspects of the area will undoubtedly be beneficial. How many more tall buildings are you planning on putting in here?	Support is noted. SPD 20 which relates to tall buildings does not prescribe appropriate sites or heights of buildings. There are many development opportunity sites across the opportunity area and these are in a variety of ownerships. Moreover, they will be delivered over the 15 year timeframe of the plan. Rather than set height caps, our preferred approach is to provide key principles which are backed up by robust criteria to assess proposals for tall buildings. We consider that this provides necessary flexibility given the long timeframe of the plan, while ensuring that development is coordinated through a clear strategy.
628	94		SPD 10 - Public Transport		We have recently received notification about plans for rerouting traffic on St George's road and London road. I am a resident on 58/60 St Georges road and naturally have a concern how this will effect the traffic on my road. Can you give me more information about the plans and which traffic is	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road

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					thought to be re-routed along St Georges road (and which major roads will be re-routed there). There was talk that London Road is considered more residential than St Georges but this is certainly not the case.	safety, and extensive further consultation.
629	52	4 -The preferred option/options	SPD 10 - Public Transport		I write as a member of Southwark Living Streets but these comments are personal only. Page 1 Overall Comments. For disabled people, of whom there are many, lifts are preferable every time. Escalators are difficult or impossible. Page 9 SPD 38. After "narrow cluttered, broken and filthy pavements" add "Which are especially difficult for disabled people using motor scooters". Page 11, 5.9.4 The Falmouth Street pavement West Side between Trinity Street and Harper Road is unmanagable using a motor scooter due to three trees which narrow the pavement. Page 12 last paragraph. Attention to the central section of Newington Causeway has many advantages not least of which is that a refuge is provided thereby for pedestrian use. Although I am greatly in favour of cyclists to an elderly person cyclists en masse can be quite frightening. You wait for a break in the motor traffic so as to allow you to cross the road. You get a break in the motor traffic only to see a batch of cyclists travelling fast towards you with their heads down. It is quite frightening. A central refuge makes it much easier to cross as you can cross in two stages. The same thing applies to Borough High Street between Newington Causeway and the Borough Tube station.	The improvements to the Northern Line Ticket Hall would be fully accessible to disabled people, whether the main means of access to the platforms is by lift or escalator. The comment about broken footways is a matter for maintenance, not this SPD. When considering new development we will ensure that footways are of sufficient width, including where street trees or other obstacles are present. We will provide sufficient formal pedestrian crossings of main roads to provide for safe crossing by all users.
629	68	Appendix 1- Implementation	SPD 10 - Public Transport		For disabled people, of whom there are many, lifts are preferable every time. Escalators are difficult or impossible	The improvements to the Northern Line Ticket Hall would be fully accessible to disabled people, whether the main means of access to the platforms is by lift or escalator.
629	90	5 - Character Areas		Rail Corridor SPD 38 - Transport and movement	Page 9 SPD 38. After "narrow cluttered, broken and filthy pavements" add "Which are especially difficult for disabled people using motor scooters".	This reference is not a reference taken from the Elephant and Castle SPD. SPD 15 states that we will ensure the public realm is inclusive, well lit, overlooked and which feels safe at different times of the day and in the evening.

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629	92	5 - Character Areas			Page 11, 5.9.4 The Falmouth Street pavement West Side between Trinity Street and Harper Road is unmanagable using a motor scooter due to three trees which narrow the pavement.	Paragraph 5.9.4 indicates that we plan to address this problem.
629	93	5 - Character Areas		Enterprise Quarter SPD 50 - Transport and movement	Page 12 last paragraph. Attention to the central section of Newington Causeway has many advantages not least of which is that a refuge is provided thereby for pedestrian use. Although I am greatly in favour of cyclists to an elderly person cyclists en masse can be quite frightening. You wait for a break in the motor traffic so as to allow you to cross the road. You get a break in the motor traffic only to see a batch of cyclists travelling fast towards you with their heads down. It is quite frightening. A central refuge makes it much easier to cross as you can cross in two stages. The same thing applies to Borough High Street between Newington Causeway and the Borough Tube station.	We will work with TfL to ensure that all cycling infrastructure is well-designed and doesn't disregard the needs of other road users.
631	95	5 - Character Areas		Rail Corridor SPD 37 - Land uses	BACKGROUND Royal Mail formerly Consignia Plc, is the successor to the former statutory corporation, The Post Office. Although its management operates independently, Royal Mail is wholly owned by the Government through the Secretary of State for Business, Innovation and Skills. Its services are regulated by the Postal Services Regulator, Postcomm. Its letters business, Royal Mail is the operator of universal postal service functions through the Royal Mail letter post delivery and collection services handling letters, postal packets, and high value (registered) packets. Royal Mail Group also operates Parcelforce Worldwide, which is a parcels carrier. The United Kingdom letter post business was fully liberalised in January 2006 by Postcomm and Royal Mail now operates in a highly competitive market place. As such, it effectively operates like any other business and is continually seeking to find ways to improve the efficiency of its business (e.g. increased automation) and respond to the changes in communications technology (e.g. email and internet). Put simply, the nature of the mail industry has and continues to change and Royal Mail's real estate needs to respond accordingly. 1.1 Royal Mail Properties Royal Mail has a number of holdings within the Borough. It is, however, with regard to Royal Mail's Kennington and Walworth	Nature of the organisation is noted. The protection of existing employment space and promotion of new business opportunities is highlighted in SPD4 and is an integral part of the vision for the opportunity area. We are aware of no proposals to currently redevelop this site. In the event that such proposals were submitted to the council, one of our policy requirements would be to provide replacement employment space. This is set out in further detail in policy 1.4 of the Southwark Plan.

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					<p>Delivery Office (DO) site at 111 – 123 Crampton Street, SE17 3AA that we submit these representations. Royal Mail owns the freehold of the Kennington and Walworth DO which is operational. Should this site be redeveloped it would be vital that their operations either be appropriately reprovided on-site or relocated in a suitable alternative location. Further, it should be noted that, should any land or property surrounding Royal Mail’s operational site be redeveloped, it would be vital that any new uses be designed and managed, including through imposition of appropriate conditions / obligations, so that they are both cognisant of, and sensitive to Royal Mail’s existing operations. SECTION 5: CHARACTER AREAS 2.1 Rail Corridor Royal Mail’s Kennington and Walworth DO falls within the boundary of the Rail Corridor Character Area. The DO is identified as a potential opportunity site and is referred to as “Sorting Office and 31 Amelia Street” in the SPD and OAPF. The SPD and OAPF states that “These [potential opportunity] sites can provide a range of uses including residential and business uses. They are [able to] provide the potential to knit together the often fragmented townscape to give the area a more consistent character”. The Council’s strategy for the Rail Corridor Character Area includes retaining business uses and supporting the introduction of residential use on the upper floors. Policy SPD 37: Land uses states that a range of business (Class B) along with other uses will be allowed in the railway arches. We note that Royal Mail’s DO is located to the west of the railway arches. Royal Mail has no current plans to vacate or dispose of their Kennington and Walworth DO site. Given that this site is operational, we request that the Elephant and Castle draft SPD and OAPF (supporting policy and / or text) explicitly states that the re-provision / relocation of Royal Mail’s Kennington and Walworth DO operations will be required prior to any redevelopment of their site. Furthermore, we note that in order for Royal Mail’s site to be brought forward for redevelopment, relocation will need to be viable for and commercially attractive to Royal Mail. The proceeds from the disposal of their site will need to yield both sufficient value to fund the purchase and fit-out of a new site and the relocation of their operations thereto.</p>	

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					<p>There will also need to be commercial attractiveness that would incentivise the business to relocate the operations. In addition, it would be essential that any new facility is provided prior to the demolition of the existing and / or suitable temporary accommodation is provided, if necessary, to ensure the continuity of service. This will ensure that Royal Mail's operations will not be prejudiced and they can continue to comply with their statutory duty to maintain a 'universal service' for the UK pursuant to the Postal Services Act 2000. Further, as previously stated, should any sites surrounding Royal Mail's site be redeveloped it would be vital that any new uses be designed and managed, including through imposition of appropriate conditions / obligations, so that they are both cognisant of and sensitive to, Royal Mail's operations. Policy Consideration The requests set out above accord with Planning Policy Statement 4 (PPS4): Planning for Sustainable Economic Development, which details that LPAs should plan positively and proactively to encourage economic development, in line with the principles of sustainable development. In particular, PPS4 states that LPAs should develop flexible policies which are able to respond to economic change and notes the need for co-ordination with infrastructure and housing provision. Further, we note the Government's draft National Planning Policy Framework (NPPF) which is the most up-to-date statement of national policy, albeit in draft form. In particular, we note that it: states that development management should "foster the delivery of sustainable development, not hinder or prevent development"; ■ requires investment in business "not to be over-burdened by the combined requirements of planning policy"; and ■ requires local planning policy to "have a clear understanding of business needs within the economic markets operating in and across their area" (with emphasis added). We reserve the right to amend or supplement these representations at a later date if necessary. We would be grateful if you could acknowledge receipt of our representations and advise us as to the next stages of the Elephant and Castle SPD and OAPF.</p>	
633	96		SPD 10 -		I own an old car but drive less than 2,000 miles a year, so my interest is as a local resident of ten years standing, not as	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for

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			Public Transport		<p>a motorist. I do, however, frequently use the buses. Nor am I simply a 'nimby'; I have written previously in support of various proposed developments and am generally in favour of the regeneration goals. But this traffic re-routing proposal is completely unacceptable on a number of grounds. The proposal to route all buses along London Road and revert St George's Road to two-way transit for all other vehicles is apparently based on the suggestion that the current bus routes are subject to congestion. Yet cramming all the bus routes onto one road will surely exacerbate this problem, while also creating dangerous over-crowding and confusion at the myriad of bus stops that will need to spring up to accommodate the new routes. This will simply recreate, on an even greater scale, the current crowding (rather than calm queuing) of clamouring people wanting to board buses outside the shopping centre. Where the impact on the local environment is concerned, I point out that while London Road is largely lined by commercial and University facilities, St George's Road comprises housing, three schools, a playgroup, a cathedral, two churches, a dance school, a park, sports grounds and a world-class museum. Under the current proposals, all of the latter will be subjected to the greater noise, dirt and congestion caused by slow-moving stop-start two-way traffic, whereas the current traffic flow is smooth and relatively quiet. Two-way traffic is also more hazardous and less predictable for the large number of local school-children to navigate safely. There is also the matter of cost and disruption. This proposal would be very expensive and deliver no overall improvement for local users of public transport, let alone local residents. While it is being implemented, it will cause enormous disruption, traffic delay and increased pollution from idling engines in endless traffic queues. Finally, while I could go on at length with my own objections, I would simply like also to endorse the letter of 10 January you have received from my neighbour, Candace Gillies-Wright, and associate myself with the points she makes. Thank you for the opportunity to contribute to the debate, but please note that local residents are not going to take this proposal lying down.</p>	<p>which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.</p>
634	53	4 -The preferred	SPD 5		2. The Equalities Impact Assessment within the draft	Noted.

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		option/options	- New Homes		Housing SPD sets out a concern that property values will increase in the area and this will prevent existing residents from accessing housing. Whilst we recognise that there will be an impact on the existing community and development proposals should consider ways of mitigating this, it is essential that capital values do increase to cross-subsidise the affordable housing	
634	54	4 -The preferred option/options	SPD 5 - New Homes		3. It is essential that capital values do increase to cross-subsidise the affordable housing. 4. It is not clear within the 35% affordable housing how many will be required at target rent levels (as part of the s106) or at rents less than 80% MV. Will this be covered in the revised Affordable Housing SPD? 5. I couldn't see anything specific about fixed term tenancies and ART rent levels except in the case of ART rents, a reference to the Mayor's statement that Councils should not prescribe % of MR. Will this be covered in the revised Affordable Housing SPD?	The SPD cross references to the overarching Core Strategy and saved Southwark Plan policies on affordable housing. The current policy, as set out in the SPD is for a minimum of 35% affordable housing, of which 50% should be social rented and 50% should be intermediate housing. Our draft and adopted affordable housing SPDs provide further guidance if the policy cannot be met. With the introduction of the new product "affordable rent" through the inclusion of affordable rent in the PPS3 definition of affordable housing, we are looking at the implication of this new type of tenure in Southwark. Our current policy remains as set out above. We took a report to Planning Committee on 20 December 2011 clarifying that this remains our policy, and set out how we will look at applications for affordable rent. This is report is available on our website. We consulted on a new affordable housing SPD prior to the full introduction of affordable rent. Subsequently we will be consulting on an updated affordable housing SPD later in 2012 to take into account affordable rent, the National Planning Policy Framework, the proposed Early Alterations to the London Plan and the Mayor's draft Housing SPG.
634	55	4 -The preferred option/options	SPD 9 - Community facilities		6. Reference is made to community facilities – in particular educational facilities will need to be reviewed if private investment in housing and businesses is to be attracted and retained.	There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work.
634	56	4 -The preferred option/options	SPD 19 - Energy		7.Community heating network – not clear who/how/when this is going to be constructed and how it will be funded, unless by s106 conts. Running & maintenance costs will need to be	CHP networks would be delivered through private funding or through S106 planning contributions. The delivery of CHP networks will be secured through the use of planning

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			, water and waste		identified up front. Unpopular with residents!	conditions.
634	57		SPD 20 - S106 Planning obligations and the community infrastructure levy		8. S106 and CIL – we don't know what LBS policy will be – CIL takes precedence over s106. The Borough will have to take a view about what level contributions will stifle redevelopment and investment and support non-grant funded affordable housing. It is not clear whether various options have been subjected to sensitivity analysis. Our view is that affordable housing provision should take precedence over any other s106 requirements	We have undertaken an impact of the proposed tariff on the viability of development. This study is published on our website. The study showed that generally the developments tested should be able to provide 35% of homes as affordable housing and provide funding for the tariff. The tariff is required to help fund infrastructure which is needed to mitigate the impact of development.
634	58	4 -The preferred option/options	SPD 9 - Community facilities		9. Car free developments: there will be a need for parking provision for wheelchair/Blue badge and family housing. Different sites within the area may therefore be more and less appropriate for either these types of accommodation or car free requirements.	All development will be required to make adequate provision for parking for disabled drivers. We believe that the needs of all other residents can be met through a combination of walking, cycling, public transport, car clubs and taxis, and so do not require private car parking.
634	59	4 -The preferred option/options	SPD 1- Shopping		10. We support the major new town centre approach as outlined in the housing spd	Support noted.
635	62				As this is the formal (and final) consultation on the Draft SPD, we are writing with a formal representation on behalf of London South Bank University. As you know London South Bank University has a vested interest in the long term future of the Elephant and Castle area and wishes to work in partnership with London Borough of Southwark to ensure that the SPD becomes a robust tool for delivering high quality and sustainable future regeneration. The Draft SPD is comprehensive and is developing into a good quality document, but we would like to suggest a number of changes to refine the principles and policies to accurately reflect the university's campus vision. To that end we hereby submit formal comments and suggested amendments to the	a) We have not included reference to LSBU in paragraph 2.2.9 as a major employer. We have not referred to any other employers in the area, and it is appropriate to refer to the various major industries/sectors in the area. b) We have included reference to LSBU within the Social and Community Infrastructure section. c) The vision is derived from the Core Strategy Elephant and Castle vision which was adopted in 2011. The vision cannot be altered. 3.2.11 does not specifically refer to individual key stakeholders by name. It is appropriate that it remains this way. d) We have ensured there is consistent references to London South Bank University.

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					<p>Draft SPD diagrams and text. For clarity the comments have been broadly prioritised in order of importance and we attach mark ups where appropriate to illustrate the points raised. Our comments are structured under the following sections: 1. The role of London South Bank University; 2. London South Bank University Estate Vision; 3. Enterprise Quarter principles; 4. Student accommodation and other land uses; 5. Heritage and conservation; 6. Central area principles; 7. Section 106 contributions 1.1 As a major land owner, employer and stakeholder, London South Bank University has a very important role to play in the regeneration of the Elephant and Castle area. The university is committed to working in partnership with London Borough of Southwark and would like this to be fully reflected in the Draft SPD. Requested amendment: Specifically name London South Bank University in the following locations: a) As a major employer – p.21, para 2.2.9. b) As major social infrastructure – p.23, para 2.2.14. c) As a key partner – p.28 (vision) and p.31, para 3.2.11. d) Please can there also be consistent reference throughout the document to London South Bank University – p.29 (core strategy diagram), p.120, para 5.8.7, and p.139.</p>	
635	63				<p>2. London South Bank University Estate Vision 2.1 Since the Enterprise Quarter SPD was adopted in 2008 the university has developed a clear vision for the future growth and improvement of the Southwark campus. This vision seeks to provide an enhanced central campus focusing on the existing area of university accommodation and providing a high quality environment with a diverse mixture of uses. This vision will contribute substantially to the regeneration of the area, with spin off benefits by way of educational attainment, employment, vibrancy and physical environment improvements. While the SPD is supportive of the growth of the university, a number of important components of the vision are not yet fully reflected in the draft SPD with several proposals in the SPD being in conflict with the core objectives. The comments below seek to support those elements that align with the vision and identify those that conflict to ensure the SPD facilitates the regeneration of this important site: a) An overarching objective of the university's</p>	<p>a) We have amended p.30, para 3.2. to include the suggested text b) We have amended SPD8 to include the suggested text c) d) and e) We have included the sites for inclusion as potential development opportunities in Figure 6 f) support noted g) Support noted</p>

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					<p>vision is to create a compact 24 hour campus, where activity is created through a diverse mix of uses including introduction of student accommodation, leisure and cultural uses, as well as university accommodation and town centre uses. In this way the campus will become vibrant with natural surveillance, improved safety and a reduction in the fear of crime particularly in the evenings. The vision seeks to make better use of the existing accommodation and take opportunities for physical improvements wherever possible. The aspiration for the growth of London South Bank University is supported in the SPD, but the importance of improving the existing stock and environment should also be recognised. Requested amendment: Change text at p.30, para 3.2.7 as follows: ‘Support the growth and improvement of London South Bank University and the London College of Communication’ (suggested amendment underlined). b) We are supportive of the SPD where it promotes the growth the provision of space for higher education – p.43 (SPD8) and p.121 (SPD49). The SPD should also support the refurbishment of higher education space. Requested amendment: Amend SPD8 (p.43) as follows: ‘Proposals for provision of new and refurbished space for higher education will be supported’ (suggested amendment underlined). c) A number of sites have been identified for future development to facilitate the growth and improvement of the campus, but not all are indicated in the draft SPD as potential development sites. These are identified and explained below, and for clarity please find enclosed (at Appendix A) mark ups showing the exact extent of the sites for inclusion as potential development opportunities. d) The Technopark site bounded by London Road, Ontario Street and Keyworth Street is a future development site that is crucial to delivering the university’s campus vision (referred to as ‘Anchor 3’). It is located at a key arrival point to the university from the town centre and by various modes of public transport, but currently fails to perform that crucial gateway role. The future aspiration is therefore to redevelop this site and the surrounding public realm so that it marks arrival into the Enterprise Quarter and provides pedestrian friendly connections into the university campus. It should therefore</p>	

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					<p>be identified in the SPD as a development opportunity. Requested amendment: Identify the Technopark site as a potential development opportunity in the SPD at p.20 (figure 6) and p.124 (figure 40). e) The university owns sites at Caxton House, Dante Place and 83 New Kent Road. As part of the vision for a more compact campus, and to enable more efficient use of the existing university accommodation, these sites are likely to be redeveloped in the future and should therefore be identified as potential development opportunities. Requested amendment: Identify the following as development opportunities as indicated in Appendix A – Caxton House at p.20 (figure 6) and p.124 (figure 40), Dante Place at p.20 (figure 6) and p.112 (figure 34), and 83 New Kent Road at p.20 (figure 6) and p.129 (figure 43). f) Arts, culture, leisure and entertainment uses are important in improving activity, vibrancy and achieving a 24 hour campus. We therefore support the positive view of proposals for arts, culture, leisure and entertainment uses (p.42, SPD6). g) We support the planned improvements to public transport, walking and cycling – p.45 (SPD10), p.47 (SPD11).</p>	
635	64			<p>Transport Quarter SPD 51 - Built Environment</p>	<p>3.1 The vision for the future of London South Bank University is for an active, vibrant and high quality community campus in the heart of Elephant and Castle. This will be a significant contributor to and catalyst for regeneration in the area with many spin off benefits for the local economy and communities. While many of the principles in the SPD will help to achieve the campus objective, there are some areas that should be strengthened to present and promote this as a clear directional strategy. a) The character description of the Enterprise Quarter should recognise the variations in the quality and style of built form, with some areas of poor quality built form in the university area along London Road, Newington Causeway and Borough Road with an inward looking nature of the university and lack of active ground floor frontage. Requested amendment: Add new paragraph after 5.8.7 (p.122) to state 'The built form in the Enterprise Quarter is of variable ages and qualities, with some poor quality buildings in particular along London Road, Borough Road and Newington Causeway that lack active ground floor frontage and fail to contribute positively to the streetscene.'</p>	<p>a) We do not consider it necessary to add an additional paragraph. The character area guidance already includes adequate reference to the existing nature of development and opportunities for improvement. SPD 51 sets out development should: Contribute towards creating a more coherent townscape through the form, mass and height of new buildings. It should provide footprints which encourage pedestrian movement through blocks and ensure that active frontages are provided at ground level. The supporting text to SPD51 also makes reference to the poor street frontages, inward looking nature of the university campus, and the lack of a coherent townscape character or quality. b) We do not consider it necessary to add an additional bullet point. The SPD sets out in the strategy section the objective of improving the public realm at key gateways into the university, including at the junctions of Borough Road/Southwark Bridge Road, Southwark Bridge Road/Newington Causeway and London Road/Ontario Street. The strategy also promotes the improvement of linkages into neighbouring area and the creation of new</p>

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					<p>b) The corner of London Road and Ontario Street is a key gateway arrival point to the university from the Central Area and via various modes of travel. This area however lacks a sense of arrival and fails to perform the role of a gateway. In particular, the public realm is of poor quality and lacks definition, and the Technopark building (on the corner of London Road and Ontario Street) is a major barrier to movement failing to announce the entrance to the university. Creating a gateway in this location will not only mark the entrance to the university campus area but will better connect the Enterprise Quarter to the central area and promote pedestrian movement to the north along the key strategic route of London Road. Requested amendments: Add new bullet under paragraph 5.8.7 (p.120) – ‘Promote the creation of a gateway at the south of the Enterprise Quarter on London Road, connecting and encouraging movement from the central area and announcing arrival into the university area.’ Add new bullet under SPD51 (p.123) – ‘Development should: • Contribute towards creating and strengthening gateways into the area and improving legibility, including from the south at the junction of London Road / Ontario Street.’ (suggested addition underlined) Amend figure 40 (p.124) to indicate a gateway public space at the junction of London Road / Ontario Street (see Appendix B for mark up). c) We are generally supportive of the building heights strategy in the draft SPD, but it would benefit from additional clarity and refinement in relation to townscape legibility and the role of gateways. In particular we would like to see greater emphasis on using building heights to emphasise the southern gateway to the Enterprise Quarter and enhance the role of this area in drawing pedestrians to and from the central area. The Enterprise Quarter SPD (2008) included a very clear indication of the appropriate locations for tall buildings but this is not well reflected in the Draft SPD. In line with the previous approach, the Technopark site (on the London Road / Ontario Street junction) is considered an appropriate location for a taller building of landmark quality to mark the gateway and entrance to the university campus. Requested amendments: Add new bullet under SPD17 (p.56) – ‘Tall buildings should: •</p>	<p>links through the area to integrate with existing public spaces. We do not consider it is necessary to include an additional bullet point to SPD51 within the ‘built form’ section. The fifth bullet point of SPD51 ‘Public Realm’ provides guidance for the enhancing the pedestrian environment at gateways into the LSBU campus, and includes London Road/Ontario Street. We have amended figure 40 to indicate a gateway public space at the junction of London Road / Ontario Street. c) We do not consider it necessary to indicate in the SPD all the ways of reinforcing way-finding and legibility. The SPD guidance is intended not to be prescriptive in nature. Figures 14 and 15 show indicative locations to focus taller buildings to reinforce the gateways into the centre. We have amended paragraph 5.8.4 to include the reference to London Road We have amended the text in SPD51 (page 123) to include reference to the Enterprise Quarter and London Road. d) Support noted We have removed Appendix 2 from the SPD We have amended the bullet in SPD51 to include the reference to gateways and the reference to the junction of London Road/Ontario Street. We have amended Figure 12 and Figure 40 to include the suggested annotations i.e. pedestrian route from the junction of London Road/Ontario St to Keyworth St and gateway space in this location. e) Support noted We have amended SPD49 to include the suggested text We have amended Figure 40 to include annotations of active ground floor frontages throughout the area. f) We have not made the amendment. The area-wide guidance in SPD18 sets out flexibility in relation to the provision of tree planting. Where the provision of additional street canopy cover is constrained by the presence of utilities or other services, the guidance sets out that this may be resolved through suitable street design such as build-outs or median strips.</p>

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					<p>Help reinforce way-finding and the legibility of the area, including by announcing key pedestrian activity nodes and arrival points and reinforcing gateways.’ (suggested addition underlined) The tall buildings strategy is not clearly represented on figures 14 and 15 (p. 58). While we acknowledge the importance of flexibility in the SPD, a plan diagram would be beneficial to help identify those locations that the Council deems appropriate for taller buildings and demonstrate the interconnections with other aspects of the SPD strategy. Amend paragraph 5.8.4 (p.119) – ‘There is an opportunity for taller buildings to be developed on Newington Causeway and London Road which will help to define the gateway into the central area.’ Amend text under SPD51 (p.123) – ‘Tall buildings should: • Help define gateways into the central area and Enterprise Quarter, especially to the south of the viaduct, shown on figures 14 and 15. They should diminish in height moving north along Newington Causeway and London Road to manage the transition to surrounding building development.’ (suggested additions underlined) d) We generally support the principles for enhancing the quality of the public realm in the draft SPD, particularly the improvement of the public realm (p.52, SPD15) and the creation of a finer grain of development (p.53, SPD16). We are pleased to see that many of the key public realm principles from the Enterprise Quarter SPD (2008) have largely been taken forward in the draft SPD. The intended role of Appendix A is however unclear and the proposals are notably more detailed than for any other area. Since the Enterprise Quarter SPD was adopted in 2008, the university has advanced its strategy for the future of the campus and many of the highly detailed public realm proposals in Appendix A no longer align with the development opportunities. There are also now further opportunities for improvements to the public realm and permeability of the area which we consider should be promoted in the SPD. Requested amendments: Remove Appendix 2 from the SPD. Amend SPD51 (p.122) – ‘Public realm improvements should focus on: • Providing public spaces to act as focal points and gateways within the area: - At the junction of London Road / Ontario Street.’ (suggested</p>	

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					<p>additions underlined) Amend figure 12 (p.49) and figure 40 (p.124) as per the annotations at Appendix B and summarised as follows: • Promote a new and more direct pedestrian route from the junction of London Road / Ontario Street to Keyworth Street to increase permeability between the Central Area and the Enterprise Quarter. • Create a gateway space at the junction of London Road / Ontario Street to announce arrival and improve the legibility of the area. e) There activation of frontages throughout the Enterprise Quarter will help to provide natural surveillance and to create a 24 hour community campus while also improving integration with the surrounding areas. We therefore support the strategy text promoting active uses at ground floor (p.120, para 5.8.7 and p.121, SPD49). Requested amendments: Amend wording of SPD49 to state 'development should provide active ground floor uses along all routes and spaces.' (p.122, SPD51). (suggested additions underlined) Amend figure 40 (p.124) as per the annotations at Appendix B and summarised as follows: • Promote the activation of ground floor frontages throughout the area. f) We recognise the value of tree planting and support the proposals for the creation of green linkages, including in the West area linking to the Enterprise Quarter. It should however be recognised within the SPD that tree planting is subject to feasibility in relation to the utilities in particular. Requested amendments: Amend SPD51 (p.122) to state – 'Reinforcing the formal 'boulevard' character of streets leading to St George's Circus, supplementing existing mature street trees on Lambeth Road and Borough Road where necessary and feasible, and introducing new tree planting on London Road where possible'. (suggested additions underlined)</p>	
635	65		SPD 8 - Higher education and student housing		<p>4.1 Providing high quality and affordable student accommodation in the right locations is a key priority for the university to create a sense of community in the university area. Student accommodation will make a vital contribution to the objective for a '24 hour' central campus by creating activity and eyes on the street during day and night. Any new accommodation will be linked directly with the university providing for students who attend the university and will</p>	<p>a) Support noted. b) We have inserted a new bullet point to refer to promote a community campus in the heart of the Enterprise Quarter. Is it not appropriate to refer to a 24 hour campus as existing surrounding uses need to be taken into account in terms of the impact on amenity. We have amended this paragraph in SPD 49 to include student accommodation as a type of use that can be introduced. The SPD cannot require this to be just for South Bank</p>

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					<p>therefore contribute directly to the local economy and vibrancy. a) We support the objective to help address needs for student accommodation (p.30, para 3.2.6). We also support the favourable view of proposals for student housing (p.43, SPD8). b) Where it is considered essential to creating a community and a more vibrant mix of uses, student accommodation, in direct association with London South Bank University, should be promoted in the Enterprise Quarter. It should also be recognised that the area lacks activity and natural surveillance during the evening, and the SPD should strongly promote a more diverse mixture of uses. We are generally supportive of the land use principles under SPD49, but consider that further additions would strengthen this guidance. Requested amendments: Add new bullet under paragraph 5.8.7 (p.122) – ‘Promote a 24 hour community campus in the heart of the Enterprise Quarter.’ Add student accommodation as a use promoted under SPD49 – ‘Residential use, including student accommodation associated with the university, can be introduced...’ (suggested amendment underlined). c) Student accommodation is a vital component of the university’s long term vision for the central campus. Student accommodation in the Enterprise Quarter directly linked to London South Bank University should therefore be a priority over other providers to ensure that other developments do not prejudice the delivery of the campus vision. d) As set out in point 2(e) above, there may be opportunities in future to release land for development in order to rationalise the university’s land ownership and provide a more compact campus. We have identified the sites in the Pullens (Dante Place) and Rockingham (83 New Kent Road) areas, and consider that both of these sites could be deemed appropriate for an alternative private residential use. Requested amendments: Identify opportunities for conversion or redevelopment of student accommodation sites for housing, including in the Pullens and Rockingham character areas. Add new bullet under SPD5 (p.36) to state: ‘Proposals for the conversion or redevelopment of student accommodation to private residential will be supported Amend SPD41 (p.110) to state: ‘Additional residential use will be supported, including the</p>	<p>University. C) Whilst the SPD recognises the importance of London South Bank University and the London College of Communication as important presences in the area and we are continuing to work with these universities, the SPD cannot prioritise the needs of one university over others. D) We have added these two sites: Dante Place and 83 New Kent Road as opportunity sites. These are now shown on figure 6: Potential development sites in the opportunity area. Existing policies in the saved Southwark Plan and the Core Strategy already allow a loss of student accommodation to other uses, including residential (C3) use. The SPD does not need to provide further guidance on this point.</p>

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					conversion and redevelopment of student accommodation'. (suggested addition underlined) Amend SPD52 (p.127) to state: 'Additional residential use will be supported, including the conversion and redevelopment of student accommodation'. (suggested addition underlined)	
635	66		SPD 15 - Public realm		5.1 We recognise that heritage assets need to be preserved and respected, but there is an imbalance in the SPD currently with a disproportionate emphasis on conservation than promoting physical improvement and a more attractive, better quality environment in many areas. In order to address that balance we suggest the following amendments. a) SPD16 provides the overarching principles for built form. The principles primarily relate to protecting the existing character, built form and heritage and fail to recognise the need for improving poor quality built form. Requested amendments: Add new bullets under SPD16 (p.53) to state: • Improve the quality of the environment and townscape in areas of deficiency. • Enhance the townscape through the design and architectural quality. b) We understand that there will be consultation later this year on buildings proposed for local listing through the council's heritage SPD. We support this as a robust approach to designating locally listed buildings with an opportunity for the public and stakeholders to comment and ensure accuracy. However, as the Elephant and Castle SPD will be adopted in advance of that SPD, we do not consider it appropriate for buildings proposed for local listing to be included in that SPD at this stage. Should buildings not be designated as locally listed, there will be undue confusion and conflict between the SPDs. We therefore strongly object to the inclusion of any reference to buildings proposed for local listing. Requested amendments: Remove all references to buildings proposed for local listing, including figure 18 (p.76), figure 21 (p.87), figure 24 (p.93), figure 27 (p.99), figure 30 (p.106), figure 33 (p.111), figure 36 (p.117), figure 40 (p.124), figure 42 (p.129). Remove Appendix 3 from the SPD. c) We are concerned about a number of buildings proposed for local listing where we consider that these are inadequately justified both within the SPD (and background evidence documents) and in terms of their historic and townscape qualities. In particular, the justification is unclear	SPD16: Agree. Policy 16 has been amended accordingly. Appendix 3: Text has been added to appendix 3 clarifying that the list will be updated from time to time and that a definitive and up-to-date list is available on the council's website. This should help avoid confusion over which buildings are locally listed. Local listing: Planning Policy Statement 5 encourages local authorities to identify buildings with local value. We have identified buildings which make a positive contribution to the character or appearance of the area due to their architectural or historic interest, or because they form part of an interesting group. The criteria for local listing are set out in section 4.3.9 of the E&C Urban Design background paper. This process has been carried out in accordance with English Heritage's Good Practice for Local Listing Consultation Draft, English Heritage, February 2011. The features of special interest relating to the buildings mentioned are set out in the appendices to the Characterisation Study. Colours: We will consider changing the colours in the final published version. Later in the year the Council will be consulting a Heritage SPD and a borough-wide local list will be formally consulted on as part of that process.

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					<p>for the proposed local listing of 103 Borough Road, Caxton House at 13-16 Borough Road, and 83 New Kent Road. As an example, only part of the 103 Borough Road building is included and it has been the subject of much physical change with few original features intact. We therefore feel that further more detailed interrogation and consultation is required before any local listing goes forward and we strongly object to these proposed local listings on p.124 (figure 39), p.129 (figure 42) and in Appendix 3. Requested amendments: Amend figure 39 (p.124) to remove proposed local listings, particularly of 103 Borough Road and Caxton House on Borough Road. Amend figure 42 (p.129) to remove proposed local listing of 83 New Kent Road. Remove references to 103 Borough Road, Caxton House and 83 New Kent Road from Appendix 3. d) As a general point, the colours between current and proposed conservation areas are difficult to distinguish on figures throughout the report (p.55, fig 13).</p>	
635	67			<p>Central Area SPD 23 - Built Environment</p>	<p>6.1 First impressions are crucial to London South Bank University where there is a need to fill student places in an ever more competitive higher education environment. Students and visitors to London South Bank University arrive by various modes of transport, including the tube and train lines, and the quality and appearance of the central area of Elephant and Castle is therefore paramount to the university. a) There is little mention of the need to improve the appearance and sense of arrival in the central area, despite Elephant and Castle being identified as the 'southern gateway to Central London' by the London Plan. The quality of the environment in this area is currently very poor and hostile for pedestrian and greater emphasis should be placed on this in the SPD. There is a lack of emphasis on future design and architectural quality as a key principle, and particularly in relation to the central area, and this should be addressed to secure effective future regeneration. Requested amendments: Add new bullet under paragraph 3.2.9 (theme 5) as follows: • 'Promote the highest design and architectural quality in new and refurbished buildings commensurate with the role of the area as a southern gateway to Central London.' Amend SPD1 (p.32) to state: •</p>	<p>35. Paragraph 3.2.9: Agree with the requested amendment. The policy has been amended accordingly. SPD1: SPD1 focuses on retail provision. References to design quality are made in policy 16. Paragraph 5.1.7 has been amended accordingly. SPD 23: Further references to design quality are not needed in policy 23. These are adequately covered by the overarching policies in SPD 17 and SPD 27. Figure 19: as its title suggests, Figure 19 is indicative and further amendments are not considered necessary.</p>

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					<p>'Work with the landowner to transform the shopping centre through the highest quality redevelopment or remodelling, supporting the introduction of new large 'anchor tenants' and promoting a wider and mix of retail uses to strengthen the appeal of the town centre to a wider catchment'. (suggested addition underlined) Add new bullet under paragraph 5.1.7 (p.71) as follows: • 'Ensure all development and public realm enhancements are of the highest quality to provide a positive perception of this strategic gateway.' Add new bullet under SPD23 (p.74) as follows: • 'All development on the shopping centre should be of the highest design and architectural quality.' Add new bullet under SPD23 (p.75) as follows: • 'Taller landmark buildings should be elegant and of exceptional architectural quality in order to create an appropriate identity for this strategic gateway.' b) The quality of the public realm in the central area will be vital to improving perceptions of the area and turning it into a high quality gateway. Further opportunities should be taken to improve the public realm in the central area, particularly around the northern roundabout and at future entrances to the shopping centre. Requested amendments: Amend figure 19 (p.77) to expand the areas of opportunity for public realm improvement around the edges of the northern roundabout and to show an additional opportunity for a new civic space to the northern entrance of the shopping entrance. See mark up at Appendix C</p>	
635	69		SPD 20 - S106 Planning obligations and the community infrastructure levy		<p>7.1 London South Bank University recognise the council's policy for Section 106 contributions but seek greater clarification on the changes to the Section 106 charging that are proposed within this SPD. a) The SPD proposes Section 106 contributions for developments over 100m2 or 1 additional dwelling. This is not evidenced specifically in the S106 viability study which tests contributions only in relation to far larger scale developments. It is a substantial change from the SPD, which sets out 10 units or 1,000m2 as the threshold and without evidence to suggest the small scale developments could cope with the change in viability terms we object to this proposal and the substantial burden of open book financial appraisals for such small scale development applications. b) It is not possible to easily compare the S106</p>	<p>A) The viability study tests development on a range of sites between 0.14 and 9 ha. It also factors in variable build costs associated with lower buildings (below 6 storeys) and tall buildings (between 25 and 35 storeys). Moreover, it should be noted that the tariff applies where there is an uplift in the amount of development. Finally, in the case of residential development and student housing development, the study assumes the provision of affordable housing. Affordable housing however will not be required in smaller schemes below 10 units which would improve the viability of such schemes. B) The tariff set out in the draft SPD represents a significant increase from the level set out in the s106 Planning Obligations SPD. This is because the level of transport mitigation required to deliver regeneration</p>

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					tariffs for strategic transport (proposed to supersede tariffs in S106 SPD) due to different charging units. The S106 SPD charges at a rate of £210 per person, whereas the proposal in the draft SPD is for charges of £104 per square metre (for residential developments)	in the opportunity area is significant.
635	1066	5 - Character Areas		Pullens SPD 43 - Built form and the public realm	e) In the Pullens character area, the area to the north of Newington Butts is very different character to the south by way of the urban grain, appearance, scale and form of development. The text should give greater recognition to the different style and form of buildings north of Newington Butts, and recognise that some areas may be appropriate for larger scales subject to the context and relationship to conservation areas. Requested amendments: Amend text on to recognise the variations in the character of built form particularly between the north and south of Newington Butts – p.108 (paras 5.6.1 – 5.6.3), p.110 (SPD43)	The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to encourage development to consider the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.
636	98	4 -The preferred option/options	SPD 10 - Public Transport		I have only just had drawn to my attention the latest proposals. i wish to comment on one aspect, namely the suggestion that St George's Rd should become 2 way. This would be highly retrograde. The road is highly residential, has 4 schools on the road or very close, a nursery, other educational establishments and doctors' and dentists' surgeries. Deliberately to make the traffic flow more noisy and dangerous would be foolish; and I strongly oppose the suggestion.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
637	103	4 -The preferred option/options	SPD 10 - Public Transport		I have just heard of your consultation for plans regarding the regeneration of our area. I live on St George's Rd and have seen a reference to proposals to make St George's Rd a 2-way street. I cannot find out from all the information presented exactly what you propose to do and feel your deadline to be shocking given the fact that this, a point of utmost importance to our quality of life, is something we have come across by chance, through hearsay. I would have expected a professional consultation in which the information were not "buried" under an avalanche of documents, but rather a clearly exposed plan of what you had in mind. I	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					WOULD strongly object to any plan to increase traffic flow for cars, taxis and lorries. Our street is dangerous enough and polluted (noise and fumes) enough as it is. Our street is mainly residential, lined with schools, colleges, churches, dental practice, surgery, pharmacy, play areas...We need to preserve what we have and not destroy it.	
637	104	4 -The preferred option/options	SPD 10 - Public Transport	Central Area SPD 22 - Transport and movement	Ps: I would like to bring to your attention the fact that we are Grade II listed. Our houses were not built to sustain the heavy traffic we now endure, let alone even heavier flows. Our terrace and the Cathedral create a very large proportion of the Grade II listed buildings contained in this Conservation area. It is vitally important for us to understand exactly what you have in mind. Your SPD 22 document is not sufficiently detailed.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
638	105			Heygate Street SPD 27 - Built environment	With the proposed Walworth public square, I've tried to summarize the points against a solid paved area and in favour of green space for the community. The area could be an excellent opportunity to extend the much valued old Walworth town hall memorial area and Museum. I've listed my points below: Green spaces within the development are vital to the final scheme being successful for residents. Reducing green spaces can lead to - Increased greenhouse gas emissions resulting from construction and operation of developments, including through embodied energy in materials, heating, lighting and power during operation and energy use in transport - Decreased resilience of the borough to climate change, including through increased density and massing which may exacerbate the urban heat island effect and increased surface water run off which may increase local flood risk - Increased resource use during construction and operation, including materials, energy and water use - Increased waste production, both during construction and operation - Increased air and noise pollution, particularly during construction but also due to possible car use during occupation - Increased pressure on open space - damage to biodiversity There is also a risk that significant development will lead to a decreased quality of living environment, with high density development potentially leading to reduced space and day lighting and increased	We have signalled the general opportunity to improve the area in para 5.2.19 under SPD 27. There are opportunities to create significant new public spaces, including a market square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the Old Town Hall. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: safety security accessibility the relationship between buildings and their surroundings

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					noise, and decreased quality of the design and negative impacts on local character and the historic environment. This is an opportunity to enhance biodiversity value and community benefit by maximising the green space. There's a clear link between nature conservation and well-being as published in the CABE report "Greening the Grey" http://webarchive.nationalarchives.gov.uk/20110118095356/http://www.cabe.org.uk/files/grey-to-green.pdf	
639	109				Open-City is an independent organisation that champions the value of well designed places and spaces in making a liveable and vibrant city, and the role everyone plays within it. A high-quality built environment plays a key role in making cities liveable. Our advocacy and enabling work focuses on in-depth collaborative engagements that help councillors, communities and other stakeholders to consider what 'design quality' means, why it is vital in creating a more liveable city and how to demand it in their neighbourhoods. Our wealth of experience, expertise and research has been built up over two decades and we have a broad reach among many different communities – local authority officers and councillors, young people, creative professionals, and the wider public. This forms the basis of our response to this consultation. The consultation documents are comprehensive and wide ranging. There is a large amount of information to take on board and to assess before making comments. It is inevitable, with such a spread of information and a fairly limited time to comment, and given that the SPD does not create new policy, that the comments we feel able to make are fairly limited. However, one of our particular areas of expertise and experience is public art and public realm, primarily gained through our Art in the Open (AITO) programme, and I have attached some detailed comments and suggestions in respect of this area.	Comments noted
639	110				Coming to the document, and looking at the consultation strategy in particular, there is a nagging sense that the process feels top down and that this is a 'consultation' document. We did attend one of the events organised to engage with the community, and found it to be thinly attended, though this may be by no means typical.	Our Statement of Community Involvement 2008 (a statutory document) sets out how and when we will involve the community in the alteration and development of town planning documents and applications for planning permission. National planning laws set out the minimum standards for public consultation. We have gone beyond

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						<p>these standards and have set out how we have engaged with the community, stakeholders and businesses in the preparation of the SPD in the Consultation Report. The preparation of a scoping report was the first stage to assist in the preparation of the SPD and its sustainability appraisal. The Scoping Report was subject to public consultation in January 2011 - February 2011. The scoping report set out the sustainability objectives and indicators that will be used to measure the impacts of the SPD upon sustainable development and it also set out baseline information to draw attention to key environmental, social and economic issues in the area which may be affected by development in Elephant & Castle. Consultees were asked to provide details of any other plans and programmes, sustainability objectives, key issues and baseline information that they considered to be particularly relevant to the preparation of the SPD. We received a number of consultation responses on the Scoping Report. These are set out in the Appendices to the Consultation Report. This stage informed the preparation of the draft SPD. We consulted on the draft SPD for 12 weeks, comprising of 6 weeks informal and 6 weeks formal consultation in accordance with our SCI. In undertaking the consultation programme for the SPD, we have needed to take into account the important roles played by the different groups and communities within the area to find out the best ways of involving people in the consultation. We have worked with established networks and partnerships to try to make sure that people are being involved effectively. The Consultation Report sets out a detailed account of the range of events and meetings held.</p>
639	111				<p>Through our work, we are aware that there are distinct communities within the Elephant and Castle area, some of whom feel that they associate with certain spaces and places within their locality. Generally speaking, an understanding of particular groups and their needs and aspirations does not come through the document, although it is clear from the lists and events in your consultation strategy that attempts are being made to get to many different groups.</p>	<p>We have inserted additional references into the SPD section 2.2 'Elephant and Castle Today' to ensure the importance of the diverse community in the area is sufficiently highlighted.</p>

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639	112		SPD 17 - Building heights		However, the focus of our perception is around statements SPD15 (Public Realm) and SPD16 (Built Form). Whilst supportive of the general thrust of these statements, and the principles of urban design being promoted to make better places, the sense of distinctiveness reflected in a place by the resident ethnic group(s) and their lives in that area is not prominent. The sense that neighbourhoods and communities living within places have been listened to and understood within the context of making a prosperous Elephant and Castle, and a better Borough is not strong. A possible manifestation of this process might have been reference to groups within the area who might be considering neighbourhood plans or community action (in the spirit of the Localism Act) of their own, or who have ambitions in this direction. As well as the built form, the social context can add to sense of place, the character of a place and elements of the existing environment, all of which are cited in statements SPD15 and 16.	The Council is supportive of neighbourhood planning. In April 2011 it was announced that Southwark had been selected by the government's Department for Communities and Local Government as one of the neighbourhood planning front runner authorities. The purpose is to test out the principles of neighbourhood planning as set out in the government's Localism Act, will be demonstrated. The Council has been working with a neighbourhood forum in the Bermondsey/London Bridge area as well as the Bankside Resident's Forum to provide support and advice on the preparation of neighbourhood plans. We have added reference to the potential contribution of neighbourhood planning to the area in Section 2 of the SPD. Neighbourhood planning will allow people to come together through a neighbourhood forum and discuss what detailed changes they would like in their areas and prepare neighbourhood visions and policies.
639	113		SPD 15 - Public realm		Balanced with this, we do appreciate that some overall consistency to Elephant and Castle is needed if the area is to work effectively as a key destination within central London (as reflected in the vision). Statement SPD15 perhaps needs some expression of what is meant by high quality and durable materials and street furniture to demonstrate how the public realm will work across the area as the glue that brings the character areas together. This seems particularly pertinent in the case of consolidating Walworth Road and Elephant and Castle, as expressed in SPD1. These two areas are some distance apart, and there remains a danger that they continue to work separately, despite efforts to consolidate them.	We have referred to the Council's Streetscape Design Manual in the supporting text to SPD15 -Public Realm, which provides further guidance to the types of materials which will be appropriate in the borough. The objective of the Streetscape Design Manual is to raise the quality and consistency of the design of streets and spaces in Southwark and widen the purposes they serve by: <ul style="list-style-type: none"> •Introducing a more standardised approach to their design and appearance •Improving consistency and coordination of the planning and execution of works •Considering all uses and users of streets and spaces in the design process, not focussing on vehicle movement alone.
639	114		SPD 15 - Public realm		Summary statement – Open City / Art in the Open We welcome the positive attention given to the public realm in the SPD and the specific references to the commissioning of art in public. However, we feel this important and strategic south London regeneration scheme would benefit greatly from a more generous consideration of integrated art commissioning and development of a wider cultural provision. We believe that: - the commissioning of high	Comments noted. Detailed comments are provided in response to representation reference 115

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					quality, integrated artworks, or artistic elements, can greatly enhance the design, vitality and experience of the public realm; - commissioning of art in the public realm can increase access to contemporary art practice, encouraging greater links to nearby national cultural centres, such as the Tate Gallery and South Bank, as well as strengthening local provision; - art in public can help to create uniqueness of place and new landmarks, enhancing local identity - it can be achieved with humour, diversity, and a creative challenge to orthodoxy, creating special places that people want to return to, dwell in, pass through and use. More specifically, art in public can support: - enhancement and identity of spaces and circulation in new retail centre in the Central Zone; - enhancement of routes through and between spaces across the OA – especially pedestrian and cycle routes; - strengthening of culture and arts as part of the urban fabric of the area; - creation of a stronger destination pull for visitors across London and internationally, enhancing business and the local economy; - encouraging students to study at LCC and LSBU.	
639	115			Transport Quarter SPD 51 - Built Environment	Summary statement on art in public realm for the Enterprise Quarter: We welcome the inclusion of references to commissioning art in the public realm in the Enterprise Quarter. In places, however, the references to public art need to stress the importance of an integrated approach that includes the commissioning of art along with other elements in the design process for the public realm. The phrase, 'consideration of public art....' seems weak, and may encourage the notion of public art as an add-on or afterthought at the end of the process. The approach to art in public needs to be more ambitious to fully achieve the potential for exceptional public realm and urban design for the zone. Art commissioning and artists' involvement could be part of the overall design of routes and way-finding, enhancing the experience of moving through the public realm by pedestrian/cycle routes, road crossings, and gateways – possibly with repeating or conceptually and visually linked elements	We have also added additional supplementary text to SPD11 (Public Realm) to highlight the opportunity for new developments to introduce unique elements within the public realm or on buildings to enhance the sense of place and quality of the new neighbourhood. This includes: Public art opportunities Wayfinding elements Street Furniture Lighting Hard and soft landscaping SPD11 sets out guidance for development to use existing and new landmarks and views to help direct pedestrians to key locations such as transport interchanges, public spaces and major roads, as well as providing good quality way-finding signs that follow the principles of Legible London. We have also added additional supporting text to SPD11 'Walking and Cycling' to highlight the vision to provide a network of pedestrian and cycle routes through the area, with appropriate provision of signing and physical infrastructure, connecting to existing and proposed networks in the surrounding area
639	116	3 - Vision and			Theme 5: Built environment: Attractive neighbourhoods with	We have included reference to supporting public art within

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		objectives			their own character • Promote a high quality public realm which is safe, secure and attractive. • Create a positive identity for the town centre which reflects its status as a major destination in south London and potential to appeal to a wide catchment. ADD new point • Commission artists as part of the design process introducing high quality, contemporary integrated artworks in the public realm, that engage with people and place	the supporting text to Policy SPD15: Public Realm
639	117		SPD 6 - Wellbeing - Social and community infrastructure		SPD6. Arts, Culture Leisure and Entertainment These uses will be supported where they contribute to consolidating the town centre. Development proposals on the Heygate, 50 New Kent Road and the Shopping Centre should include arts, cultural and leisure space which contributes to a lively and vibrant town centre. The factors to be taken into account in assessing such proposals are listed. ADD - encourage and reinforce links between cultural programming in designated cultural spaces and the inhabitation and activation of the public realm outside, strengthening the area as a cultural and educational quarter, as well as increasing and diversifying evening use. Area Wide Strategies and Guidance.	We have amended SPD6 to include further encouragement of strengthening links with the two learning centres (London College of Communication and London Southbank University) and the wider arts scene. We have amended the supporting text to SPD6 to provide recognition of the importance of fostering partnerships between the educational institutions, local arts organisations and community groups in order to help broaden access to, participation in and understanding of the arts within the wider community, as the area physically develops. We have acknowledged that a vibrant arts, leisure and cultural scene, will bring employment, engage students, local people and visitors, and create opportunities for training and learning.
639	118		SPD 15 - Public realm		SPD15 Public Realm “We will work with TfL, developers and the community to transform the quality of the public realm in the opportunity area, ensuring that it: • Contributes towards a hierarchy of different types of streets and spaces; • Prioritises pedestrian and cycle movement and creates places in which people will want to linger; • Helps create a sense of place and reinforces the area’s character; • Is inclusive, well lit, overlooked and which feels safe at different times of the day and in the evening. • Uses high quality and durable materials and street furniture and reduces existing street clutter where possible; • Supports adaptation to climate change, helps reduce the urban heat island effect, supports biodiversity, reduces micro-climate impacts and greens the environment by maximizing the retention of existing trees, ensuring streets and spaces are generously landscaped and incorporating Sustainable Urban Drainage Systems (SUDs).” ADD new point • Enhances the	We have provided further detail in the SPD to the contribution of public art in the opportunity area. We have included reference to supporting public art within the supporting text to Policy SPD15:Public Realm We have amended SPD 6 to include further encouragement of strengthening links with the two learning centres (London College of Communication and London South Bank University) and the wider arts scene. We have amended the supporting text to SPD 6 to provide recognition of the importance of fostering partnerships between the educational institutions, local arts organisations and community groups in order to help broaden access to, participation in and understanding of the arts within the wider community, as the area physically develops. We have amended the supporting text to SPD 6 to highlight the contribution and importance these industries have in the context of the economic future of the borough. We have

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					experience of using, waiting, contemplating and moving through places and routes by the commissioning of art and involvement of artists in the design process and design teams	also added reference to creative and cultural industries in SPD 4 and included additional references in the supporting text to ensure the SPD supports the growth of creative and cultural industries in the borough.
639	119	Appendix 2- Public Realm strategy(Ent Qtr)			Appendix 2: Public Realm Strategy – Enterprise Quarter ...The function and appearance of key gateways into the area influence people’s perceptions of accessibility and their choices as to whether to walk or use other modes of transport. It will also have an impact on the overall quality of pedestrian experience and therefore on the attractiveness of LSBU as a higher education institution and its success in attracting and retaining staff and students. The public realm strategy is based on a number of elements: Traffic free public spaces, where pedestrianisation or pedestrian priority is implemented to create new pedestrian space, including key public space nodes; - Green links; Strategic gateways to the area as a whole, which link the enterprise; - quarter to other areas and to public transport nodes; - Gateways into the heart of the area, which link the university to the - wider area and to public transport nodes; - Improvements to key streets; - Improvements to secondary pedestrian routes/ service routes; - Other aspirational elements, and - Other transport improvements to pedestrian, cycle and bus facilities. 1.2.2 Design Principles/Proposals - Create a pedestrian priority precinct with cycle access along the main north-south axis between Borough Road and Ontario Street through removal of all vehicles except emergency access and essential service vehicles. - Define a new square at junction with Keyworth Street with high quality paving including natural stone retaining existing trees and providing additional trees to south side. Provide raised planter to London Road building perimeter to enclose space with trees and ground cover set 450mm above street level to provide additional seating and enclose space. Provide seating and information board. - Consider opportunities for public art in association with this square, either within space or around the perimeter. 1.5 University Gateway - Ontario Street (Project 4b) 1.5.1 Aims - Define gateway to the university quarter from Elephant and Castle; - And the tube station, in order to improve the university’s ‘front door’. - Restructure	We are deleting Appendix 2 as we feel it is too detailed for this document. The detail has been summarised within the policy itself – see SPD 50 third bullet point - “Vehicle priority should be reduced to enhance.....”

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					the existing space to provide a high quality urban square. 1.6 University Gateway - Southwark Bridge Road (Projects 4a, 5g, 5e) 1.6.1 Aims - Reduce barrier effect and enhance east west permeability across the university; - Create more public space for pedestrians to enjoy within the area; Strengthen the gateway on Borough Road; - Consider opportunities for integrating public art into public realm. 1.9 Strategic Gateway - Newington Causeway (Project 3b) 1.9.1 Aims - Define urban square, in order to enhance legibility within the neighbourhood; - Provide space for outdoor seating associated with Public House and in the event of with potential development, create active frontage; - Develop location for public art, in order to reinforce gateway to the university quarter; - Create punctuation point midway between London Bridge area and Elephant and Castle.	
640	106	5 - Character Areas		Heygate Street SPD 27 - Built environment	As residents of Garland Court, Wansey Street my wife and I would like to make the following points about the development of the public square In general we are cautiously optimistic about the development of a town square. However, our main concern is of noise and anti-social behaviour particularly at night. Residents of Wansey Street have long since suffered with people sitting and drinking on the little wall that abuts the site of the old Shell Garage. This has continually resulted in litter and noise late at night. As you can imagine, plans to create a space that positively encourages people to loiter are likely to only increase the type of street drinking that we have had to put up with. We would hope that robust measures would be taken to ensure that the square could not be accessed at night or one that provides no seating. These are the only ways that we can see that it would work with due consideration to residents' needs. Our preference is also for a green space in the square, apart from the aesthetic and environmental benefits this would bring to the area we feel it would help reduce noise from the Walworth Road.	We have signalled the general opportunity to improve the area in para 5.2.19 under SPD 27. There are opportunities to create significant new public spaces, including a market square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the Old Town Hall. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: safety security accessibility the relationship between buildings and their surroundings
641	120	5 - Character Areas		Heygate Street SPD	This is a response from Cllr Toby Eckersley in an individual, Walworth resident, capacity: 1 Strengthen protection of existing mature trees in the Heygate Estate, especially at corner of Walworth Road and Heygate Street	SPD 28 sets out our approach to the Heygate Street character area including to retain as many existing trees as possible, taking into account the character of streets and spaces, their quality, group value and value as individual

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				28 - Natural environment		specimens. Specific reference to the trees at the corner of Walworth road and Heygate Street is set out in paragraph 5.2.23 of the SPD.
641	121	4 -The preferred option/options	SPD 9 - Community facilities		This is a response from Cllr Toby Eckersley in an individual, Walworth resident, capacity: 2) be more robust about school space required for greatly increased population. Para 1.3.3 says new secondary school no longer required. If this is because a secondary school will be provided on the Aylesbury (presumably former Walworth lower school site, Trafalgar Street) that should be clearly stated - with comment on suitability of this site for pupils in E&C area. I could find no reference to primary school provision: if a new school is not required then there should be some comment on expansion potential in existing primary schools in the area. In order to maximise funder interest in providing schools, there should be no bias against free schools.	The details are contained in the Infrastructure Plan in Section 6.5 of Appendix 1. There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work.
641	122	4 -The preferred option/options	SPD 12 - Parking		This is a response from Cllr Toby Eckersley in an individual, Walworth resident, capacity: 3) SPD12: revisit car parking. The attractiveness of dwellings for family occupation would be enhanced by some parking provision. On-site car parking provision (e.g. underground) should not be entirely excluded in the CAZ, unless the car club arrangements provide assurance that a car would always be available at short notice. At a minimum, developers' views about the relevance of this aspect to their intentions re marketing of the non-affordable housing should be heeded. Non-availability of on-highway respark is supported.	All development will be required to make adequate provision for parking for disabled drivers. We believe that the needs of all other residents can be met through a combination of walking, cycling, public transport, car clubs and taxis, and so do not require private car parking. Agreements for car club spaces provided to support car-free development will include conditions to ensure a good level of availability of the cars.
641	123	5 - Character Areas		Brandon Street SPD 31	This is a response from Cllr Toby Eckersley in an individual, Walworth resident, capacity: 4) Mention Browning's tomb in the Brandon Street character area section (para 5.3)	The tomb is not Browning's, he is buried at Westminster Abbey. The tomb is a survival from the former York Street Chapel, built, originally in 1790, York Street is the former name of Browning Street. The chapel is famous as the poet Robert Browning was baptised here. The chapel was destroyed in a fire in 1978. The tomb was moved from the site of the chapel and is that of Richard Holbert, one of the founders of the chapel.
641	124	5 - Character Areas		Transport Quarter	This is a response from Cllr Toby Eckersley in an individual, Walworth resident, capacity: 5) reference to "Walwott" Sq conservation area (SPD 51, p112) should probably be to	This typographical error has been noted and amended.

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				r SPD 51 - Built Enviro nment	Walcot Sq conservation area, and would sit better in section on West square character area rather than Enterprise Quarter character area.	
642	141	4 -The preferred option/options	SPD 14 - Transp ort mitigati on		1. I welcome the policy approach that all development will be phased so that the transport capacity can be improved in time to accommodate the new residents, but am unclear how development control will be able to implement such a proposal. I would like to see more detail on how this will be achieved.	The method of control has not yet been determined, but has proven effective on other developments, notably for the large-scale mixed-use development at Brent Cross.
642	143	4 -The preferred option/options	SPD 5 - New Homes		2. Targets for delivering new homes should be realistic and should not be set at such a scale that any one ward bears the burden of all the housing development, particularly when the infrastructure has not increased sufficiently to meet the demand that already exists. Despite the number of homes which have been built in Cathedrals ward in recent years there has been no increase in the number of doctor's surgeries in the ward and open space has been lost and not replaced, despite this being an area of open space deficiency. It should be noted that whilst the Heygate estate is being demolished to make way for new homes, this is not the case in other wards where residential properties are being squeezed in on top of everything that already exists.	The target for new 4,000 new homes in Elephant and Castle is set out in the Core Strategy. We cannot change this through the SPD. Existing policies are already in place to ensure that as well as delivering new homes to help meet housing need and our housing target, we also protect other uses where appropriate and encourage supporting infrastructure. Appendix 1 of the SPD also sets out further information on implementation, including an infrastructure plan to ensure that the supporting infrastructure (to include transport, leisure facilities, community facilities and open spaces) to support the increased population. SPD 20 sets out guidance on planning obligations and the community infrastructure levy to ensure the delivery of key infrastructure and to mitigate the impact of development.
642	144	4 -The preferred option/options	SPD 8 - Higher educati on and student housin g		3. Student housing should be restricted so that it does not form a significant component of any ward's population. Any student accommodation should be part of a strategically approved plan and speculative generic student accommodation on windfall sites should be discouraged.	SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is already a larger concentration of student housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities. Our view is that the Core Strategy

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						policy will enable a balance between student and other types of housing, whilst SPD 33 will ensure there is no an over-concentration in the Walworth Road character area. Within other parts of the opportunity area, student housing may be acceptable, subject to the Core Strategy policies as we do not think there is an over-concentration of student housing in other parts of the opportunity area and as the two local universities both have expressed a need for more student accommodation.
642	145	4 -The preferred option/options	SPD 8 - Higher education and student housing		4. The two universities should be supported in their growth, however this must be in conjunction with the aspirations of the whole community. The universities should not be supported over and above what is appropriate to the area in building and infrastructure terms.	The SPD promotes the growth of the two universities. Proposals involving the expansion of the universities will be assessed against all the policies in the SPD.
642	146	3 - Vision and objectives	SPD 18 - Open spaces		5. 3.2.10 Promote, enhance and increase the network of high quality open spaces etc.	There are limited opportunities to create new open space across the borough. We have amended paragraph 3.2.10 to state "Promote and enhance the network of high quality open space"
642	147	4 -The preferred option/options	SPD 3 - Hotels		6. A significant number of hotel bed spaces have been provided in Southwark since the GLA's 2006 Hotel Demand Study. Please clarify how many more bed spaces are needed in Southwark overall.	The majority of new bed spaces have been provided in the Bankside area. We consider the hotels can make a valuable contribution to the mix of uses at Elephant and Castle. They may also help relieve pressure in other areas such as Bankside. 807 hotel bed spaces have been built between 2006/07 and 2010/11.
642	151		SPD 6 - Wellbeing - Social and community infrastructure		7. Please clarify how the council is ensuring that local facilities are located together, and specifically what those facilities are in relation to Cathedrals ward. Please explain why the S106 health contribution from developments has not resulted in any new health facilities for the increasing population in Cathedrals ward.	Promoting the co-location of community facilities is a general principle that is reflected in plans and strategies for a number of departments and services across the Council. Examples in the Cathedrals ward include redevelopment of the leisure centre. We will continue to work closely with NHS Southwark to determine need for new and improved health facilities. Current dialogue suggests no demand for new facilities in the short/medium term, but a longer term need to accommodate population increases around London South Bank University. We have amended the land use guidance for the Enterprise Quarter to state that proposals for health provision in that area will be

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						supported. There are opportunities on non-council owned sites. The approved scheme on the site of the former London Park hotel includes the provision of a theatre and the council is currently considering an application for business incubator space and gallery space at London South Bank University. We will also continue to secure community use of new school facilities in line with the Southwark Plan, although no new school developments are proposed in Cathedrals ward in the immediate future.
642	152	4 -The preferred option/options	SPD 11 - Walkn g and cycling		8. Please ensure that the desire for cyclists to take the fastest route through the Elephant and Castle does not impede on the ability of other road users (including pedestrians) to navigate safely through the Elephant and Castle area.	All schemes will be designed to ensure a safe interface between pedestrians and cyclists.
642	153	4 -The preferred option/options	SPD 10 - Public Transp ort		9. Whilst I am a big supporter of car free development, there needs to be a significant improvement in the usability of the public transport system in order to offer a credible alternative to car ownership. This means that the already overcrowded bus and tube facilities at the Elephant and Castle must be properly adjusted to meet the increasing demand.	Elephant & Castle is already highly accessible by bus, underground and rail. Through Policy SPD 10 we will seek improvements in capacity to bus and underground facilities.
642	154	4 -The preferred option/options	SPD 13 - Servicing and deliveri es		10. Whilst it may be appropriate to prevent servicing and deliveries from clogging up the main roads, careful consideration should be given to the impact on residential amenity of existing properties from servicing points located in narrow side and back streets.	Our planning policies require developments to make adequate provision for servicing. Any proposal that would lead to disruption on any street would be resisted.
642	155	4 -The preferred option/options	SPD 10 - Public Transp ort		11. I would urge you to take serious note and respond to the concerns that have been raised by residents around the proposals to change the traffic patterns on London Rd and St George's Rd. This matter needs to be given separate and careful consideration and should be looked at more thoroughly.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
643	158				Overall we think the document covers most environmental issues well although a few themes could be expanded upon. However, we do recognise that some of the issues may have been addressed in other LDF documents.	Noted.
643	160	4 -The preferred option/options	SPD 19 -		Paragraph 4.6.12 and 6.5.22 address the residual Tidal Flood Risk but do not fully acknowledge Southwark Councils	This is a borough wide issue. Core Strategy policy 13 requires development to reduce the risk of flooding by

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			Energy , water amd waste		responsibilities under the Flood and Water Management Act. Both these paragraphs should make reference to the existing surface water flood risk within the Opportunity Area, make links to Southwark Council's Surface Water Management Plan and recommend that development delivers on priority actions within the Surface Water Management Plan. The Southwark Strategic Flood Risk Assessment (SFRA) and the Sustainability Appraisal acknowledges that given the heavily urbanised character of much of the borough, it is inevitable that localised flooding problems arising from under capacity drainage and/or sewer systems will occur, particularly given the mounting pressure placed upon ageing systems as a result of climate change. Furthermore, sewer systems are generally designed (in accordance with current Government guidance) to cater for the 1 in 30 year storm, and highway soakaways are generally designed for only 1 in 10 year storms. Storms over and above these design events will exceed the drainage system, resulting in overland flow, often in an uncontrolled manner, resulting in localised flooding. Although relatively few localised flooding incidents have been observed in recent years, any location within the borough may be susceptible to localised flooding, irrespective of whether or not they have flooded in the past.	reducing surface water run-off and using sustainable urban drainage systems. A Surface Water Management Plan for the borough is currently being prepared and we will look at taking forward the recommendations through our forthcoming Development Management DPD. Further guidance is also set out in our Sustainable Design and Construction SPD.
643	161	4 -The preferred option/options	SPD 19 - Energy , water amd waste		No mention of Contaminated Land There is no reference to dealing with land contamination in the OAPF despite the area having a significant industrial history. We feel the document does not adequately reflect the economic opportunities and potential constraints associated with strategically assessing and treating brownfield land in the Elephant and Castle OAPF area. A Global Remediation Strategy (GRS) could be developed for the OAPF to help strategically assess the potential risks associated with redeveloping previously developed brownfield land. There is also an improved Code of Practice to regulate the reuse of excavated materials. This Code will facilitate easier cleaning up and re use of excavated materials in soil treatment centres or soil hospitals, which can economically serve a number of small development sites in an area and reduce the need and cost of sending off site to landfill or treatment. We are promoting the consideration of potential hub and	This is a borough-wide issue and is addressed through Core Strategy policy 13 which states that we will set high standards and support measures for reducing air, land, water, noise and light pollution. In line with policy 1 of the Core Strategy we will continue to direct development to brownfield sites, where there is contamination of land, remediation will be required before development can proceed. Further information is also set out in our Sustainable Design and Construction SPD which states that; •where a sensitive use is proposed or on sites that have had or are adjacent to past industrial uses, a study must be submitted with the planning application that identifies the potential for contamination on the site based on past land uses and site conditions. •Where there is a real potential for contamination, or not enough information is available to show there is no risk of contamination, a more detailed study will be required that determines

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					cluster sites in other Opportunity Areas. Please refer to the link below -Development Industry Code of Practice - Definition of Waste http://www.claire.co.uk/index.php?option=com_phocadownload&view=file&id=212:initiatives&Itemid=82 "	whether contamination actually exists, its nature and the risks it may pose and whether these can be satisfactorily reduced to an acceptable level through remediation. This study must be carried out by a qualified professional.
643	162	4 -The preferred option/options	SPD 15 - Public realm		P52 Section 4.5 SPD 15 Public Realm Good section on Climate Change Adaptation in SPD 15: Public Realm. We advise that SuDs will also reduce urban diffuse pollution and this could be added to the list of benefits in Paragraph 4.5.2.	Support noted. We have added reducing urban diffuse pollution to the list of benefits in Paragraph 4.5.2
643	163	4 -The preferred option/options	SPD 19 - Energy , water and waste		P65 Paragraph 4.6.12 There is a missed opportunity at the end of this paragraph to recommend that Greenfield Run-off rates should be delivered within Elephant and Castle.	We have added an additional sentence to paragraph 4.6.14 stating that where possible, greenfield run-off rates should be achieved on site. However, this is predominantly a borough-wide issue, Core Strategy policy 13 sets out a target for all major development to reduce surface water run-off by more than 50%. Further information is also set out in our Sustainable Design and Construction SPD.
643	164				We hope the regeneration of Elephant and Castle will deliver greater resource efficiency, appropriate use of brownfield land and protect and enhance a network of well designed public realm, and incorporate the highest standards of surface water management and contribute to an improved and protected water environment.	The purpose of the Elephant and Castle SPD is to provide a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The vision for Elephant and Castle states that the area will be a leading example for sustainable development. It will meet the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality. A key theme of the SPD is Theme 6 Natural Environment: Sustainable use of resources, which sets out objectives to; •Promote a network of high quality open spaces which have a range of functions including recreation, children's play, sports and food growing. •Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes. •Reduce the impact of development on the environment, minimising greenhouse gas emissions and enabling adaptation to climate change and managing pollution, waste and flood-risk. Sustainable development is a borough-wide issue. Core Strategy policy

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						13 sets how we will require all development to require as little energy as possible to build, we will also require applicants to demonstrate how they will avoid waste and minimise landfill from construction. Our Sustainable Design and Construction SPD also sets out additional guidance
643	166	3 - Vision and objectives			We support the vision for Elephant and Castle and especially the undertaking in paragraph 3.1.4 that Elephant and Castle will be a leading example for sustainable development meeting the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality. The Environment Agency supports growth that can be supported by the necessary environmental infrastructure (for water resources, wastewater, waste and flood risk management), provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities.	Support noted.
643	168	3 - Vision and objectives			We support Theme 5: Built environment: Attractive neighbourhoods with their own character. The economic value of the green infrastructure would also enhance the economic value of a neighbourhood. By improving building façades and creating a more pleasant environment with communal gardens, play areas and other green spaces, the turnover of tenancies would decrease dramatically — as well as unemployment rates. The theme should be used to create spaces that are accessible to the public and perhaps provide multiple benefits. It would also be a great way of improving the economic value as well as the social and environmental value of a locality, because it starts to look better, it feels better; confidence rises.	Support noted.
643	169	3 - Vision and objectives			We also support 3.2.10 Theme 6: Natural environment: Sustainable use of resources. We welcome the council commitment to incorporate green roofs in new developments. Living roofs and walls can enhance biodiversity, reduce the risk of flooding (by absorbing rainfall), improve a building's thermal performance, thus reducing associated energy costs, help counter the Urban	Support noted.

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					Heat Island Effect, support higher density more sustainable development and improve the appearance of the urban areas. For more information please refer to our Green Roofs Toolkit	
643	171	4 -The preferred option/options	SPD 5 - New Homes		We support the council commitment to meet the standards of residential design and space. We are please to note that design will also take into account the provision of SUDS. The Flood and Water Management Act 2010 will introduce far-reaching requirements for SUDS on future construction work. When the commencement order takes effect, applicable construction works will not start until drainage systems have been approved by 'Approving Bodies' in line with national standards for SUDS. The existing right to connect surface water drainage systems to public sewers (under Section 106 of the 1991 Water Industry Act) will be restricted to those approved under the new regime, i.e. appropriate SUDS. Approving Bodies (the local planning authorities) will be obliged to adopt all approved drainage systems except those on single properties and public highways. Road drainage will be adopted by Highways Authorities, as now, but design, construction and maintenance must be in line with the new national standards. This will therefore impact on how development in the town will be implemented. The Act applies to any construction work that creates a building or other structure, including "anything that covers land (such as a patio or other surface)", that will affect the ability of land to absorb rainwater. In other words all new buildings, roads and other paving, whatever the size, type or scale of the project, will be affected – as well as alterations that have drainage implications	Support noted.
643	173	4 -The preferred option/options	SPD 15 - Public realm		We welcome the council preferred approach to create distinctive neighbourhoods. The Draft Planning Framework has an explanation of how the uses will work together, making the place more useful for the community and, where possible, allowing people to do more than one thing in the same area. Having a good mix of uses is a vital part of creating sustainable places and communities. We hope the amount of development planned will take into account how much development is suitable for each site. This should take	Support noted.

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					account of the various restrictions identified in the site analysis and the aims of good urban design. It should balance a variety of design features such as solar gain, crime prevention and accessibility and explain the design decisions that are made. It would be very useful to explain the purpose of different parts of the site and placement of certain buildings or spaces.	
643	174	4 -The preferred option/options	SPD 18 - Open spaces		The Draft Planning Framework should help explain that planned landscape design is based on a strategy for long term maintenance and management. It should explain the purpose of landscape design on the site, and how this will be achieved and maintained, for example to create a natural habitat, support an existing green corridor or provide a sensory garden or play space.	Paragraph 5.2.22 sets out our approach to the Heygate Street character area which states that proposals will be expected to provide a coherent landscaping strategy which considers the role of spaces, the links between them, its maintenance and delivery. Detailed matters such as landscaping will be considered as part of the planning application process. In line with policy 12 of the Core Strategy, we will require a design and access statement to be submitted with all development proposals. The design and access statement is required to include an explanation of the commitment to maintaining the landscaping.
643	177	4 -The preferred option/options	SPD 18 - Open spaces		We welcome the wide coverage provided in the Draft Planning Framework on open space. Improving and linking green spaces to local residents and wider population and visitors is crucial and we welcome proposals for the improvement and enhancement of the public realm. In particular we see development as an opportunity for the green spaces to become a major educational and community resource. Providing new and attractive green grid style development, improving entrance ways and knowledge of parks, enhancing and possible extension of the existing green spaces, would be welcome development.	Support noted.
643	178	4 -The preferred option/options	SPD 19 - Energy , water amd waste		Southwark is in a designated area of serious water stress and targets currently exist in the London Plan for water efficiency. Southwark is also situated in Thames Water London Zone, where a deficit in supply is currently met by use of the desalination plant, and further deficits will need to be met in future to meet demand from future growth. The 5-year (2005/06 and 2009/10.) average water use in London Water Resource Zone is 167 litres per person per day, which is much higher than the England and Wales average of 150 litres per person per day. Therefore water efficiency	This is a borough wide issue. Core Strategy policy 13 requires development to achieve a potable water use target of 105 litres per person per day. Our Sustainable Design and Construction SPD sets out further information on reducing water use including; •Applications should demonstrate how the water demand of the development has been minimised through water efficient design. •Residential developments should achieve a potable water use target of 105L per person per day. •Non-residential development should achieve at least 1 BREEAM credit for

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					<p>measures will be essential to support new growth in the borough. We welcome the Draft Planning Framework commitment to encourage the sustainable use of water resources and its target to reduce demand per person per day. Although we recognise that the planning framework covers a limited area, there is still scope for residents and businesses to reduce the water they consume through improved water efficiency. Key water efficiency measures include:</p> <ul style="list-style-type: none"> • Installation of water savings fittings - dual/low flush toilets, spray taps, low flow showers; • Retrofitting 'variable flush' devised in existing toilets; • Use of water efficient appliances - dish washers and washing machines; • Opportunities for grey water (i.e. used wastewater, such as bath water, for non potable uses, such as toilet flushing) and rain water use; • Low water-demand planting in gardens; • Use of sustainable urban drainage systems (such as green roof tops); • Behavioural changes - i.e. turn off taps when not required, full load washes. <p>The Draft Planning Framework should offer an opportunity for the borough to exceed the targets in the London Plan and contribute to achieving sustainable water use. London Plan 2011 Policy 5.15 Water use and supplies sets a water use target of 105 litres per person per day for residential development, a target which takes into account the standards in the Code for Sustainable Homes. The Flood and Water Management Act 2010 requires that all new sewers/lateral drains are adopted by the Water Companies. Existing private drains and sewers were adopted from 1 Oct 2011. Developments with new sewers are now required to enter into an adoption agreement under the Water Industry Act 1991. Developers are expected to produce detailed drawings, manhole schedules and sections together with drainage calculations to the Unified Build Standard issued by DEFRA. This standard is expected to be incorporated into the forthcoming Sewers for Adoption 7th Edition which will also cover pumping stations. Sewers should include adequate clearance from adjacent buildings to allow for future access for maintenance and structural integrity of the sewer. Careful routing of the drainage network would minimise the requirements for Easements and Building-Over agreements. Consideration should be</p>	<p>water consumption.</p> <ul style="list-style-type: none"> • Highly efficient water saving fixtures, fittings and appliances should be used. • Development should include a system to collect rainwater for use in external irrigation/watering, unless this is not feasible due to site constraints. • The development should connect to a local water supply or borehole where this is available. • There should be 100% metering of all newly built property

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					accorded to the area's vulnerability to climate change, using the most recent scenarios and specifically the implications for built development, infrastructure and services and biodiversity. The council should require development proposals to take account of the expected changes in local climate conditions, throughout the proposed lifetime of the development, by adaptation or flexibility to allow future adaptation. Information on these measures must be submitted with an application. Specifically, the council should require major developments to: <ul style="list-style-type: none"> • identify the type of and extent of the main changes expected in the local climate throughout the lifetime of the proposed development, • identify the potential impacts of these changes on the proposed development and its neighbours, • indicate the ways in which the proposed development design overcomes the hazards and exploits the opportunities associated with these impacts whilst meeting other sustainable development criteria, particularly the need to achieve overall reductions in greenhouse gas emissions 	
643	179	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		Once London Borough of Southwark has a charging schedule in place the default position is that all chargeable developments will pay CIL. Ensuring that the CIL and planning obligations are used to complement one another as methods of securing infrastructure and community benefits will be the key to smooth operation. To avoid any double charging to developers, the council cannot seek the provision of or contributions towards those items included in their Charging Schedule (R123 of the CIL Regs) through planning obligations, even where they could be justified as site-specific remediation. However there may be certain sites where the on-site requirement for the provision of infrastructure will require use of planning obligations.	The council will consult over the summer on its draft preliminary charging schedule. When adopted, CIL may supersede the s106 policy in the SPD.
645	226				The EAN report on their Visioning Day held on 4th June 2011 needs to be carefully examined and reviewed and, where necessary, relevant points incorporated into the SPD.	We have provided detailed representations on all EAN's comments.
645	228	3 - Vision and objectives			The Elephant & Castle area has long been a place of settlement and movement in south London; historically the cross-roads that people passed through north to the river	The author's vision is noted. It is considered that the SPD picks up on the themes mentioned. SPD 5 reiterates the need to create mixed communities which include both

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					<p>and its many bridges, the City and the West End and south to residential London and Kent and Surrey. After the war, accommodating movement turned into domination by movement as the Piccadilly of the south and its communities, shops and entertainments were erased by roads and roundabouts. Now at the start of the 21st Century the Elephant area should be a place both for the thousands who pass through and the thousands who live locally; reconnecting what had become isolated communities living around the Elephant and in Walworth; ensuring that these communities and neighbourhoods can be genuine participants in devising solutions to the big issues we face. (It is important to acknowledge the work community is often used very complacently by politicians, residents and others. There need to be an indication that this concept needs thorough and robust definition. Key factors that are central to strengthening community and building bridges between the diversity of groups that currently live and will pass through the area are building relationships between individuals and groups and making connections. The physical designs in the area needs to promote these factors and the SPD needs to weave this into later sections.) We need to create a housing stock that caters for single people, couples and families of all levels of income. This must include generous levels of social rented housing that meets current and projected future needs. Employment is needed to address the high levels of deprivation in the area and to help younger people to remain; the independent and smaller businesses which can create higher levels of employment and keep the spend in the local area need to be nurtured; a mix of shops, independent traders and street markets is also required to meet the needs of the diverse communities in the area. Our diverse secular and faith communities need to be supported with the facilities that meet their needs. Finally the whole area needs to be knitted together with a network of streets and roads that encourages people to walk and cycle; the potential of the patchwork of open and green spaces to contribute to social interaction and community needs to be endorsed and therefore they need to be protected and also linked by green routes high in biodiversity that offer a contrast and balance to</p>	<p>private and affordable housing. SPD 18 seeks to reinforce the network of open spaces, improving their quality and value to the community. SPD 4 promotes the provision of new business space and highlights the benefits of providing flexible space which can meet the demand of SME businesses. SPD6-SPD9 highlight the need to ensure that growth can be supported by appropriate community and social infrastructure including school places, leisure facilities, health facilities and community spaces.</p>

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					our inner city life. Over the next 20 years we want the Elephant area to become a thriving inner city neighbourhood that meets the needs and aspirations of its existing residents and those who will settle here in the future.	
645	230	4 -The preferred option/options	SPD 1-Shopping		<ul style="list-style-type: none"> • Traders at the E&C Shopping Centre need support for the sustainability of their businesses, and their ability to return/remain in the centre during redevelopment. • The important contribution of small retail units and street markets surrounding the main development sites, providing goods that local people can afford and as local employers. • The value and needs of smaller independent traders and shops on Rodney Road, New Kent Road, Harper Road and East Street must be recognized and supported. • It is essential that the larger 'chain' retail outlets are carefully controlled in order not to undermine the small independent offer. (It is clear that the Use Classes is a blunt tool to deal with this matter and it is vital that consideration is given to introducing local conditions (sequential studies) to encourage an appropriate mix.) • There is a need to support businesses through training and facilitation of knowledge. • Recognition of the contribution of minority ethnic businesses to the variety of retail offers in the area and to cultural diversity by providing the space for the development of social networks and social infrastructure. • Recognition that the railway arches is a business community in transition and with the right support and commitment can fully transform into a thriving Latin Quarter. • Affordable retail units for only 5 years is not enough. The Council should have long term commitment in support of small businesses that will contribute to and enhance the distinctive character of the area. (There needs to be robust studies examining the meaning and achieving a definition of affordability. The experiences of the Technopark and other studies from Swansea and Cardiff Universities may be relevant here.) 	<p>1. Applicants proposing large scale retail development will need to identify through a Retail Impact Assessment the impacts upon existing employment and propose mitigation measures to help address impacts. Affordable space will be secured through s106 planning obligations attached to planning permissions. A legal agreement will set out the nature of the obligation i.e. provision on-site, provision off-site (i.e. to another appropriate site under the applicant's control), or a financial contribution. In those cases where physical provision results the developer would build the units; and in a suitable location, to be agreed as part of the scheme. Their size would be limited by condition or a clause in the obligation. Thereafter, a condition or clause in the legal agreement would restrict the unit as affordable space only. Where off-site physical provision results, a developer could build new units or refurbish existing vacant units and retain ownership as anticipated with on-site provision.</p> <p>2. We have added additional text to SPD1 to provide further recognition of the value and contribution of local shops in the area and also highlighted the importance of the local shopping parades on Rodney Road, New Kent Road, Harper Road and East Street. SPD2 recognises the importance of street markets and their contribution to providing a more varied shopping experience as well as providing local employment.</p> <p>3. The SPD sets out flexible guidance on the mix of uses in order to take into account the needs of future businesses. Large retail schemes will need to submit a retail impact assessment which will include details of the size and mix of new retail units. This will help ensure we meet the aspirations of the SPD to promote a mixed retail offer of large and small units. The Saved Southwark Plan policy 1.7 'Development within town and local centres' will also be used to assess proposals for retail developments. This policy lists out criteria which be used to assess the contribution of new developments will have to the viability and vitality of the centre, to ensure a</p>

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						<p>range and critical mass of retail services are provided. We have however introduced restrictions in the SPD in terms of the proportion of A5 use (hot food takeaway), we have set out in the Walworth Road Character Area guidance that no more than 5% of units on Walworth Road should be in A5 (hot food takeaway) use and a restriction on clustering of units. While it is recognised that hot food takeaways contribute to the mix of town centres, if there are too many it can displace other shop and food options, have a negative impact on the amity of local residents and harm the vitality and viability of the town centre. 4. The SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's. 5. We have amended the SPD within Section 2 to add further recognition of the cultural diversity that exists in the area, including the diversity of businesses at the Elephant and Castle, in particular, the Latin American presence and the contribution to the local economy and retail offer. 4. We have added additional text to SPD4 which acknowledges the Latin American presence in the railway arches and the contribution the businesses make to the area, however it would not be appropriate to have a preference for an ethnic group to occupy business units in the area. 5. Five years is considered a reasonable amount of time for a business to establish itself. While discounted rent will be appropriate to bring independent retailers into new spaces, once they gain traction and start making money, they will be able to afford to pay more rent. MORE HERE</p>
645	235	4 -The preferred option/options	SPD 1-Shopping		<ul style="list-style-type: none"> The location, size and type of hotels that might be introduced into the area need to be very thoroughly examined, particularly in the light of the overall vision above. 	<p>SPD 3 is consistent with the overarching policy 10 in the Core Strategy which sets out policy where we will allow development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. We cannot be prescriptive on the size and</p>

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						type of hotel within the SPD. This level of detail would be assessed at the planning application stage, in terms of assessing design, relationship with other buildings and the impacts on local amenity
645	237	4 -The preferred option/options	SPD 4 - Jobs and Business		<ul style="list-style-type: none"> • Training and employment opportunities in leisure and retail need to be explored with local colleges and universities. (The experience and work of Elephant Jobs needs to be used in this respect.) • New business spaces need to be encouraged that will provide employment opportunities for local residents. In particular the potential of encouraging a network of residential and commercial building maintenance. (Plumbers, electricians, decorators etc do not need large spaces to operate from. Also, remember the bakery run by Gilfords on the Heygate.) 	The SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's. The Council's Economic Development currently funds Business Support advisors which are available to support businesses in the area. SPD4 supports new business space to be designed flexibly to help meet the needs of the local office market and SMEs.
645	240	4 -The preferred option/options	SPD 5 - New Homes		<p>Housing •The central significance of the contribution of housing design and mix to promoting and strengthening community needs to be clearly stated. (This is particularly important given the increased densities that are being projected for the area.)</p> <ul style="list-style-type: none"> •The SPD seeks a target of at least 35% affordable housing throughout the opportunity area. This must be a minimum. As with the comments on affordability in relation to retail there needs to be a close examination of the meaning of affordability and an explicit definition of the same. (As recognized in the Affordable Housing SPD much reference to affordable housing is not affordable to the vast majority of Southwark residents, whether they be families, young professionals, older people. In relation to this point there needs to be a strong cross reference to the Affordable Housing SPD which was recently consulted upon and is due to be considered soon. Consideration should be given to dealing with the next stages of both these SPDs together.) •The space standards and private amenity spaces of all types of homes need to be generous and explicit. (The reference to the details in para. 4.2.5 needs to be made explicit.) <p>The following further</p>	The 35% target is a minimum. See below for detailed comments on the meaning of affordability. We plan to consult on an updated Affordable Housing SPD in spring 2012 to provide further guidance on affordable rent and take into account changes introduced through the National Planning Policy Framework. With regards to the point on space standards, we feel that paragraph 4.2.5 is clear in cross referencing to the minimum space standards in the residential design standards SPD. There is no need for this SPD to repeat guidance in other SPDs. With reference to the proposed further changes. 1. . Social rented housing: The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing

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					<p>changes are required: •The maximum achievable amount shall be social rented housing, recognising that for most local people this is the only housing that is affordable. •An explicit commitment to allow former Heygate residents to return to the new homes must be reaffirmed. (They should be given particular priority when designing sizes and allocating homes in the first development site.) •Viability studies will not be permitted to allow affordable housing to fall below the minimum requirement of 35%. The viability studies will determine how much additional affordable housing above the 35% threshold can be achieved. •A redefinition of the word affordable to relate to actual modest incomes. •The shortage of larger family homes and the fact that lease arrangements (a high number of buy to let properties) have negative impact on community. •There needs to be a higher proportion of 3 bedroom plus homes.</p>	<p>requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies. 2. Viability studies: National guidance through Planning Policy Statement (PPS) 1, PPS12 and PPS3 require policies to have a degree of flexibility to allow for changing circumstances over the lifetime of the plan. They also require policies to be deliverable and implementable. The Core Strategy policy on affordable housing requires as much affordable housing on developments of 10 or more units as is financially viable. As set out in the background paper to the Core Strategy housing policies, our affordable housing viability study (2010) shows that a minimum of 35% affordable housing is a deliverable policy across the majority of the borough over the 15 years of the Core Strategy. However, there may be cases where the policy is not viable, and as set out in the background paper, we allow a financial appraisal to be submitted to justify a departure from policy. This approach is set out in the affordable housing SPDs (both adopted and draft) and applies to the whole borough. The London Plan also advocates this approach. We will therefore continue to require a financial appraisal to be submitted to justify to the satisfaction of the council why the minimum policy requirement cannot be met. 3. Definition of affordable. The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London Plan similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. 4. Family homes. In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the</p>

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						Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. Furthermore the Core Strategy requires a minimum of 60% of units with 2 or more bedrooms. This recognises the need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes. The Elephant and Castle SPD cannot amend these policies. In addition our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. These minimum space standards are approximately 10% larger than our previous standards and will help us to ensure the new development provides an adequate amount of space to create good living conditions.
645	241	4 -The preferred option/options	SPD 8 - Higher education and student housing		Student accommodation that meets the needs of the local higher education institutes and is managed by them. Again, there needs to be close and clear guidance on affordability.	Section 4.3 of our residential design standards SPD sets out that planning applications for student accommodation need to be accompanied with evidence that there is an identified need for this type of housing. This includes confirmation that the accommodation will be affordable to the identified user groups, details of security arrangements and details of the long-term management and maintenance arrangements of the student accommodation. We have updated "we are doing this because" section of SPD 8 in the Elephant and Castle SPD to cross reference to this section of the residential design standards SPD.
645	243	4 -The preferred option/options	SPD 5 - New Homes		Although there can be an overall objective the distribution of affordable homes and their sizes should not be uniform across the whole SPD area. (For example, there are compelling reasons for the first development site to come forward to have a considerable majority of larger and social rented units given the need and location.)	The Core Strategy, saved Southwark Plan policies and the guidance in the Elephant and Castle SPD set out minimum policies for affordable housing and dwelling sizes. We encourage developments to exceed these minimums wherever possible. Subsequently some of the developments may have more affordable housing and

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						larger sized dwellings to other developments.
645	245	4 -The preferred option/options	SPD 9 - Community facilities		As stated in the vision and all the sections above, the promotion and strengthening of community is central and vital to this regeneration project. • Dimensions of regeneration that need to be explicitly stated are social, economic, physical, political and spiritual. • The infrastructure must provide opportunities for individuals and groups to meet, to foster their connections and relationships.	Noted. The vision for the Elephant and Castle is the same as that set out in the adopted Core Strategy, so we are unable to amend that through the SPD. SPD9 sets out that we will work with a range of organisations to identify need for new community infrastructure over the lifetime of the plan. Existing community facilities will continue to be protected by policy 2.1 in the Southwark Plan. In addition to built facilities, the SPD details a number of new public spaces and projects to improve the public realm that could support more informal meeting and social interaction. Further detail is set out in Section 5 Character Areas.
645	258	4 -The preferred option/options	SPD 6 - Wellbeing - Social and community infrastructure		• Careful attention and explicit reference needs to be given to the potential of arts and other creative/cultural activities. (The existence of some vibrant local organization e.g. Cooltan Arts, Southwark Playhouse, Blue Elephant Theatre, Hotel Elephant needs to be affirmed and they need to be brought together to help develop a strategy).	We recognise in the supporting text to SPD6 (Arts, Culture, Leisure and Entertainment) the contribution and importance these sectors have in the context of the economic future of the borough. We have also added reference to creative and cultural industries in SPD4 (Jobs and Business) and included additional references in the supporting text to ensure the SPD supports the growth of creative and cultural industries in the borough.
645	260	4 -The preferred option/options	SPD 9 - Community facilities		• On the other hand, design and layout of buildings and spaces must not fragment and 'ghettoise' parts of the area. • The location and development of existing schools, police facilities, surgeries, libraries, cultural activities, sports (indoor and outdoor) facilities, places of worship, advice centres, bases of support and voluntary organizations needs careful consideration. Similarly the potential of connections between these organisations need to be considered. (For too long and too often many of the above exist in their own bunkers and too little commitment is given to the benefits of a holistic approach.) • Also, thought need to be given to the creation of more informal meeting spaces and, in this context and more generally , there needs to be a clearly stated principle which emphasizes the importance of engaging local residents in a meaningful way. • Careful attention needs to be give to the resourcing of these processes. (The work of local independent organizations like the Elephant Amenity	Comments noted. Built environment policies in section 4.5 include a range of criteria that aim to deliver high quality design. This includes consideration of the local context and character and the need to ensure a good relationship between buildings and the public realm. Guidance in the character area sections builds on these principles. The provision of the facilities mentioned has been considered throughout the preparation of the SPD. SPD9 sets out that we will promote the development of community facilities in accessible locations. Where opportunities arise, we will pursue the co-location of facilities since this has benefits for the facilities themselves and the people who use them. The fact box in SPD9 includes a broad range of community facilities that could be used as informal meeting places and we will support a range of these over the lifetime of the SPD. Similarly, Section 5 on the character areas sets out detail about a number of areas where we will focus on

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					Network, Walworth Society, Elephant Urban Forest, Elephant and Castle Community Development Trust, Blackfriars Settlement all need attention and appropriate funds found.)	improving the public realm and creating new public spaces.
645	264	4 -The preferred option/options	SPD 10 - Public Transp ort		The approach of TfL to date is appalling given the statements in The London Plan. They should be required to be much more imaginative and also reconsider their capital investment programme and contribution. The amount they take from the s106 contribution should be minimal.)	The purpose of s106 contributions is to mitigate the impact of development. The anticipated growth in homes and jobs in the area will impact of public transport infrastructure. There is a need to increase capacity in the northern line station in order to accommodate growth. The strategic transport tariff set out in the SPD will help secure the necessary improvements.
645	266	4 -The preferred option/options	SPD 10 - Public Transp ort		Public transport connections and hub: given the centrality of public transport in the area connections between the bus stops, underground stations and railway station must be given a high priority in the design and layout of the Town Centre. In particular, the location of the bus stops (the current arrangement is a bad experience – inadequate pavement space and shelters) and the under use and unsafe and inaccessibility of the rail station need urgent attention.	Policy SPD 10 covers this.
645	267	4 -The preferred option/options	SPD 14 - Transp ort mitigati on		The TfL roads. The red route roads in the area and especially the northern roundabout at the E&C and the New Kent Rd need to be humanised by reducing their domination by motor vehicles through capacity reduction, pavement widening, subway removal and speed reduction.	We are working with TfL to develop the design for the northern roundabout. While measures to "humanise" it are a key priority for the council, we must recognise that it is a strategic part of the Transport for London Road Network and as such we cannot compromise traffic capacity.
645	269	4 -The preferred option/options	SPD 11 - Walkn g and cycling		20mph. Streets and roads in our area should be designed and designated as 20mph maximum to encourage walking and cycling. Nothing makes a bigger difference to road safety than lower speed limits.	The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.
645	270	5 - Character Areas		Walwo rth Road SPD 34 - Transp ort and movem ent	Walworth Rd. The Walworth Rd project needs to be completed making the Walworth Rd single carriageway in each direction (with adequate bus stopping spaces) in the northern section between Amelia St and the E&C and in the southern section by the Gateway Estate.	Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of

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						further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.
645	271	4 -The preferred option/options	SPD 19 - Energy , water and waste		Heavy traffic, poor air quality, noise and pollution are major issues. The SPD should require robust evidence of the impact of development proposals in these areas.	It is a key objective of the SPD to reduce the impact of development on the environment and manage pollution, waste and flood-risk. Ensuring development does not have a negative impact on the environment is a borough wide issue and our approach is set out in Core Strategy policy 13. Saved Southwark Plan policy 3.3 also requires a sustainability assessment to be submitted with all major development proposals setting out how the economic, environmental and social impacts of the proposal have been considered. Further information is also set out in our Sustainable Design and Construction and Sustainability Assessment SPDs.
645	275	4 -The preferred option/options	SPD 15 - Public realm		It is important to examine the sustainability of demolition and redevelopment. The 1995 Unitary Development Plan contained a clause about not demolishing structurally stable houses – this clause could be reinstated in the SDP, giving a positive bias towards refurbishment.	The purpose of the Elephant and Castle SPD is to provide a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The vision for Elephant and Castle states that the area will be a leading example for sustainable development. It will meet the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality. A key theme of the SPD is Theme 6 Natural Environment: Sustainable use of resources, which sets out objectives to; •Promote a network of high quality open spaces which have a range of functions including recreation, children’s play, sports and food growing. •Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes. •Reduce the impact of development on the environment, minimising greenhouse gas emissions and enabling adaptation to climate change and managing pollution, waste and flood-risk. Sustainable

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						development is a borough-wide issue. Core Strategy policy 13 sets how we will require all development to require as little energy as possible to build, we will also require applicants to demonstrate how they will avoid waste and minimise landfill from construction. Our Sustainable Design and Construction SPD also sets out additional guidance for reducing the amount of raw materials used over the lifetime of a development. The priorities are; •Existing buildings on a site should be adapted and reused as much as possible. It may be possible to achieve other environmental objectives (such as improving energy efficiency) by small additions and adaptations to the fabric (such as new window fittings and extra insulation). •Where the adaptive reuse of the whole building is not appropriate, developments should investigate reusing parts of the existing building. •Demolition materials should be reused on-site where possible, such as for aggregate, fill or landscaping, or as part of new structures. •Where additional building materials are required, the use of recycled materials is preferred and these should be from sustainable or local sources •Demolition materials or surplus materials not required for the development should be collected for reuse and recycling in other building schemes.
645	276	4 -The preferred option/options	SPD 17 - Building heights		The SPD must demand evidence that tall buildings will not have a negative effect on micro-climate, particularly studies of sunlight, shading and ground level wind patterns.	SPD 17 states that tall buildings should avoid harmful microclimate effects. This would include effects on sunlight and wind patterns. Developers would need to demonstrate this in submitting applications.
645	278	4 -The preferred option/options	SPD 18 - Open spaces		Landscape must be accessible and the split between public and private space needs clarification. Spaces must be well designed to encourage people to meet and linger outdoors. The work of the Elephant Urban Forest needs to be affirmed and developed.	We will provide further clarification on how public and private space will be identified in SPD 15 of the final SPD. SPD 15 sets out how we will create places in the public realm where people will want to linger.
645	280	4 -The preferred option/options	SPD 18 - Open spaces		The EAN report on Interim Uses needs to be carefully examined and reviewed and, where necessary, incorporated into the SPD. Similarly, the Open Spaces Strategy and comments received during that consultation should be reviewed and assessed for relevance.	Interim uses are referred to as part of our strategy for the Heygate Street character area. They are also addressed further through the draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535

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						/open_space_strategy
645	283	4 -The preferred option/options	SPD 20 - S106 Planni ng obligati ons and the commu nity infrastr ucture levy		<p>The benefits of S106/Community Infrastructure Levy (CIL) payments from developers. Making sure money is spent in the area. • Much of the success of the SPD from the point of view of local people depends on the actual creation of the improvements set out in the SPD. • There are real fears that the vast majority of the contributions by developers will be allocated to TfL for their high profile and extremely expensive transport improvements at the E&C. where the principal beneficiaries will be those travelling through the local area or coming into the area to shop or spend leisure time. • Unless community priorities such as green routes, social rented housing, affordable retail units and improvements to community facilities are in fact created then the regeneration will simply be shoehorning more people into a dense space and displacing others who can no longer afford to live in the area. The following commitments need to be explicit in the SPD: • S 106 spend on the above 4 categories and the proposed Green Routes will be quantified and ring-fenced. • There will be transparency and public oversight of where s106 from each development in the Opportunity Area is being spent and specifically from the Lend Lease developments. • To work with the local community to agree projects from the community project banks that will receive s106 funding from the Lend Lease developments.</p>	<p>We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area.</p>

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						http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
645	284	4 -The preferred option/options	SPD 15 - Public realm		Local people are keen to see the historic architecture of the local area preserved and provide a contrast to the new developments that will be created. Although conservation areas are proposed at Larcom St and Elliotts Row, we are keen to see a conservation created along the length of the Walworth Rd between Wansey St and Manor Place in the north and Burgess Park in the south. We would also like to see the island block on the west side of the Walworth Rd north of Hampton St included in the Walworth Rd conservation area. (Relevant work done by the Local History Studies Library based at John Harvard Library and also the work and writings of Stephen Humphrey relating to the Elephant and Castle and Walworth Road needs to be carefully reviewed.)	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
645	286				The regeneration of this area is a very challenging matter, given its unique location in both Southwark and London and also the many and various dimensions of regeneration. Supporting and creating and developing community – relationships, resilience, connections, commitment – is central to this process. In spite of the political and other pressures to get on and deliver something and the prevailing hostile financial climate care needs to be taken in order not to leave successive generations with a mess.	We agree that it is important to ensure that regeneration and growth are coordinated to help ensure sustainable development.
646	313				I write to you as a resident of Perronet House, Princess St, SE1 6JS. I have: - Lived in the Elephant and Castle for 8 years and in Cathedrals Ward, Southwark for 13. - Volunteered and encouraged people into greening and beautifying the public realm here for 8 years. - Written about Elephant and Castle in my book and articles, published around the world, most recently South Korea. - A degree in urban and economic geography from Oxford University - Had the world's media and royalty visit me in the Elephant and Castle, from the New York Times to Daily Mirror, Daryl Hannah to Camilla Duchess of Cornwall. - Worked for 13 years employed to promote behaviour change through marketing communications on behalf of leading brands and government departments. - Loved the Elephant and Castle	Noted.

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					and I welcome bold regeneration initiatives. But I think there's lots of room for improvement within the SPD and some worrying risks too.	
646	314	4 -The preferred option/options	SPD 18 - Open spaces		Vision. I believe Elephant and Castles heyday (late nineteenth century, early twentieth century) can teach us a lot about direction for regeneration. - A major transport intersection (road, rail, foot) - A destination for escapism (entertainment, worship) - A destination for shopping - A place of diverse workers and diverse residents It was dynamic and distinctive. WWII damaged it. The 1950s' simplistic aspiration that the transport system should flow as smoothly as the blood in our veins made it worse, inappropriately designed retail space in the 1960s (the shopping centre) failed quickly and mono-tenure housing in the 1970s (Heygate Estate, Perronet House, Draper House, Albert Barnes) sealed its fate for decades as an area for the deprived to sink into. Remarkably amongst all of this green space has not been in short supply at Elephant and Castle since the 1970s, but it has been hidden away in places like the Heygate Estate (Elephant and Castle Urban Forest) and Gaywood Estate and taken for granted on roundabouts and verges because of the distraction of concrete and cars. The SPD seeks to solve some of this but also seems poised to repeat these failings, remixing the problems for the early 21st century because once again the balance between these uses seems wrong.	We recognise that there is much to learn from the way in which the area has developed which should inform our current approach..
646	315				The SPD also seems out of balance: - Transport – undervaluing the role E&C plays as a major transport route and hub and too opposed to private motorised transport whether for parking or for flow. - Environment – undervalues existing green assets and initiatives. - Retail – too generic and uncompetitive given E&C's proximity to competition. - Housing – skewed towards small households These issues will now be looked at in turn:	Detailed comments have been provided on these matters.
646	316	5 - Character Areas		Central Area SPD 22 - Transp	Transport. · St George's Road – do not make this two way traffic by diverting London road south bound private vehicles onto it · St George's Road has a far higher proportion of residential housing, much of it closer to the road than London Road and not built to withstand noisy motorised transport in	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road

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				ort and movement	contrast with the modern residential block on the south end of London Road · St George's Road is home to community amenities such as schools, churches, gyms, sports ground and the Imperial War Museum that would suffer from the increase in traffic. · St George's Road should be seen as a potential green route connecting Elephant and Castle to Lambeth North, not as spare capacity for private traffic. · The grounds (pedestrian safety) for reducing traffic on London Road seem really misguided – it's the two-way buses that are usually cited for the danger, and these would remain! · A few Garden Row residents have turned this idea into a cause they're championing because their short one-way road would become quieter from these changes. · This is such a significant proposal, such major surgery to the road system, and yet the proposals and implications are buried as one bullet point of the SPD on page 45. Surely a focused consultation should be had separate from this consultation?	safety, and extensive further consultation.
646	317	5 - Character Areas		Central Area SPD 22 - Transport and movement	North Roundabout – we should not rule out the role of subways in helping improve the flow and safety of all the users. They appear to have been written off as wrong in any form, yet usually this comes from those who have little need to use them. Space is so precious here. · The subways could be made simpler and more welcoming: configured in a more logical way (straight lines), better sign posted, more colourfully illuminated, decorated or upgraded with commercial premises. Look what improvements in lighting and paint did for the subways around Waterloo ten years ago. · If we place all users at the same street level then it inevitably slows people and those on wheels and it increases hazard. Already pedestrians jump the lights at the new crossings on the south roundabout, taking a risk between the dual carriageway traffic. I believe in shared space and 'naked streets' but not in every situation. · With intelligent investment in design and marketing the subways even have potential to give Elephant character and distinctiveness.	On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings.
646	318	5 - Character Areas		Heygate Street SPD	Walworth Rd – the investment in new pavements and road narrowing was a great vision but a botched poor quality execution that has deteriorated in pot holes and dented street furniture. This project needs completing up Walworth	The principles set out in the SPD intend to ensure that the quality of the public realm is of a high standard, implemented well and conform to other standards set out such as in our Design and Access SPD. Our Design and

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				27 - Built environment	Road to Elephant Road and upgrading in standard so it is safer and more welcoming for all users, whether on foot or on wheels	Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings
646	319	5 - Character Areas		Rockingham SPD 54 - Transport and movement	New Kent Road – the flow of pedestrians and cyclists from the north of New Kent Road to the South needs to be encouraged and made safer. Meadow Row offers potential, as does the new raised cul-de-sac next to the viaduct and new L&Q building.	The redevelopment of the Heygate Estate will provide an environment that is highly permeable for pedestrians and cyclists.
646	320	4 -The preferred option/options	SPD 14 - Transport mitigation		Cars – they are being demonised in this plan, whether for residents or visitors. Private motorised transport is hugely liberating. Driven at slow speed and powered by clean sources of energy, cars need not be the killing machines they are sometimes portrayed as. The fine line is getting their volume and placement right. Let's go for tweaking the status quo rather than seeking wholesale surgery.	Noted, and we believe the policies in the SPD would achieve this.
646	321	4 -The preferred option/options	SPD 18 - Open spaces		Environment ·Public spaces are there for people to pass through and linger in. We should not only be encouraged to enjoy public parks but the public realm can be a place of leisure too. All spaces, except where flow is priority should be designed to encourage people to meet and linger outdoors. We should not fear anti-social behaviour colonising these spaces. This can be discouraged without resorting to negative landscape engineering.	It is a key part of the vision set out in the SPD to create a more attractive and safe environment with priority for public transport users, cyclists and walkers over the car. We will seek to ensure that a new and improved street layout is provided including new public open spaces which will allow those who live and work in the area to move around easily and safely. SPD 15 sets out how we will prioritise pedestrian and cycle movement in the public realm and create places in which people will want to linger. SPD 27 sets out how we will ensure internal courtyards and communal amenity spaces are designed for a range of activities, including seating areas, play spaces and community planting. We will require landscaping to be of

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						high quality and encourage biodiversity through tree planting/retention, water features and habitat creation. Our draft Open Space Strategy sets out further information on improvements to the quality of open spaces and this is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
646	322	4 -The preferred option/options	SPD 18 - Open spaces		Existing green space must be treasured and incorporated into the plan. The SPD and Southwark Council's emerging Open Spaces Strategy has a significant flaw: the maps and auditing ignores all green spaces that weren't already 'protected' as parks. Open, green/grassy/shrubby/flowery land on housing estates and within the transport network is ignored. Were this land included: <ul style="list-style-type: none"> · Your ratios of people to open space would immediately be improved · The need for new green spaces would be less pressing. · Brown field sites would be prioritised for redevelopment. · Existing green space could be invested in and offer greater value to residents (e.g. lighting, raised beds, play areas, allotments) · Existing green space would also be less vulnerable for development e.g. The large grassy area containing mature trees that sits at the centre of the north roundabout of Elephant and Castle is most vulnerable. It provides a soothing antidote to the bustle of traffic, a sink for rain-water, a stop off point for wild life. Think of all the people who benefit from it, both passers by on foot, in cars and all those who look down on it from the high-rise homes of Metro Central Heights, Strata and Perronet House. I've seen people have BBQs out there, sit there reading and even do gardening there. I fear it could become as sterile and functional as the hard landscaping at the south roundabout. 	We have an additional paragraph (para 4.6.5b) setting out more detail on how we will seek to improve the amenity value of land on housing estates and within the transport network. Further information is also set out in our draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
646	323	4 -The preferred option/options	SPD 18 - Open spaces		Robust, straightforward landscape design rather than tricky expensive gimmicks – less fancy hard landscaping and more practical soft landscaping – the £1m spent on St Mary's Churchward with Martha Schwartz association (2008) was a misguided investment. The build quality was as poor as the design quality. It began falling apart quickly, and what appears to be its most popular asset (the wide flat lawn and children's playground) is obscured by the shabby yellow	SPD 27 sets out how we will ensure communal amenity spaces are designed for a range of activities, including seating areas, play spaces and community planting. We will require landscaping to be of high quality and encourage biodiversity through tree planting/retention, water features and habitat creation. Our draft Open Space Strategy sets out further information on improvements to the quality of open spaces and this is available to view on

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					forest of Belisha beacons and tawdry concrete baubles. The park's makeover mocks the worst of the existing shabby street furniture.	our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy Detailed matters such as landscaping will be consulted on as part of the planning application process.
646	324	4 -The preferred option/options	SPD 18 - Open spaces		Empower local volunteers to help maintain the public realm – this might sound a bit too idealistic but in reality it's already happening here already (in fact E&C even had a royal visit in 2011 to see what's been happening in this realm), TfL are gently encouraging it and next door in Lambeth, they're even funding schemes inspired by guerrilla gardeners. With so many people living here without gardens their energy could be creatively channelled into tending the public realm.	This is a borough-wide issue and is addressed further through the draft Open Space Strategy. The draft Open Space Strategy sets out a key objective to encourage local communities to be involved in the planning, design and management of local open spaces. The draft Open Space Strategy is currently out for consultation and is available to view on the council's website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
646	325	4 -The preferred option/options	SPD 15 - Public realm		Public realm must be easily accessible and not privatised into new-gated communities. The document is vague about what is accessible and what is private.	SPD 16: Built Form has been amended to say that developments should provide an appropriate sense of enclosure, helping create well defined, inclusive and defensible streets and public spaces. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: safety security accessibility the relationship between buildings and their surroundings
646	326	4 -The preferred option/options	SPD 1- Shopping		Commercial (Shopping and Entertainment) · The SPD seems to be based on an outmoded premise that thriving conventional local retail environments are relatively straightforward to create – create the stores of the right size, put them in busy places, the chain brands will come and the customers will then spend. Yet national trends suggest the opposite is happening – we are after more experiential shopping experiences if we're not to just shop online. http://www.guardian.co.uk/business/2012/feb/02/high-street-shops-death-spiral?newsfeed=true	Our policies have been informed by a Retail Capacity Study which looked at available expenditure and also took in to account the growing amount of shopping done on line. We are confident that the population in the catchment and available expenditure can support the growth set out.

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646	327	4 -The preferred option/options	SPD 1-Shopping		<p>I fear we will have a glut of conventional commercial premises (we already have some new long term empty retail spaces at Wansey Street, New Kent Road and Walworth Road)? To become a genuine retail destination we need to either be differentiated or to be a stronger magnet than rival local retail hubs, or a bit of both.</p> <ul style="list-style-type: none"> o Differentiation: In retail this usually emerges slowly quite naturally through specialisation of trade (e.g. Hatton Garden), through immigrant settlers, (e.g. Brick Lane), through opportunistic entrepreneurs benefiting from low rents to launch low margin or high-risk businesses (e.g. Shoreditch in the 1990s). Implications: introduce restrictive planning guidance to create clusters of trades or subsidise low margin, high-risk businesses – 5 year’s affordable rent is not long enough. The existing traders may well offer the best opportunity to get this started. They must be celebrated for their future potential. o Stronger Magnet: pull out all the stops so people come here for pleasure. Invest in significant car parking, provide large retail anchors (a big supermarket) and entertainment and cutting edge architecture. Think Westfield or at the very least Canary Wharf with John Lewis and a big car park at the heart of it. 	<p>We have recognised in the SPD that Elephant and Castle currently has a specialist function, but this only appeals to a small catchment area. Our Retail Study suggests that more comparison goods floorspace can be provided at Elephant and Castle and through SPD1 we support the introduction of new large ‘anchor tenants’ and a wider mix of retail uses. SPD6 supports more arts, culture, leisure and entertainment uses to be provided in order to support a more lively and vibrant town centre, and importantly, increase its attraction to a wider catchment. With regard to car parking, our objective through our adopted Core Strategy is to encourage people to use sustainable types of transport. In preparing the transport guidance in the SPD we have taken into account London Plan and Core Strategy policies. The Mayor states in Policy 6.13: Parking - that an appropriate balance should be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. The Policy also states at bullet b) that in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people). We have set out the requirement for car-free development in the CAZ, with justification set out in the supporting text to SPD12. In assessing planning applications which propose car parking, we will take into account London Plan Policy 6.13 E c) which states that in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole.</p>
646	328	4 -The preferred option/options	SPD 9 - Community facilities		<p>Musical halls and religious venues thrived in Elephant’s hey day. Some still do, and these should be nurtured and more encouraged with other cultural amenities.</p>	<p>We promote provision of new arts, cultural, leisure and entertainment uses in SPD6 Our strategy through SPD9 is to locate community facilities together in accessible locations, so that opportunities are taken to ensure new facilities can be used by all members of the community.</p>
646	329	4 -The preferred option/options	SPD 9 - Comm		<ul style="list-style-type: none"> o Make more of the Imperial War Museum by encouraging people to come via Elephant and linger enroute there. o Encourage IWM to have a prominent satellite location for 	<p>The council recognises the contribution of IWML to the opportunity area. The wording in SPD16 has been changed to draw attention to IWML's masterplan.</p>

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			unity facilities		some of their exhibits – a tank, a plane etc o Encourage a new flag ship high end cultural venue to locate here	
646	330	4 -The preferred option/options	SPD 15 - Public realm		o Extend borders of Bankside Urban Forest deeper into Elephant and Castle so visitors north of E&C are encouraged to wander south.	We have included a reference to improving links to Bankside Urban Forest in paragraph 4.6.5 of the final SPD.
646	331	4 -The preferred option/options	SPD 9 - Community facilities		o Invest in marketing cultural events at Elephant and Castle.	The SPD has recognised there is an opportunity to build upon the positive reputation of the Elephant and Castle as a creative area, improve its arts and cultural offer and strengthen and diversity the evening economy. This is set out in SPD6. We have amended SPD6 to include further encouragement of strengthening links with the two learning centres (London College of Communication and London Southbank University) and the wider arts scene. The Council actively promotes and supports cultural events through various communication channels, such as the Council's Events webpage on the Council's website. The Arts and Culture team also offer support and resources to organisations and community groups throughout the area to help them deliver activities, events and workshops. One example of partnership working is with the Southwark Arts Forum who provide a range of networking, advice and information services to its members.
646	332	4 -The preferred option/options	SPD 9 - Community facilities		o Make Elephant and Castle Southwark's political hub with a new town hall here.	We have amended the document to say that we will explore opportunities to provide a new multi-purpose meeting space or civic space at Elephant and Castle. However, it is not envisaged that this would be a town hall.
646	333	4 -The preferred option/options	SPD 5 - New Homes		Housing We need a higher proportion of 3+ bedroom homes. The area has the potential to provide a wide range of inner city housing to a diverse range of residents who can benefit from the local area and central London attractions. There is a disappointing skew towards small housing stock that is not suitable for families and encourage short-term residency as people migrate away when they reach that life stage. My peer group (30-something highly skilled professionals settling down to have a family) reluctantly leave an area they love	The Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5

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					because so little housing stock of this spec is available at any price in this locality. I know several families who have done this already and more lined up to go.	bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. Furthermore the Core Strategy requires a minimum of 60% of units with 2 or more bedrooms. This recognises the need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes. The Elephant and Castle SPD cannot amend these policies. In addition our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. These minimum space standards are approximately 10% larger than our previous standards and will help us to ensure the new development provides an adequate amount of space to create good living conditions.
647	335	4 - The preferred option/options	SPD 10 - Public Transport		I have recently heard that buried within the plans outlined for the regeneration at Elephant and Castle is a proposal to make St Georges Road carry traffic in both directions and to make London Road public transport only. I own a house in St Georges Road (133) and wish to register a firm objection to this proposal. Our houses are a row of grade 11 listed survivors. The resultant increase in traffic flow and stationary vehicles emitting pollutants will be highly damaging to the fabric of these buildings. In addition, I cannot see how the essential parking outside our houses will be able to be retained within the width constraints of the road. There is a dedicated disabled parking space to cater for the needs of one of the residents and many other elderly people that rely on their cars being close to their properties. The removal of this essential facility will be unacceptable. At present the traffic flow works well - 'If it ain't broke'!	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
648	336	5 - Character Areas		Heygate Street SPD 27 - Built environment	It has been brought to my attention the Council wishes to build a new square on the empty space beside the old town hall, at the end of Wansey Street, on the lot formerly occupied by Shell. I welcome this development as I believe a square will uplift the overall aspect of the former Heygate Estate. The large-scale demolition of the block of flats behind this plot of land is two years behind schedule and the general feel of the area, falling within the regeneration zone, is	This proposal has been identified as a development site in the next stage of the SPD. Further detail on the design of the space will be worked up through the application for the Heygate estate and public consultation will be undertaken on this. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the Old Town Hall.

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					<p>currently depressed on account of the dilapidated council flats and the empty lot. There have been incidences of squatting and serious crime committed in this immediate area over the past year and it would be appropriate for the Council to open the space with a square. This will be good for the morale of the local community (those living and working along Wansey Street and the Walworth Road) and further instils a sense of pride in local residents. An example of a successful regeneration of a public space can be found in Brixton. Windrush Square by the Ritzy Cinema demonstrates how such projects, if carried out sensitively, can lift the image of an area. These are my views: 1. I support the transformation the old patrol station into a square and would be in favour of planned green space. If this area is to be paved, it must be sensitively done so as to blend in with the local landscape. There are many paved spaces in the surrounding area – those by the Elephant & Castle Shopping Centre and the Strata – there is the good argument therefore to keep further paving to a minimum. 2. Any development must bear in mind the needs of the local community. The square must be aesthetically pleasing and those living on Wansey Street must be consulted when plans are drawn. Similarly, security concerns are foremost in the minds of local residents. Public squares have the tremendous advantage of being a focal point for the local community (Clever Square in Kennington is a good example). However, there is the danger that the space is unintentionally marred by the few who engage in anti-social behaviour. Future developments around the site, whether for business or leisure, must complement the square (and the wellbeing of local residents) and not become the cause of concern.</p>	
648	337	4 -The preferred option/options	SPD 8 - Higher education and student housing		<p>Lastly, on the opposite the site of the proposed square are two large student halls of residence – the Julian Markham House and Dashwood Studios. A third site is being currently developed by safestay on the grounds of the old Labour Party Headquarters on the Walworth Road while a fourth is being planned. While the presence of students often adds to much colour and vibrance to the areas they are a part of, there is also the danger of anti-social behaviour and this</p>	<p>Noted. The Core Strategy sets out our policy on student housing which whilst recognising the need to provide student homes also seeks to ensure that student housing development does not harm the local character. The SPD provides further guidance specific to the Elephant and Castle. SPD 33 on the Walworth Road character area sets out that "Student housing development at the northern end of the character area (north of Amelia Street) will not be</p>

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					could be the source of tension between the different groups living in that area. I would urge the Council to be mindful of these possibilities in their planning discussions and decisions. Regular contact with the providers of student accommodation services and the relevant universities must be maintained to ensure that noise disruption is minimised and complaints are dealt with swiftly. I welcome students to the Walworth Road and would be disappointed if they were regarded as a nuisance. I make this statement knowing that there have been instances over the years of some students misbehaving and being inconsiderate in what is effectively a residential area.	supported. As set out in your response, this section of the Walworth Road, which includes Julian Markham House and Dashwood Studios, as well as a recent permission on Hampton Street to built 221 student bed spaces already has a lot of student housing. By not allowing any more we will ensure that there is a choice of housing types to create mixed and balanced communities SPD 8 provides further guidance on higher education and student housing to set out that proposals for the provision of space used for higher education will be supported. As set out in the we are doing this because section, we will continue to work with the two local universities (London South Bank and the London College of Communication). Furthermore, existing guidance in our residential design standards SPD sets out guidance to ensure that student housing does not harm the character of an area including requiring evidence of a management strategy.
649	338	4 -The preferred option/options	SPD 10 - Public Transport		We gather that representation regarding the redevelopment Elephant and Castle should be sent urgently - mainly because most people we know in our neighbourhood have not been consulted and the deadline for comment has almost passed. We only found out about the deadline last week. We certainly have an objection - regarding the proposed changing of the St George's Road traffic system from one-way to two-way. This would make traffic very dangerous for the people - many of them children - attending the four schools and one nursery in the road, as well as the Cathedral, Morley College and the Imperial War Museum. In fact, we are surprised that a 20 mph speed limit has not already been imposed for the safety of the above-mentioned visitors as well as the many local residents. There is also the pollution - both of noise and emissions from traffic - to be taken into account. We can assure you we are not the only householders deeply concerned about the traffic plan	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
649	420		SPD 10 - Public Transport		We certainly have an objection - regarding the proposed changing of the St George's Road traffic system from one-way to two-way. This would make traffic very dangerous for the people - many of them children - attending the four schools and one nursery in the road, as well as the	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road

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					Cathedral, Morley College and the Imperial War Museum. In fact, we are surprised that a 20 mph speed limit has not already been imposed for the safety of the above-mentioned visitors as well as the many local residents. There is also the pollution - both of noise and emissions from traffic - to be taken into account. We can assure you we are not the only householders deeply concerned about the traffic plan	safety, and extensive further consultation.
650	339	4 -The preferred option/options	SPD 5 - New Homes		The SPD seeks a target of at least 35% affordable housing throughout the opportunity area. The following changes are required: - The maximum achievable amount shall be social rented housing, recognising that for most local people this is the only housing that is affordable. - Viability studies will not be permitted to allow affordable housing to fall below the minimum requirement of 35%. The viability studies will determine how much additional affordable housing above the 35% threshold can be achieved. - A redefinition of the word affordable to relate to actual (modest) local incomes. - The shortage of larger family homes and the lease arrangements (a high number of buy to let properties) have negative impact on community. There needs to be a higher proportion of 3 bedroom plus homes	1. Social rented housing: The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies. 2. Viability studies: National guidance through Planning Policy Statement (PPS) 1, PPS12 and PPS3 require policies to have a degree of flexibility to allow for changing circumstances over the lifetime of the plan. They also require policies to be deliverable and implementable. The Core Strategy policy on affordable housing requires as much affordable housing on developments of 10 or more units as is financially viable. As set out in the background paper to the Core Strategy housing policies, our affordable housing viability study (2010) shows that a minimum of 35% affordable housing is a deliverable policy across the majority of the borough over the 15 years of the Core Strategy. However, there may be cases where the policy is not viable, and as set out in the background paper, we allow a financial appraisal to be submitted to justify a departure from policy. This approach is set out in the affordable housing SPDs (both adopted and draft) and applies to the whole borough. The London Plan also advocates this approach. We will therefore continue to

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						<p>require a financial appraisal to be submitted to justify to the satisfaction of the council why the minimum policy requirement cannot be met. 3. Definition of affordable. The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London Plan similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. 4. Family homes. In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. Furthermore the Core Strategy requires a minimum of 60% of units with 2 or more bedrooms. This recognises the need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes. The Elephant and Castle SPD cannot amend these policies. In addition our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. These minimum space standards are approximately 10% larger than our previous standards and will help us to ensure the new development provides an adequate amount of space to create good living conditions.</p>
650	340	4 -The preferred	SPD		I am not in favour of making Walworth Road a single	The SPD does not include any specific proposals for

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		option/options	10 - Public Transport		carriageway in both directions or introduce a 20 mph speed limit. The TfL roads and especially the northern roundabout at the E&C and the New Kent Rd need to be made far safer for pedestrians and cyclists and users of powered two-wheelers.	Walworth Road. Improvements to TfL roads are sought by a number of policies in the SPD, including major improvements to the northern roundabout.
650	341	4 -The preferred option/options	SPD 1-Shopping		<ul style="list-style-type: none"> · Traders at the E&C Shopping Centre need be able to remain in the centre during redevelopment and return afterwards. · Recognise the important contribution of small retail units and street markets to providing goods that local people can afford and as local employers. · Recognition of the contribution of minority ethnic businesses to the variety of retail offers in the area. · Recognition that in the longer term the Arches can fully transform into a thriving Latin Quarter for London. · Affordable retail units for only 5 years are not enough. 	<p>1. Applicants proposing large scale retail development will need to identify through a Retail Impact Assessment the impacts upon existing employment and propose mitigation measures to help address impacts. Affordable space will be secured through s106 planning obligations attached to planning permissions. A legal agreement will set out the nature of the obligation i.e. provision on-site, provision off-site (i.e. to another appropriate site under the applicant's control), or a financial contribution. In those cases where physical provision results the developer would build the units; and in a suitable location, to be agreed as part of the scheme. Their size would be limited by condition or a clause in the obligation. Thereafter, a condition or clause in the legal agreement would restrict the unit as affordable space only. Where off-site physical provision results, a developer could build new units or refurbish existing vacant units and retain ownership as anticipated with on-site provision.</p> <p>2. We have added additional text to SPD1 to provide further recognition of the value and contribution of local shops in the area. SPD2 recognises the importance of street markets and their contribution to providing a more varied shopping experience as well as providing local employment.</p> <p>3. We have amended the SPD within Section 2 to add further recognition of the cultural diversity that exists in the area, including the diversity of businesses at the Elephant and Castle, in particular, the Latin American presence and the contribution to the local economy and retail offer.</p> <p>4. We have added additional text to SPD4 which acknowledges the Latin American presence in the railway arches and the contribution the businesses make to the area, however it would not be appropriate to have a preference for an ethnic group to occupy business units in the area.</p> <p>5. Five years is considered a reasonable amount of time for a business to establish itself.</p>

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650	342	4 -The preferred option/options	SPD 17 - Building heights		The SPD must demand evidence that tall buildings will not have a negative effect on micro-climate, particularly studies of sunlight, shading and ground level wind patterns	Policy SPD 17 states that tall buildings should avoid harmful microclimate impacts. This would include impacts on sunlight and wind.
650	343	4 -The preferred option/options	SPD 15 - Public realm		Landscape must be accessible and the split between public and private space needs clarification. Spaces must be well designed to encourage people to meet and linger outdoors	We have amended the text in SPD 15 to ensure that there is a clear distinction between public and private space and to ensure that public realm is defensible and inclusive. There are opportunities to create significant new public spaces, including a market square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the old Town Hall.
650	344	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		The benefits of S106/Community Infrastructure Levy (CIL) payments from developers. Making sure money is spent in the area. Much of the success of the SPD from the point of view of local people depends on the actual creation of the improvements set out in the SPD. There are real fears that the vast majority of the contributions by developers will be allocated to TfL for their high profile and extremely expensive transport improvements at the E&C. where the principal beneficiaries will be those travelling through the local area or coming into the area to shop or spend leisure time. Unless community priorities such as green routes, social rented housing, affordable retail units and improvements to community facilities are in fact created then the regeneration will simply be shoehorning more people into a dense space and displacing others who can no longer afford to live in the area. I therefore seek the following commitments in the SPD: <ul style="list-style-type: none"> · S 106 spend on the above 4 categories and the proposed Green Routes will be quantified and ring-fenced. · There will be transparency and public oversight of where s106 from each development in the Opportunity Area is being spent and specifically from the Lend Lease developments. · To work with the local community to agree projects from the community project banks that will receive s106 funding from the Lend Lease developments. 	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be

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						<p>provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds:</p> <p>http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area.</p> <p>http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details</p>
650	345	4 -The preferred option/options	SPD 16 - Built form	Walworth Road SPD 35 - Built form and public realm	Local people are keen to see the historic architecture of the local area preserved and provide a contrast to the new developments that will be created. Although conservation areas are proposed at Larcom Street and Elliotts Row, I am keen to see a conservation created along the length of the Walworth Rd between Wansey Street and Manor Place in the north and Burgess Park in the south. I'd also like to see the island block on the west side of the Walworth Rd north of Hampton St included in the Walworth Rd conservation area	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
651	346	4 -The preferred option/options	SPD 10 - Public Transport		I was horrified to hear of the proposal to make this two way opposite St Georges cathedral where I live. This will increase the noise, make parking harder and reduce the value of our house quite needlessly. Please leave us alone	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
652	347	4 -The preferred option/options	SPD 10 - Public Transport		I have become aware of Southwark Council's proposal to permanently divert all cars, taxis, vans, trucks and coaches on London Road onto St George's Road which would be come two way traffic to accommodate the increase. As a resident living on St George's Road I do not agree with the the proposed plans as this would mean that the road I live on will become noisier and dirtier than it already is. Could you	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					please email me the proposed plans so I can keep updated on the situation and confirm receipt of this email?	
653	353	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and traffic free. Cyclists deserve much more recognition and understanding around Elephant & Castle, so that they can ride safely, and so that ultimately, cycling can be encouraged more widely around this heavily congested and dangerous area of London. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
654	352	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, which I use frequently, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
655	351	4 -The preferred option/options	SPD 10 - Public Transp ort		I am writing to object to the proposal to make St George's Road a two way traffic road. I have lived on St George's Road for 35 years and have seen many changes. This one is the most ill-considered. St George's Road is a mainly residential street - there are 4 schools who will be greatly effected with the extra traffic the two way scheme will generate. Please note my strong objection to this proposal.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
656	350	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and traffic free. Please amend the SPD to provide for this route	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
657	349	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Please please sort out the E&C eastern cycle bypass. The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and traffic free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.

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658	348	4 -The preferred option/options	SPD 10 - Public Transport		I write to express my objection to any proposed changes to the traffic flow on St Georges Rd. I understand there is a proposal to look at directing all private traffic from London Rd to St Georges Rd and make London Rd buses only. Such a change will have the affect of doubling traffic volume on St Georges Rd and, as St Georges Rd is predominantly residential, this will have a unacceptably negative affect on the lives of residents on this road in respect to the levels of noise and safety.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
660	368				As the Council know, Peabody has recently acquired a vacant office building known as the T Clarke building located at 116-118 Walworth Road. The site has been acquired with a view to developing it for housing and, in particular, for affordable tenure housing. The proposals will in addition include a mix of commercial uses including retail at ground level fronting Walworth Road. The potential of the site for a residential led proposal and the scale of development appropriate to the site have been informed by the current adopted SPD guidance contained in the Walworth Road SPD SUMMARY OF THE OBJECTION The draft Elephant and Castle SPD states at Paragraph 1.3.2 that it will replace, amongst other documents, the currently adopted Walworth Road SPD. Paragraph 1.14 of the draft SPD states that the SPD "will help ensure that the Council makes decisions transparently, providing clarity for members of the public and giving more confidence to developers to invest in the area." At paragraph 1.4.1 it makes clear that the draft SPD is not starting afresh, but makes reference to work that has already been undertaken over the years in planning the area. It goes on to state that the Council have collated evidence to inform and justify the draft SPD including information that was collected to prepare the Walworth Road SPD (2008). Our client supports the regeneration of the Elephant and Castle area and considers that the objectives of the new SPD are admirable but believes that these objectives are not borne out in the draft document as published in respect of the Walworth Road area. They consider that the effect of the new SPD, if adopted in its present form, would be to significantly reduce confidence for developers and not assist in investment in the area. Furthermore, our client has	Support for the overall regeneration objectives are noted. The concerns about the removal of the Walworth Road SPD are noted. However, given the adoption of the 2011 London Plan and the Core Strategy 2011, it was considered necessary to update previous guidance for the area and consolidate this into one OAPF/SPD. The thrust of the objectives in the 2008 SPD have been carried forward into the new SPD

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					<p>significant concerns that the Council have not taken account of work that has gone before as it is suggested in para 1.4.1, in particular, in relation to the previously established urban design aspects of the Walworth Road area. For these reasons our client objects to the proposed revised guidance and the proposed replacement of the adopted Walworth Road SPD. The Walworth Road SPD has assisted in guiding developments in the area which have in general either been granted planning permission or have been completed. A few remaining sites, for which this guidance would be relevant, including the T Clark site, have yet to be the subject of formal development proposals. The Walworth Road SPD was published to guide development within the relevant area which was in need of significant investment. Over recent years the majority of the area has now been developed in line with the adopted guidance. Therefore much of the vision the document sought to deliver has now been achieved and thus it is arguable that a standalone SPD for this relatively small part of the Opportunity Area is no longer essential. However, it must be recognised that the full extent of the original vision has still not been delivered and the removal of the key guiding principles from the Council range of planning documents potentially risks its delivery. In particular, the T Clark building is yet to be developed. The guidance as quoted above had specific proposals in terms of the use and height of any such proposal</p>	
660	465			Walworth Road SPD 33 - Land uses	<p>GUIDANCE FOR THE WALWORTH ROAD AREA We set out below in more detail our client's specific objections through the analysis of the guidance that is included in the current adopted Walworth Road SPD, which will be deleted as a result of the adoption of the proposed SPD in the form that it is currently drafted. We also make a number of observations in respect to other parts of the draft SPD. We then make suggestions as to how the SPD might be amended to take account of these concerns. The adopted Walworth Road SPD provides a level of detail sufficient to give reasonable certainty to potential developers bringing forward individual development proposals in the area. The following extracts from the existing adopted guidance are of significant relevance to our client's interest: 5.1 The northern</p>	<p>The SPD sets out specific guidance for the Walworth Road and Rail Corridor Character Areas. The SPD strategy for the Rail Corridor character area includes (amongst others) sets out an appropriate level of detail for the future development of this area. The strategy includes the retention of business uses, introduction of residential on upper floors, reinforce the continuity of the retail frontage along Walworth Road and encouraging a range of town centre uses. Section 5.5 refers to the T Clarke building as a potential development opportunity site, and specifically states that the identified sites can provide a range of uses including residential and business uses. We state that the sites provide the potential to knit together the often fragmented townscape and give the area a more</p>

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					<p>end of Walworth Road is to become the focus of town centre activity for the Elephant and Castle Opportunity Area. Along and adjacent to this street a mix of the following town centre uses will be encouraged on the ground and first/mezzanine floors of new buildings fronting onto Walworth Road, Steedman Street and Amelia Street:</p> <ul style="list-style-type: none"> • Retail (Use Class A1) • Financial and Professional Services (Use Class A2) • Restaurants, cafes and bars (Use Classes A3-A5) • Other commercial leisure uses • Cultural and entertainment uses • Education and training uses • Community and civic uses • Other employment generating uses including offices and light industry (Use Class B1(a) (b) & (c)) • Hotels (Use Class C1) <p>5.2 Mixed tenure residential will be encouraged on the upper floors of all new buildings brought forward in the SPD area. All new replacement buildings (on the remaining sites of 120-138 Walworth Road, T. Clarke building, Kwik Fit, Metropolitan Police Authority and the hotel): Town Centre Uses at ground and first floor/mezzanine. Residential in upper floors. The Walworth Road SPD identifies our client's site as a location which provides the termination of views along Heygate Street and which should therefore provide for a taller landmark development (figure 5.3). It seeks that development should maximise the potential to reinforce the view along Heygate Street and identifies the T Clark site as important in achieving this. At paragraph 5.10 it states: The T. Clarke building currently occupies a prominent location at the termination of views along Heygate Street. The potential exists to mark this viewpoint with a new building of up to 10/12 storeys provided that the proposals are of exceptional design quality.</p>	<p>consistent character. In relation to the list of uses originally set out in the Walworth Road SPD, we have included a Fact Box in SPD4, which sets out a definition of town centre uses which will be considered on sites within the opportunity area. With regard to the comment on tall buildings, we carried out a Tall Buildings Study to consider where tall buildings could be appropriate, sensitive or inappropriate, in accordance with London Plan (2011) policies, PPS5 and CABE and English Heritage guidance. Our testing of options indicated that it would be appropriate for tall buildings to be used to help reinforce the gateways into the centre and provide a focus in views along main roads. We have represented these gateways on Figures 14 and 15. This means that the tallest elements of developments will generally be in these locations. We state in SPD39 (Rail Corridor Build Form) that building heights in this area should relate to the surrounding context. We identify the opportunity for heights of buildings to culminate on plots adjacent to the viaduct, where this built form can complement the adjacent Walworth Road Character Area.</p>
660	471	2- History, Elephant and Castle today, challenges and opportunities			<p>In addition to the potential loss of helpful guidance through the replacement of the Walworth Road SPD set out above, our client has a number of specific concerns in relation to the following</p>	<p>We have responded to each comment made.</p>
660	473				<p>Indicative Land Uses Our client objects to the lack of clarity provided by proposed SPD Figure 5 which indicates that the indicative land uses in the northern part of Walworth Road are mixed use with commercial/community uses with light</p>	<p>We have amended the key to Figure 5 to include a reference to residential use.</p>

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					industrial. It should be made clear that upper floors are predominantly residential	
660	476			Brandon Street SPD 31	Throughout the document the guidance indicates a division in the character of land use and urban form to either side of the northern part of Walworth Road. Whilst it is accepted that the recent history of this location has been a more industrial character to the west and the large residential blocks of the Heygate Estate to the East the document fails to suggest why this character distinction should be continued or perpetuated in the area. Indeed such an approach is likely to lead to an uncomfortable imbalance between the scale of development on either side of the street. An opportunity exists to recognise that the northern part of Walworth Road should have a character of its own as opposed to being a boundary between the two areas derived from a hangover of the past. Peabody therefore object to the approach taken to the different characterisation of the Heygate and Rail Corridor character areas which in their view should be amended to provide a vision for a consistent character for the length of this part of Walworth Road.	The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The West of the Walworth Road is different to the east as has been set out in the document. The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to reflect this. The policies in all three relevant character areas aim to create a more unified character along the street, e.g. by infilling the Heygate frontage and introducing a retail frontage on both sides. The wording in SPD16 has also been changed to read: Consider the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.
660	478		SPD 5 - New Homes		Density Standards The Core Fact Box on page 39 refers to Core Strategy Policy 5 in relation to density. It states that the only exception to the density ranges should be when development has an exemplary standard of design. Our client considers that whilst an exemplary standard of design is something that should in general be sought throughout the opportunity area the guidance should additionally recognise that there are some sites where the nature of the location and the configuration of the site are such that higher density may be appropriate	The fact box refers to existing policy in the Core Strategy which recognises that with opportunity areas there may be cases where schemes can be above the density ranges where exemplary standards of design are met. This already allows specific sites where higher density is appropriate to go over the density ranges set out in the Core Strategy.
660	480		SPD 20 - S106 Planning obligations		Financial Contributions It is recognised that there is a need within the opportunity area for additional infrastructure and contributions should be sought to assist in achieving these improvements. However, our client considers that whilst many of the sites across the opportunity area will be able to make the full contribution there will be a number of sites where the site specific circumstances are such that it will not	Viability is a material planning consideration. It is not considered that a further reference to viability in SPD 20 would improve the policy. The policy has been amended to emphasise that the strategic transport tariff will be applied only on the uplift in floorspace.

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			and the community infrastructure levy		be possible. We note at paragraph 4.7.5 the guidance provides for the use of viability testing as means to establish whether a scheme would be made unviable by the need for such a contribution. Our client considers that the main text contained within the shaded box should make clear the contributions are subject to viability rather than it being part of the explanatory text. It is also considered that the policy would benefit from a clearer explanation of how existing floorspace will be taken into account when calculating the payments due. For example to what extent can existing office floorspace offset any contribution required in relation to new residential floorspace?	
660	482			Brandon Street SPD 31 -	Walworth Road Built Form On page 105 in relation to SPD 39 the draft document states that buildings should be smaller scale and relate to the surrounding built form. This is overly prescriptive and imprecise and should be amended to make clear that this is in general the case but also give recognition that there are sites where greater height is appropriate within the townscape.	We disagree. Our testing shows that there should be a relatively consistent height along Walworth Road and taller buildings should be used to reinforce gateways into the centre and provide a focus along main roads.
660	483				CONCLUSION AND AMENDMENTS REQUIRED The proposed SPD/OAPF fails to provide the level of detail that is appropriate to ensuring the long standing vision for the northern end of Walworth Road is fully delivered. Without this level of detail the application of development plan policy to the area will be unclear and thus the level of developer certainty that is sought by the guidance will not be achieved. In conclusion, and on behalf of our client, Peabody, we object to the cancellation of the Walworth Road SPD because we contend that suitable replacement is not proposed within the draft SPD/OAPF document. Consequently, our recommendation is that the Walworth Road SPD should not be replaced by the draft SPD, or preferably that more detail should be included within the draft SPD to reflect that which will be superseded by the revised document. We trust these representations are helpful in your further consideration of the drafting of the SPD and will be taken into account in the final version of the SPD. We would be pleased to discuss these representations with you should this be helpful	The council has responded to each of the concerns raised by Peabody.

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661	369			Heygate Street SPD 27 - Built environment	Just a quick email to say that I'm very much in favour of the proposed new open space opposite Wansey Street. I'd like it to be a grassed/green area as opposed to concrete.	Supported noted. SPD policy 28 requires developers to provide high quality landscaping which provides interest and attraction throughout the year. This would be addressed in more detail as part of a landscape strategy which will accompany the planning application.
662	372				The document recognises the presence of Latin American business in the area and the need to make sure that this is not lost as a result of the regeneration of the E&C (p23 point 2.3.2 / p32 point 4.1.2). Our response to the SPD draft document asserts the significance of these shops and addresses those points that could threaten the presence of Latin American retailers in the area. The Latin American presence in Elephant and Castle core area comprises of four clearly identified zones: Elephant & Castle shopping centre, the Arches in Elephant Road, the Arches in Eagles Yard and Tiendas del Sur in Newington Butts. These shops are not just selling Latin American products they are also part of an entire social network and support system for many Latin Americans living in London. Economically these shops are also important because they provide employment and income for many families in London and contribute to the variety of offers in the area. Latin Americans are not only participating in the economy of the area, but transforming it and in the process creating a Latin place in London. This presence is important because it contributes to London's cultural diversity – precisely what makes London a multi-cultural world class city.	We have amended the SPD in Section 2 to provide further recognition of the cultural diversity of the businesses that exist in the area, in particular, the Latin American presence and the important contribution they make to the character, retail offer and local economy of the area.
662	374				General issues about the consultation process – E&C regeneration Business continuity has been a concern from the start of the regeneration process. This has been evident in the number of times in which this has been discussed in council meetings and in an independent study conducted by Business Extra in 2005.1 The study identified four main concerns amongst traders in the E&C shopping centre: sustainability of businesses until the demolition of the centre,• the position if they decide to exit early,• whether	Comments noted.

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					<p>they will be entitled to any compensation• ability to return to the centre after the redevelopment• These issues are still a concern for traders in the area and more needs to be done by the Council to address these. The following issues have been identified by Latin American retailers in the area: 1. Uncertainty about the process and about what will happen to the businesses in the area. In the case of E&C shopping centre, there is confusion over St. Modwen's plans and motivations for the centre. 2. The process has taken too long – 'nothing seemed to happen' – this in certain ways explains the current apathy and lack of engagement by some retailers. They are simply tired – but also resigned to whatever would happen. Some think this is too big to fight. 3. Length of Lease for retailers in the shopping centre – As long term leases came to an end – renewal was on short term basis (no longer than 5 years). This was very much a strategy to have the centre vacated by the previous plans to demolish the shopping centre. There is still uncertainty about their terms of contract and their entitlement. The issues identified by Business Extra in 2005 are still relevant. 4. Capacity Building – There is a need to support businesses through training and facilitation of knowledge that it is geared towards the specific needs of minority ethnic businesses. 5. Signs of transformation in the Arches (Elephant Road and Arches behind Strata Bldg) – Negotiations have taken place and Latin American retailers next to Strata have gained a few steps on the way. This is a business community in transition and with the right support and commitment by those involved it can fully transform into a 'thriving Latin Quarter'. It is clear from conversations with retailers that the information they have received about the regeneration has been fragmented and not necessarily from official sources, to the point that it is dismissed as mere rumours. The lack of follow up about the process was also mentioned as a shortcoming of the process. Retailers commented that in various occasions they have been asked to fill questionnaires, but the process seems to end there. Filling questionnaires does not amount to participating in the consultation process; it is yet another exercise of superficial accountability by the institutions involved. The credibility of the information received has been</p>	

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					put into doubt and involvement in the consultation process queried, so there is a need for a constant link between retailers, the council and developers. This will be crucial to guarantee business involvement in the delivery and phasing of the development for the area.	
662	378		SPD 4 - Jobs and Business		<p>Railway Arches: The regeneration of the railway arches is mentioned as one objective in the theme of town centre regeneration. This is clearly welcomed by all, but the document is not clear about what exactly this means and how will the process be managed. The following points are of concern to the Latin American businesses in the area: Who is in charge of the regeneration of the arches and what support will be provided to existing businesses.</p> <ul style="list-style-type: none"> • How will the process be managed? • Has the council taken into account the challenges that businesses already operating in the arches will face whilst construction goes on and how will the council support these businesses? • Uncertainty about the possibility of opening up some arches to provide access to the front of the shopping centre. This is an aspect that has worried retailers in the arches for some time given that visions for the area have included the disappearance of some of the retail space under the arches to link and stimulate movement between Walworth Road, Elephant Road and the front of the shopping centre. Will the regeneration of the arches involve the disappearance of some of the retail space now available? Keeping the current mix of activities. There is concern that a new mix of land uses will be reducing the number of spaces for some of the most frequent current activities: e.g. retail, food, entertainment. There is concern that in the future some businesses will be displaced to achieve a 'mix of uses'. • Protecting current tenants from excessive rent increases in the next few years as the area is transformed. Business owners fear that the transformation will bring steep increases in rent that will force them to move out of an area in which they have been investing for around 20 years. Business owners are also concerned that landlords may favour well established 'household brand' shops and that current tenants will be displaced in favour of chain retailers. They would like 	<p>1. The Council will work with Network Rail, the shopping centre owner, and its development partner Lend Lease to achieve the objective of regenerating the railway arches. The area around Elephant Road and the arches is an important transition area between the Heygate development site and the shopping centre. SPD1 sets out new affordable retail space, secured and provided through large retail developments over 1,000sqm, will be made available in the first instance to businesses which have been displaced as a result of development.</p> <p>2. Affordable retail space will be secured through s106 planning obligations attached to planning permissions. A legal agreement will set out the nature of the obligation i.e. provision on-site, provision off-site (i.e. to another appropriate site under the applicant's control), or a financial contribution. In those cases where physical provision results, the developer would build the units in a suitable location, to be agreed as part of the scheme. Their size would be limited by condition or a clause in the obligation. Thereafter, a condition or clause in the legal agreement would restrict the unit as affordable space only for a period of five years. The units will be managed by the developer.</p> <p>3. Applicants will be required to prepare a phasing plan for development submitted as part of a planning application for a retail development proposal. The impacts on local businesses and the proposed mitigation measures will need to be identified. It is not intended that any s106 or other monies be passed directly to any individual business to help in relocation. This may breach EU State Aid rules. The Council's Economic Development currently funds Business Support advisors which are available to support businesses in the area.</p> <p>4. Our objective is to reduce the barrier which the railway creates and to make the central area more accessible from the Heygate development site and 50 New Kent Road site to the east. This area will</p>

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					<p>to have some certainty that they will get first option in the future to be tenants. • Over the last two years Latin American businesses in the arches have invested in the premises. The retailers need reassurance about the alternatives available to them during the regeneration process: relocation costs if needed, compensation, entitlement and sustainability of businesses whilst construction goes on and after redevelopment. • The following points do not provide a clear vision of how many units and percentages for each category of uses is the council aiming for: 3.2.5 Regenerate railway arches, enabling their use for mix of uses including businesses, retail and community uses (p30) 4.1.15 We promote through saved Southwark Plan policy 1.5 the use of the railway arches for either A, B and D uses to ensure the spaces can meet the needs of a wide range of occupiers (p36)</p>	<p>provide a new market square as well as shops, office and leisure space, cafes and restaurants. Providing strong links through the railway viaduct and shopping centre is critical to drawing pedestrian movement east of the viaduct and enabling commercial development on the Heygate and 50 New Kent Road development sites to flourish. The objective will therefore require opening up of some of the arches to create a through route. The Council will be working with Network Rail, the shopping centre owner, and its development partner Lend Lease to investigate options of how to achieve this objective. Any retail units which are displaced as a result of the opening up of rail way arches will be prioritised for new affordable retail space elsewhere in the area in accordance with SPD1 5. SPD4 sets out that the railway arches should continue in active use for a range of uses including small business space, light industrial uses and appropriate A or D class uses as these all make a positive contribution to the local economy. We have also set out in SPD 25 character area guidance for the Heygate Street area that a new market square on the eastern side of the viaduct will become a key location in the town centre. To help generate activity around the square and make it lively at different times of day, it should be fronted by retail uses. The SPD also states that a range of non-residential uses will be appropriate in the railway arches. These provide a key edge to the market square and Heygate development site and an important gateway to the railway station and shopping centre. The railway arches are a key feature of the area and provide a significant amount of space for businesses. However, the contribution which the arches make to the character of the area is currently limited by the fact that the public realm around them is often poor. Through saved Southwark Plan policy 1.5 we promote the use of the railway arches for a variety of uses, including shops, cafes, restaurants, business units and community uses. There are many examples in Bankside and Waterloo where use of arches for shops, creative industries and restaurants when combined with public realm improvements to the external environment, can help create lively and attractive places. 6.</p>

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						<p>The provision of new shopping floorspace at Elephant and Castle will help consolidate its role as a major centre in our hierarchy of town centres in the borough. Over the coming years, increases in population and disposable income will help to increase expenditure and by providing more of a choice of shopping in the area will help to boost the local economy by attracting more shoppers from the local area and further away. This will aid in the overall success and revenue generation of independent retailers in the area and affordability of any potential rent increases. The imposition of a rent cap beyond the five year period as set out in SPD1 is not considered appropriate as it would be too prescriptive and it raises concern on how this could be monitored effectively, how enforceable it would be and how it would relate to other occupational costs such as the landlords operating expenses, service charges and business rates. 7. SPD1 sets out the Council's preference is for affordable units to be made available in the first instance to existing businesses in the opportunity area who have been displaced as a result of development in the town centre, then new business start-ups, and finally other independent retailers. 8.-The provision of affordable units in new large retail developments will help to mitigate the impacts on businesses displaced as a result of development. It is not intended that any monies be passed directly to any individual business to help in relocation, which may breach EU State Aid rules. Where s106 financial contributions are made in circumstances whereby it is demonstrated by the applicant that it is not feasible or viable to provide on-site or off-site affordable units, the contributions will be pooled for the locality. 9. The SPD supports renewal and expansion of commercial and community floorspace in the opportunity area but needs to retain a degree of flexibility about the provision of the number of different uses in locations. It would not be appropriate to set out prescriptive criteria for the proportion of types of uses in the rail way arches. The SPD sets out flexible guidance on the mix of uses in order to take into account the needs of future businesses. However, in terms of A5 use (hot food takeaway), we have set out in the</p>

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						Walworth Road Character Area guidance that no more than 5% of units on Walworth Road should be in A5 (hot food takeaway) use and a restriction on clustering of units. While it is recognised that hot food takeaways contribute to the mix of town centres, if there are too many it can displace other shop and food options, have a negative impact on the amity of local residents and harm the vitality and viability of the town centre.
662	379		SPD 1-Shopping		The document acknowledges that some displacement of businesses might happen whilst the regeneration takes place – the main questions for retailers are: How will this process be managed?• How to achieve minimum disruption from the development process?• Clarity over S106 funds – are these available for relocation of businesses?• Clear definition of affordable space• Percentage of affordable units in the shopping centre and Heygate site.• Rent value at ‘40% below market rate averaged over a 5 year period’ does not take into account the different types of small businesses in the area.• o Five years are not enough to assess the viability and success of businesses. The council should have long term commitment in support of small businesses that will contribute and enhance the distinctive character of the area whilst ensuring a variety of offers. o Uncertainty over the five year period – when will the period start? Is there a set date for this period? Is it from the start of a business in the area? For how long will this provision exist?	1. Applicants proposing large scale retail development will need to identify through a Retail Impact Assessment the impacts upon existing employment and propose mitigation measures to help address impacts. Affordable space will be secured through s106 planning obligations attached to planning permissions. A legal agreement will set out the nature of the obligation i.e. provision on-site, provision off-site (i.e. to another appropriate site under the applicant’s control), or a financial contribution. In those cases where physical provision results the developer would build the units; and in a suitable location, to be agreed as part of the scheme. Their size would be limited by condition or a clause in the obligation. Thereafter, a condition or clause in the legal agreement would restrict the unit as affordable space only. Where off-site physical provision results, a developer could build new units or refurbish existing vacant units and retain ownership as anticipated with on-site provision. 2. Applicants will be required to set out a phasing plan for development to be submitted as part of a planning application. Impacts on local businesses and proposed mitigation measures will need to be identified. 3. The provision of affordable units in new large retail developments will help to mitigate the impacts on businesses displaced as a result of development. It is not intended that any monies be passed directly to any individual business to help in relocation, which may breach EU State Aid rules. Where s106 financial contributions are made in circumstances whereby it is demonstrated by the applicant that it is not feasible or viable to provide on-site or off-site affordable units, the contributions will be pooled for the locality to provide indirect support. 4.The supporting text to SPD1 sets out those businesses which would be

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						eligible to take up new affordable space. It also sets out the criteria for provision. Detailed arrangements will be specified in s106 planning obligations. 5. SPD1 requires at least 10% of new floorspace (GIA) in large retail developments (including refurbishments) over 1,000 sqm to be made available as affordable space. This would include the proposed retail floorspace at the Heygate and any proposals for retail development in the shopping centre which are above 1,000sqm 6. There is no single accepted definition of what constitutes an “affordable” rent for small businesses/retailers. We have derived the minimum affordable rental level by looking at overall rental values in the area. 7. Five years is considered a reasonable amount of time for a business to establish itself. 8. The five year period would commence upon occupation of the unit and this would be set out in the rental agreement .
662	380		SPD 6 - Wellbeing - Social and community infrastructure		Social and Community Infrastructure (SPD6, p42) A statement in favour of supporting proposals for the provision of social and community infrastructures is not enough. The council should provide, make available and manage spaces for community uses and other cultural events. The document seems to suggest that the provision of such a space should be privatised. Local voluntary organisations and community groups are in need of space to meet and provide services for the community they serve and it is imperative that such a space is provided by the council under the current scheme.	The Council is required to use limited resources efficiently and the need to provide social and community infrastructure within the opportunity area will need to be addressed by the public, private and voluntary sectors in partnership. The Council provides and manage a range of facilities that are available for community uses, including libraries, schools and parks. This will continue to be the case. The new Leisure centre will also be a major community facility that will be managed by the Council. Other facilities will inevitably be managed independently of the Council. The Infrastructure Plan will be updated over the plan period to reflect the need for new or improved social and community infrastructure as development takes place. New facilities will be delivered in partnership with a range of providers. SPD9 has been amended to highlight that well valued community facilities will continue to be protected under policy 2.1 in the adopted Southwark Plan.
662	381				Identity of E&C (3.2.9 - p31) There is a strong support for the recognition of E&C core area as a ‘Latin Quarter’. The E&C is a place where Latin Americans have invested economically and emotionally. There is a sense of attachment, a sense of ownership in the transformation of Elephant & Castle into a ‘thriving Latin Quarter’. For Latin	The objectives set out within Theme 5: Built environment are strategic in nature and provide the basis for the more detailed guidance in the SPD. We have amended the SPD in Section 2 ‘Challenges and Opportunities’ to include additional recognition of the contribution of the Latin American businesses and community in the Elephant and

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					Americans the Elephant and Castle is a place, a destination, not a passing through route. Some organisations feel that this recognition could be achieved with the creation of a square or the presence of an architectural piece or artistic manifestation in a site that reinforces the character of the area as Latin. This will certainly contribute to heighten the sense of belongingness that Latin Americans have established with Elephant & Castle.	Castle area. We have added additional supporting text into SPD15: Public Realm to highlight the opportunity to provide unique elements within the public realm or on buildings to enhance the sense of place and quality of the new neighbourhood and create features of surprise or delight.
662	384	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and traffic free	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
662	385	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Choice is important for pedestrians. I'd like to see much better pedestrian surface crossings than are currently in place on the Northern Roundabout AND the retention of some of the subway underpasses for pedestrians. These obviously need upgrading	On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings.
662	386	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The fast gyratory which runs up St Georges Road also needs addressing as part of a traffic and speed reduction package for a much wider area. This is the only way to achieve better safety and encourage more cycling and walking.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
662	387	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The area has to be increasingly seen as a residential and business destination in its own right - not simply as a fast route through for heavy motor traffic.	Noted.
663	382				The Elephant and Castle area is currently blighted by the persistence of fast, heavy motor traffic on the inner ring road which essentially constitutes an inner urban motorway. The attractiveness, safety and liveability of the area could be improved if much more attention was paid to providing safer and convenient facilities for pedestrians and cyclists and promoting modal shift away from motor vehicles and towards improved public transport capacity	Policies SPD 10 and 11 cover this.

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663	383		SPD 10 - Public Transp ort		The Elephant and Castle (Northern) Roundabout is the most dangerous junction in London for cycling, by TfL's own figures. As a barrier between much of the Borough and central London it should be a priority location for designing in safer cycling facilities and making sure that pedestrians and sustainable forms of transport are placed at the heart of the design of the interchange. Proposals to alter the use of St Georges Road and London Road should incorporate segregated cycling routes	Improvements to TfL roads are sought by a number of policies in the SPD, including major improvements to the northern roundabout.
664	404		SPD 10 - Public Transp ort		I am writing to comment on the recently issued SPD for Elephant & Castle. I see on pages 45-47 that the council and TfL propose to change the traffic flows on London Road and St George's Road "to improve reliability and reduce bus-on-bus congestion at stops." In light of the number of pedestrians who have been hit, and seriously injured, by buses in the northbound (contra-flow) bus lane on London Road, within the last 18 months, I would ask that when considering changing these traffic flows, the safety of all road users is given at least the same priority as the stated objective of improving bus services.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
665	408		SPD 10 - Public Transp ort		My family and I are residents of Southwark and I also work in the borough. I write to object to two elements of the borough plan. Additionally, I have concerns about the phrasing of the equalities and impact assessments. Firstly: I object to the proposal to make London Road a bus only road and to make St Georges Road a two way street. These proposals were buried within the SPD and were certainly not made clear at the recent consultation events. Many local residents had no idea that the plans to regenerate the local area and the, currently down-trodden, Elephant and Castle shopping centre, also included plans to increase traffic in St Georges Road. I do not believe you can state that you have adequately consulted on the traffic change elements of the SPD, for that reason. The proposal as described will not have the desired effect, that is to reduce the pedestrian and bus congestion on London Road. Instead the proposal will leave the bus and pedestrian congestion almost unchanged but significantly increase the volume of traffic on St Georges Road. Increasing the traffic volume on St Georges Road is	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					<p>inappropriate because:</p> <ul style="list-style-type: none"> • St Georges Road is mainly residential road with street level residential property along most of its length. London Road is mainly commercial and includes Southbank University. It has street level residential property for less than a quarter of its frontage. The residents of St Georges road will be subjected to increased levels of noise and air pollution, which should be more sensibly channelled down a commercial road. • St Georges Road has very high pedestrian numbers at peak times due to the presence of: <ul style="list-style-type: none"> o One nursery, two primary schools, and one secondary school o One Cathedral, one church and two missions (Catholic and Salvation Army) o One GP surgery and a pharmacy o One community arts centre and the access route to the games pitches o One national museum, and the area's largest park • The pedestrians on St Georges Road include very large numbers of children, whether attending school or playing sports on the pitches. We have already witnessed too many near misses, especially between 3.30pm and 4pm and have no desire to see increased injury rates due to increased traffic. By comparison London Road has pedestrians either waiting for a bus or who are adult learners. It also has appropriate dedicated crossings. • St Georges Road has one of the areas few listed Georgian terraces and access to one of the borough's finest Georgian Squares. Both would be spoilt by increasing traffic volumes. The SPD and OAPF make reference to the need for 'green corridors' to link the limited number of green spaces in this area of the borough. Increased traffic past West Square and the Geraldine Harmsworth park would only exacerbate the isolation of what little green space there is. • London Road at its narrowest point allows four lanes of traffic, St Georges Road allows only three lanes at its narrowest due to the curbside presence of mature trees. So pushing more traffic down the narrower road would increase congestion and pollution. • In the rush hours traffic runs from Elephant and Castle down to Blackfriars (and Waterloo) road and back again. The currently northbound traffic is diverted via Westminster bridge road. The SPD/OAPF proposal would do this for north and southbound traffic. This amounts to an additional 500m per affected vehicle. Given the large 	

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					<p>volumes of traffic using this route it is an astonishing waste of time and fuel. There are several alternatives to the London/St Georges roads proposal, which may better deliver the intended benefit of improving the flow of buses, cars and pedestrians. One option would be to restrict traffic on St Georges Road:</p> <ul style="list-style-type: none"> • Limit traffic on St Georges Road to north and westbound buses and emergency vehicles only. • London Road would then be two way to all traffic but carrying only southbound buses. • Reorganisation of the southerly bus stops on London Road would minimise their congestion. • St Georges Road could then be reorganised as 'shared use' in the manner of Exhibition Road in Kensington. This would give a wide "green corridor" linking the borough's main pedestrian hub with its biggest tourist attraction and all the schools, churches and community facilities Southwark has to offer on St Georges Road. • St Georges Circus would need to be fully reopened to traffic, making use of the eastern end of Lambeth Road. This would avoid creating a bottle-neck there as can happen now. • Diverting Westminster bound traffic via London road adds less than 200m compared to the most direct route. This is much more fuel efficient. <p>Reopening the eastern portion of Lambeth road improves flow and traffic efficiency still further. This will also massively reduce traffic along Garden Row, a predominantly residential street</p>	
665	409		SPD 12 - Parking		<p>Secondly: I object to the proposal that the retail development of E&C shopping centre has no parking associated with it. The SPD/OAPF makes reference to the Elephant and Castle shopping centre becoming 'destination' retail space. This will only be possible if it contains either shops not found on routine high streets (like South Moulton Street), or a large number of similar specialist shops (like Hatton Garden), or to include a supermarket thereby allowing people to do their weekly shop and visit the other retail outlets whilst they're there (like Canary Wharf). The area is unlikely to attract high end retailers due to the area demographics, but it currently lacks a large supermarket. This is a good opportunity to bring a major destination shop to the area which will in turn draw in shoppers and their wallets. This won't work if they can't get their shopping home. And the supermarket's own research</p>	<p>We have recognised through Policy SPD 21 for the Central Character Area, that the shopping centre provides a significant opportunity to improve the retail offer in the area, and there is potential to increase the appeal of the centre to Southwark residents. SPD 21 sets out guidance for the redevelopment/remodelling of the shopping centre which promotes the improvement of the retail offer through the provision of a range of types of retail, including comparison goods. In addition, SPD 1 supports the transformation of the shopping centre with the introduction of large 'anchor tenants' and a wider mix of retail uses. The retail strategy for the area is to boost the amount of comparison goods floorspace, providing more choice for residents, support the local economy and reduce the need for people to make trips to destinations further away. With</p>

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					suggests shoppers do not wish to take their weekly shop home by public transport.	regard to car parking, the Elephant and Castle already has a very good public transportation network, and the road network does not have capacity to accommodate additional cars. SPD12 (Parking) sets out a requirement for car-free development in the CAZ, which in conjunction with proposed improvements to public transport, will help to reduce congestion and pollution in the area. The shopping centre contains an existing quantum of car-parking spaces for use by shoppers. In the redevelopment/ remodelling of the shopping centre, the owners will need to justify through robust evidence any proposal to increase in the level of car parking spaces.
665	410	EQIA			Lastly: The equalities and impact assessments highlight the risk of alienating the current black and minority ethnic populations if the area 'gentrifies'. It would be a mistake to maintain the area in deprivation simply so those who have lived in it as an area of deprivation are able to feel that it has not changed. Elephant and Castle is less than 30 minutes walk from Covent Garden and only 20 minutes walk to Parliament. You can hear Big Ben chime from West square. London is finally waking up to the proximity and convenience of this part of 'south London'. At the north end of the patch flats are being built costing several million pounds. This may be frightening, or alienating, to some but with it comes much needed regeneration funds and council tax revenue. The existing population, my family included, should be included and encouraged in all consultation but we should not hold back this important development which will help lift the area out of poverty	Our Statement of Community Involvement (2008) sets out how we engage with the community to ensure we consult with as many different groups as possible on our policy documents. We have carried out extensive consultation on the Elephant and Castle SPD to ensure we consult as fully as possible. Our consultation report which accompanies the final SPD sets out the consultation we carried out and a summary of the responses we received. it comes much needed regeneration funds and council tax revenue. We have updated the EQIA to explain more clearly that how we have consulted on the SPD to try and involve all groups in the consultation process.
666	414		SPD 10 - Public Transp ort		I would like to raise my objection to the proposed change to the traffic flow on St. George's Road. Firstly, I was surprised that the local community and residents have not been consulted about the changes. Can I get an explanation of why this has not happened? Second, the proposed changes will drastically change the quality of life for me as a local resident. The traffic flow is already very heavy, this would only increase the noise and pollution. We have a young child, whose sleep is already disturbed from the existing traffic and the residual noise from the tube line under the	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					house. I fear that this will make it worse. Not to mention the increase risk of road accidents. Third, the street is largely residential and community focused. Further, there are three churches(St George's, St Jude's Salvation Army) and four schools on the road (St George's, St Jude's, Notre Dame, Charlotte Sharman Nursery). Fourth, it is a scenic area. Many of the buildings are listed and part of the heritage of the street will compromised by the increased traffic. I would gratefully like receipt of this objection and that I as a resident of the area be consulted about the planned changes.	
667	415		SPD 10 - Public Transp ort		I have recently heard that buried within the plans outlined for the regeneration at Elephant and Castle is a proposal to make St Georges Road carry traffic in both directions and to make London Road public transport only. I own a house in St Georges Road (135) and wish to register a firm objection to certain aspects that may arise from this proposal. Our houses are a row of grade 11 listed survivors. The resultant increase in traffic flow and stationary vehicles emitting pollutants will be highly damaging to the fabric of these buildings. I also have two young children and the extra pollution and noise could quite possibly be detrimental to their health. In addition, I cannot see how the essential parking outside our houses will be able to be retained within the width constraints of the road. There is a dedicated disabled parking space to cater for the needs of one of the residents and many other elderly people and families that rely on their cars being close to their properties. The removal of this essential facility will be unacceptable. These are family houses. I would like to see a new road design that took the opinions from local residents into consideration for example- parking, traffic speed and traffic volume. I would be in favour of two way traffic if it were reduced to one lane each way, along with bike lanes. At the moment we do have a problem with speed. It would be great to see any proposed new designs for the road lay out. Then we can see what positives and negatives there are.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
668	366		SPD 10 - Public		I fully endorse the proposals to convert London Road to two-way buses only traffic as stated in section 4.4.4 of the draft SPD. I also urge LB Southwark to press TfL to bring forward	Support noted.

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			Transp ort		these proposals as a matter of urgency. I am also attaching my statement as local resident to the meeting hosted by Caroline Pidgeon, Leader of the Liberal Democrat Group, Chairman of the Transport Committee, London Assembly, with representatives of TfL, and attended by Simon Hughes MP, one local councillor and three local residents, held at City Hall on 21 November 2011, since this sets out my view of the dangerousness of the existing contraflow bus lane in London Road.	
669	355	3 - Vision and objectives			The Vision is rightly aspirational for the Area. It refers to the potential to develop the Area into an attractive central London location; that regeneration will facilitate a more desirable place for both existing and new residents; and the need for excellent shopping, leisure facilities and cultural activities. Whilst the Vision is broadly supported, the supporting objectives and policies must accord with the Vision's high aspirations. Significant investment and a positive approach to development risk will be required to deliver this Vision given the existing economic, social and environmental contexts. It is critical therefore that the objectives and policies are sufficiently flexible and commercially cognisant to provide the supportive basis for development to occur.	Noted. The council considers that the vision and the objectives correspond with each other.
669	356	5 - Character Areas		Central Area SPD 21 - Land uses	Where policy is inflexible, this will place greater pressure on the deliverability of particularly challenging schemes such as the redevelopment of the ECSC. This redevelopment project will be unique in the Regeneration Area, having very complex design, structural, financial and commercial constraints to contend with. The strict application of all of the following policy requirements set out in the Draft SPD will, in combination, make a viable development impossible to achieve: <ul style="list-style-type: none"> • Excellence in design; • Highest environmental standards; • BREEAM Excellent; • Code for Sustainable Homes requirements; • Minimum 35% affordable housing requirements; • 10% affordable retail for existing, displaced occupiers; • No additional parking; • No net loss of non-residential (office) space; • Physical space requirements for London Underground station expansion; • Physical space requirement for new open space; • Several routes through 	There are a number of policies which affect the site. Many of these are set out in the Core Strategy, including an affordable housing requirement, minimum code for sustainable homes etc. The majority of the requirements listed apply to all development across Southwark. In our view, the SPD has sufficient flexibility to facilitate growth and regeneration. If there are specific ways in which a developer believes that a proposal is unable to meet planning policy, this would need to be justified through robust evidence which justifies the shortcomings.

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					the Shopping Centre and railway; • Limitations on building heights; • Planning Obligations SPD tariff; • Additional Strategic Transport tariff; and • The Mayoral CIL. It is requested that the SPD states (at Paragraph 5.1.7) that greater flexibility is required in the application of policy for this complex mixed use development (which will retain the existing structure) to be successfully delivered. Many of these elements are considered further below.	
669	357	4 -The preferred option/options	SPD 1-Shopping		Policy SPD 1: Shopping should refer specifically to the “need to provide larger retail units alongside new anchor tenants (for convenience and/or comparison goods) within the redeveloped ECSC”. The justification text should explain that this will ensure that the ECSC will be able to achieve a ‘step change’ in retailing and compete with higher order centres in the wider London catchment area by meeting modern retailer requirements and shoppers’ expectations. The SPD’s Vision contains a number of land use targets for new floorspace (Paragraph 3.1.4). The physical and financial constraints of existing town centre sites such as the ECSC mean that flexibility will be required to enable the delivery of mixed use redevelopment schemes, particularly when the Council’s main priority is to achieve a ‘step change’(as a ‘Major Town Centre’). This ‘step change’ will require a significant shift in the nature and attraction of the retailers. These retailers will require a retailing environment fit for purpose and designed for the 21st Century, incorporating larger units than existing. Financial inducements will also be required for anchor retailers and medium-sized units, and this will bring further viability challenges to the development appraisal.	SPD1 refers to supporting 'large 'anchor tenants' and also the promotion of a wider mix of retail uses in the shopping centre. We do not consider it is necessary to include the reference to comparison and convenience goods in the policy. The supporting text provides explanation of the existing situation (i.e. there is currently a low proportion of comparison goods shopping at Elephant and Castle) and that the provision of new shopping floorspace will help consolidate the role of Elephant and Castle as a major town centre and provide more choice for the borough's residents, enabling them to shop locally as opposed to travelling outside the borough to shop. We have amended the text at 4.1.5 to include reference to convenience goods. We have also referred to the desirability of achieving a step change in retail provision. The quantum's of floorspace set out in the Vision are derived from the Core Strategy vision for Elephant and Castle which was adopted in 2011. The SPD needs to be consistent with the Core Strategy. SPD1 sets out the objective for large retail developments to provide a vibrant mix of retail uses in order to achieve the floorspace targets set out in the vision, however we also set out that we want to maintain a balance of uses in the town centre and protected shopping frontages to ensure the centre can thrive.
669	358	5 - Character Areas		Central Area SPD 21 - Land uses	Further, retail in itself may well be unviable without appropriate alternative uses being provided as part of a mixed use scheme. The development value of residential use in this respect is likely to be central to the overall success and ability to deliver the ECSC redevelopment scheme, particularly given the foreseeable commercial property environment, and the limited extent of land that can	As required by the Core Strategy and the Affordable Housing SPDs, the applicants will be required to submit a financial appraisal to justify the lack of affordable housing on any site where the policy threshold applies. Both the draft and adopted affordable housing SPDs set out guidance on when there may be circumstances where a scheme delivers exceptional community benefits over and

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					be used for development purposes. Policy SPD21 of the SPD should recognise that “where regeneration objectives (e.g. significant improvements to the retailing environment) can be secured through the provision of higher value residential use as part of a mixed use scheme, this may require greater flexibility on affordable housing provision expectations and other planning gain expectations”.	above the standard section 106 contributions required. They set out that in these exceptional circumstances we may review the levels of affordable housing required on the site if it is satisfactorily demonstrated that wider regeneration objectives should be prioritised.
669	359	5 - Character Areas		Central Area SPD 21 - Land uses	Policy SPD4 sets out that all “existing business floorspace should be retained, unless replaced by an alternative town centre use” (Policy SPD4). Policy SPD21 clarifies this further for the ECSC specifically by stating that there should be “no net loss of non-residential floorspace”, and that the number of employment opportunities should be increased. Policy SPD21 (at supporting text at 5.1.8) should specifically recognise that to achieve the retailing concept as part of the ECSC regeneration, other policy objectives will not be achievable for the ECSC redevelopment.	SPD4 sets out that existing business space within town centres should be retained in accordance with Saved Southwark Plan Policy 1.4, unless replaced by an alternative town centre use, in accordance with Saved Southwark Plan Policy 1.7. The Fact Box in the supporting text to SPD4 sets out the range of town centre uses which would be suitable as replacement for the loss of business floorspace. Our objective is to promote and retain employment generating uses within town centres, in order stimulate growth in the local economy, attract inward investment and help facilitate the growth of small and medium sized enterprises.
669	360	5 - Character Areas		Central Area SPD 21 - Land uses	Policy SPD21 does not refer to the significance of factors such as the quality of office floorspace. As a highly visible “gateway” site, the ECSC redevelopment will be central to improving the desirability and attraction of the area as set out in the Council’s Vision. It is considered that the office market conditions are unlikely to support high-specification buildings, including the refurbishment of Hannibal House as part of a viable mixed use development. Therefore Policy SPD21 (fourth circular bullet) will be contrary to SPD1 and the Vision (Paragraph 3.1.4 – first paragraph) and should therefore be deleted.	SPD4 sets out that existing business space within town centres should be retained in accordance with Saved Southwark Plan Policy 1.4, unless replaced by an alternative town centre use, in accordance with Saved Southwark Plan Policy 1.7. The Fact Box in the supporting text to SPD4 sets out the range of town centre uses which would be suitable as replacement for the loss of business floorspace. Our objective is to promote and retain employment generating uses within town centres, in order stimulate growth in the local economy, attract inward investment and help facilitate the growth of small and medium sized enterprises.
669	361	5 - Character Areas		Central Area SPD 21 - Land uses	In respect of ‘affordable retail’ it is important that the SPD at Policy 21 and its supporting text recognises that the retail element of the regeneration of ECSC will not be phased. At this time, it is anticipated that the development process will take at least two years, and potentially longer for the residential element. There will therefore be no temporary retailing space available for existing retailers / tenants to ensure continuity of trade within ECSC during this demolition	The impacts of the shopping centre development proposals should be set out in a Retail Impact Assessment which is required to be submitted for schemes over 1,000 sqm. We have provided sufficient flexibility in the SPD on the affordable retail requirement. We have stated our preference for affordable units to be made available in the first instance to displaced businesses to ensure impacts on these businesses are appropriately mitigated. Further

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					/ construction period. Further, given this length of time it is highly unlikely that relocated retailers will be prepared to move their business twice given the costs involved and the disruption to business. On this basis, any new retail floorspace within the ECSC cannot be expected to provide for these relocations specifically as it is an unrealistic expectation. The focus for these relocating tenants and for affordable retail should therefore be on other parts of the expanded retailing area / town centre. Cross references would therefore be required in Policy SPD25 and 33. The regeneration of the ECSC will provide a range of new retailer spaces including anchor tenants and larger unit sizes to meet occupier requirements and the strong retail trading expectations of the Council. Any requirement for affordable retail at a regenerated ECSC should be accommodated off site. On this basis, the 10% target provision of affordable retail units and related relocations is appropriately addressed by the SPD at a regeneration area-wide level (as set out in SPD1: Shopping). It is not considered necessary, or helpful to the Council's Vision, to have a further specific policy reference to the need to accommodate affordable retail units for the ECSC specifically as a result of relocations at SPD21: Land Use (third circular bullet should be deleted).	consideration of the end tenancy of the units would be undertaken at the planning application stage. Where it is demonstrated by the applicant that it is not feasible or viable to provide on-site or off-site affordable units, s106 planning contributions will be sought to mitigate impacts and they will be pooled for the locality to provide indirect support or provision.
669	362	5 - Character Areas		Central Area SPD 21 - Land uses	The recognition of the ECSC as a site on which tall buildings will have positive benefits is encouraged. High development density will be a key component in the delivery of a viable ECSC redevelopment and this should be recognised in Policy SPD23 (first bullet under "Built Form").	Policy on density is provided in the Core Strategy. This allows for densities which exceed the maxima where design and the standard of accommodation are exemplary.
669	363	5 - Character Areas		Central Area SPD 23 - Built Environment	It is recognised that the existing ECSC is an 'inward looking' shopping centre, but that this can only be positively addressed in any redevelopment scheme by specifically referring to the design limitations caused by the existing external ground and internal floor levels in Policy SPD23 – Public Realm. The promotion of active uses where possible is therefore acknowledged, on the clear basis that it will not be possible to make all frontages active at the ECSC given existing levels in particular. The overall footprint of the ECSC is likely to change significantly by making greater use around	The guidance set out in SPD 23 is not meant to be prescriptive in nature and further detail at the planning application stage would be required to ascertain the most appropriate design and public realm outcome in the redevelopment of the shopping centre.

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					the 'fringes' of the existing shopping centre structure. The pedestrian movement network within this footprint is impossible to anticipate at this time without fully understanding the ECSC's structure and the likely nature of retailer requirements (e.g. the size and location of anchor stores). It is therefore particularly unhelpful for the SPD to promote detailed spatial requirements that may compromise such technical and commercial matters.	
669	364	5 - Character Areas		Central Area SPD 23 - Built Environment	Paragraph 5.1.12 should recognise the prospect that some land in, or adjacent to, ECSC may be required to accommodate the proposals for improved tube station access and ticket hall improvements. In such circumstance, this should be considered as a direct contribution to strategic transport enhancements.	The council have amended the SPD to refer to this requirement.
669	365	5 - Character Areas		Central Area SPD 23 - Built Environment	Secondly, having regard to this land take, potential further land take as a result of a suggested new "civic space" on the west side of the ECSC (Figure 19) is acknowledged as one potential design solution. However this should be proportionate in scale to the identified issue of congested public realm in this area, and balanced against physical constraints such as existing levels and the need to create legible and active routes. The diagram should reduce the depth of this space from the back of pavement.	Figure 19 states that the proposals are indicative. The council has stated that there is "an opportunity for a new civic space". It is not intended that Fig 19 should be interpreted in a prescriptive way. The size of the space will need to be explored in more depth through the planning application process.
669	367	5 - Character Areas		Central Area SPD 22 - Transport and movement	It is recognised that the north / south and east / west permeability within the ECSC 'urban block' should be a design objective. However, the necessity for more than one pedestrian route (between New Kent Road and Walworth Road) under the railway line as set out in Figure 19 is totally unrealistic. There are a number of reasons (including restrictive structural layout; existing retail floor and ground levels; meeting retailer spatial requirements; centre management arrangements; restrictive rail operations; third party land ownerships; and the adverse impact on viability) why this is impractical. It is undisputable that an attractive and active form of east / west connectivity to the Heygate Estate redevelopment land is important. However, our assessment is that one retained and significantly improved route within an urban block of some 200m in length (north to	An key principle is to recognise the important access routes between the Heygate Estate and the shopping centre. Figure 19 of the document illustrates this principle indicatively. Given the importance of creating links, we consider their inclusion in the SPD to be vital. We recognise the challenges of realising such links and these details will be further explored in the planning application.

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					south) is perfectly acceptable in an urban design context, and is within keeping with the character of the wider Area. Furthermore, this arrangement would relate well with the illustrative layout of the redeveloped Heygate Estate (Figure 22) which identifies one east / west route relating to a new public space. Policy SPD22 should change “routes” to “route” in the second bullet point.	
669	371	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		The need for underground station improvements as set out in SPD10 is a consequence of the existing situation, regardless of the levels of development anticipated in the SPD.It is important that the SPD recognises this point at Paragraphs 4.4.2 and 4.7.3-6, andsecondly that even with development contributions, it is obvious that there will be a funding shortfall in respect of anticipated improvements to the underground stations. It is therefore important that the SPD clearly sets out that the transport improvements will be (in part) met by financial contributions from the wider development anticipated outside of the Regeneration Area in the Borough given the significance of the works. It should be made clear that the Strategic Transport Contributions apply to net new floorspace in any redevelopment scheme (i.e. net of existing floorspace). It should also be clarified whether the assessment of retail schemes’ viability (referred to in Paragraph 4.7.4) in calculating strategic infrastructure contributions has had regard to other policy factors such as the need to provide affordable retail, and the loss of developable land (and therefore value) to achieve underground station improvements.	The amount of growth anticipated in the opportunity area will necessitate improvements in public transport infrastructure. The SPD acknowledges that the cost of the infrastructure required cannot be wholly met by s106/CIL funding. It also acknowledges that the public sector will be expected to bridge the gap. Policy 20 states that affordable retail space would be exempted from the strategic transport charge. The policy has been amended to emphasise that the strategic transport tariff will be applied only on the uplift in floorspace. We have amended policy 21 to refer to a policy requirement to provide space on the shopping centre site for public transport infrastructure.
669	373	4 -The preferred option/options	SPD 12 - Parking		Policy SPD12 states that all development in the Central Activities Zone should be car-free, aside from an adequate provision of parking for disabled persons and for car club spaces.The SPD provides some realism at Paragraph 4.4.10 which states that “in occasional instances where this impacts on viability, developers must provide robust evidence, including a financial appraisal, in order to justify off-street spaces”. This paragraph should equally apply to commercial development (not only residential).	Viability can be considered as a reason to depart from any policy and so there is no reason to specifically state so here.
669	375	5 - Character Areas		Central Area	If the Council is to achieve a ‘step-change’ in its retailing offer as set out in the Vision, Policy SPD22 should recognise	In preparing the transport guidance in the SPD we have taken into account London Plan and Core Strategy

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				SPD 22 - Transport and movement	that the ECSC redevelopment will require a greater level of car parking than that which might be acceptable elsewhere in the Regeneration Area. Policy SPD22 should be amended to recognise the specific factors for the ECSC redevelopment. It should state that the Council will take into account commercial and financial factors in negotiating the appropriate levels of car parking within the Central Area. Key anchor retailers will carefully consider car parking levels, even in Inner London, given the expectations of customers in an increasingly challenging 'high street' market. The likely anchor tenants will need favourable inducements to be secured as part of the ECSC regeneration proposals, and will seek assurances that the overall offer of the retail environment and associated facilities (including parking) are sufficient to trade successfully. Competition from other town centres and other media is such that central area shopping must be competitive to thrive. The existing underground car parking will not be sufficient, particularly given the offer from other competing centres within and outside of the Borough.	policies. The Mayor states in Policy 6.13: Parking - that an appropriate balance should be struck between promoting new development and preventing excessive car parking provision that can undermine cycling, walking and public transport use. The Policy also states at bullet b) that in locations with high public transport accessibility, car-free developments should be promoted (while still providing for disabled people). We have set out the requirement for car-free development in the CAZ, with justification set out in the supporting text to SPD12. In assessing planning applications which propose car parking, we will take into account London Plan Policy 6.13 E c) which states that in town centres where there are identified issues of vitality and viability, the need to regenerate such centres may require a more flexible approach to the provision of public car parking to serve the town centre as a whole.
669	376	4 -The preferred option/options	SPD 19 - Energy, water and waste		Policy SPD 19 - General Energy, Waste and Water sets out the expectations of the Council which are in accordance with the London Plan. Given the regeneration challenges of the Elephant and Castle Regeneration Area, it is important that the SPD interprets London Plan guidance more specifically. Policy SPD19 should recognise that such targets are not always feasible or financially viable, and therefore where these targets are not possible, proposals should clearly set out the reasons why. Reasons may include the delivery of other regeneration objectives for example.	We will expect all development to meet the highest possible environmental standards, in line with the Core Strategy and the London Plan. Applicants will need to demonstrate if these targets cannot be achieved on site. In some instances, S106 contributions may be secured where environmental targets cannot be achieved on site.
669	377				As set out above, Key Property Investments are highly supportive of the regeneration proposals, and the need to provide further planning policy guidance specific to the area. In preparing the SPD, the Council has the ability to provide clarity and flexibility on the application of planning policy in relation to development proposals at the ECSC. The redevelopment of the ECSC will be a particularly challenging project as set out above. Strict application of the content of the full content of the SPD (and supporting London Plan and Core Strategy policies) will make the evolving development	The support for regeneration is noted.

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					proposals impossible to deliver. The 'Central Area' section of the SPD allows the Council to interpret policy specifically for the ECSC development proposals. It is strongly recommended that the amendments set out above are incorporated in the final version of the SPD. Without the delivery of a redeveloped ECSC, the Vision for the wider regeneration area cannot be delivered. Given the ECSC's significance and specific constraints, it is paramount that sufficient flexibility is afforded to maximise its development potential. It is essential that the retail offer is significantly improved. This can only happen if other related development 'conditions' are achievable – these include: - an appropriate retail layout (realistic routes and active frontages); - the ability to maximise value-driving land uses (e.g. market residential); - the provision of sufficient car parking numbers; and - the minimisation of development costs.	
670	397	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
671	418	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
672	399	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
673	400	4 -The preferred option/options	SPD 11 -		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for

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			Walkn g and cycling		included in the SPD. This should be clear, direct, fast and car free.	cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
674	401	4 -The preferred option/options			Further to your invitation for consultation of 23rd December 2011. We would like to make the following representation based on our consultations with local businesses, residents and community organisations (Business Extra was established in 2003 through Southwark Council to support local businesses at the Elephant and Castle through the process of regeneration and is based at the Elephant and Castle) : 1. Timing: We are disappointed that it has been reported that the key contracts in connection with the proposed development have already been agreed by Southwark Council two weeks before the end of the consultation for the SPD. This would seem to make the consultation process pointless and likely to be ignored. 2. Consultation Plan: Business Extra has not been formally included in the Consultation Plan as well as our subsidiary company London Knowledge Innovation Centre (LKIC) based at the Elephant and Castle which incubates some 40 high growth knowledge based businesses. We are also the organisation that provides policy support on these types of issues to the Southwark Chamber of Commerce and Industry (SCCI) and therefore we believe that there has been no formal consultation with SCI.	1. Our Statement of Community Involvement 2008 (a statutory document) sets out how and when we will involve the community in the alteration and development of town planning documents and applications for planning permission. National planning laws set out the minimum standards for public consultation. We have gone beyond these standards and have set out how we have engaged with the community, stakeholders and businesses in the preparation of the SPD in the Consultation Report. We consult for 12 weeks comprising 6 weeks informal and 6 weeks formal consultation on all of our Local Development Documents (which include SPDs). The consultation on the draft SPD is not connected with the regeneration agreement between the Council and Lend Lease. This was signed in July 2010. The Heygate Estate redevelopment scheme will need to take into account the guidance set out within the SPD. The council's Consultation Report sets out the consultation that has been carried out and shows how the planning regulations have been met, along with the council's SCI. We consulted with the Local Economy Group - Local Thematic Partnership of which the Southwark Chamber of Commerce is a member and representatives. We also consulted LSBU.
674	402		SPD 4 - Jobs and Busine ss		3. Background Paper – Retail: This paper is based on The Southwark Retail Study carried out in 2009 and is significantly out of date as there have been many subsequent developments since it was carried out including: a. Falling real incomes of local population; b. Plans to build on the main car parking facility for the Walworth Road; c. The decanting of key sites by Southwark Council taking away local spend; d. Effective decanting of the Heygate; e. Planned closure of the office accommodation at the Elephant and Castle Shopping Centre; f. The substantial time lag between the decanting of residential and commercial	Background Paper Retail: The Core Strategy Inspectors Report (January 2011) confirmed that whilst the evidence in the Retail Study often assumes a broad and generally more strategic nature, it does include data on the health of towns and analyses predicted impacts arising, for example, from enlarging town centres. The Inspector concluded that such matters incorporate considerations of social and economic deprivation to an adequate degree. The Inspector was satisfied that the available evidence in the Study addressed proportionately the plan making policies of PPS4. This has led to a sufficiently robust strategic

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					<p>premises and the new build is likely to destroy most existing businesses before the new build occupation has any impact; g. The current retail exodus from the Walworth Road, not helped by the riots of 2011 but with the key retailers (M&S, Peacocks, Argos, Santander) planning to leave in 2012 which will destroy the High Street retail offer; h. The run down of the East Street Market because of a mixture of the impact of recessionary trends and poor management. This will further deteriorate the retail offer; i. Ignoring of significant planned and actual retail developments inside and outside the borough and their considerable adverse impact on the plans in the SPD (development s including London Bridge, Peckham, Nine Elms: City as a growing retail destination, Westfield at White City, Stratford and Croydon). The competitive influence of these developments needs to be carefully considered as they will have a significant impact on the retail potential of the Elephant and Castle regeneration. Most disturbing is that most of these developments will already be in place before the Elephant and Castle is completed. j. Negative parking policies that help to continue to stop people from shopping at the Elephant and Castle. The accuracy of this background paper must be also be questioned as it has left out Business Extra's office premises at 175A Walworth Road and the laundry at 175 Walworth Road. 4. Background Paper- Employment: This paper concentrates on the planned creation of 5000 new jobs but ignores the earlier adverse influences of regeneration plans that have led to the loss of around 2,500 jobs including loss of jobs by the NHS, HMRC , Southwark Council and SMEs. The target should be the creation of 7,500 new jobs rather than just creating 5,000 new jobs . The interim situation during the regeneration needs to be properly considered because many existing jobs will also be lost during the process and the employer businesses will disappear. The paper does not state what the existing number of jobs at the Elephant and Castle are which makes it difficult to know what the baseline figure to measure the real impact of the SPD proposals. The statements made under 3.11-3.12 are substantially incorrect as most of the SPD area is SE1 anyway and that it always has been an centre for external</p>	<p>approach for retail provision within the Borough linking, as necessary, to the intended DPDs and SPDs identified in the Council's Local Development Scheme (including the Elephant and Castle SPD). We require all large retail development schemes to submit a Retail Impact Assessment which will include a quantitative need assessment. This will provide the detail necessary to assess the overall impact of a scheme on the borough. These will include: 1. Definition of the catchment/study area. 2. Analysis of consumer demand (population and expenditure data) 3. Assess existing retail supply and market shares. 4. Compare existing retail supply with demand. 5. Identify future expenditure capacity and need for new floorspace. The Retail Impact Assessment will also need to look at impacts upon employment (opportunities for supporting local businesses etc; quality of life (location specific needs-deprived area considerations) and regeneration (i.e. extent to which new development will encourage population growth). Background Paper Employment: Southwark is projected to have an increase of 34,000 jobs over the period 2011-2031. Through its evidence base, the London Plan sets an indicative employment capacity of 5,000 new jobs for the Elephant and Castle Opportunity area over the period 2011-2026. The objective of meeting the provision of 5,000 new jobs is set out in the vision for the opportunity area. SPD4 builds upon the vision, and sets out reference to the employment floorspace quantum, which will help to deliver the 5,000 new jobs. The supporting text to SPD4 refers to the adopted Policy 10 of the Core Strategy and the s106 Planning Obligations SPD which requires s106 planning obligations to be used to target training and employment opportunities created by new development towards Southwark's residents. We will monitor the delivery of our planning policies to see if we are meeting our targets and objectives. The Southwark Annual Monitoring Report indicators are used to monitor results. Where necessary, as a result of this monitoring process, we will adjust the implementation of our policies to make sure we meet our objectives. To recognise the positive contribution incubator</p>

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					<p>and large scale employers (HMRC, NHS, two universities, major building society). Because of its excellent communications should not only be denigrated to be designated for the local office market. Under 3.8 mention is made of LKIC . What is not mentioned is that LKIC is a major catalyst for high growth potential foreign and external investment at the Elephant and Castle and that LKIC needs additional space factored into the SPD for its existing and anticipated future needs for incubation and for growth second stage space. Currently, as LKIC's businesses grow they leave the borough. We should try to get more businesses to stay at the Elephant and Castle and try and capture more local jobs. This thread of activity needs to be woven into the SPD rather than only referring to "office space", without consideration of what it would be used for. Under 3.6 reference is made to the Latin American business community only. This ignores the rich diversity of businesses at the Elephant and Castle. Most businesses are owned and run by the Afro Caribbean, community with significant Afghanistani and Bangladeshi owners as well as the Latin American community.</p>	<p>space can have in retaining local employment, we have amended SPD4 to include support for the provision of business incubator space in new schemes. We have set out in Theme 1 of the SPD the objective of ensuring that new retail and business opportunities generate around 5,000 jobs. We have amended the section on Challenges and Opportunities to also recognised the wide range of ethnicities of business ownership in the area, in addition to the Latin American community.</p>
674	403				<p>5. Equalities Impact Assessment: There is nothing to say how the information for the assessment was gathered, and there is a lack of objective evidence indicating the relative importance of the issues raised as each is treated as being substantially of equal importance and to support the overall conclusions. The document lists a number of factors under sub-headings. Where is the evidence for the statements made and the mechanism of how the SPD actually addresses those statements? In the context of transport the "considerations" raised are not adequately addressed by SPD because in the SPD there is no transport assessment. This is a major omission as a main aspect of the E&C regeneration is transport. In the context of sustainability there is also no mention of the high levels PM10 and NO2 in London that are outside EU guidelines and considered to be causing 4000 early deaths per annum. This is clearly unsustainable. They are very relevant to the transport assessment that is in turn closely related air equality for PM10 and NO2. Of additional concern is that the current</p>	<p>The role of the EQIA is to consider the potential impacts of the SPD on the groups identified as having protected characteristics under the Equality Act 2010. The EQIA is undertaken alongside the preparation of the SPD so that it can influence the way in which the SPD is prepared, such as the timing, location and format of our consultation, and also so that it can influence the SPD policies themselves. Large parts of the EQIA are subjective. In making judgements about particular impacts we consider a range of sources, including views previously expressed through consultations. It is important to acknowledge that the SPD will have a varied impact on people within each protected group and it is difficult to claim a definitive, objective impact on one particular group. However, where a potential impact is identified, we can consider amending our approach accordingly. Where impacts are unavoidable, we can consider mitigation measures to minimise any impact. The impacts of regeneration and growth on air quality throughout the opportunity area are considered as part of</p>

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					measurements of air quality, which have not improved since the Great Smog of 1952, are made three metres off the ground and the impact of vehicle emissions is much greater at pedestrian breathing heights. So the real emissions are quite likely to damage the health of the local population may be much greater than even the official records indicate.	the sustainability appraisal. These impacts will continue to be investigated in more detail as individual developments come forward. Core Strategy policy 13 sets out that all new development will be required to meet the highest possible environmental standards. All major developments are required to submit an air quality assessment as part of the planning application process. Further guidance is set out in our sustainable design and construction SPD. We are also working to secure a new air quality monitoring station at Elephant and Castle, which would monitor background air quality for Central London. This should be working from April 2012.
674	405				6. Sustainability Assessment: The Summary of SA Results indicates significant minor negatives with uncertainty for sustainability objectives SDO 6, 7, 8, and 9 , the environmental objectives for shopping, hotels, jobs and businesses and new homes. These are key aspects of the SPD. A proven minor negative with uncertainty could easily be a major negative. Statements like improving air quality in Southwark are not good enough. There is legal requirement for the E&C to meet the European Directive on air quality and there is no indication that these air quality standards will be met. To not do so is illegal and therefore unsustainable.	Sustainability appraisal is a tool that helps to identify the potential impacts of different policy options. As a result of the SA, some policies are amended, but some impacts will be unavoidable and in such cases it is important that the focus is on identifying appropriate mitigation measures and/or compensation. All major developments are required to submit an air quality assessment as part of the planning application process and so we will work to ensure that individual schemes contribute to improving air quality. Further guidance is set out in our sustainable design and construction SPD.
674	406	4 -The preferred option/options	SPD 10 - Public Transport		7. Supplementary Planning Document: Based upon the points raised above it is considered that the SPD is not properly informed by the underlying studies to have adequate authority to proceed in its present form. In addition and key importance is the absence of any objective transport assessment. This makes it very difficult to accept the proposals of the SPD as transport considerations are key to the future regeneration of the Elephant and Castle. Transport is the main cause of the very high PM10 and NO2 emissions that adversely affect the health of all residents and users of the Elephant and Castle area. These emissions are already at an illegal and harmful level and there is no indication what the SPD impact will be. Currently only 10% of the local population have cars. The SPD provides for much higher levels of residency with a provision of parking spaces and more retail activity. Yet because of the recognised need for	The policies in the SPD will ensure that development is sustainable and does not add to air quality problems. XXXX interim uses XXXX

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					<p>the continuing use of road traffic there is no substantive approach to deal with the likely increase in local vehicle traffic. However, because most of the traffic at the Elephant and Castle is passing through, it is impossible to know what impact potentially higher than existing vehicular traffic will be and what the impact will be on the Elephant and Castle. Recent presentations made by TFL do indicate no significant change to the Northern Roundabout and the considerably crowded narrow pavements outside the shopping centre by the bus stops show no sign about being improved. The proposed redevelopment of the shopping centre will preclude any expansion of the pavement area for what is recognised as the busiest bus interchange in Europe. With the rapid rise in local residents and increased business use the proposals for the Elephant and Castle it is unlikely that the bus transport arrangements will be able to cope. There is no mention in the SPD of Interim Use proposals that have been developed in connection with the local community. These interim uses are critical to deal with the time-lag from decanting through demolition and to the new build in order to maintain commercial and community continuity at the Elephant and Castle during the window of regeneration opportunity. Please do not hesitate to contact me if you need any further information.</p>	
674	407		SPD 4 - Jobs and Business		<p>8. Additional Proposals for SPD: Taking into account the challenges of establishing a new shopping area and the pressures on the environment we would like to propose the creation a knowledge city that would build upon the success of LKIC and seek to use first and second floor mezzanine space in new blocks for knowledge based innovative businesses to be incubated and for the provision of grow on space without the businesses having to leave the Elephant and Castle. This would be a special type of potentially live work space as the entrepreneurs and their staff created through local incubation would also be potential customers for occupying new build residential. This type of identity could be built around the relative tranquillity of the Heygate and would compliment the existing higher education provision of the two universities at the Elephant and Castle. This employment creation mechanism based on high growth</p>	<p>We have amended SPD4: Jobs and Businesses - to include support for the provision of incubator space in new business floorspace. With regard to interim uses the SPD provides support in several places. We have amended the objective in Theme 3: Wellbeing: Social and community infrastructure to refer to interim uses: ' providing more and improved educational, health and community facilities which meet the needs of existing and future residents and support interim uses which promote these.' Theme 7: Delivery: Making regeneration happen sets out the objective of ensuring that comprehensive redevelopment does not compromise safety and maximises opportunities to make use of vacant sites on an interim basis. The Heygate Street Character Area SPD25 encourages interim uses of development sites.</p>

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					potential knowledge based businesses would help to create the Elephant and Castle as a significant international destination for new business growth and innovation with good environmental credentials. A current proposal by Business Extra to build a Boxpark as an environmentally friendly interim use is seen as the catalyst for the future creation of a new knowledge city at the Elephant and Castle as well being able to provide temporary for decanted local businesses.	
675	411	3 - Vision and objectives	SPD 3 - Hotels		The Elephant & Castle area has long been a place of movement in south London; historically the cross-roads that people passed through north to the river and its many bridges, the City and the West End and south to residential London and Kent and Surrey. After the war, accommodating movement turned into domination by movement as the Piccadilly of the south and its communities, shops and entertainments were erased by roads and roundabouts. Now at the start of the 21st Century the Elephant area should be a place both for the thousands who pass through and the thousands who live locally; reconnecting what had become isolated communities living around the Elephant and in Walworth; ensuring that these communities and neighbourhoods can be genuine participants in devising solutions to the big issues we face. We need to create a housing stock that caters for single people, couples and families of all levels of income and includes generous levels of social rented housing. Employment is needed to address the high levels of deprivation in the area and to help younger people to remain; the independent and smaller businesses which can create higher levels of employment and keep the spend in the local area need to be nurtured; a mix of shops, independent traders and street markets is also required to meet the needs of the diverse communities in the area. Our diverse secular and faith communities need to be supported with the facilities that meet their needs. Finally the whole area needs to be knitted back together with a network of streets and roads that encourage people to walk and cycle; our patchwork of open and green spaces need to be protected and linked by green routes high in biodiversity that offer a contrast and balance to our inner city life. Over the	The Core Strategy sets out as vision for the opportunity area. We have developed this vision further through the SPD. The vision sets out the aspiration to regenerate Elephant and Castle into a more desirable place for both existing and new residents. The policies in the Core Strategy and the saved Southwark Plan ensure that there will be a range of housing types including different bed sizes and tenures. SPD 5 and the supporting fact box also set this out. The SPD also provides detailed guidance on walking and cycling, and green spaces. SPD 11 sets out guidance on walking and cycling, SPD 15 on public realm and SPD 18 on open spaces. The guidance on the nine character areas also provides further guidance.

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					next 20 years we want the Elephant area to become a thriving inner city neighbourhood that meets the needs and aspirations of its existing residents and those who will settle here in the future.	
675	412	4 -The preferred option/options	SPD 5 - New Homes		<p>1. Housing •The SPD seeks a target of at least 35% affordable housing throughout the opportunity area. The following changes are required: -The maximum achievable amount shall be social rented housing, recognising that for most local people this is the only housing that is affordable. - Viability studies will not be permitted to allow affordable housing to fall below the minimum requirement of 35%. The viability studies will determine how much additional affordable housing above the 35% threshold can be achieved. -A redefinition of the word affordable to relate to actual modest incomes. •The shortage of larger family homes and the lease arrangements (a high number of buy to let properties) have negative impact on community. There needs to be a higher proportion of 3 bedroom plus homes.</p>	<p>1. Social rented housing: The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies. 2. Viability studies: National guidance through Planning Policy Statement (PPS) 1, PPS12 and PPS3 require policies to have a degree of flexibility to allow for changing circumstances over the lifetime of the plan. They also require policies to be deliverable and implementable. The Core Strategy policy on affordable housing requires as much affordable housing on developments of 10 or more units as is financially viable. As set out in the background paper to the Core Strategy housing policies, our affordable housing viability study (2010) shows that a minimum of 35% affordable housing is a deliverable policy across the majority of the borough over the 15 years of the Core Strategy. However, there may be cases where the policy is not viable, and as set out in the background paper, we allow a financial appraisal to be submitted to justify a departure from policy. This approach is set out in the affordable housing SPDs (both adopted and draft) and applies to the whole borough. The London Plan also advocates this approach. We will therefore continue to require a financial appraisal to be submitted to justify to the satisfaction of the council why the minimum policy requirement cannot be met. 3. Definition of affordable. The</p>

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						<p>definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London Plan similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. 4. Family homes. In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. Furthermore the Core Strategy requires a minimum of 60% of units with 2 or more bedrooms. This recognises the need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes. The Elephant and Castle SPD cannot amend these policies. In addition our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. These minimum space standards are approximately 10% larger than our previous standards and will help us to ensure the new development provides an adequate amount of space to create good living conditions.</p>
675	413	4 -The preferred option/options	SPD 10 - Public Transp		2. Transport. • Walworth Rd. The Walworth Rd project needs to be completed making the Walworth Rd single carriageway in each direction (with adequate bus stopping spaces) in the northern section between Amelia St and the E&C and in the	Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm,

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				ort	southern section by the Gateway Estate. • 20mph. Streets and roads in our area should be designed and designated as 20mph maximum to encourage walking and cycling. Nothing makes a bigger difference to road safety than lower speed limits. • The TfL roads. The red route roads in the area and especially the northern roundabout at the E&C and the New Kent Rd need to be humanised by reducing their domination by motor vehicles through capacity reduction, pavement widening, subway removal and speed reduction.	including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street. The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this. We are working with TfL to develop the design for the northern roundabout. While measures to "humanise" it and other main roads are a key priority for the council, we must recognise that it is a strategic part of the Transport for London Road Network and as such we cannot compromise traffic capacity.
675	416	4 -The preferred option/options	SPD 1-Shopping		3. Shopping. • Traders at the E&C Shopping Centre need support for the sustainability of their business, and their ability to return/remain in the centre during redevelopment. • Recognise the important contribution of small retail units and street markets surrounding the main development sites, providing goods that local people can afford and as local employers. Support will be given to the needs of independent traders and shops on Rodney Road, New Kent Road, Harper Road and East Street. • There is a need to support businesses through training and facilitation of knowledge. • Recognition of the contribution of minority ethnic businesses to the variety of retail offers in the area and to cultural diversity by providing the space for the development of social networks and social infrastructure. • Recognition that the Arches is a business community in transition and with the right support and commitment can fully transform into a thriving Latin Quarter. • Affordable retail units for only 5 years is not enough. The Council should have long term commitment in support of small businesses that will contribute to and enhance the distinctive character of the area.	1. Applicants proposing large scale retail development will need to identify through a Retail Impact Assessment the impacts upon existing employment and propose mitigation measures to help address impacts. Affordable space will be secured through s106 planning obligations attached to planning permissions. A legal agreement will set out the nature of the obligation i.e. provision on-site, provision off-site (i.e. to another appropriate site under the applicant's control), or a financial contribution. In those cases where physical provision results the developer would build the units; and in a suitable location, to be agreed as part of the scheme. Their size would be limited by condition or a clause in the obligation. Thereafter, a condition or clause in the legal agreement would restrict the unit as affordable space only. Where off-site physical provision results, a developer could build new units or refurbish existing vacant units and retain ownership as anticipated with on-site provision. 2. We have added additional text to SPD1 to provide further recognition of the value and contribution of local shops in the area. SPD2 recognises the importance of street markets and their contribution to providing a more varied shopping experience as well as providing local

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						employment. 3. We have amended the SPD within Section 2 to add further recognition of the cultural diversity that exists in the area, including the diversity of businesses at the Elephant and Castle, in particular, the Latin American presence and the contribution to the local economy and retail offer. 4. We have added additional text to SPD4 which acknowledges the Latin American presence in the railway arches and the contribution the businesses make to the area, however it would not be appropriate to stipulate a preference for any one ethnic group to occupy business units in the area. 5. Five years is considered a reasonable amount of time for a business to establish itself.
675	417	4 -The preferred option/options	SPD 15 - Public realm		4. Environment • Heavy traffic, poor air quality, noise and pollution are major issues. The SPD should require robust evidence of the impact of development proposals in these areas. • The SPD must demand evidence that tall buildings will not have a negative effect on micro-climate, particularly studies of sunlight, shading and ground level wind patterns. • Landscape must be accessible and the split between public and private space needs clarification. Spaces must be well designed to encourage people to meet and linger outdoors. .	SPD 17 addresses these points clearly under bullet points: – Tall buildings should • Allow adequate sunlight and daylight into streets, public spaces and courtyards. • Avoid harmful microclimate and shadowing effects or adverse affects on local amenity. Major applications are required to submit Air Quality and Transport assessments. Further details on what is required to be submitted in set out in the Sustainable Design and Construction SPD. SPD 16: Built Form has been amended to say that developments should provide an appropriate sense of enclosure, helping create well defined, inclusive and defensible streets and public spaces.
675	419	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		5. The benefits of S106/Community Infrastructure Levy (CIL) payments from developers. Making sure money is spent in the area. • Much of the success of the SPD from the point of view of local people depends on the actual creation of the improvements set out in the SPD. • There are real fears that the vast majority of the contributions by developers will be allocated to TfL for their high profile and extremely expensive transport improvements at the E&C. where the principal beneficiaries will be those travelling through the local area or coming into the area to shop or spend leisure time. • Unless community priorities such as green routes, social rented housing, affordable retail units and improvements to community facilities are in fact created then the regeneration will simply be shoehorning more people into a dense space and displacing others who can no longer afford to live in the	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The

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					area. We seek the following commitments in the SPD: • S 106 spend on the above 4 categories and the proposed Green Routes will be quantified and ring-fenced. • There will be transparency and public oversight of where s106 from each development in the Opportunity Area is being spent and specifically from the Lend Lease developments. • To work with the local community to agree projects from the community project banks that will receive s106 funding from the Lend Lease developments.	policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
675	421	4 -The preferred option/options	SPD 16 - Built form		6. Heritage. • Local people are keen to see the historic architecture of the local area preserved and provide a contrast to the new developments that will be created. Although conservation areas are proposed at Larcom St and Elliotts Row, we are keen to see a conservation created along the length of the Walworth Rd between Wansey St and Manor Place in the north and Burgess Park in the south. We would also like to see the island block on the west side of the Walworth Rd north of Hampton St included in the Walworth Rd conservation area.	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
676	422	1- Introduction and background	SPD 9 - Comm		Introduction. • The Walworth Society is a newly formed group that seeks to be a voice for local people throughout the Walworth area. In time, we are aiming to be a group that is	Support for the SPD is noted. Section 2.3.3 of the SPD recognises that there is need for more homes of all types. The Core Strategy and saved Southwark Plan set out our

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			unity facilities		<p>reflective and representative of local people. Our initial focus is on becoming an effective representative for the local area, the protection and preservation of historic buildings and the protection and promotion of our open and green spaces. • We have a written constitution, elected officers and a committee which meets on a monthly basis. We have over 110 members and all have been consulted in relation to this SPD response and the comments we have received have been taken into account. Overview. • The Walworth Society is extremely supportive of many aspects of the Elephant & Castle SPD and its supporting document the Elephant & Castle Opportunity Area Characterisation Study. The creation of two conservation areas is extremely welcome as is the protection of a large number of historic buildings throughout the SPD area. The focus on improving open spaces is also welcome as is the desire to improve the connections between them through a network of green routes which are particularly supportive of travel on foot and by bicycle. • We would, however, like to make the following 5 principal points and then follow these up with more detail comments on a number of aspects of both the SPD and the Characterisation Study. 1. Supporting the Local Community. Local people have significant concerns about elements that will affect the long term future of and viability of the local community with particular reference to: • The amount of affordable housing that envisaged for the area. The SPD seeks a target of 35% affordable housing throughout the opportunity area. We feel that thought needs to be given to increasing this proportion owing to the significant shortage of affordable housing that currently exists in the area. In addition more innovative solutions are needed to create lower cost housing in the area. Even what are deemed affordable housing rents is now set at 80% of market rent. In our area, these levels are too high for local people to afford owing in part to the high levels of private rents. • The benefits of S106/Community Infrastructure Levy (CIL) payments from developers. Much of the success of the SPD from the point of view of local people depends on the actual creation of the improvements set out in the SPD. At present there are real fears that the vast majority of the contributions by developers</p>	<p>policies for affordable housing across the whole of the borough. Core Strategy policy 6 requires a minimum of 35% affordable housing and Southwark Plan policy 4.4 requires a split of 50% social rent and 50% intermediate housing. Both policies will apply in Elephant and Castle. This approach is supported by evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010). The SPD can only provide additional guidance, it cannot change adopted policies. Southwark consistently delivers some of the highest amounts of affordable housing in London. We are constantly looking at ways in which we can deliver more affordable housing, including working with the Homes and Communities Agency (HCA), registered providers and private developers. We recognise that the cost of improving the area's public transport infrastructure, in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The CIL will provide a new way of funding infrastructure that we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL charging schedule over summer 2012 and expect to adopt the CIL in 2013</p>

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					<p>will be allocated to TfL for their high profile and extremely expensive transport improvements at the E&C. Although these may have an indirect benefit to local people the principal beneficiaries will be those travelling through the local area or coming into the area to shop or spend leisure time. Unless the improvements that are outlined in the SPD such as green links or improvements to community facilities area in fact created then the regeneration will simply be shoehorning more people into a dense space without any improvements. The spends on wider area improvements needs to be quantified and ring-fenced. • Although the SPD envisages in new residential developments that there should be provision of a community facility for the residents who live in that development such as communal meeting spaces, terraces etc, there are concerns over: - the realistic provision of disabled access within such 'multi-use' spaces - sound proofing issues in new build proposals, particularly where spaces become used for parties and events. More generally, in the past, developers have failed to adequately design their 'multi-use' or communal spaces leading to them being unusable for that purpose and creating a suspicion that such developers were not really intending it to be for community use. • Strict assessment of the creation of and provision of community facilities should be required at planning application stage to ensure the facilities created are viable and are carried through to completion.</p>	<p>Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Core Strategy policy 12 states that all development must be easy to get around and Southwark plan policy 3.13 establishes inclusive design as one of the key principles of urban design that all developments must address. Section 4.1.7 of our Design and Access Statement SPG sets out the information we will require from applicants with respect of inclusive access. Sound proofing and noise is addressed in section 11.4 of our sustainable design and construction SPD and will be assessed for individual planning applications as part of the development management process. The provision of a range of community facilities is an important part of our vision for future growth at Elephant and Castle. Core Strategy policy 4 sets out that where community facilities are provided, we will require a management plan to be submitted that sets out how the facility will be run, who the identified users are and the access arrangements for the facility. The policy also sets out that we will ensure that community spaces are flexible and so suitable for a range of potential users.</p>
676	423	4 -The preferred option/options	SPD 15 - Public realm		<p>2. The Heritage of the Area. • The documents are effective in identifying the buildings that are important to the historic environment in the area. What is missing is a vision for the opportunities that exist overall. We feel that the Walworth Rd possesses a sufficiently rich array of historic buildings to justify its designation as a Conservation Area in the medium term. We would like to see this supported in the SPD and recognition of the capacity for heritage led regeneration for the area. • Support for this comes from the section 7 of the London Plan and will allow local people, groups and businesses to bid for funding to help improve the buildings on the Walworth Rd which are extremely rich in their heritage value although currently often neglected. We feel that this regeneration will provide a welcome contrast and</p>	<p>The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.</p>

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					<p>supplement to the more modern redevelopment occurring at the Elephant & Castle and on the Aylesbury Estate. • Whilst supporting the wider principals and proposals for regeneration within the 'opportunity area' (as identified by the SPD), the Walworth Society firmly believes that a sustainable future for the Walworth Road depends upon the preservation and enhancement of the special historic character of the Walworth Road. This could be achieved through an acceptance of 'heritage-led regeneration' as defined in policy 7.9 of the London Plan. New development in appropriate areas can help to stimulate the local economy, but if this development compromises the integrity of what constitutes the special historic character of Walworth then it is unlikely that any regeneration will be sustainable. With this in mind it is a key ambition of the Walworth Society to preserve both the designated and undesignated heritage asserts along the Walworth Road and to seek recognition and protection of the character through designation of a linear conservation area. • The Society rejects the Council's brief report which determined there was insufficient potential for a conservation area along the Walworth Road, particularly when comparing the area with that recently successfully designated in Peckham. Too much weight appears to be given in the assessment to the decline in integrity of historic shop fronts at ground floor level. Rather this should emphasise the urgency with which conservation area protection is required, in order that funding schemes such, as the HLF's Townscape Heritage Initiative, can be investigated to improve the situation and unlock the potential of the high street's historic character.</p>	
676	424	4 -The preferred option/options	SPD 18 - Open spaces		<p>3. Open Spaces. •The Walworth area is extremely deprived in relation to public green space. The table below shows how the wards that make up the local area sit at the lowest end of the scale nationally for publicly accessible green space and sit well below the Southwark average too. Ward Name % Greenspace % Greenspace Ranking (out of 10,654 English wards) Cathedrals 13.2% 10,473 East Walworth 10.8% 10,529 Faraday 5.5% 10,614 Newington 4.2% 10,632 Chaucer 3.7% 10,638 Southwark Average 16.2% Source : http://cresh.org.uk/cresh-themes/green-spaces-and-</p>	<p>We set out in SPD 18 how we will expect all development to improve the overall greenness of places, through measures such as living walls and roofs and high quality landscaping. SPD 18 also states how we will expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest. Where trees are lost, they should be replaced by new trees which result in a net improvement in canopy cover. We will also seek to ensure that street trees are used to green streets and reinforce planting where trees are integral to the</p>

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					<p>health/ward-level-green-space-estimates/ •The physical and mental health benefits of access to open space are well known and it is vital more is done to: -Agree and set targets for access to open space as part of the SPD work (perhaps by ward or by Lower Super Output Area (LSOA) as these better reflect neighbourhoods that can be walked or cycled to). -Ensure that when development is considered, open space is also created that benefits both new and existing local residents. While the most obvious example of this will be within the footprint of the Heygate Estate, it is equally applicable to developments with the Rail Corridor Character Area where increasingly large numbers of residents have little access to open space. Amidst the development that will occur there, thought needs to be given to public accessible space for the benefit of all local residents. -Where open space is created, it is publicly accessible at all times. - Thought is given to CREATING open/green space throughout the area. Innovative approaches can be used to turn streets with excess capacity (partly aided by the sharp decline in vehicle ownership throughout the local area) into green spaces or play streets. A good example of this might be Liverpool Grove between the Walworth Rd and St Peter's Church. •These issues are not covered at a high level in the SPD and much more thought is needed as to how the pressure for increased population (and the psychological and physical stresses that can bring) can be countered with a meaningful strategy for increased access to open/green space for people in Walworth. •There is concern that the place of faith communities and their buildings are not recognised as a resource within the SPD and we feel that further work and comment should be made in respect of the social capital these group offer to the wider community.</p>	<p>historic townscape. We will also use the guidance set out in SPD 11 to provide a high quality network of pedestrian and cycle routes in the opportunity area. Development in the opportunity area will need to provide convenient, direct, safe, and attractive pedestrian and cycle links. This will include linking new and existing public and open spaces creating a network of spaces that act as a focus for activity and draw people through the area. We have set a final standard of 0.76 per 1,000 population in the SPD in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate redevelopment will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026.</p>
676	425	4 -The preferred option/options	SPD 6 - Wellbeing - Social and community		<p>4. Provision of Educational Facilities. • The SPD provides for a potential for up to 6,000 new homes which will impact on the requirements for new schools and additional school places. As there are no proposals for new schools within the SPD area, it is crucial that real targets are analysed, understood and set around school needs. All of the schools in the area are already more or less full. • More understanding of this issue is needed in the SPD and clear</p>	<p>There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work. We also work closely with NHS Southwark to determine whether there are sufficient</p>

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			infrastructure		ideas set down as to how the education committee envisage provision of additional school places will work. 5. Provision of Health Facilities. • Large developments are planned for the site of the Heygate Estate and will have a significant impact on demand for health services. • Although the SPD seeks to promote active lifestyles through walking, cycling, gardening etc more clarity is needed around discussions with NHS Southwark and what is being proposed and its impact on existing facilities and the requirement for additional ones.	health facilities in the area to support the increased demand caused by new development. Further detail is set out in the infrastructure plan in section 6.5 of Appendix 1. There are no plans for new facilities in the short to medium term, although there is a potential longer term need in the area around South Bank University. The demand for health facilities will be kept under review as development comes forward.
676	426	4 -The preferred option/options	SPD 16 - Built form		Detailed Comments. • Page 44. SPD 16: Built Form. Mention of development proposals should retain locally listed buildings wherever possible and consider the retention of buildings which are identified as having townscape merit. We strongly support aspirations in relation to residential properties having active ground frontages with frequent windows and entrances and non-residential frontages taking care over activity at ground level and the use of lattice shutters as against roller shutters or solid shutters • SPD 18: open spaces. page 51. Food growing page 52 the mention of streets having 60% canopy cover. Opportunities for other heritage assets. Although the characterisation study is largely excellent and has done a great job in highlighting buildings that deserve protection and, in time, improvement, we feel that there are a number of other buildings that deserve to be included either in terms of being locally listed or having townscape merit. To lose these buildings we feel would be a grave loss to the local area. Buildings that should be considered for protection include: • Victorian terraces at the southern end of Penton Place on the east side and Penrose Street on the northern side and southern side east of Penton Place. Penton Place – south of Manor Place Penrose St (north side) Penrose St (south side) noteworthy buildings include more than solely the doctor's surgery. Penrose St – Corner of Penrose Grove Walworth Road – the newsagents north of NatWest bank and buildings above Bagel King and Chicken Cottage. • The buildings on East Street at its junction with the Walworth Road (which includes the Halal meat shop). Outside the SPD area and existing local conservation areas, other buildings that we would like to recommend for local listing include: • The Surrey Memorial	Support noted. Our evidence does not show enough to demonstrate that these buildings should be highlighted in the SPD now. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally list them. Later in the year the Council will be consulting a Heritage SPD and a borough-wide local list will be formally consulted on as part of that process. At that point, there will be an opportunity to make representations on individual buildings, prior to the finalisation and adoption of the list. Members of our local communities will be encouraged to suggest buildings and other heritage assets of noteworthy value at this time.

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					Gardens Hall. • The Southwark Environment & Leisure building on Penrose St (opposite the vehicle entrance to Morrissions. This has 2 commemoration stones set into the front wall. • The pub the Robert Peel on Hillingdon St. • Manor Place Terrace 169-181 Manor Place SE17 • The Royal Standard Pub. The only pre-Brandon Estate building that remains in the area • Former National builders merchant Victorian buildings (2 from the early and one from late 1800s)	
676	427	5 - Character Areas		Walworth Road SPD 35 - Built form and public realm	<p>• Page 85 5.4.2. Detailed review of this paragraph is needed. We disagree with this aspect of the description of the Walworth Rd that underplays the opportunity for heritage led regeneration in this part of the opportunity area. The Opportunity Area Characterisation Study makes it clear (page 75) that “much survives from the late 18th, 19th and early 20th centuries with Georgian, Victorian and Edwardian architecture of good quality”. We believe that the presence of a large number of buildings that are of townscape merit, the potential for many to be locally listed and those that are already grade 2 listed (such as the Town Hall) mean that a major opportunity exists to seize on the potential of these neglected but significant assets to create a genuinely attractive Walworth Road in the longer term. This would also offer a counterpoint to the far more modern development being proposed to the north and in many other areas such as the rail corridor. We have a belief that although it is not possible to designate the Walworth Road as a conservation area at this point this will be possible in the future and that part of the vision for the local area should be the preservation and improvement of the significant heritage and sheer diversity of the buildings that run from Wansey St south to Albany Road.</p>	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
676	428	5 - Character Areas		Walworth Road SPD 33 - Land uses	<p>• SPD 33: land uses. Types of retail need to be assessed and maximums need to be set for shops such as payday loans, pawn shops and betting shops etc.</p>	Local planning authorities have very little control over uses such as betting shops, pawnbrokers and pay-day loan shops. This is because often these uses do not require planning permission. Uses such as betting shops, pay-day loan shops, banks, estate agents and travel agents are categorised in the same “use class” (A2, financial services). Planning permission is not required for changes within the same use class. There is also a permitted

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						change of use to A2 uses from a restaurant, pub or cafe. The council recently responded to a government consultation arguing that betting shops should be placed in their own use class which would give the LPA more control. However, this would require a change to the planning regulations.
676	429	5 - Character Areas	Please click to select	Enterprise Quarter SPD 51 - Built Environment	<ul style="list-style-type: none"> Figure 39. Heritage assets in the enterprise quarter character area. We strongly support the retention of the terraces on Borough Road east of the railway line and the Georgian building on Newington Causeway. A major task will be to protect these buildings when previously the intention was to flatten the whole Newington Triangle site and offer that up the development. 	Support noted.
676	430	4 -The preferred option/options	SPD 18 - Open spaces		<ul style="list-style-type: none"> There are a number of mentions of the Carter Place green/open space. We strongly support the retention of this space and fought hard for this as the Friends of Cater Place Garden. Given the fact that the Planning Inspector has given the green light for its development, we do not understand its inclusion in the SPD as a meaningful site for consideration as publicly accessible green space. The SPD/Southwark Council needs to make clear what is now realistic. We make suggestions below as to how alternative approaches might create green space in Liverpool Grove as and when the Carter Place Garden site is developed. Open Spaces – Liverpool Grove. In the light of the likely loss of Carter Place Garden, we suggest that the opportunity for open space is revisited on Liverpool Grove between the St Peters Church and the Walworth Road. A part of the Walworth Road project included an attempt to make more of the view through to the church and the green space of Faraday Gardens. Given the likely work that is planned on Liverpool Grove to make it more of a home zone east of the current barrier and the relatively poor uses that are made of the street at present and the excess of carriageway that exists, a pocket Park or green space could be created in this area that would meet the aspirations that people had for a green view and open space along the Walworth Road. Open Spaces – Green Fingers. There is a real need to create the strategic links 	Carter Place is referred to in the draft Open Space Strategy as a potential site for protection as open space. If development were not to occur on this site, we would wish to safeguard this site for protection as open space. SPD 35 sets out our approach to conserve or enhance the Liverpool Grove conservation area and its setting which include works to the public realm and surrounding streetscape. The council does not protect civic spaces and the site has not been identified as a potential open space for protection in the draft open space strategy. Paragraph 4.6.5 of the SPD recognises that improving links to and between open spaces is particularly important as most people in the area get to open spaces on foot. We have set out in the SPD that there is also potential to improve green routes to other parts of the borough, including links through to Aylesbury and Burgess park.

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					between the E&C SPD area and the Aylesbury SPD area. The Green Fingers idea is one that is really exciting and thought should be given to the early creation of these links both to reconnect the Aylesbury to the newly improved Burgess Park but also to help make connections between the areas that have low open space provision in the north and Burgess Park.	
677	432	4 -The preferred option/options	SPD 11 - Public Transport		I agree with the Elephant Bypass Group in their aims to improve cycling around the Elephant and Castle junction. The consultation around the SPD is an opportunity to improve the eastern cycling bypass by including in the SPD a new route from Hampton Street to Meadow Row. This should be clear, direct, fast and traffic free. This is a great opportunity to improve one of the most dangerous junctions for cyclists in London and I hope my comments and that of other cyclists are taken into consideration. Best wishes, Jenny Jones	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists.
678	434	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route. We both regularly cycle through Elephant & Castle and having this bypass improved would make a significant difference to us.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
679	436	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists.
680	437	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
681	438	4 -The preferred option/options	SPD 11 - Walkn		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient

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			g and cycling		free. Please amend the SPD to provide for this route.	links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
682	439	4 -The preferred option/options	SPD 11 - Walkn g and cycling		I am writing as a business owner & cycle commuter. I employ 15 people in Southwark borough, a handful of whom currently cycle in to work; many more would like to but feel unable to do so at present due to the often hostile road environment. The opportunity to improve the eastern cycling bypass at Elephant & Castle, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
683	440	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
684	441	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Please improve the eastern cycling bypass of the Elephant and Castle, via a new route from Hampton Street to Meadow Row, in the SPD. Make it clear, fast, direct, car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
685	442	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
686	443	4 -The preferred option/options	SPD 11 - Walkn g and cycling		I am led to believe that there is a supplementary planning document for the Elephant and Castle area which is currently out for consultation. If so, I would like to support the calls to improve the eastern 'cycling bypass' around the existing roundabout, facilitating a new route from Hampton Street to	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient

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					Meadow Row, and that this should be included in the SPD (i.e. amending the SPD to provide for this route). Ideally, this should be clearly signed, direct, and car-free.	link between Walworth Road and the Rockingham Estate and the cycle network beyond.
687	444	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
688	485			Rockin ghan SPD 54 - Transp ort and movem ent	Please find below comments to be included in SPD document with specific reference to the Rockingham Character Area 1) Please note that there is reference to green pathways and cycling routes which attempt to go through buildings . Please ensure that we use the pathways that already exist i.e. new kent road via Falmouth road all the way to Dover street 2) The community centre at the moment is over 30 years old and needs to be replaced by a Multi purpose, purpose built building housing community facilities and office space for use/rent thereby creating employment opportunities 3)Section 106 moneys to be channelled into ensuring repairs are carried out in a meaningful way including kitchen/bath refurbishments 4) The Green spaces on the Rockingham to be protected and managed in a responsible way that respects the lines and nature of the Rockingham Estate 5) To ensure that the development of the Parade should be sympathetic to the people who live on the estate as well as be able to attract viable commercial entities 6) To ensure that any new developments on the estate are complementary to the housing mix already established on the estate i.e. council rented/Privatey owned	1: We located the arrow across buildings to suggest that pathways across the estate between Falmouth Road and Newington Gardens should be improved. However, this was confusing and we have deleted it. 2: The council recognises that the community facilities are in need of improvement and have flagged this in the SPD. I We have also stated that we will explore opportunities to fund this work. This could include directing s106 contributions or in the future funding raised through the infrastructure levy (CIL) towards this project. 3: Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. 4: We recognise that housing amenity areas are a valuable resource to the community and have amended SPD18 to refer to this. 5: Improvements to the public realm at the parade would be subject to further consultation. 6: Policy on housing is set out in SPD5 and in our Core Strategy. At least 35% of homes in new developments should be affordable.
689	448			Heygat e Street SPD 27 - Built environ ment	Following my telephone conversation with your office today, concerning the consultation on the on the Elephant & Castle SPD. Having obtained his document at the eleventh hour. I was assured during my conservation that my comments will be considered. The point I want to make is regarding Brandon Street. The Appendix 3: schedule of building which have the potential to be locally listed on page 137. On this page concerning Brandon Street is mentioned The Crown	The building concerned was identified during a building audit of the area. Not all planning permissions are implemented and many of them lapse. As the building still remains in the area unchanged, it is not yet clear whether the existing permission will or will not be implemented. As such it currently is still valid to include within the document.

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					Public House – 115-117. I would have thought that your department would have known that this potential listed building had already been given planning permission for demolition and development. Having been one of the objectors I can give you the reference APP/A5840/A/11/2143911/NWF, granted on the 25th July 2011. So I am wondering why this has been included in this document when your department should be some enquiries before publishing. I look forward to your reply	
690	510				Southwark Cyclists is the leading organisation that promotes and supports cycling and cyclists in Southwark, and is a local group of the London Cycling Campaign. Our 800 strong membership believe that cycling as transport is undervalued, under used and under supported to-date. We are pleased to maintain a positive working relationship with Southwark Council and believe this is an exciting time for cycling in London and Southwark in particular, with recent commitments from the administration to support The Times' 'Cities Fit for Cycling' campaign (launched on 2 February) and the allocation of a sizable budget for cycling improvements. This response is guided by our principles for improving infrastructure for cycling in Southwark: On main roads cycling should be physically separated from traffic with specific facilities at junctions to make for safe, direct journeys (as per the Go Dutch LCC campaign). 2. On residential Streets traffic should be limited to 20mph and with suitable road design and filtered permeability so that cyclists and other traffic can mix successfully. 3. Southwark offers a number of opportunities to create green cycling links through parks and canals; these should be fully exploited. This draft SPD was prepared some months ago and we believe that as well as some simple omissions or errors, it would value from reappraisal under this revised state of affairs This document is divided into three parts: Our Response, a detailed point by point response to the SPD as it stands; Key Issues, the flaws, as we see it, with the SPD in general terms; and Our Vision, the Southwark Cyclists view of what Elephant and Castle could be: a bold urban centre that has recovered from the 1960s motoring addiction and redefined itself as a hub for modern, sustainable, urban living - with cycling at its	While cycling infrastructure is appropriate in some places, the Council hopes to make all streets safe for cycling through a variety of measures, together with free cycle training for residents and workers in Southwark. The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.

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					heart. We see Elephant and Castle as the missing hub for cycling journeys across Southwark and south and central London - we very much hope that in this period of renewed focus on the potential of cycling in Southwark the final SPD will incorporate this vision.	
690	519				Section 2. Challenges and Opportunities We strongly agree with the view that Elephant and Castle has the potential to be a fantastic town centre, and are pleased that the SPD recognises the growing contribution made by Latin American businesses (2.3.2). This is a unique asset for the borough and improving access to it will be of benefit to a wide area. A vision of Elephant and Castle as a destination for retail has the potential to make the same mistake as the LCC's 1960s scheme by failing to capitalise on passing trade - in considering routes for cycling though the area we would encourage visible routes that pass near to or through commercial areas, with significant visible and secure cycle parking, to encourage passing commuters and leisure users to make use of the businesses. Routing cycling exclusively via residential roads will reduce this opportunity and limit the potential market of new retail We strongly agree that facilitating for more walking and cycling is essential to the area (2.3.5). However, we would assert that it is essential for the SPD to recognise the serious harm done by the current level of traffic at the Elephant and Castle, in terms of urban space allocation, noise, air pollution and pedestrian and cycle casualties (Key Issue 1). Reference to hostile public realm is made in 2.3.6 but the wide-ranging negative effects of the current road design are not recorded. We would request that these points be made in the revised 2.3.5 We note the serious congestion and interchange issues present in the Elephant's public transport infrastructure and suggest that the SPD should cite modal shift from public transport to cycling as a way of reducing the pressure currently felt on those links. We applaud the recognition that the traffic dominated road network "severs neighbourhoods and creates hostile public realm" (2.3.6).	Support noted. Policy SPD 11 adequately covers points on cycling.
690	523	3 - Vision and objectives			Section 3. Vision and Objectives We applaud the vision of the redevelopment of Elephant and Castle that sees the	Support noted. We consider Policy SPD 11 sufficiently covers cycling matters.

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					<p>subways removed and the creating of a more attractive and safe environment with priority for public transport users, cyclists and walkers over the car (3.1.4) We support the aspiration to increase retail activity on the main roads approaching the Elephant and Castle and see this as very compatible with increasing cycling on these routes. (3.2.5) We strongly support the call (3.2.7) to ensure that the new development promotes healthy and active lifestyles, and we strongly believe that facilitating mass cycling would be a key tool in that effort. We strongly support the call (3.2.8) to “reduce the impact of the viaduct and main roads as a barrier to pedestrian and cycle movement and use development opportunities to provide a high quality network of pedestrian and cycle links which are attractive, safe and easy to use”. We would ask for Theme 3.2.8 to include specific reference to the existing situation - cycling is not merely not attractive, safe and easy at Elephant and Castle - it is positively hostile (Key Issue 1). We would ask for the inclusion of a distinct point in 3.2.8 on cycling, and propose the wording: Provide for the growth of mass cycling through this hub with clear, direct, fast and safe cycling routes suitable for all residents. Theme 6 (3.2.10) calls for sustainable use of resources - we would request that this should include aspects of commuting and travel that are unsustainable with reference to alternatives. We propose the wording: Restrict unsustainable travel choices such as private motoring and facilitate sustainable alternatives such as walking, cycling and public transport.</p>	
690	528	4 -The preferred option/options	SPD 1- Shopping		We support the aspiration (SPD1) of a retail centre that supports the existing retailers on Walworth Road and provides space for displaced tenants of the existing centre, whilst reinvigorating commercial use of the principal roads.	Support noted
690	530		SPD 2 - Markets		We support the aspiration (SPD2) to maintain a thriving market at Elephant and Castle	Support noted
690	532		SPD 3 - Hotels		We support the aspiration (SPD3) to develop hotel bed spaces at Elephant and Castle.	Support noted

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690	534		SPD 4 - Jobs and Business		We support the aspiration (SPD4) to provide business space at Elephant and Castle	Support noted
690	536		SPD 5 - New Homes		We support the aspiration (SPD5) to provide new homes of a variety of tenure and size at Elephant and Castle	Support noted.
690	538		SPD 6 - Wellbeing - Social and community infrastructure		We support the aspiration (SPD6) to provide arts, culture, leisure and entertainment facilities at Elephant and Castle.	Support noted
690	541		SPD 7 - Sports facilities		We support the aspiration (SPD7) to provide new sports facilities at Elephant and Castle	Support noted
690	543		SPD 8 - Higher education and student housing		We support the aspiration (SPD8) to support the expansion of higher education at Elephant and castle	Support noted
690	546		SPD 9 - Community facilities		We support the aspiration (SPD9) to provide community facilities at Elephant and Castle	Support noted
690	548		SPD		We strongly support the aspiration (SPD10) to create a bus	Support noted. While the SPD does not specifically

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			10 - Public Transp ort		only street in London Road - on the firm proviso that the liberated road space be used to provide a clear, direct, fast and safe cycling route from E&C to Waterloo, in parallel to the bus corridor. Separation of cyclists and buses improves safety and service for both user groups (Key Issue 2). We strongly support the aspiration to make St Georges Road two way. Two way roads have been shown to be safer and more convenient. However, we request that cycling provision that is clear, direct, fast and safe be provided on this corridor, as per the above (Key Issue 2). We would ask for the inclusion in SPD10 of the provision of interchange between Cycling and other modes at the Elephant and Castle, including use of the Cycle Hire Scheme (as a location on the current boundary). Suggested amended wording: Improve interchange between all public transport modes and cycling (including the Cycle Hire Scheme) and maximise opportunities to increase passenger waiting areas at bus stops. We note that section 4.4 omits potential utility to be gained from a modal shift from buses to walking and cycling on the key SE-NW corridor. Buses are congested and overcrowded on this route, while many journeys (notably to local schools) are short and easily walkable or cycleable. The SPD should note this and provide for the development of clear, direct, fast and safe cycling routes to support this end.	mention the potential for modal shift in the corridor suggested, its policies will encourage and support this.
690	550	4 -The preferred option/options	SPD 11 - Walkn g and cycling		We feel there would be benefit from the separation of SDP11 into separate walking and cycling policies - where they are considered together it is unclear as to which applies to which case and while we agree that much is common the E&C plays a role as a local hub for south London cycle routes (especially commuters), which it does not for walking. These intra-borough movements are currently not served well by the provisions of the SPD. We strongly agree that Southwark should "work with TfL, developers and other stakeholders to provide a high quality network of pedestrian and cycle routes in the opportunity area". We strongly agree that cycle links should be convenient, direct, safe, and attractive, however, we also feel they should be fast and clear – something that previous developments at E&C and elsewhere in London have failed to achieve. To provide for modal shift to cycling, policy should be to make cycling as easy as possible - which	We consider that Policy SPD 11 and supporting text is suitable and sufficient to address all these comments. Support noted. While cycling infrastructure is appropriate in some places, the Council hopes to make all streets safe for cycling through a variety of measures, together with free cycle training for residents and workers in Southwark. The Council has a separate scheme to introduce cycle parking to existing estates. Earlier work by TfL has shown that the removal or peninsularisation of the northern roundabout is not feasible if it is still to serve its role as junction of a number of main roads.

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					<p>includes providing competitive journey times with other transport modes and clearly signposted routes We are very concerned by the current classification of 'safe'. We believe that safe cycling routes can be achieved, as the experience of many Continental cities has shown, by reducing road speeds and through traffic on secondary roads, and by providing segregation and specific junction interventions on main roads We would urge the inclusion of provisions for physically separated cycling routes on the many roads with dangerous traffic levels in this SPD Area (Newington Butts, New Kent Road, St Georges Road, Garden Row, Westminster Road, Borough Road, Newington Causeway, Southwark Bridge Road, London Road and the Elephant and Castle itself. The majority of these are TfL controlled and we would urge the council to set about concerted lobbying efforts to secure the needed improvements. There is much good guidance available in the TfL Street Design guidance for cycle lanes and we would urge for the SPD to include the provision that all roads in the SPD area should be brought up to this - or higher - standard. We agree with "the facilitation of east-west pedestrian and cycle movement through the opportunity area". However, we note below the currently unsatisfactory explanation of how this policy might be enacted in the central area. We support the desire to "reduce severance created by the railway viaducts and main roads". Figure 1, overleaf, shows the current Bikeability ratings of the roads in the SPD area. Issues with Bikeability classifications notwithstanding, this shows clearly that the TLRN routes, and some borough roads, cut the SPD area into inaccessible areas for new or less confident 5 cyclists. Crucial routes (i.e. Aylesbury Estate to St Georges Road schools) become impossible for people to consider as the roads they see around them are multi-lane, fast flowing and dominated by heavy traffic and HGVs - with no provision for cycling. On main roads the feeling of 'severance' for cycling is best considered to comprise two factors, the inaccessibility of the roads themselves and the barriers they create in developing alternative routes using quieter streets. On the main roads this is best reduced by the provision of clear, separated space for cycling - as per the LCC's 'Go Dutch' campaign.</p>	

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					<p>For the creation of quieter routes on residential streets severance can be reduced with the provision of greater opportunities to cross safely and conveniently and enhanced route signage to guide people to these safe points. We agree with making “cycle connections into the surrounding area”. However, as noted above, the Elephant and Castle junction system plays a much greater role than this for London’s cycle routes - the vision (detailed further below) should be for a hub for cycling routes at the Elephant, recreating the passing traffic that made the area thrive before the 1960s road scheme. SPD11 must be amended to include a statement to that effect and we suggest the wording: Support intra-borough cycling routes, especially commuting, bringing passing cyclists into the heart of the regenerated town centre to support retail and leisure. We note that in existing housing stock there is all too often inadequate storage for bikes. Southwark has introduced excellent standards for new developments, we would like the SPD to support the provision of cycle parking for older properties and to include a statement to that effect. We propose the wording: Provide cycle parking facilities for pre-existing residential properties where this cannot be accommodated on site. We support the policy to provide for access at surface level - we note that this is not distinguished in SPD11 as a policy for cyclists, pedestrians or both. Despite the failures of pedestrian grade separation at Elephant and Castle it is felt that, on occasion, grade separation can be of benefit to cyclists and it should not be ruled out. We note that Copenhagen, a world leader in urban planning for cycling, is currently introducing cycling overpasses at busy junctions - while there is little experience with grade separation in the UK the complexity of the Elephant and Castle junction means that we would not wish to rule out any options without consideration. SPD11’s aspiration to remove the subway crossings does not deal with the greater fundamental issue of the Elephant and Castle roundabout and the obstacle it presents to cycling in the borough (Key Issue 1). Our first choice would be to remove this roundabout, as per the 2004 redevelopment concept. We recognise the issues with negotiating with TfL for the removal of the roundabout but we would note the</p>	

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					<p>remarkable changes that have taken place in this field of debate in the last year, since this was last evaluated, and urge Southwark Council to restore its aspiration to remove the roundabout and revert to two way traffic. We do not believe, however, that either the roundabout or a two way Elephant and Castle junction can be a safe environment for cycling without segregated cycling provision and/or suitable alternative routes. We are concerned by proposals to pedestrianise Keyworth Street. We note that Keyworth Street is part of the CS7 Elephant and Castle bypass and we are concerned the proposals to pedestrianise it in SPD11 do not refer to this, nor state that cycling provision would be maintained. We oppose the restriction of cycling on Keyworth Street We strongly support the policy to “link new and existing public and open spaces creating a network of spaces that act as a focus for activity and draw people through the area” - we would ask that it be clarified that this refers to pedestrians and cyclists (if it does so, and we believe that it should) We support the policy to “use new and existing landmarks to inform directions” - we request that this policy should apply also to cyclists. We note the specific need for vastly improved wayfinding in the Elephant and Castle area for cyclists and urge for a specific policy to be added to address this (Key Issue 3). We strongly support the provision of convenient and secure cycle parking as per current standards.</p>	
690	558	4 -The preferred option/options	SPD 11 - Walkng and cycling		<p>Elliotts Row Vs. Oswin Street This diagram contains some issues that concern us. We would note that this incorrectly shows the CS7 route using a direct path via Oswin Street, it does not - it uses Elliotts Row. The diagram inaccurately suggests that the existing bypass is direct and clear, which it is not. We would request this diagram be amended to more accurately display the existing layout</p>	Noted.
690	561	4 -The preferred option/options	SPD 11 - Walkng and cycling		<p>Cycle Superhighway 6 We are alarmed that the diagram does not include Cycle Superhighway 6 (CS6) , which is currently in development for delivery in 2015. CS6 is not referred to at any point in the SPD which is a cause of great concern. We would urge the SPD team to be in contact with the CS6 project officer (Jessica Ellery at TfL). The SPD must</p>	<p>The exact route of the proposed Cycle Superhighway 6 has not yet been determined and so it was considered inappropriate to include even an indicative line on the figure.</p>

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					be amended to include this provision. CS6 will introduce new cyclists to the key SE-NW corridor through the area - the local experience of CS7 is that opportunities to make simple connections to it, to improve permeability, were not foreseen, though TfL money would likely have been available. An example of this is the failure to provide two way access to Strata (with 500 bike spaces) on Hampton Street to CS7. We would urge the inclusion of a further point to SPD11 to address CS6, suggested wording Provide convenient cycling connections to the Cycle Superhighways, existing and planned (CS6 and CS7), as well as routes on the London Cycle Network.	
690	565	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Existing, or Proposed? The diagram serves a dual purpose of showing existing and proposed routes - we find this confusing and fear that it may give an inaccurate impression. Issues such as the use of Elephant Road as a cycling route are not resolved and it is unclear what view the council takes. We request the roles be divided, with an 'existing' and 'desired' map each showing accurately the state of affairs today and Southwark Council's desired goal.	A number of respondents commented that Figure 12 was confusing and so we have removed the map. The transport and movement maps in the Section 5 provide a more detailed picture of key routes in each of the character areas.
690	566				Churchyard Row - Who has priority? On Figures 11 and 12 Churchyard Row is shown as both pedestrian and cycle access. Currently this is configured as a road, but has no pavement. At the south east end a Toucan Crossing is provided, but the waiting area is constrained by the Churchyard railings and road. As a key part of the existing bypass these features can cause conflict between pedestrians and cyclists. We would urge the opening of the churchyard so that pedestrians could use the parallel pathway that is currently inaccessible from Newington Causeway	Noted. Improvements will be sought alongside adjacent development.
690	572		SPD 12 - Parkin g		We strongly support the development of the CAZ as car free (SPD12). We note with concern the flexibility to provide a greater parking provision for purposes of 'viability' (4.4.10) and believe that the experience of Strata SE1, with less than 10% parking provision and all homes sold offplan, demonstrates that there is no viability concern with the sale of car-free homes in the SPD area. We strongly support a policy of not providing on-street parking permits to new	Support noted.

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					residents (4.4.9). We would urge that parking for disabled vehicle users, car clubs and servicing areas (SPD13) be provided in bays, rather than on street. Bay parking, out of line with the traffic flow, is greatly safer for passing cyclists. These bays should be significantly wide enough so that the 'door zone' does not intrude into the path of cyclists.	
690	578		SPD 15 - Public realm		We strongly support policy (SPD15) to prioritise pedestrian and cycle movements.	Support noted.
690	594		SPD 16 - Built form		We strongly support policy (SPD16) to create blocks which pedestrians and cyclists find easy to move around. We are concerned that proposals to create a conservation area on Elliotts Row should not inhibit future improvements of this important cycling corridor (part of CS7 and the western bypass). We would request that the SPD recognises the importance of Elliotts Row as a cycling route and makes reference to the need to balance valuable heritage protection with growing usage by cyclists. We would be pleased to support a conservation area in Elliotts Row if any effect this might have on the cycling provision might be explained and mitigated (Key Issue 4	Support noted. Creation of a conservation area does not preclude the provision of facilities for cyclists.
690	597			Central Area SPD 22 - Transport and movement	We support the broad aspirations of SPD22, but are confused by the reference to providing east-west cycling routes through the shopping centre and railway viaduct. It is unlikely that the management of the centre will permit cycle movements through the building and current understanding is that the centre will continue to be an indoor facility with floors above and below ground level. An aspiration of direct routes through this site is supported (as per the 2004 development proposals), but a more practical provision for convenient cycling routes around the large footprint of the building should be facilitated. We request this first point of SPD22 be amended, and suggest splitting it into two points: <ul style="list-style-type: none"> • Provision of strong east-west routes for pedestrians through the shopping centre and railway viaduct. • Provision of strong east-west routes for cyclists around the shopping centre on as direct a path as possible. We support the broad aspirations for 'removal of the subways and creation of new 	The figure showing cycle routes is indicative to support the objective of Policy SPD 11. The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. The final design of the changes to the northern roundabout will include enhanced provision for cyclists.

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					<p>pedestrian/ cyclists crossings on key desired lines'. However, we are concerned that this wording does not adequately address the concerns we have at the main roundabout. (Key Issue 1) We see it as essential that a separate point in SPD22 addresses the critical safety issue of the cycling provision on the Elephant and Castle roundabout. By TfL's own figures this is the most dangerous junction in London for cycling. While not the borough's direct responsibility, as a key stakeholder we would call for Southwark to be representing the view to TfL and City Hall that to maintain this junction in anything like its present form is unacceptable. The draft plans shown to members of the E&C regeneration forum make only the most cursory provision (in the form of ASL lines) and it is our opinion that the proposals will not create the step change in accident rates that is needed. Beyond the numbers of actual accidents, there is a pronounced fear of the E&C roundabout shared by new cyclists and non-cyclists. As a barrier between much of the borough and central London it should be Southwark Council's priority to see a radical solution introduced here that creates the improvement in safety - real and perceived - that is needed. A second aspect is the provision of the Elephant and Castle cycle bypass - the roundabout is a very complex junction and we recognise the difficulty in adapting it to accommodate all users (though we do believe this is possible and should be a priority). The existing Elephant Bypass comprises of different east and west sections. To the west it uses narrow, quiet residential streets with sections of traffic-free paths (Key Issue 4). To the east it is on larger roads, indirect and currently severed by the inadequate temporary crossing on New Kent Road (Key Issue 5). We would request that Southwark Council makes provision in the central area policy, and relevant character area policies, to prioritise the further development of the E&C bypasses to safely accommodate more cyclists and provide for more routes. We ask that the following two points need to be added to SDP22: ● Provision of safe cycling infrastructure allowing bicycle movements on the Elephant and Castle roundabout. ● Improvement of the Elephant and Castle cycle bypass. We are concerned that while 5.1.11 notes the hostile</p>	

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					environment for pedestrians, there is no record in the SPD of the hostile environment for cycling in the central area. We would request this be included, and suggest the following wording for an additional point under 5.1: 5.1.11b The current road design is very dangerous for cyclists - with Transport for London's accident statistics ¹ for 2008 to 2010 showing that there was a total of 89 casualties at the northern roundabout during this three-year period. This represents an average of one casualty every 12 days. Our objective is to make this junction safe and welcoming for all road users, including cyclists, and improve the existing Elephant and Castle cycling bypass as an alternative route. Facilitating cycle movements through this junction is essential to meeting our goals to improve cycling access for all Southwark residents.	
690	601		SPD 2 - Markets	Central Area SPD 23 - Built Environment	We strongly support SPD23's provision that development should be easy to move around for pedestrians and cyclists.	Support noted.
690	602			Central Area SPD 23 - Built Environment	SPD Figure 19. We note with concern that despite stated policy to improve east-west cycle links in the central area, the diagram shows no such links, indeed, the links shown do not connect and fail to provide a network of useful routes. The indication of Elephant Road as a key cycling route is also of concern, this is discussed further below (Key Issue 6). This diagram also does not show cycling on the roundabout, which must be an aspiration. The mistake on figure 16, showing the CS7 Bypass on Oswin Street, is repeated here - we would ask for this diagram to be replaced, with it made clear if the council wishes to reroute this bypass via Oswin Street or keep it on Elliotts Row.	Plans of cycle routes are indicative only. The aspiration in Policy SPD 11 is to create a network of safe routes.
690	604			Heygate Street SPD 26 -	Heygate Street We support the intention to demonstrate 'the highest standard of street design to encourage walking and cycling in an environment where motor vehicles are still permitted' (SPD26). We strongly support proposals to "Provide a layout which is easy for pedestrians and cyclists	Support noted. The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists.

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				Transport and movement	to move around, establishing north south routes which connect with Harper Road and Falmouth Road on the north side of New Kent Road and Brandon Street to the south, as well as east-west routes which link Walworth Road with Rodney Road and Rodney Place (Figure 22). We agree that "The positioning of crossings on New Kent Road on pedestrian and cyclist desire lines will be vital to the attraction of these routes." However, we also see links to Meadow Row as being vital and would request that this be included in this policy, and indeed this is the preferable route the replacement eastern Cycle Bypass, detailed further below (Key Issue 3). We note with concern that SDP26 does not refer to connections to the South West, we suggest that it should and it should note the importance of connections to Hampton and Steedman streets. Southwark Cyclists members have, in previous conversations with the council, agreed in principal to a cycle contraflow on Hampton Street and we believe that a connection between Hampton Street and Meadow Row represents the best route for an Eastern Bypass, as detailed below (Key Issue 4). We note with concern that, again, there is no reference to CS6, which will arrive at the Heygate Character area via Walworth Road in 2015 (TBC). SPD26 must make mention of CS6 and we propose the following be added to that point: Provide for the appropriate interface with CS6 and connections from it to cycling routes to North and West. We support proposals to minimise car parking, and as noted above request that any car parking be provided in bays of sufficient width to avoid creating a 'door zone' where cyclists may travel	
690	606			Heygate Street SPD 27 - Built environment	We support SDP27's provisions for cycling.	Support noted
690	607			Heygate	SPD Figure 22 We are concerned by the inadequate cycling links shown in Figure 22. The use of Elephant Road as a key	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for

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				Street SPD 26 - Transport and movement	link is a cause of concern, detailed below (Key Issue 5), and the diagram fails to take account of the remarkable opportunities presented in this area to create a better easternbypass (Key Issue 3), instead Southwark Council proposes that users should continue to use Heygate Street, in its future unknown configuration, where cyclists compete with buses and general traffic. A traffic free eastern bypass is possible here and should be provided. Heygate Street remains an important route for cycling (with Rodney place and Rodney Road) and as a busier, wider road, we see this as an ideal case for the introduction of segregated cycle lanes. We suggest this provision be made in the SPD. We are concerned by the vagueness of the indicated route along New Kent Road, where a partially successful cycle track exists (sadly flawed in its connections to the road network and the awkward positioning of bus stops and telephone boxes). It should be made clear what the council's position is on the improvement of this facility. We again note with concern the absence of CS6 from this diagram.	cyclists.
690	609			Brandon Street SPD 31 -	We note that the council has not recognised under 'opportunities' the valuable role Brandon Street and Portland Street already play as a NW-SE cycling route, a role which could be greatly improved by this development. We would suggest this should be added and we propose the wording: Brandon Street (and Portland Street) provide a valuable cycling route on less busy roads between the central area and Aylesbury, Camberwell and beyond. Improving this route for cycling through filtered permeability will ensure residents and visitors have a quieter alternative to Walworth Road.	Policy SPD 11 covers all roads in relation to cycling.
690	611			Walworth Road SPD 34 - Transport and movement	Walworth Road We have no issues with the SPD proposals	Noted
690	614			Rail	Railway Corridor We support proposals for the rail corridor,	Support noted. The cycle link that is highlighted in figure 31

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				Corridor SPD 38 - Transport and movement	particularly improved pedestrian links. We feel links to either side of the viaduct could also accommodate cycle movement and would ask to see this added to the SPD.	has been recommended by cyclists as a safe cycle route and appears in Transport for London's cycle guide for the area. There are a number of other routes in the opportunity area that could be suitable for cycling, including the routes either side of the viaduct, but we have not consistently identified these in the SPD. Our aspiration, as set out in SPD11 Walking and cycling, is to provide a high quality network of cycle links throughout the opportunity area and extending into surrounding areas.
690	617			Pullens SPD 42 - Transport and movement	Pullens We have no issues with the SPD proposals.	Support noted.
690	619			West Square SPD 46 - Transport and movement	West Square We are concerned, as noted above, that a proposed conservation area on Elliotts Row should not reduce opportunities to improve the western Elephant and Castle cycle bypass, which uses Elliotts Row, not Oswin Street (as is shown in Figure 37). We note the importance of Brook Drive as a cycling link between Elephant and Castle and Westminster along quieter routes. We suggest that the SPD should seek to improve the character of Brook Drive to achieve this, ideally by reducing on street car parking. We also note that Brook Drive comprises of many flat conversions with poor cycle storage options. While Brook Drive devotes some 66% of available road space to car parking, there is no provision for cycle parking. We ask that improved cycle parking for residents of Brook Drive be proposed in the SPD, to be delivered through a reduction in on street car parking	A conservation area does not preclude the provision of cycling facilities. Policy SPD 11 covers cycle parking.
690	621			Enterprise Quarter SPD 50 - Transport and	We are concerned that the proposed pedestrianisation of Keyworth Street (in SDP50) should not impinge on the cycling routes that are currently provided, as detailed above (Key Issue 4). We note that Enterprise Quarter is a key destination for visitors and provision here should include a significant increase in cycle parking. St George's Circus is another dangerous junction for cycling - we would request	Pedestrianisation of Keyworth Street does not necessarily mean the exclusion of cyclists. St George's Circus would be affected by the proposal to make London Road a public transport corridor, at which time opportunities will be sought to improve cycle safety as appropriate. Support noted.

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				movement	the SPD record this and state the importance of revising this junction with cycling safety a priority (Key Issue 2). We ask for the reconfiguration of St Georges Circus to allow cycle movements on currently blocked routes, including Borough Road into Lambeth Road (the desire line linking CS7 to Lambeth Bridge) and Borough Road to Westminster Bridge Road. We note with concern that the Character area statement covering London Road does not make reference to proposals to make this a public transport only route. We support this suggestion and believe cycling would be best accommodated, given the wide available width, in segregatedlanes to avoid conflict with buses. We ask that the SPD be amended to that effect (Key Issue 2).	
690	622			Rockingham SPD 54 - Transport and movement	Rockingham We have no issues with the SPD proposals	Noted
690	623		SPD 10 - Public Transport		1. Elephant and Castle Junction Northern Junction We see it as essential that the SPD addresses the safety critical issue of the cycling provision on the Elephant and Castle roundabout. By TfL's own figures this is the most dangerous junction in London for cycling. While not the borough's direct responsibility, as a key stakeholder we would call for Southwark Council to be representing the view to TfL and City Hall that to maintain this junction in anything like its present form is unacceptable. The draft plans shown to members of the E&C regeneration forum make only the most cursory provision (in the form of ASL lines) and it is our opinion that the proposals will not create the step change in accident rates that is needed. Beyond the numbers of actual accidents, there is a pronounced fear of the E&C roundabout shared by new cyclists and non-cyclists alike. As a barrier between much of the Borough and central London it should be Southwark Council's priority to see a radical solution introduced here that creates the improvement in safety - real	The final design of the changes to the northern roundabout will include enhanced provision for cyclists.

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					and perceived - that is needed. Since Southwark Council's renewed commitment to safer cycling, it is vital that the work on the E&C roundabout be reopened and all options for safe cycling provision be considered. Southern Junction We would express dissatisfaction with the provisions of the southern junction, which despite releasing huge areas of land, specifically does not provide for protected right left turns - most dangerously southbound between Elephant and Walworth Road instead encouraging users onto the pavement, designated shared space, but poorly signed and introducing conflict between cyclists and pedestrians waiting at crossings. These issues were raised in the Safety Assessment before construction but dismissed. We would suggest that the Southern junction should be retrofitted to include protected left turn cycle lanes.	
690	625		SPD 10 - Public Transport		2. London Road, St George's Road, St George's Circus Southwark Cyclists supports the two way operation of both routes with public transport and cycling only on London Road. We believe both these roads are sufficiently wide to accommodate segregated cycling provision and we ask for this to be specified in the SPD. We ask for the reconfiguration of St George's Circus to allow cycle movements on currently blocked routes, including Borough Road into Lambeth Road (the desire line linking CS7 to Lambeth Bridge) and Borough Road to Westminster Bridge Road. We note that poor maintenance of the existing on-pavement cycle path has made this dangerous and confusing and ask the proper provision be urgently provided here	Support noted.
690	626	4 -The preferred option/options	SPD 11 - Walking and cycling		3. Wayfinding The many routes proposed and suggested here are very complex and confusing for people familiar with the elephant, let alone new visitors. We suggest that as part of the SPD process a view should be taken on a significant improvement for signage for cycling at Elephant and Castle.	Policy SPD 11 covers wayfinding.
690	627	4 -The preferred option/options	SPD 11 - Walking and cycling		Elephant and Castle Bypass (West) We would like to see the western bypass improved. We would like to be reassured that proposals for an Elliotts Row conservation area will not inhibit future cycling improvements. We would encourage clarification of the use of Churchyard Row and the opening of	A conservation area does not preclude the provision of cycling facilities. Improvements to Churchyard Row will be sought alongside adjacent development.

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					<p>a pedestrian route through the fence on Newington Causeway to allow pedestrians an alternative to this busy cycling route. The SPD inaccurately shows the bypass routing Oswin Street. We suggest that either route (or both, with two way working) is suitable but improvements are desirable, including the reduction of on street parking (particularly near junctions) and the provision for currently banned turns (right onto London road, for example).</p>	
690	628	4 -The preferred option/options	SPD 11 - Walking and cycling		<p>Elephant and Castle Bypass (East) The existing bypass is indirect, severed by a temporary (5 year) crossing removal and uses an awkward combination of off road path and large road. There is an opportunity to build a vastly better bypass east of the roundabout as part of the redevelopment and this is not recognised in the SPD - we ask that it is. Figure 2, below, shows the most direct possible bypass around the Elephant and Castle to the East, via Hampton Street and Meadow Row. This route roughly follows the existing road, Deacon Way, with new connections to North and South. While we maintain our desire to see a proper cycling solution at the roundabout, whatever happens the E&C Cycle Bypass routes remain an important alternative and quieter route, a key hub on the Cycle Superhighway Network (connecting CS7 and CS6) and an essential local network to allow connections between the separate communities around the junction. Rebuilding the Heygate creates the opportunity to massively improve this provision: • shorter journey distances compete with roundabout • serving key desire lines • driving consumers into the Heygate retail area • connecting Heygate to local amenities • supporting the aspiration of a car free redevelopment. Discussion between ourselves and Lend Lease have been productive, but they are unwilling to clarify their position prior to making an application. We request that the SPD clearly states that a shortest possible route bypass be provided, that it be traffic free, clear, direct, fast and safe. Our preferred route is shown overleaf on Figure 2. This would use a contraflow on Hampton Street (provisionally agreed with officers) to reach Walworth Road, where a new crossing is needed. The route would then continue on a direct path to Meadow Row. Conversations with Lend Lease, who are anxious to build on the site of the</p>	<p>The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.</p>

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					optimum route have included a compromise route, also show on Figure 2. Our preference is for the Optimum route to be stated in the SPD	
690	631	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Elephant Road We are concerned by proposals in the SPD that Elephant Road should be a key cycling link. Elephant Road has no southern connections across the Walworth Road, movements into Elephant Road from the south require a right turn from the centre of a four lane road, under a railway bridge with restricted visibility. This seems a very dangerous proposal. We are also concerned that pedestrian traffic between the shops, station and market will be very heavy on this route. It seems sensible to move the key N-S Heygate route back one block, to the east of the Market Square and via a Hampton Street - Meadow Row connection.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists.
690	633	3 - Vision and objectives			Our Vision Our vision for Elephant and Castle shares much with that outlined in the SPD - we have far more areas of agreement than disagreement. We see E&C as a thriving commercial centre for South London that minimizes its environmental impact. It is car free, minimising the desire or need to use vehicles. It is home to several thousand additional residents, many of whom commute or travel for leisure by bike. It is also a hub for cycling journeys in Southwark, Lambeth and beyond. Figure 3 Figure 3. Elephant Cycle Hub Routes We believe that cycling journeys are repressed over a wide area by the existence of the Elephant and Castle junction, an area roughly shown below is effected by the need to traverse the junction to access Central London. The Elephant is a mental and physical barrier preventing greater cycling in South London. Figure 4. Indicative area of repressed cycling due to E&C junction Our vision is for a junction transformed into a safe place to cycle and a pleasant place to be. A orbital bypass, traffic free over much of its route, links to segregated cycle lanes on main roads and quiet connections on residential streets. Many Londoners from south and east travel through or to the Elephant by bike each day, many stop and use the expanded facilities - the shops, cinema, theatre and leisure centres attracting custom from passing traffic - as they did in the pre-	The final design of the changes to the northern roundabout will include enhanced provision for cyclists. The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists.

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					<p>war Elephant and Castle. Connections to key locations, matched to thriving business, leisure and academic services, all within easy access of a world class cycling network. Figure 5: Elephant and Castle as a hub for cycling in south London. Our Vision, as seen by hypothetical future users: Mary "I'm a student at LCC, in my third year studying multimedia publishing. I lived in halls for the first year near college on Walworth Road, but moved to Camberwell with friends since then. I cycle to college most days, using the route on Brandon Street - it's faster and safer than congested Walworth Road. Our flat is ex-local, but the council have provided cycle storage so there's no problem lugging the bike up four floors." Abe "I'm a concierge at one of the new developments on the Heygate Estate, I wasn't working in the Elephant before and used to commute by car - the hours I work don't favour public transport. Now I work in Elephant I cycle up CS7 and round the Elephant Bypass, there's loads of cycle parking and the clear, well lit routes make me feel very safe. Far better than waiting for the bus!" Harry "I'm a VP at a bank in Moorgate, I moved to Dulwich with my wife a few years ago. I cycle to work - I like the exercise - and take CS6 via the Elephant. The new shops at Elephant and Castle are great - I can stop, lock up safely and grab a few things and it doesn't take a minute." James "I work in the west end, I moved to the Elephant and Castle for its convenience, the cycling hub puts you at the centre of a network of routes that goes anyone you want to be in 15 minutes, be it Brixton or Hoxton, Westminster or West Dulwich. Cycling access makes the Elephant one of the best places to live in London."</p>	
691	651			Brandon Street SPD 29 - Land uses	<p>I have been instructed to write on behalf of the Executive Committee and members of the Southwark Association of Street Traders and Independent Shopkeepers trading in and around East Street Market, SE17 trading within the Elephant and Castle Opportunity Area, to object to the proposal to develop the Stead Street Car Park site Stead Street Car Park is the only off street car park within the Elephant and Castle opportunity area and beyond, and is vital to the sustainability of the East Street Market and the neighbouring shops and businesses in the area, including the Walworth</p>	<p>The Stead Street Proposal site (51P) is designated through the Southwark Plan and the SPD needs to be consistent with the saved policies in the Southwark Plan. SPD 12 sets out that all development in the Central Activities Zone (CAZ) should be car-free, unless robust evidence is provided to justify off-street spaces. This is justified through the high public transport accessibility in the opportunity area, and also to meet sustainability objectives of reducing congestion and pollution</p>

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					<p>Road. It is the only car park in the district that any person can park from more than two hours. There are 200 plus Market Stalls sited in East Street, 60 plus shops trading within the market and numerous small shops within the vicinity of the Market area, all relying on the fact that Stead Street Car Park is there to increase the footfall of the public. \It is a know fact that East Street Market and the surrounding area, for many reasons, has been suffering from a downturn in the trade and the redevelopment of the only off street car park in the vicinity is a negative step to the efforts of many businesses that are struggling in trying to rebuild a once very vibrant and busy part of Southwark. It is welcomed by many trader, shopkeepers and members of the public that are affected by the likely impacts of the SPD, that with the SPD there is a section on the sustainability issues that are relevant to the area, which this plan needs to address. (page 9). Among which are the: • Needs of Small and Medium Enterprises; • The Provision of Markets • The type and mix of retail and leisure provision viability • Impact of development on existing traders • Accessibility • Local shops and shopping parades The above are jus a few quotes from the SPD, there are many more that can be highlighted which are all relevant to the concerns of the Southwark Association of Street Traders and along with other traders that consider the proposed redevelopment of the Stead Street Car Park a retrograde step, and totally against the suggestions in the SPD that such proposals are for growth and development in the area. It is noted that the welcoming arch to East Street Market is featured on the front page of the SPD publication document, (titled REVITALISE). Please help us to keep the market open by amending the proposal to redevelop Stead Street Car Park</p>	
692	445		SPD 10 - Public Transport		<p>I attended the WCDG meeting on Wednesday 25th January 2012, at the Waterloo Action Centre. Subsequently involved neighbours, residents on St George's Road, SE1 to a meeting at our house to discuss local matters, in particular transport issues. We object to the proposal to create a bus-only street in London Road and in particular reverting St George's Road to two-way operation: Ref 4.4 SPD10 . We foresee a deterioration in the street environment to bot the</p>	<p>The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.</p>

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					house and pedestrian areas. SE1 6HY	
693	446			Brandon Street SPD 29 - Land uses	I am writing to you in regards of my concerns of losing the only local shops on Rodney Road. I am a local resident myself and use these shops on a regular basis. I would be grateful if you could make sure the owners do not turn them in to houses. We need our local shops as they are the only local shops Thank you for your time	We have removed site (reference 30) 98-104 Rodney Road from the list of potential development opportunity sites in the opportunity area and Figure 6. We have amended the supporting text to SPD1 to provide further recognition of the value and contribution of local shops in the area.
694	447	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
695	449	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
696	487	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPC to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
697	492	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
698	503	4 -The preferred option/options	SPD 11 -		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for

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			Walkn g and cycling		included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
699	525	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
700	539	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
701	551	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
702	577	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to safeguard a path for this route and to actively promote it.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
703	588	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Removal of the Northern Elephant and Castle Roundabout Paragraph 4.4.6 contains by far the most disappointing sentence in the document. Removal of the northern Elephant and Castle roundabout is critical to the regeneration of the whole opportunity area. The vision for the Elephant and Castle as having the "potential for redevelopment into an	We are working with TfL to develop the design for the northern roundabout. While measures to "humanise" it are a key priority for the council, we must recognise that it is a strategic part of the Transport for London Road Network and as such we cannot compromise traffic capacity. The council's Transport Plan 2011 commits to making

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					<p>attractive central London destination" (paragraph 3.1.4) and "the potential to become a fantastic town centre" (paragraph 2.3.2) will not be realized without the removal of the roundabout. This appalling and enormous blight on the town centre and the huge severance that it creates, along with its consequent massive adverse effects on road safety, personal security, air quality, noise, amenity, residential quality of life and business health cannot be resolved solely through adding surface-level pedestrian crossings in place of the subways (very welcome though this is) but leaving the roundabout and its multi-lane high-speed circulating motor vehicle traffic in place. The Elephant and Castle will not fundamentally change without replacing the roundabout with a crossroads (or a small series of crossroads) that take up much less space, and devoting the space thus freed up to higher value uses such as wide footways, wide cycleways and cycle lanes, bus stop waiting areas, street trees and temporary business uses such as public seating outside cafés and other shops. The northern roundabout is the Elephant and Castle to most people (and to virtually everyone who does not live in the area) and it will not fundamentally change for the better unless and until the northern roundabout is replaced with a junction that is much more in keeping with its Central London location. I do appreciate that the Borough's position is clearly signalled in paragraph 4.4.6 and that the impact on motor vehicle movement of replacing the northern roundabout with a less land-hungry and human-scale crossroads is considered (for the moment) unacceptable by Transport for London, not by the Borough, but I consider that the Borough should be going in to bat for the people of Southwark on this and clearly indicating what is needed to transform the Elephant and Castle rather than just accepting the status quo because of the current intransigence of the strategic roading authority. A clear statement in the supplementary planning document that the roundabout needs to be replaced in order for the vision for the opportunity area to be achieved could set in train processes that will eventually see the Elephant and Castle transformed, whereas paragraph 4.4.6 just lets the area drift. Please do not waste this critical opportunity to challenge</p>	<p>Southwark a 20mph borough. We will look at all options to achieve this.</p>

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					<p>Transport for London's massively misguided priorities about what the centre of Western Europe's biggest city should be like. 2. Roadspace Reallocation Many other parts of the opportunity area (in addition to the Elephant and Castle and its roundabouts) also suffer from dominance by high volumes of fast-moving motor vehicle traffic and the resulting severance and related problems that this causes. These streets include Camberwell Road, London Road, Newington Butts, Newington Causeway, Old Kent Road, Saint George's Road and Walworth Road. I consider that the document would be improved through the addition of clear policies to require (on Borough streets) and promote (on Transport for London streets):— 1. The reallocation of road space to reduce the excessive provision of general carriageway space, which induces excessive motor vehicle use and speeds, in favor of the provision of much wider footways; cycleways and cycle lanes of decent width (2+ metres, so as to allow cyclists to overtake each other without needing to leave the protected facility); and amenities such as street trees, cycle parking racks, seating etc.; and 2. The provision of 20 mph speed limits on all streets throughout the opportunity area. The character area guidance should also be specific as to the particular opportunities that should be taken to productively reallocate roadspace in favor of pedestrians, cyclists, residents and visitors, instead of those passing through at speed, isolated in their vehicles from contributing to the areas.</p>	
703	595	4 -The preferred option/options	SPD 5 - New Homes		<p>Density I consider that the housing densities recommended in paragraph 4.2.4 will not serve to achieve the vision for a revitalized Elephant and Castle, particularly outside the Central Activities Zone. I appreciate that a formal change to the target densities cannot be achieved through a supplementary planning document, but consider that the need for higher densities in the opportunity area could be beneficially signalled in the document, as has usefully been done for other policy areas (e.g., the proposed new conservation areas, public open spaces and sites of importance for nature conservation). Housing densities below about 700 habitable rooms per hectare are unlikely to create the conditions for the regeneration that the document</p>	<p>Our Core Strategy sets out our policies on density. This cannot be changed through the SPD. The Core Strategy and saved Southwark Plan policies provide sufficient flexibility. The Core Strategy sets out a wide density range, which is repeated in the SPD. It allows development to exceed the density ranges in the opportunity area where exemplary standards of design are met. This provides adequate flexibility to take into account site specific circumstances, whilst ensuring that higher density schemes are excellently designed. The density policies are used alongside other important policies including saved Southwark Plan policy 3.11 on the Efficient Use of Land. The SPD maintains this approach.</p>

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					<p>seeks. These suburban densities are not generally appropriate in a central city context like Walworth and Newington. Allowing new medium-density development without an explicit reason for doing so (such as a location in a conservation area or the setting of a listed building) is likely to continue the existing blight of many parts of the opportunity area. A lack of an enlivening urban density in a very urban context is a significant part of the reason for the failure of previously redeveloped parts of the opportunity area such as the Heygate Estate. Higher densities do not necessarily correlate with compromises in amenity or residents' quality of life provided that (as the document sets out) "development has an exemplary standard of design" and appropriate consideration is given to factors such as soundproofing, overlooking, privacy, defensible space, containment and dispersal of cooking smells etc. Good design should be able to achieve this without inappropriately resorting to suburban densities in the central city. I therefore consider that the density range that developments must comply with throughout the whole of the opportunity area should be increased to between 700 and 1,350 habitable rooms per hectare unless there are site-specific factors (such as a conservation area location) that make a lower density appropriate.</p>	
703	605	1- Introduction and background			<p>4. Opportunity Area Boundary: Walworth Road/Camberwell Road In some locations the boundary of the opportunity area seems to lack an obvious rationale. On Walworth Road and Camberwell Road the focus on the immediate street frontage to the exclusion of the residential properties behind seems likely to lead to disjointed planning between retail and residential, and between those residential properties above ground floor that front onto Walworth Road and Camberwell Road and those residential properties set further back, fronting onto the side streets. This is likely to be particularly problematic when the relevant properties form a historic unity of construction, such as many of the Victorian terraces and more modern developments such as the Gateway Estate. The inclusion of a single block of Camberwell, to the south of Grosvenor Terrace, also seems curious given the lack of any specific mention of or policies in relation to this small area. I</p>	<p>The boundaries of the opportunity area are established through the core strategy and it is not possible to change them through the SPD. It is noted that it is not necessarily a natural boundary. However, the location of the boundary however would not alter the policy stance on the protection of heritage assets. Policies in the Core Strategy, the London Plan and Planning Policy Statement 5 would require the group value of assets such as listed terrace to be considered in the event that a planning application which effected them were to be submitted.</p>

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					would therefore recommend that the southern boundary of the opportunity area be extended west (south of Penrose Street) to the railway line and be amended to exclude the small block south of Grosvenor Terrace.	
704	620	4 -The preferred option/options	SPD 5 - New Homes		At least 35% affordable housing throughout the opportunity area. A higher proportion of 3 bedroom plus homes. less student homes - with sensible counting of proposed stock - including Oakmayne development!?	The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies. In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. With regard to student homes, SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is

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						already a larger concentration of student housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities.
704	624	4 -The preferred option/options	SPD 11 - Walking and cycling		The Walworth Rd project needs to be completed. Streets and roads should be designed and designated as 20mph maximum to encourage walking and cycling. The TFL roads and especially the northern roundabout at the E&C and the New Kent Rd need to be made far safer for pedestrians and cyclists.	Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street. The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this. Policy SPD 11 proposes considerable work for the northern roundabout, together with improvements to crossing facilities on New Kent Road.
704	629	4 -The preferred option/options	SPD 1- Shopping		Traders at the E&C Shopping Centre need to be able to remain in the centre during redevelopment and return afterwards. Recognise the important contribution of small retail units and street markets to providing goods that local people can afford and as local employers. Recognition of the contribution of minority ethnic businesses to the variety of retail offers in the area. Recognition that in the longer term the Arches can fully transform into a thriving Latin Quarter for London. Affordable retail units for only 5 years is not enough.	1. Applicants proposing large scale retail development will need to identify through a Retail Impact Assessment the impacts upon existing employment and propose mitigation measures to help address impacts. Affordable space will be secured through s106 planning obligations attached to planning permissions. A legal agreement will set out the nature of the obligation i.e. provision on-site, provision off-site (i.e. to another appropriate site under the applicant's control), or a financial contribution. In those cases where physical provision results the developer would build the units; and in a suitable location, to be agreed as part of the scheme. Their size would be limited by condition or a clause in the obligation. Thereafter, a condition or clause in the legal agreement would restrict the unit as affordable space only. Where off-site physical provision results, a developer could build new units or refurbish existing vacant

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						units and retain ownership as anticipated with on-site provision. 2. We have added additional text to SPD1 to provide further recognition of the value and contribution of local shops in the area. SPD2 recognises the importance of street markets and their contribution to providing a more varied shopping experience as well as providing local employment. 3. We have amended the SPD within Section 2 to add further recognition of the cultural diversity that exists in the area, including the diversity of businesses at the Elephant and Castle, in particular, the Latin American presence and the contribution to the local economy and retail offer. 4. We have added additional text to SPD4 which acknowledges the Latin American presence in the railway arches and the contribution the businesses make to the area, however it would not be appropriate to have a preference for any one ethnic group to occupy business units in the area. 5. Five years is considered a reasonable amount of time for a business to establish itself. While discounted rent will be appropriate to bring independent retailers into new spaces, once they gain traction and start making money, they will be able to afford to pay more rent.
704	635	4 -The preferred option/options	SPD 17 - Buildin g heights		The SPD must demand evidence that tall buildings will not have a negative effect on micro-climate.	SPD 17 states that tall buildings should avoid harmful microclimate effects. This would include effects on sunlight and wind patterns. Developers would need to demonstrate this in submitting applications.
704	638	4 -The preferred option/options	SPD 15 - Public realm		Landscape must be accessible and the split between public and private space needs clarification. Spaces must be well designed to encourage people to meet and linger outdoors Green walls - proposals must demonstrate viability and long-term sustainability. Many systems have a constant need for automatic irrigation, a high maintenance demand and are prone to failure - they are eco-bling, rather than sustainable technology.	Paragraph 5.2.22 sets out our approach to the Heygate Street character area which states that proposals will be expected to provide a coherent landscaping strategy which considers the role of spaces, the links between them, its maintenance and delivery. SPD 15 sets out how we will create places in the public realm where people will want to linger. SPD 27 sets out how we will require landscaping to be of high quality and encourage biodiversity through tree planting/retention, water features and habitat creation. Detailed matters such as landscaping will be considered as part of the planning application process. In line with policy 12 of the Core Strategy, we will require a design and access statement to be submitted with all development

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						proposals. The design and access statement is required to include an explanation of the commitment to maintaining the landscaping.
704	639	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		The benefits of S106/Community Infrastructure Levy (CIL) payments from developers. Making sure money is spent in the area. Spend on community priorities such as green routes, social rented housing, affordable retail and improvements to community facilities need to be ringfenced.	<p>We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds:</p> <p>http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly</p>

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						reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
704	641	4 -The preferred option/options	SPD 16 - Built form		To create a Conservation Area along the length of the Walworth Road.	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
704	648	4 -The preferred option/options	SPD 18 - Open spaces		0.61 hectares per person is very low, and the deficiency is compounded by major roads and railways which are barriers to access. [Compare the National Playing Fields Association's '6 Acre Standard', or 2.43 ha per 1000 population, although this cannot always be achieved in cities]. Every opportunity must be taken not only to create high quality and robust new open space, but to improve existing spaces and the links between them. Small incidental spaces, such as those on housing estates, can make an enormous contribution. The SPD should include the improvement [with the community] of these spaces, and should give them protection through policy. These should be specifically named as one of the categories of community projects eligible for Sec 106/ CIL funding. New public open space provided should be designated as such and protected by policy for the long term. New space provided by development for public access should be managed as public space where people are welcomed, not as private space where the presence of the general population is merely tolerated. Replacement of trees lost to development - clarification required of replacement 'by new trees which result in a net improvement in canopy cover as measured by stem girth'. On day one, or over several years? We welcome the intention to use the CAVAT methodology for evaluating trees and calculating contributions, but any such contribution	We have amended the final SPD to set out a standard of 0.76 per 1,000 population in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate redevelopment will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026. Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces. We have amended SPD 18 to state that replacement trees should result in a net improvement in canopy cover as measured by stem girth at the time of planting. Where S106 contributions are sought using the CAVAT methodology, this will be in addition to funds negotiated for other infrastructure such as children's play provision and public realm in line with our S106 toolkit.

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					for tree replacement must be in addition to, not instead of, a developer's other commitments in terms of providing landscape spaces and play or community facilities.	
704	652	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		2.3.8 - The transport infrastructure should not be upgraded at the cost of other local needs, such as affordable housing and community facilities. S106 contributions should be used to benefit the local community, rather than relief the budget pressures of other organisations, such as TfL. It secures this money because it is a powerful organisation, rather than the intrinsic merit of the schemes it proposes, necessary as they might be.	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need to improve transport infrastructure. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have

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						<p>spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details</p>
704	653	3 - Vision and objectives	SPD 5 - New Homes		<p>3.2.6 - The specific commitment made in the 2004 Elephant Regeneration SDP to reprovide the 1200 social rented homes lost from the Heygate estate should be retained and repeated here and elsewhere in the SPD as appropriate. Mr. Abbott, head of the Elephant Regeneration team, reported that only 527 of the Heygate replacement homes will be delivered by the early housing site programme (Elephant housing workshop on 31 Jan). This leaves a considerable shortfall that will not be met by the redevelopment of the Heygate footprint, which will only give 300 social rented units (that is if they are not to be affordable rent). The SDP should also outline how the shortfall of between 400 and 700 social rented units will be met. 3.2.6 - The SDP should distinguish between the various kinds of affordable housing and detail here how many of each type the regeneration will provide. This is particularly important now that the new category of 'affordable rent' has been introduced. The phrase 'affordable housing' is now applicable to such a wide range of incomes (£0 - £60k pa) that its use obscures whether or not the poorest are having houses provided for them</p>	<p>The Saved Southwark Plan designation for proposals site 39P sets out the uses required within the Elephant and Castle Core Area. It sets out there should be "no fewer than 5,300 mixed tenure new homes, including 1,200 to replace those lost through the demolition of the Heygate Estate". This designation is still our adopted policy. We have updated our development capacity assessment (DCA) and our housing background paper to include information about what has been built and what we think will come forward. The DCA is a tool that we use to estimate the potential housing capacity of development sites that may come forward in the future. The research that has informed the background paper update shows that between April 2005 and March 2011, 1170 new homes were built in the Elephant and Castle Opportunity area, of which 122 have been social rented homes and 217 intermediate). Furthermore, the Heygate replacement programme, once completed, will provide an additional 600 homes (some of these have already been built). It is predicted that 512 of these will be affordable (422 social rent and 90 intermediate). Our development capacity assessment estimates suggests there is capacity for 6,400 new homes in the opportunity area by 2026. Based on our current planning policies we expect 2,145 of these to be affordable homes (1,020 social rent and 1,125 intermediate). This means that 7,000 homes could be delivered in the opportunity area between 2011 and 2026, with around 2,650 of these being affordable (1,560 social rent and 1,215 intermediate). The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London</p>

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						similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing.
704	655	4 -The preferred option/options	SPD 5 - New Homes		4.2 - SPD 5 The ambition to achieve 35% affordable housing has been undermined by the masterplan agreement with Lendlease for 25% affordable housing. Lendlease will be building 2400 of the 4000 new homes, and their representative at the housing workshop, mentioned above, made it clear that its outline planning application would be for 25% affordable housing, not 35%; to compensate other developments in the area will necessarily have to provide more than 35% affordable housing. It seems very unlikely this will occur, both in the light of the planning permissions granted at the Elephant over the past 10 years and Southwark's own judgement that 65% free-market housing is needed to ensure a development's viability. The SDP should state how this problem is to be overcome, so that the 1400 target will be reached. 4.3.4 - The development that will provide the Leisure Centre will not provide any affordable housing, an example of affordable housing losing out for S106 funding to competing priorities. The SPD should say what measures will be adopted to ensure that the ambition to achieve 35% affordable housing will not be undermined by other S106 demands.	Our policy for affordable housing is set out in the Core Strategy and the saved Southwark Plan, with further guidance in the draft and adopted affordable housing SPDs. The policy and guidance sets out that the minimum amount of affordable housing should be 35% affordable housing, and as set out in the affordable housing SPDs, where this policy cannot be met, the applicant needs to submit a financial appraisal to justify why a departure from policy is necessary. In the case of the leisure centre site, as with all schemes, we would require a financial appraisal to justify why affordable housing cannot be provided. The affordable housing SPDs set out guidance that there may be some exceptional circumstances where a scheme delivers exceptional community benefits over and above the standard section 106 contributions and that in these cases we may review the levels of affordable housing required on the site if it can be satisfactorily demonstrated that there is a need of such facilities. A financial appraisal would also be required to demonstrate how this justifies the policy requirement of affordable housing not being provided.
704	656	4 -The preferred option/options	SPD 8 - Higher education and student housing		4.3.9 - To all appearances the amount of student accommodation has already reached saturation point in the opportunity area and much has been built that does not provide affordable housing. The SPD should consider whether a complete moratorium on student housing is desirable.	SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is already a larger concentration of student

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						housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities. Our view is that the Core Strategy policy will enable a balance between student and other types of housing, whilst SPD 33 will ensure there is no an over-concentration in the Walworth Road character area. Within other parts of the opportunity area, student housing may be acceptable, subject to the Core Strategy policies as we do not think there is an over-concentration of student housing in other parts of the opportunity area and as the two local universities both have expressed a need for more student accommodation.
704	658		SPD 9 - Community facilities		The commitment to new community facilities is completely empty of any concrete proposals. The 2004 framework document promised 'a comprehensive range of social, education, health, and leisure facilities', including a library/lifelong learning centre, secondary school and an energy centre. This SPD should explain why these are no longer proposed – surely something is possible out of a £1.5bn budget?	The SPD refers to a range of facilities directly in policy guidance and in the infrastructure plan. The level of detail reflects the fact that this is a 15 year plan and the SPD needs to be flexible enough to accommodate changes to policy, legislation, funding and local need. SPD 7 refers to the provision of a new leisure centre. The proposed redevelopment is currently at the design stage and a planning application is expected in Spring 2012. The provision of education and health facilities will be subject to ongoing discussion with colleagues at the Council, the GLA and NHS Southwark, respectively. There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work. A range of community facilities will be supported as part of the redevelopment of the Heygate estate. Specific facilities, such as a library, will continue to be discussed, with firmer details being set out as planning applications for the redevelopment are submitted. SPD19 sets out that all developments should consider the feasibility of connecting to a Combined Heat and Power (CHP) system. Where a new system is required, this would usually be provided in an on-site Energy Centre. As noted in SPD9, the community facilities needed to underpin growth in the area will be kept under review over the lifetime of the SPD.

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704	659	5 - Character Areas		Rockingham SPD 55 - Built form and public realm	5.9 - The Rockingham character area, which consists almost entirely of the Rockingham estate, is poorly served by the SPD. While the aspiration to improve the area is expressed several times there are few concrete proposals and without these the area will lose out in the competition for S106 funds. Most of the proposals focus on movement through the estate, rather than improving the estate itself. SPD 55 'Built form and public realm' is no doubt necessary, but seems of little relevance, given that there is only one development site identified in the area (the Hand in Hand pub). The SPD should consider whether there is a case for the Rockingham having some priority for S106 funds and whether some S106 funding can be directed there from developments in the further north of the borough. The SPD should amplify on the value of the large green spaces and ensure that it is adequately protected by policy. The SPD should amplify on the value of the community centre and the many groups who use it and make concrete proposals for improving the centre and supporting the user groups. Figure 43 This shows one of the proposed pedestrian routes going through two blocks of flats on the Rockingham estate (Wickstead and Arrol) without deviation. Is this a true representation of the proposal?	The circumstances under which the council can require s106 contributions are established in the Community Infrastructure Regulations 2010. The legislation states that we can only require s106 from a developer where their scheme creates a need for a particular facility or piece of infrastructure. We are therefore unable to divert s106 to the Rockingham from developments taking place further north in the borough. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. A certain proportion of all money raised through CIL will also be available to fund local priority projects, to be determined by the local community. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. SPD56: Natural environment focuses specifically on improving the green spaces that exist within the estate and on improving links to the new park to be provided as part of the redevelopment of the Heygate Estate. The value of the community centre will be recognised by adding a new paragraph to the 'opportunities' section. The link in figure 43 is indicative and demonstrates the need for an improved link that runs roughly from east to west through the Rockingham character area.
704	660	5 - Character Areas		Rail Corridor SPD 37 - Land uses	I would also like to put forward an idea: instead of having a swimming pool in the leisure centre, how about reinstating the public Baths on Manor Place? It would be wonderful to preserve what was once such a lovely pool.	The former baths at Manor Place have been filled in and the site is currently used for waste sorting. Furthermore, the Manor Place Depot is allocated in the Southwark Plan as a housing site and we are unable to amend this allocation through the SPD. The former leisure centre site is the preferred location for a swimming pool because of its

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						position at the centre of the opportunity area and its fantastic public transport links.
705	630	4 -The preferred option/options	SPD 5 - New Homes		I would want to see a high percentage of affordable housing in the area, at least 35%; a good proportion of these should be 3 bedroom plus homes.	The Core Strategy and saved Southwark Plan set out our policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. Our evidence in our housing requirements study (2009), our strategic housing market assessment (2010) and our affordable housing viability study (2010) underpin this approach. The SPD cannot change our policies. In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible.
705	632	4 -The preferred option/options	SPD 11 - Walkn g and cycling		I would like to see streets designated as 20 mph maximum and the northern roundabout made safer for pedestrians and cyclists.	Improvements to TfL roads are sought by a number of policies in the SPD, including major improvements to the northern roundabout. The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.
705	634	4 -The preferred option/options	SPD 1- Shopping		I'd like to see small traders at the Elephant remain. Local people need these traders as they provide goods we can afford. I would like to see the area supported as a Latin quarter in London	SPD1 recognises the importance of small shops in the opportunity area and the contribution they make to the local economy. We have also amended the supporting text to SPD1 to provide further recognition of the value and contribution of local shops in the area. We have also amended the SPD in Section 2 to provide further recognition of the cultural diversity of the businesses that

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						exist in the area, in particular, the Latin American presence and the important contribution they make to the character, retail offer and local economy of the area.
705	636	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		I'd like to see the S106 monies spent in the area, and community priorities such as affordable housing and improved community facilities be respected	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need to improve transport infrastructure. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have

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						spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
705	637	5 - Character Areas		Walworth Road SPD 35 - Built form and public realm	The area has some lovely buildings. I live nearby and there are several buildings at risk and some that have recently been knocked down to the great detriment of residents. I'd like to see a conservation area created along the length of the Walworth Road to prevent this happens in the area	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
706	640	4 -The preferred option/options	SPD 5 - New Homes		Firstly, there seems to be a high reliance on the s106 for the development of infrastructure and social facilities (such as social housing) in the new developments. The s106 is a percentage measured on profits, ultimately a tax on the profitability of the private real estate investment. If the profits fall, then the provision for facilities and infrastructures falls too, as has been proven in the past. This makes the 35% minimum as set by the London Plan be reduced to 25%. Southwark Council should embrace a minimum 35% affordable housing for the Elephant and Castle Opportunity Area, regardless of profit- based viability, and should refuse to deploy s106 money to that aim	SPD 20 sets out guidance on planning obligations and the community infrastructure levy to ensure the delivery of key infrastructure and to mitigate the impact of development. The SPD refers to the Core Strategy and saved Southwark Plan policies requiring a minimum of 35% as affordable housing. Many of the schemes that come forward are section 106 affordable housing schemes, especially due to the reductions in funding from the HCA. Our affordable housing SPD sets out that where the minimum 35% affordable housing requirement cannot be met, a financial appraisal needs to justify to the satisfaction of the council a departure from policy. This will continue to be the case in the Elephant and Castle.
706	642	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the		Section 106 money should be spent on social amenities, including green public spaces (but not including expensive new Transport for London infrastructures). The competition between local amenities and housing has already become visible in the development of the Leisure Centre, where the planned 30-odd-floors tower has currently 0% affordable housing (SPD 4.3.4). Housing should not be undermined by other S106 demands, and vice versa. Funding for new subsidised housing should not come from the s106 and	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport

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			commu nity infrastr ucture levy		should therefore not be subjected to the profit margins of developers. The Elephant and Castle OA is a prime real estate location promising high profit margins for investors, so the Council should be able to demand more and not to the detriment of local needs.	infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. We will seek to maximise the amount of affordable housing provided while also seeking to balance this with other priorities. These include the need to improve transport infrastructure. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report We also produce quarterly reports on Section 106 expenditure by ward and community council area. http://www.southwark.gov.uk/info/200152/section_106/1479/current_section_106_agreement_details
706	643	4 -The preferred option/options	SPD 5 - New Homes		Secondly, the term 'affordable housing' (see SPD 3.2.6) is not aligned to the London Plan 2008 definition as "housing designed to meet the needs of households whose incomes are not sufficient to allow them to access decent and appropriate housing in their borough" (see London Plan	The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London similarly defines affordable

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					2008, 3A.8). Current intermediate housing (12.5% estimated for the Opportunity Area) requires household income thresholds far above average and median of the area and of the borough at large. The term 'affordable housing' should be clarified or dropped altogether, as it's misleading to the borough population.	housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. It explicitly refers to the London Plan definition. Within the Affordable Housing SPD we set out the income thresholds at which social rented and intermediate housing should be affordable. Through the Affordable housing SPD we set out our affordability thresholds for intermediate housing, which are significantly lower than the ranges for intermediate housing in the London Plan. See our website at www.southwark.gov.uk/ahspd for more information.
706	644	4 -The preferred option/options	SPD 5 - New Homes		Thirdly, the 1200 social rented homes lost from the Heygate Estate have not been replaced yet. Former Heygate residents should be re-housed in the area, as it was promised to them, and the council should be actively avoiding the shortfall of several hundred social rented units (probably between 500 and 700) of the current development plan.	We have updated our development capacity assessment (DCA) and our housing background paper to include information about what has been built and what we think will come forward. The DCA is a tool that we use to estimate the potential housing capacity of development sites that may come forward in the future. The research that has informed the background paper update shows that between April 2005 and March 2011, 1170 new homes were built in the Elephant and Castle Opportunity area, of which 122 have been social rented homes and 217 intermediate). Furthermore, the Heygate replacement programme, once completed, will provide an additional 600 homes (some of these have already been built). It is predicted that 512 of these will be affordable (422 social rent and 90 intermediate). Our development capacity assessment estimates suggests there is capacity for 6,400 new homes in the opportunity area by 2026. Based on our current planning policies we expect 2,145 of these to be affordable homes (1,020 social rent and 1,125 intermediate). This means that 7,000 homes could be delivered in the opportunity area between 2011 and 2026, with around 2,650 of these being affordable (1,560 social rent and 1,215 intermediate). Former Heygate Estate tenants do have a right to return to a new home within the E&C area. Those who wanted to be re-housed have been

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						offered homes in the Heygate Replacement Scheme sites, the last of which will be Stead St, and their needs are taken into account in agreeing the mix of the development.
706	645	4 -The preferred option/options	SPD 8 - Higher education and student housing		Moreover, many rented new homes built in the area are now specifically targeted as expensive (far above average income levels) student accommodations. It is widely studied that transient student populations do not provide the resilient and sustainable communities the council aims to achieve (see SPD 4.3). There should therefore be a cap on student housing. If the demand for student accommodation continues to grow, students can always live in affordable and social housing, while lower and median income households cannot accommodate themselves in student housing (given the function and design, and the cost).	SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is already a larger concentration of student housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities. Our view is that the Core Strategy policy will enable a balance between student and other types of housing, whilst SPD 33 will ensure there is no an over-concentration in the Walworth Road character area. Within other parts of the opportunity area, student housing may be acceptable, subject to the Core Strategy policies as we do not think there is an over-concentration of student housing in other parts of the opportunity area and as the two local universities both have expressed a need for more student accommodation.
706	646	4 -The preferred option/options	SPD 5 - New Homes		To build a long-term and sustainable community there should be a positive bias towards family homes (3+ bedrooms) and a cap on studio flats (very high turnover) and 1-bedrooms (equally useless at retaining residents). The ability to gain more secure tenancies and a cap on rent could also be useful tools to this aim.	In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. Furthermore the Core Strategy requires a minimum of 60% of units with 2 or more

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						bedrooms. This recognises the need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes. The Elephant and Castle SPD cannot amend these policies. In addition our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. These minimum space standards are approximately 10% larger than our previous standards and will help us to ensure the new development provides an adequate amount of space to create good living conditions.
706	647	3 - Vision and objectives			If the SPD is to protect homes, community and sustainability, then a positive principle to be introduced should be refurbishment versus redevelopment. It has been widely acknowledged that for buildings with long lifespan, refurbishment is always a more viable option than demolition and redevelopment (see for instance the Southwark Council Heygate Estate Survey 1998). What is needed is a positive bias towards refurbishment, which was an important clause of the Unitary Development 1995 document: sound buildings should not be demolished, but refurbished. This is important also in light of the fact that demolishing large buildings, such as the council estates, has a very high impact on carbon emissions in the atmosphere. In the SPD carbon calculation this emission ('embodied carbon') is entirely missing. A positive bias towards refurbishment would mean promoting a more ecological and sustainable development and regeneration of an area, without the need for physical development at all costs	The purpose of the Elephant and Castle SPD is to provide a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The vision for Elephant and Castle states that the area will be a leading example for sustainable development. It will meet the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality. A key theme of the SPD is Theme 6 Natural Environment: Sustainable use of resources, which sets out objectives to; •Promote a network of high quality open spaces which have a range of functions including recreation, children's play, sports and food growing. •Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes. •Reduce the impact of development on the environment, minimising greenhouse gas emissions and enabling adaptation to climate change and managing pollution, waste and flood-risk. Sustainable development is a borough-wide issue. Core Strategy policy 13 sets how we will require all development to require as little energy as possible to build, we will also require applicants to demonstrate how they will avoid waste and minimise landfill from construction. Our Sustainable Design and Construction SPD also sets out additional guidance for

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						reducing the amount of raw materials used over the lifetime of a development. The priorities are; •Existing buildings on a site should be adapted and reused as much as possible. It may be possible to achieve other environmental objectives (such as improving energy efficiency) by small additions and adaptations to the fabric (such as new window fittings and extra insulation). •Where the adaptive reuse of the whole building is not appropriate, developments should investigate reusing parts of the existing building. •Demolition materials should be reused on-site where possible, such as for aggregate, fill or landscaping, or as part of new structures. •Where additional building materials are required, the use of recycled materials is preferred and these should be from sustainable or local sources •Demolition materials or surplus materials not required for the development should be collected for reuse and recycling in other building schemes.
706	649	4 -The preferred option/options	SPD 1- Shopping		Fourth, independent retailers are an important element of the area and should be supported. Traders at the Shopping Centre should be re-housed while St Modwens' carries out refurbishment of the building, and should be able to return. This means that rents in the building should remain at similar levels than now. Moreover, affordable retail units should be a priority to retain the vibrant social and cultural fabric of the area, and this means in the long term (not just for 5 years or through short-term business incubators). The future changes risk to negatively impact on the Latin American community in particular, as well as on many East African shops and services. It's a duty of the council to ensure diversity and retain the character of the Elephant and Castle through economic and fiscal tools that allow small and independent retailers to be successful (as they have proven to be in the last 10 to 15 years).	We recognise the concerns of existing businesses that regeneration inevitably creates some uncertainty. The purpose of providing affordable retail space is to mitigate the impact of development on existing businesses which may be displaced by regeneration, helping them manage a period of transition. In this context, 5 years is considered a reasonable period to help existing businesses manage the period of transition and establish themselves. We believe that the level of detail set out in the SPD is appropriate. We have specified the time period in which affordable rent would apply, the rate at which rents would be discounted and that it would be offered in the first instance to tenants displaced by development. These are the key principles. Further detail will be set out in s106 legal agreements which ensure that the space is provided. We will continue to work with traders to discuss the details of the way in which it can work.
706	650	4 -The preferred option/options	SPD 18 - Open spaces		Lastly, many new developments employ an ambiguous definition of open spaces (semi-private, semi-public?). The SPD/OAPF should be clear regarding the rights to pathway. Privately secured 'open' spaces are not public (as for	PPG17 sets out a number of definitions for different types of open space. Our draft Open Space Strategy sets out further information on these types of open spaces and the provision in Southwark. The Open Space Strategy has

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					instance the proposed privately-managed open green spaces in the Land Lease Heygate Masterplan). The council should enforce the maximum accessibility and permeability of the new development by existing local residents, and make sure that public access and use remains granted at all times	identified Elephant and Castle as an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces. Further information on the how we will improve the quality of open space provision in the borough is set out in our draft Open Space Strategy which is currently out for consultation and is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
707	654	3 - Vision and objectives			IWML is generally supportive of the E&C SPD. IWML understand that the document has to address a range of issues and opportunities to meet the aspirations of the area. It provides a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. IWML is a national cultural institution and one of only two museums within the SPD boundary. Therefore, IWML would like to raise the profile of the Museum within the SPD, highlighting its role as a valuable asset for both the local community and economy. As part of this profile raising, IWML strongly support the Representations made by the 'Cultural Industries of the Elephant and Castle', which call for greater emphasis on the Cultural Industries in the regeneration of the area and their protection and development into the future.	Support for regeneration is noted. The council values the contribution of IWML to the area and the borough.
707	724	4 -The preferred option/options	SPD 6 - Wellbeing - Social and community infrastructure		IWML note that E&C is described as having a 'positive reputation as a creative area' and that it is well served by heritage facilities including IWML and the Cuming Museum. IWML agrees that the range of leisure and entertainment uses in the town centre is narrow and that there is potential to build on its positive reputation and improve its arts and cultural offer. Therefore, there is an opportunity to include the planned works to IWML in the list of opportunities at page 19 (paragraph 2.3.4). This could include a bullet point stating – • The IWML Masterplan has been developed setting out the future vision for the museum with the overall objective of improving existing facilities and the visitor experience exponentially. Improvement works will be carried out in a series of phases and will transform the galleries and other	The wording in SPD16 has been changed to read: The Imperial War Museum London has commissioned a Conservation Management Plan as well as a proposal for a masterplan. We support the masterplan proposals and subsequent planning and listed building applications for the Museum, which will improve the existing museum whilst protecting and enhancing the designated heritage assets.

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					public amenities within the building.	
707	725	2- History, Elephant and Castle today, challenges and opportunities			There is also an opportunity to highlight the contribution made by the GMHP to the natural environment at page 20. IWML understand that the demand for open space in the E&C area is high and that the Park provides a vital source of open space. IWML is supportive of all opportunities to improve the quality and offer of open space at the GMHP. A bullet point at paragraph 2.3.7 could say – • The GMHP provides a vital source of open space. There are opportunities for the improvement of this space and the connections between other green spaces in the E&C area.	The draft Open Space Strategy identified Geraldine Mary Harmsworth Park as being of above average quality and value. The Parks Action and Improvement plan sets out a number of potential proposals for the park between 2010-2019 including; •Improve entrances, e.g. more planting at each entrance point. •Introduce signage outside the park to encourage visitors. •Broaden the user base e.g. through the activities of Community Outreach team. •Raise further awareness of dog fouling, e.g. campaign and events. •Enhance sustainability practices – site specific management plan. •Engage with community to enhance the ecology of the site.
707	726	3 - Vision and objectives			IWML is supportive of the overall vision for the E&C Opportunity Area to develop an attractive central London destination and is particularly supportive of the opportunity to provide excellent leisure and cultural activities. IWML believe it is important that the SPD fully recognises the value of IWML, both from a cultural and economic perspective. In 2011, IWML estimated that in terms of the economic impact of tourism by visitors to the Museum, it contributed £38.9million to the local economy (calculated using a toolkit produced by the Association of Independent Museums and DC Research (http://www.aim-museums.co.uk/pages/pg-18-aim-economic-impact-paper/)).	The council recognises that IWML makes a very valuable contribution to the area. IWML is mentioned a number of times in the SPD, for examples in SPD6.
707	727	3 - Vision and objectives			IWML support the strategic objectives for the SPD which help identify a clear direction for future development. Theme 1 'Town centre: Shopping, business and hotels' seeks to improve the arts and cultural offer within Elephant and Castle, while Theme 2 'Wellbeing Social and Community Infrastructure' seeks to promote local community facilities. There is an opportunity for the IWML Masterplan works and subsequent planning and listed building applications to be referenced under both these themes. Improvements to the local cultural offer can be achieved by supporting and enhancing the existing cultural facilities such as IWML	Support for the objectives of the SPD are noted. The council recognises the contribution of IWML to the opportunity area.
707	729	4 -The preferred option/options	SPD 6 - Wellbei		IWML supports policy SPD 6 which supports proposals involving arts, cultural and leisure uses. The first phase of the IWML Masterplan works will significantly improve the	Noted. The council recognises the contribution which IWML makes to the opportunity area and borough.

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			ng - Social and commu nity infrastr ucture		visitor experience. With this in mind, IWML believe the contribution the Museum makes to the arts, culture and leisure offer in the area should be recognised within Policy SPD6.	
707	730	4 -The preferred option/options	SPD 9 - Comm unity facilitie s		IWML supports the classification of cultural facilities as community facilities as defined on page 36 'Fact Box: Community Facilities'. IWML notes Policy SPD9 which sets out that the Council's strategy is to locate new local community facilities together. However, IWML believes that this policy should also recognise and support existing community facilities and their role in the E&C area. Existing community facilities such as IWML provide a vital contribution to the area and their improvement and enhancement should be supported.	Support noted. The SPD vision is derived from the adopted Core Strategy and so cannot be amended, however, it is noted that the IWML has a prominent role in the opportunity area. References to the value of the IWML have been added under 'opportunities' and 'strategy' in the West Square character area section. The protection and improvement of existing community facilities is currently covered by policy 2.1 in the saved Southwark Plan. Although this will eventually be reviewed as part of the forthcoming Development Management DPD, we will add a cross-reference to policy SPD9 to highlight that we will support valued local community facilities.
707	731	4 -The preferred option/options	SPD 16 - Built form		IWML supports policy SPD 16 which sets out the priorities for preserving heritage assets within Elephant and Castle. Policy SPD16 seeks to 'conserve and enhance the character of heritage assets and their settings'. IWML is a Grade II listed building and is set within the West Square Conservation Area. IWML fully supports the protection and conservation of these heritage assets and have commissioned a Conservation Management Plan (produced by Alan Baxter Associates) to identify the areas of highest significance. The IWML Masterplan and the first phase planning and listed building application have been fully informed by the assessment of significance and seek to respect the most significant parts of these assets.	Support noted.
707	733	4 -The preferred option/options	SPD 18 - Open spaces		IWML supports SPD18 which seeks to maintain and improve a network of open spaces and designated Metropolitan Open Land in the E&C area. IWML is set within the grounds of the GMHP, a well established and valuable area of open space within E&C. Open space in E&C is limited. For an area of high population density it has one of the lowest levels of green space provision within the borough (4.6.3, P54).	Geraldine Mary Harmsworth park is identified as an important open space in the West Square character area. Paragraph 5.7.5 recognises that parts of Geraldine Mary Harmsworth Park require enhancing to provide better seating and lighting for residents and visitors. We have included an additional bullet point under SPD 48 to support development that provides improvements, including a

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					Therefore, it is important that the Park is maintained and improvements are supported. The IWML Phase 1 Planning and Listed Building application proposes a new café terrace for the Park, improving the relationship between IWML and the GMHP. The proposals seek to open up the eastern façade of the building, relocating the café internally and providing a new terrace in the park for use by Museum and Park visitors alike. While developing the Phase 1 application, IWML has worked closely with the LBS Parks department who own the Park. IWML believe there are opportunities for further support and partnership working in the future to deliver improvements to the Park. There is an opportunity for a masterplanning exercise to be undertaken, which IWML are happy to be involved in. Policy SPD18 should recognise these opportunities for improvements to the Park and open space offer in E&C.	wider range of facilities to Geraldine Mary Harmsworth Park
707	734	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		IWML supports Policy SPD20 which sets out that s106 monies will be pooled and put towards large items of infrastructure such as open spaces and community facilities. IWML notes that SPD20 sets out that s106 contributions will be sought for all developments in the opportunity area which provide 100sqm of additional floorspace. In its role as a national cultural institution and local community facility, IWML also support the caveat to this policy which states that 'where appropriate, contributions may be replaced by provision of facilities 'in kind''. IWML is a charitable institution and is itself a community facility, and as such seeks to avoid diverting funds away from the Museum. IWML also note that a new strategic transport tariff is proposed and that development owned and used by charities as defined in the 2010 CIL regulations is exempt from this. IWML supports this exemption. As set out above, support and recognition of the Museum and the Park in which it sits should be encouraged throughout the SPD. IWML also believe there is an opportunity for future works to the Park to be supported through s106 monies collected from the E&C area. The Park is a vital source of open space and a much used community facility and should be supported both in policy and financial terms. IWML is working alongside the Park at the moment and is happy to continue this and extend beyond ongoing	Support noted. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects. Every year we provide a report setting out what s106 contributions we have received and how we have spent the funds: http://www.southwark.gov.uk/info/200152/section_106/1481/section_106_annual_report

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					conversation to partnership working should funding allow. IWM supports proposals for improvements to the Park. There is an opportunity for these improvements and wider Park works to be a target for s106 monies generated from the E&C developments.	
707	735	5 - Character Areas		West Square SPD 47 - Built form and public realm	IWML is located within the West Square Character Area. IWML support the recognition of the IWML as a historic institutional building and also the opportunity for enhancements to the GMHP. However, there is an opportunity for the Masterplan works proposed at IWML to be included in the 'Opportunity' section for this character area. This could be included as follows– "Support the Masterplan proposals and subsequent planning and listed building applications for the Museum, which will improve the existing museum whilst protecting and enhancing the designated heritage assets"	The wording in SPD16 has been changed to read: The Imperial War Museum London has commissioned a Conservation Management Plan as well as a proposal for a masterplan. We support the masterplan proposals and subsequent planning and listed building applications for the Museum, which will improve the existing museum whilst protecting and enhancing the designated heritage assets.
707	737	5 - Character Areas		West Square SPD 47 - Built form and public realm	IWML support policy SPD 47 which sets out the strategy for development within the West Square sub area. As a Grade II listed heritage asset, IWML is supportive of this policy which seeks to 'conserve or enhance the setting of the built heritage including the Imperial War Museum and gardens'. IWML has produced a Conservation Management Plan and is committed to conserving and enhancing the building and its setting. In order to continue to conserve and enhance the West Square conservation area and views of the IWML, the Museum are keen to explore opportunities to relocate the Lambeth Road coach parking. Relocating these coach parking bays in front of the Museum would not only enhance views into the Park and of IWML, but would also provide additional space for disabled parking. IWML welcome the opportunity to take forward discussions on the relocation of the coach parking.	This is a detailed matter which can be addressed through a planning application. The Council would be happy to discuss at pre-app meetings.
707	738	5 - Character Areas		West Square SPD 48 - Natural environment	Policy SPD48 sets out the opportunities within the West Square Character Area for improving the natural environment. The SPD describes the GMHP as providing 'a pleasant refuge from the surrounding streets and traffic'. There are however, opportunities to further improve and enhance the GMHP in the future and as such IWML request that this is included on the list of opportunities for the Natural	Geraldine Mary Harmsworth park is identified as an important open space in the West Square character area. Paragraph 5.7.5 recognises that parts of Geraldine Mary Harmsworth Park require enhancing to provide better seating and lighting for residents and visitors. We have included an additional bullet point under SPD 48 to support development that provides improvements, including a

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					Environment within West Square.	wider range of facilities to Geraldine Mary Harmsworth Park
707	739	Appendix 3 - Schedule of buildings which have potential locally listed building			IWML note that the IWML All Saints Annex building is proposed to be locally listed. IWML would resist the local listing of the Annex until further discussion has been had with LBS on its potential implication.	The Elephant and Castle SPD flags buildings which are potentially locally listable. However, it does not in itself locally list them. We are proposing to amend the SPD to make sure that this is clear. We will consult formally on the Local List and a Heritage SPD later in the year. At that point, there will be an opportunity for the local community, developers and landowners, to make representations and provide evidence on individual buildings, prior to the finalisation and adoption of the list.
707	740	3 - Vision and objectives			As a national museum, IWML makes a significant contribution to both the local community, and domestic and international visitors in its role as a cultural institution. As one of only two museums in the E&C area and with the IWML about to embark on implementing its Masterplan works, there is a great opportunity for policy within the SPD to focus on supporting and enhancing IWML. The Museum's plans to mark the Centenary of the First World War from 2014 will place Southwark at the centre of national commemorations of this highly significant anniversary (IWM will be taking the national cultural lead in Centenary related activity). There are also opportunities for the SPD to utilise the evolving relationships between the Musuem and Parks and direct s106 monies towards the Park as a key area of open space in E&C. The current phase one planning and listed building application will mark the beginning of a significant programme of improvement and investment for community facilities within the area. Following phases will look to enhance the visitor experience further. It is therefore essential that the SPD supports development at IWML to help achieve the goals set out in the IWML Masterplan.	Support for the objectives of the SPD are noted. The council recognises the contribution of IWML to the opportunity area.
708	677	4 -The preferred option/options	SPD 1- Shopping		Harriet Harman has produced a telling report regarding the proliferation of betting shops in the walworth area, this is a major problem in economically deprived areas. These shops prey on the desperate and economically vulnerable in society as do the the loan and pawn shops prevalent in these areas. http://www.harrietharman.org/uploads/d2535bc1-c54e-6114-a910-cce7a3eff966.pdf	Local planning authorities have very little control over uses such as betting shops, pawnbrokers and pay-day loan shops. This is because often these uses do not require planning permission. Uses such as betting shops, pay-day loan shops, banks, estate agents and travel agents are categorised in the same "use class" (A2, financial services). Planning permission is not required for changes

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						within the same use class. There is also a permitted change of use to A2 uses from a restaurant, pub or cafe. The council recently responded to a government consultation arguing that betting shops should be placed in their own use class which would give the LPA more control. However, this would require a change to the planning regulations.
708	678	4 -The preferred option/options	SPD 1- Shopping		A temporary capping of rents or subsidies would help small local businesses with a positive contribution to the area, during tough economic times. Kennedy's butchers shop and other listed/significant properties should be part of any redevelopment strategy. The introduction of temporary uses/licenses to invigorate tired shop fronts and highlight the need for intervention are needed. Recognising a leisure/retail need or commercial opportunity for national and international companies to gain local exposure could provide much needed capital or limelight in moving troubled properties forward and breathing new life into shops such as Kennedy's. During the long-term redevelopment empty spaces should be temporarily used if possible (eg a Boxpark at the Shell garage next to Wansey Street is a very good idea. Try and keep the grass area next to it open so that a cafe, say, could spread onto it in the summer). A definite marriage between existing uses and recreational space should be sought. Warm weather should provide an opportunity for increased profits for local businesses	SPD1 requires at least 10% of new floorspace (GIA) in large retail developments (including refurbishments) over 1,000 sqm to be made available as affordable space. This includes discounted rents by not less than a total reduction of 40% below market rate averaged over a five year period. The imposition of a rent cap beyond the five year period would not be appropriate as it would be too prescriptive and it raises concern on how this could be monitored effectively, how enforceable it would be and how it would relate to other occupational costs such as the landlords operating expenses, service charges and business rates. The SPD supports the improvement of shops fronts in the area. For example part of the strategy for Walworth Road is to reinforce the character by improving shop fronts and redeveloping buildings which are of low architectural quality. The Council has a programme called 'Improving Local Retail Environments' (ILRE) which provides funds to improve shop fronts and the public realm in shopping parades in the borough. The shops for improvement have already been chosen in each of the borough's Community Council areas for the current ILRE funding stream. There will be opportunity in the next funding stream to address more shop fronts in the area. The SPD supports interim use. We have amended Theme 3: Wellbeing: Social and community infrastructure with the objective of providing more and improved educational, health and community facilities which meet the needs of existing and future residents and support interim uses which promote these. Theme 7: Delivery: Making regeneration happen sets out the objective of ensuring that comprehensive redevelopment does not compromise safety and maximises opportunities to make use of vacant sites on an interim basis. The Heygate Street Character Area SPD25

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						encourages interim uses of development sites
708	679	4 -The preferred option/options	SPD 2 - Markets		East Street Market: I think the current east street market should serve the local community and focus on affordable basics, from food to clothing... it obviously does this to a certain level as it stands. However, a little more variety and thought is needed with respect to the number of stalls selling exactly the same produce, it would benefit from some diversity. The side streets off the market could be used to create themed areas (eg there is currently a flower seller using a side street. This could be extended to have more florists along that offshoot). Although public transport should be encouraged there should also be some parking retained for short stays.	The SPD supports the continued operation of markets, including East Street market, and also the provision of new markets in the area. Markets can help enliven town centres, reinforce the identity of an area and help provide a more varied shopping experience. Markets also contribute towards promoting community cohesion. A new market square will be provided to the east of the railway viaduct (SPD 2). The Council is developing a Street Trading and Markets Strategy which will provide further emphasis on improving the operation of East Street market.
708	680	4 -The preferred option/options	SPD 1- Shopping		E&C Shopping Centre: The centre needs a complete overhaul... some of the current retail and restaurant uses would remain and benefit from a rethink of the use of elephant and castle as an entertainment destination. An expanded cinema to tie in with current uses such as the bingo and bowling would help to add to its attraction. Perhaps giving it defined 'quarters' could help. A restaurant/bar quarter in one of the side branches could bring more people in to the centre and make it more of a leisure destination. Maybe a mini version of 'Brixton Village'? http://spacemakers.org.uk/projects/brixton/	SPD1 promotes expansion of retail floorspace in the centre to help consolidate its role as a major centre in our hierarchy of town centres. We set out that we will work with the landowner to transform the shopping centre through redevelopment or remodelling, supporting the introduction of new large 'anchor tenants' and promoting a wider mix of retail uses to strengthen the appeal of the town centre to a wider catchment. Through SPD6 we promote the provision of a wide range of arts, cultural, leisure and entertainment uses to expand and make a positive contribution to the evening and night-time economy. We support through SPD25 character area guidance for the Heygate Street area, a range of leisure, entertainment food and drink uses to be provided. The development at 50 New Kent Road has permission for new floorspace to accommodate D2 use, which will include a new cinema and active uses along the ground floor. We have also set out in SPD 25 that a new market square on the eastern side of the viaduct will become a key location in the town centre. To help generate activity around the square and make it lively at different times of day, it should be fronted by retail uses. We state that the western side of the square would make an appropriate location for some cafe or restaurant use.
708	681	4 -The preferred option/options	SPD 5 - New Homes		The definition of affordable housing should be revisited. Also, the percentage of displaced residents rehoused in the new scheme should be strictly assessed, families that have	The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3

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					formed part of the walworth community for generations are lost in the 'gentrification' of such areas. A percentage of affordable housing provided is deceptive, I feel this is used as a smoke screen for dispersing lower income tenants.	defines what is meant by affordable housing for planning policies, and the London similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. Within the Affordable Housing SPD we set out the income thresholds at which social rented and intermediate housing should be affordable. The SPD refers to both the minimum 35% target and the minimum numerical target of 1,400 new affordable homes. Appendix 1 of the SPD on implementation sets out some key committed developments underway to help deliver more affordable housing. We have also updated our housing background paper and our development capacity assessment to show how much affordable housing we expect to come forward up to 2026.
708	682	4 -The preferred option/options	SPD 5 - New Homes		Minimum sizes for homes should be encouraged. Spaces for children to play in safely which are overlooked. Mainly car-free side streets but some spaces for residents who need them (disabled, small businesses, taxi owners).	The SPD refers to our residential design standards SPD, where we set out minimum dwelling sizes and incorporate the principles of Secured By Design. SPD 12 sets out that all development in the Central Activities Zone should be car-free, aside from an adequate provision of parking for disabled persons and car club spaces. Outside the CAZ, car parking should be minimised and car free developments will be supported.
708	683	4 -The preferred option/options	SPD 12 - Parkin g		The extended use of Streetcar spaces should be encouraged, I'd like to see the council work closely with positive commercial schemes offering incentive for 'take up' in the Walworth area.	The Council supports the use of car clubs. We have one of the highest numbers of on-street car club spaces among London Boroughs, and will normally require developers to include provisions for car clubs within their Travel Plans.
708	684	4 -The preferred option/options	SPD 9 - Commu nity facilitie s		Pubs are an important part of the community adding social cohesiveness in an informal way compared to faith groups and other community activities. Given the loss of a huge number of pubs in the Walworth area I think there should options for new pubs in the developments. Also, please keep as many existing pubs open by opposing change of use or demolition, particularly those that are locally listed	SPD9, and guidance on land use in each of the character area sections, promotes active ground-floor uses. This could include pubs as part of a mix of shops and facilities to provide for local needs. Pubs will be protected to a degree by Southwark Plan Policies 1.7 and 1.10. Both of these policies protect uses falling within Class A of the Use Classes Order, unless certain criteria can be satisfied. This

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						includes shops, banks and building societies, restaurants, pubs, takeaways and other facilities typically found in town centres. Where pubs are locally listed, this would result in additional protection for the buildings but not necessarily the use as a pub.
708	685	4 -The preferred option/options	SPD 9 - Community facilities		New community facilities, like school sports halls, should be made available outside hours for other members of the community. Ideally there would be a centralised booking system for all the sports facilities in the area so that the problem of the reduced leisure centre facilities is offset. Also, with any new community centres please make them available for parties (eg weddings) by having them sound insulated and slightly away from residences if necessary. They need to be easy too book and cheap for the community.	SPD9 sets out that we will seek opportunities to ensure that new community facilities are made available for all members of the community. This stance is supported by policy 2.4 in the saved Southwark Plan, which specifically refers to facilities on school sites. Details relating to booking arrangements and particularly uses of these facilities are beyond the scope of the SPD.
708	686	4 -The preferred option/options	SPD 1- Shopping		Please limit the number of retail spaces that can be used by faith groups (see Camberwell Road near Camberwell Green). Retail should be available on the main street and separate facilities available for faith groups.	We promote the provision of active ground floor frontages for retail and commercial uses along main roads, which will contribute to the objective of increasing the appeal of the Elephant and Castle and consolidating it as a major town centre. Planning permission is required for a change of use from A use (retail) to D use (Through SPD 9 we promote the co-location of community facilities so that different facilities can complement and support one another.
708	687	4 -The preferred option/options	SPD 9 - Community facilities		Please try to ensure current levels of library facilities are maintained.	Well valued community facilities are protected under Southwark Plan policy 2.1 and a cross reference has been added to the SPD to reflect this. Libraries are considered a community facility and are listed in the 'fact box' in SPD9.
708	688	4 -The preferred option/options	SPD 6 - Arts, culture, leisure and entertainment		Links to the universities should be made more apparent. There should be more public art in co-operation with Camberwell College of Art and LCC. I've mentioned this before but why not utilise the frontage of the building behind The Tankard pub, that is opposite the Town Hall. It is a prime position yet has a dreadfully 'inactive' frontage. An almost blank wall. However, this could be seen as a blank canvas. Why not move the bus shelter a few metres and fill in the alcoves with some public art that would make people realise they are visiting Walworth. Those alcoves in the bricks are	The supporting text to SPD 8 recognises the important contribution of the two universities in the area (London South Bank University and London College of Communication) and the policy supports the growth of these two educational institutions. We have amended the supporting text to SPD 6 to expand on the contribution the two universities have in terms of arts, culture, leisure and entertainment uses in the area. The SPD supports the integration of public art into the public realm, either as part of development proposals or within streets and spaces. We

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					almost picture frames that could be used for anything!	have made specific reference in the Enterprise Quarter Character Area SPD 51. We have made additions to SPD 15- Public Realm - to reinforce the contribution public art has in transforming the quality of the public realm. The Police Forensics lab on Walworth Road has been identified as a potential development opportunity site.
708	865		SPD 18 - Open spaces		<p>1) Identifying and Defining Green Routes We need to be clear on the hierarchy of different routes. There different types of Green Routes are Green Links, Green Quiet Routes and Greened Main Roads. They might be defined as follows: Green Links link one green space to another by extending the amount of green between the two. These are “pedestrian pathways”, “woodland edges”. In Salisbury Row Park the green link is the meandering path through the park that few cyclists use. These links improve wildlife by providing migration corridors. Green Quiet Routes are lightly trafficked roads and streets used by cyclists with trees and other planting designed to slow car traffic and to improve and green the overall environment. Green routes have mix of slow moving motor vehicles, cycles and pedestrians and creating them can involve widening or building out pavements and planting more trees and other forms of greenery. Greened main roads. Main road such as the New Kent Road are often already heavily planted with mature trees. The perceptions of car drivers and how they see these roads can be changed still further with greenery. The benefit of mature trees along these routes is that they are high in biodiversity. Roads such as St Georges Road could be part of the green network owing to their heavy tree cover and overlapping canopy. Heygate Street should be part of the Green routes network, which could also include a road such as Harper Road, which again could be improved by planting more trees. These measures to green the street environment should be combined with carriageway narrowing, footway buildouts and other measures to slow traffic. The slower vehicle speeds on the green quiet routes and the greened main roads should be enforced as 20 mph maximum. 2) Characteristics and Other Notes The GLA needs to improve its definitions of these different types of route. Formal road crossings need to be wide enough to accommodate both</p>	<p>We have included an additional paragraph (4.6.5a) in the final SPD setting out further detail on the potential characteristics of green routes. Further information is also set out in our draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy</p>

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					<p>pedestrians and cyclists. In Salisbury Row Park cyclists and pedestrians rub along well. In the park itself cyclists tend not to go there and it is principally for pedestrians. In Chatham Street and Darwin Street, there is no problem because there are clear pavements and overall there are no long stretches of road so vehicles (whether bicycles or motor vehicles) move at low speeds. There may be potential to close off some roads around Rodney Road to stop rat running. In delivery the council would need to deliver the hard surfacing in a project and then the local community through gardening days, working with children perhaps at local schools and through local volunteer green groups could then help to create and maintain the planting in the area. An aim would be to keep costs low, by simpler specifications (e.g. substantial wooden edging for footway build-outs and planted areas, as in New York and some other London boroughs) Southwark aims for 60% tree cover on all streets in the SPD area. The green routes network should be identified distinctively and recognisably without extensive signage clutter Green Route between Victory Park and Nursery Road Park. Northern section of Balfour Street. Potential to close Balfour Street north of Muntun Road except for access. South of Muntun Road significant road capacity. Once again excessive carriageway space could be taken up with heavy planting of trees including larger species, planters, landscape strips and bushes. Orb Street junction. Remove approximately 50% of road capacity and make the junction far smaller. Far wider pavements are needed along with crossings that can accommodate both cyclists and pedestrians. Scope to plant large tree species in this area. Opportunity to integrate the green space just south of the Salisbury Estate car park into the junction to increase the amount of usable green space that is accessible to people in the area. Need to accommodate parking for shops on Rodney Road. Could, as on the Walworth Road, be set into the pavement. Around the Stead Street car park, are two roads necessary with one one-way roads to the north and one to the south? Could they not be made one road? 2. Green Cycling Route. North-South along Brandon Street and Portland Street. This would work as a green cycling</p>	

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					commuter route. It would be improved by: Reducing vehicle speeds through upgrading the current cushions to full width humps as has been done at the junction with East St market to slow vehicles down significantly. Building out further into the carriageway (with trees/planting on the build-outs). Potential for linear community gardening where space allows along the road. A privacy strip in front of homes which again could be greened	
709	690	1- Introduction and background			The Draft makes reference to the terminology "town centre" in a number of places. The Elephant Central Area is a 6 lane highway with 2 large interchanges to the north and south. Town Centre does not accurately describe this place. A more appropriate description might be a series of neighbourhoods around a major transport interchange. This then provides an opportunity to establish, with local communities, how the hearts of these neighbourhoods are described. A realistic description also acknowledges the fragmented nature of the Elephant and the start of a place based approach.	The council's ambition is to make the area feel more like a town centre and to reduce the impact of the severance created by the main roads in the area, hence the description.
709	691	3 - Vision and objectives			Vision is an important aspect of regeneration. Interesting to note that an analysis of the paragraph contents of the one page vision under 3.1.4 breaks down as follows: Diagram 7% Working Together 9% Sustainability 9% Place and proposals 14% Numbers and tall buildings 23% Transport 35% Aspects of community, people, inclusiveness, value, heritage, existing assets do not appear in the vision description. I strongly encourage a re working of the vision to be more responsive to the social and human aspects which are essential to vibrant neighbourhoods. Reference to the work of the Danish architect, Jan Gehl may connect with international thinking on a real people inclusive approach. Urban Research and Design Consultancy http://www.gehlarchitects.com/ Part of the vision should make a clear reference to Southwark's commitment to maintaining social housing appropriate and responsive to the needs of local people, building in a long term strategy for future provision within the area.	The vision for the opportunity area has already been established in the core strategy and the council is not able to make substantive changes to it at this stage. The vision does refer to the need to generate affordable housing and the importance of the public realm. The council commissioned Jan Gehl to prepare a public realm strategy for the Elephant and Castle and the strategy has helped inform the SPD.
709	692	Appendix 1- Implementation			The Southwark Statement of Community Involvement has also not featured in recent consultations at the Elephant & Castle masterplan. How can the inclusion of this document, together with an inclusive outreach programme be more	The council's statement of community involvement encourages developers to engage with the community prior to submitting a planning application. This process however is led by the developer rather than the local planning

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					firmly placed within the SPD. Section 6.4 would benefit from a stronger commitment to community involvement in placing it as a central element of the regeneration process. For example, has there been an on the ground study undertaken to understand how the community views need? Has Southwark considered how consultation can be undertaken in a way which does not become 'box-ticking' and one sided. A further consideration is embedding consultation through innovative arts and interim use activities.	authority.
709	693	4 -The preferred option/options	SPD 16 - Built form		Specific reference to the strategy regarding the level of quality does not appear to be incorporated. This needs to be considered as a whole life approach, especially with the legacy within Southwark of the amount of housing which clearly suffers from life and maintenance issues in addition to problems arising from design. My suggestion is to introduce a gauge to which quality can be measured. This can include reference to exemplar pilot projects which exceed current standards and find a methodology which values quality and longevity over short term cost parameters.	This point is addressed in SPD5 . We also cover the points raised within our Residential Design and Design and Access SPDs.
709	694				Stronger emphasis needs to be included in the Draft to ensure that the vision aims for an exemplar quality of regeneration. This applies to community outreach – as opposed to purely consultation, masterplanning and design of buildings. Attendance at recent consultations for both the SPD and masterplan for the Heygate has not fully addressed the meshing of new with existing. Examples of this include the scale and pattern of streets, relationships with Most importantly, there appear, at present to be significant gaps in information available to local people and a real sense of engagement in a participatory and inclusive process. The town hall on Walworth Road has an inscription title “The health of the people is the highest law”. This can provide inspiration for the drivers of regeneration and give a stronger sense of the values which Southwark place on the area	The SPD vision needs to be consistent with the Elephant and Castle vision set out in the Core Strategy, which went through an examination in public and adopted in April 2011. This Vision was developed in consultation with local people and reviewed by a Planning Inspector during the EiP hearings. The Inspector was satisfied that the production of the Core Strategy followed the adopted Statement of Community Involvement (SCI) and the Core Strategy reflected local distinctiveness adequately, (i.e. through the area visions). We consulted on the draft SPD for 12 weeks, comprising of 6 weeks informal and 6 weeks formal consultation in accordance with our SCI. In undertaking the consultation programme for the SPD, we have needed to take into account the important roles played by the different groups and communities within the area to find out the best ways of involving people in the consultation. We have worked with established networks and partnerships to try to make sure that people are being involved effectively.
709	695	3 - Vision and			Interim Use and Open access within large scale	The council is supportive of interim uses and has referred

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		objectives			regenerations is widely accepted as a positive way of managing change and prototyping new ideas and innovative ways of working*. I suggest that this should be included in Section 3.2 under themes, together with the mechanisms which can allow this to happen. *ref: Elephant Amenity Network Interim Use Strategy http://elephantamenity.wordpress.com/2011/12/07/interim-use-strategy-report/	to them specifically in SPD 25 for the Heygate character area. Theme 3 (paragraph 3.2.7) has been amended to refer to interim uses in the context of well being.
709	696	4 -The preferred option/options	SPD 19 - Energy , water amd waste		There needs to be a much stronger reference to Southwark's drive and commitment to sustainability. Sustainable thinking in real terms is in its infancy relative to long term development and delivery through international supply chains. Mechanisms need to be put in place which define what Southwark's values, as a central London borough are, for the Elephant. A clear set of values will help define agendas relative to waste reduction, re-use, energy efficiency and passive measures for new buildings.	The purpose of the Elephant and Castle SPD is to provide a framework which will guide development over the next 15 years, ensuring that regeneration is coordinated and sustainable. The vision for Elephant and Castle states that the area will be a leading example for sustainable development. It will meet the highest possible environmental standards through using low and zero carbon technologies, including renewable energy sources, heat network and combined heat and power and sustainable approaches to water management, reducing waste and controlling noise and air quality. A key theme of the SPD is Theme 6 Natural Environment: Sustainable use of resources, which sets out objectives to; •Promote a network of high quality open spaces which have a range of functions including recreation, children's play, sports and food growing. •Maximise and extend ecological diversity through promoting nature conservation in new and existing spaces, high quality landscaping, tree planting and a network of green routes. •Reduce the impact of development on the environment, minimising greenhouse gas emissions and enabling adaptation to climate change and managing pollution, waste and flood-risk. Sustainable development is a borough-wide issue. Core Strategy policy 13 sets how we will require all development to require as little energy as possible to build, we will also require applicants to demonstrate how they will avoid waste and minimise landfill from construction. Our Sustainable Design and Construction SPD and Sustainability SPD's also set out further guidance on how we will ensure sustainable development takes place across the borough.
709	697	4 -The preferred	SPD		Green walls - proposals must demonstrate viability and long-	SPD 27 sets out how we will require landscaping to be of

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		option/options	18 - Open spaces		term sustainability. Many systems have a constant need for automatic irrigation, a high maintenance demand and are prone to failure - they are eco-bling, rather than sustainable technology.	high quality and encourage biodiversity through tree planting/retention, water features and habitat creation. Detailed matters such as landscaping will be considered as part of the planning application process. In line with policy 12 of the Core Strategy, we will require a design and access statement to be submitted with all development proposals. The design and access statement is required to include an explanation of the commitment to maintaining the landscaping.
709	698	4 -The preferred option/options	SPD 18 - Open spaces		0.61 hectares per person is very low, and the deficiency is compounded by major roads and railways which are barriers to access. [Compare the National Playing Fields Association's '6 Acre Standard', or 2.43 ha per 1000 population, although this cannot always be achieved in cities]. Every opportunity must be taken not only to create high quality and robust new open space, but to improve existing spaces and the links between them. Small incidental spaces, such as those on housing estates, can make an enormous contribution. The SPD should include the improvement [with the community] of these spaces, and should give them protection through policy. These should be specifically named as one of the categories of community projects eligible for Sec 106/ CIL funding.	We recognise that the provision of open space in the area is low. We have amended the final SPD to set out a standard of 0.76 per 1,000 population in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate redevelopment will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026. We have also included an additional paragraph (para 4.6.5b) setting out more detail on how we will seek to improve the amenity value of land on housing estates and within the transport network. Further information is also set out in our draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
709	699	4 -The preferred option/options	SPD 18 - Open spaces		New public open space provided should be designated as such and protected by policy for the long term. New space provided by development for public access should be managed as public space where people are welcomed, not as private space where the presence of the general population is merely tolerated.	Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces.
709	700	4 -The preferred option/options	SPD 18 - Open spaces		Replacement of trees lost to development - clarification required of replacement 'by new trees which result in a net improvement in canopy cover as measured by stem girth'. On day one, or over several years? We welcome the intention to use the CAVAT methodology for evaluating trees and calculating contributions, but any such contribution for	We have amended SPD 18 to state that replacement trees should result in a net improvement in canopy cover as measured by stem girth at the time of planting. Where S106 contributions are sought using the CAVAT methodology, this will be in addition to funds negotiated for other infrastructure such as children's play provision and

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					tree replacement must be in addition to, not instead of, a developer's other commitments in terms of providing landscape spaces and play or community facilities.	public realm in line with our S106 toolkit.
709	701	Appendix 1- Implementation			The timeframe for incorporation of comments within 6 weeks seems extremely short. Successful regeneration develops over a time with an adaptive long term strategy in place. Item 3.2.11 page 31 makes reference to reviewing policies annually and could as a worst case scenario open up the way for watering down policies. The process of regeneration needs to have sufficient place based and strategic strength to allow the core values to be embedded, whilst remaining adaptive to future scenarios. At the present time I am not confident that this is in place. I have strong concerns that the fast-track approach which appears to have been adopted will, in the long term, deliver further fragmentation to the neighborhood	The SPD should be sufficiently flexible to be able to accommodate change over time. While policies will be monitored and reviewed annually, formal updates to the SPD will take place at longer intervals. There is scope to developed more fine grained strategies for parts of the opportunity area, enabling particular themes to be explored in more depth and over a longer time frame.
710	704	4 -The preferred option/options	SPD 1- Shoppi ng		This policy supports new retail development in the town centre, which we do not object to. However it states that to do this, large developments over 1,000sqm should provide a range of shop sizes including affordable units. It is considered that the provision of affordable space for those businesses what have been displaced as a result of redevelopment is entirely justified, however it is unreasonable to provide affordable units for 'new business start ups' and especially for 'independent retailers'. The inclusion of these end users as occupiers within the affordable retail units would result in unfair competition. Whilst the supporting text 4.17 goes on to state that the Council's preference is for occupation by displaced business firstly, then new business start-ups and thirdly by independent retailers and that suitable businesses should have 3 units or less, this would allow for an unfair advantage within the market. Competition for these units will be fierce and for those businesses which are not selected it will place them at a serious financial disadvantage (with higher rents of up to 40% greater than their competitors). This will enable the occupants of the affordable retail units to drop prices significantly with no repercussions to their profit margin. Naturally shoppers will do business with the cheapest retailer	We have provided sufficient flexibility in the SPD on the affordable retail requirement. We have stated our preference for affordable units to be made available in the first instance to displaced businesses to ensure impacts on these businesses are appropriately mitigated. Further consideration of the end tenancy of the units would be undertaken at the planning application stage.

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					and the likely result will be that those occupants of the standard units will be forced out of the market-place. Ultimately this could result in vacancies which will not support the Councils objective to see the Town Centre thrive. The affordable units should be provided for those businesses which are displaced by development as they will be directly affected by the development, through construction, shop vacancy, loss of income etc. This is wholly reasonable so as to provide a balance between both the impact of the physical development and also the likely increase in rent of a new unit over and above the rent of the existing units which are being replaced. New businesses should certainly be encouraged, however as discussed above it is considered that the offer of affordable units for some retail occupiers will place those which pay full rents at a massive disadvantage. Proposed Change: The Policy should be reworded to delete reference to new business start ups and independent retailers.	
710	705	4 -The preferred option/options	SPD 3 - Hotels		The provision of new hotels within the Elephant and Castle Opportunity Area is supported. It is considered that new hotel development will support the other uses which are being encouraged within the area and which currently exist within the town centre – such as shopping, businesses and the education sector. It is further supported that hotels should be located on main roads leading into the town centre as this will ensure that access into the town centre is easy for occupants. This is considered a common sense approach. However given the demand for hotels within the area proposals which are not located on main roads should not be discouraged purely on this basis, as they will still contribute to the diversity of the town centre. Proposed Change: Policy should add the wording at the end to say ‘or on other appropriate sites’.	SPD 3 is consistent with the overarching policy 10 in the Core Strategy which sets out policy where we will allow development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. Policy 1.12 would also be used to assess a hotel scheme and other considerations may be taken into account at the planning application assessment stage.
710	706	4 -The preferred option/options	SPD 4 - Jobs and Business		We support the provision of new business space and acknowledge that for ‘future proofing’ reasons that buildings should be designed flexibly. Equally we agree that businesses should be retained, however the policy should be flexible to allow for retention only where this is practicable. In some instances there may be existing business floorspace which is redundant, derelict, or simply unable to meet the	The Saved Southwark Plan policy 1.4 provides criteria against which to assess the loss of business floorspace. These criteria include an exception for the loss of business floorspace within town centres where in accordance with saved Southwark Plan policy 1.7, it may be replaced by Class A retail or other suitable town centre uses.

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					<p>appropriate workspace standards such as providing suitable disabled access, or where hazards such as asbestos are found within the building fabric which make the existing building unsuitable for occupation. In these cases the retention of the business floorspace should be viewed on its merits and assessed against the redevelopment options which are available. For instance it would be impractical to retain redundant, poorly utilised industrial business floorspace with low occupation when this could be replaced by a mixed use development which has the potential to offer a substantially higher level of employment within flexible buildings. We recommend that this policy be reworded to allow for greater flexibility to ensure that floorspace retention does not prohibit redevelopment, and that each case is assessed on its own merits, and ensures that the focus is on employment retention rather than the retention of the overall business floor area or space. Proposed Change: Second bullet point; additional reference to be made at end 'or where the proposed use would involve substantially greater density of employment provision' .</p>	
710	707	4 -The preferred option/options	SPD 5 - New Homes		<p>The second bullet point of this policy, which states that the Core Strategy policies will be applied to ensure that at least 35% of homes are affordable, is considered to be an inflexible approach to the delivery of new homes within the Elephant & Castle. We recognise that in accordance with the Core Strategy and the London Plan that at least 4,000 new homes should be provided in the Elephant & Castle Opportunity area we consider that the policy stipulation for 35% affordable homes will be prohibitive towards residential redevelopment. This policy would in effect render 100% affordable schemes non-compliant where they may be fully acceptable given the development criteria and housing demand. Equally it would also prohibit predominantly private market development from being accepted where viability and off-site contributions are considered appropriate justification for a reduced affordable housing provision. Proposed Change: Policy SPD 5 should be reworded to allow flexibility for individual applications to ensure that housing delivery is not unnecessarily stifled within the Opportunity Area. Policy should be worded to state that a mix of tenures and unit</p>	<p>This point referred to in the proposed change is already covered in existing policy and guidance. The Core Strategy sets the policy of a minimum of 35% affordable housing and a numerical target of 1,400 affordable homes within the Elephant and Castle opportunity area. Our evidence in our Affordable Housing Viability Study (2010) and our studies looking at housing need justify this approach for the lifetime of the Core Strategy. The housing background paper which supports the Core Strategy sets out that a financial appraisal can be submitted to justify a departure from this policy if it is not viable on a specific site. Our Affordable Housing SPDs (both draft and adopted) provide further detailed guidance on requiring a financial appraisal to justify this. We will continue to follow this approach.</p>

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					sizes will be sought with the objective of having 35% affordable and 35% of private units on application sites subject to individual site circumstances.	
710	708	4 -The preferred option/options	SPD 5 - New Homes		Bedrooms The stated values of LAeq,T = 30 dB (T = 8 hour period from 23:00 to 07:00) and LAFmax = 45 dB reflect Table 1 of the World Health Organisation (WHO) "Guidelines for Community Noise" document and would not therefore appear unreasonable. We would however suggest that the SPD acknowledge that the proposed LAFmax 45 dB criterion should relate to "typical" night time event noise rather than the absolute "worst-case". Living rooms The stated LAeq,T = 30 dB criterion (T = 16 hour period from 07:00 to 23:00) is 5 dB lower than the relevant WHO Table 1 value and could therefore be seen as onerous given that the WHO guideline values were "set at the level of the lowest adverse health effect". We suggest that Section 4.2 of SPD 5 be amended to reflect WHO guidance: LAeq,T = 35 dB (T = 16 hour period from 07:00 to 23:00). Proposed Changes: Wording noted below should be incorporated into the SPD. The SPD should acknowledge that the proposed LAFmax 45 dB criterion should relate to "typical" night time event noise rather than the absolute "worst-case" Section 4.2 of SPD 5 be amended to reflect WHO guidance: LAeq,T = 35 dB (T = 16 hour period from 07:00 to 23:00).	We are proposing to amend SPD 5 to refer to the 35dB living room standard. There is likely to be a difference of opinion on what "typical" would be. Where developers do not consider the LAFmax figure to be attainable, justification for this can be provided and Southwark have been flexible in the past. BS 8233 refers to LAFmax not exceeding 45dB 10-15 times a night. This latter approach is one we have accepted previously.
710	709	4 -The preferred option/options	SPD 5 - New Homes		The fifth bullet point refers to external amenity areas and states that these should be designed as far as reasonably practicable to attain the 55dB LAeq. It is considered that this policy point is wholly unrealistic and unachievable given the context of the site within the Elephant and Castle and the activities and uses within it. It is considered that development should not be stifled as a result of amenity areas being unable to meet the external noise levels set within this policy. Each development should be assessed on its own merits and the surrounding environment should be considered in the context of the development. For instance, the external noise within the Elephant and Castle Opportunity area is significantly affected by air, road and rail traffic, industrial and other noise creating industries. All of these noise creating elements do not lend themselves favourably to assisting	The standard set out is consistent with WHO guidelines. It also indicates that development should be designed "as far as reasonably practical" to attain the noise standard. If developers do not consider it reasonably practical, they will have the opportunity to provide justification for this.

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					development providing amenity areas/gardens which are not impacted by noise. Developers can seek to utilise design methods to attenuate against noise to a certain extent however, this should not be to the detriment to the development of open and useable amenity area. Amenity areas and gardens should not be unduly restricted by barriers and bunds if this affects the way in which they can be utilised and enjoyed. Proposed Change: This bullet point should be deleted.	
710	710	4 -The preferred option/options	SPD 8 - Higher education and student housing		We support Policy SPD 8 which supports the provision of space used for higher education and student housing. However it is considered that reference should also be made within the policy to take into account the London Plan (2011) and the recent GLA Draft Housing SPG. London Plan Policy 3.8 'Housing Choice' – states that taking account of housing requirements boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education. The London Plan recognises the significant contribution universities make to the economy and labour market and recognise that it is important not to compromise their attractiveness and potential growth through inadequate student accommodation. The Draft Housing SPG reiterates London Plan Policy 3.8 and specifically notes that the housing standards for new build dwellings do not apply to specialist forms of housing which includes student housing. It goes on to state (paragraph 3.1.49) that as student housing is used to meet distinct needs the affordable housing requirement is not generally applied. The supporting text of SPD 8 (paragraph 4.3.9) states that new student housing development should provide an element of affordable housing which contradicts the London Plan and the Draft Housing SPG. The requirement for affordable housing through student accommodation proposals will in many cases be unjustified. The delivery of affordable housing to meet affordable housing need should not be delivered at the detriment of student housing which meets local demand. We consider that greater support should be given to locating	Support noted. The council is seeking to work with and help developers the two local universities at Elephant and Castle, as they make a strong contribution to the local economy. We recognise this in the SPD. SPD8 is in line with our Core Strategy policy 8. The GLA have confirmed that the guidance on student housing in the Elephant and Castle SPD is in general conformity with the London Plan. We do not think it is necessary to refer to the Mayor's draft housing guidance in the SPD. We have added a reference to the importance of the enterprise quarter as a location for student accommodation due to the proximity to the LSBU campus.

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					student housing development within the Enterprise Quarter given its relationship with South Bank University and its mixed use character. Student housing developments in this area will assist in meeting the very significant demand for student housing as identified in the London Plan Policy 3.8. Hollybrook has discussed with the Council the opportunity to provide a student housing development on the Triangle Site for a number of years. We append a letter dated December 2009 from the Head of Planning confirming that the mix of use across the site was supported. This mix includes student housing. This use is further supported in the PPA signed between Hollybrook and the Council. Section 2 Broad Objectives includes confirmation that student housing would be supported on this site. Proposed Change: Second Bullet point should include reference to the Policy 3.8 of the London Plan and the GLA Draft Housing SPG December 2011.	
710	711	4 -The preferred option/options	SPD 12 - Parking		In general we support the provision of car free development within the Elephant & Castle as this encourages the use of sustainable methods of transport. However, there may be exceptional circumstances whereby it is not reasonable to expect that development be car free. For instance, where there is the provision of family homes it may be impractical to expect that the development be car free as this may in turn affect the saleability of the units and deter families from moving to the area (or staying in the area), which ultimately could impact on the viability of a residential scheme. The delivery of family units should not be prejudiced as a result of the requirement for development to be car free, particularly where it can be demonstrated that off-street car parking can be accommodated within the development envelope. As such each development should be assessed on its own merits and only where it is reasonable should car free development be sought. Proposed Change: First bullet point should include the following wording at the end 'or where individual site circumstances would support it.'	All development will be required to make adequate provision for parking for disabled drivers. We believe that the needs of all other residents can be met through a combination of walking, cycling, public transport, car clubs and taxis, and so do not require private car parking. Agreements for car club spaces provided to support car-free development will include conditions to ensure a good level of availability of the cars. No evidence has yet been presented that the lack of car parking will affect viability. Approximately 60% of households in the area already manage without owning a car.
710	712	4 -The preferred option/options	SPD 16 - Built		We support the various points set out within this policy however, we are deeply concerned with both the third bullet point which seeks to 'retain locally listed buildings wherever	The council's approach is consistent with its approach in the 2008 Enterprise Quarter SPD which shows both the Institute of Optometry and the café as being buildings with

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			form		<p>possible' and the fourth bullet point which 'considers the retention of buildings which are identified as having townscape merit or ensure that the design, scale and massing of replacement buildings reinforces the character of the surrounding townscape'. Whilst the wording of the text is not in itself particularly alarming it is the SPD Figure 39 to which this text relates to that is of concern. The figure identifies those buildings which the Council consider are heritage assets within the specific areas within the Elephant and Castle. Hollybrook Ltd owns a very significant portion of land within the Enterprise Quarter, which is bounded by Newington Causeway, Borough Road and the railway viaduct known as the Newington Triangle. This site equates to nearly a hectare of land and is currently under-occupied with a series of ad hoc business units and commercial properties. Discussions with the Council have been on going for a number of years with planning officers about the proposals for the site. These discussions have centred on the delivery of a comprehensive development of the site with a large mixed use scheme. As demonstrated in these discussions this comprehensive approach is only possible if the majority of buildings within the Triangle are demolished. These discussions included dialogue with the GLA who were supportive of the scheme and the delivery of the mixed use comprehensive scheme. Of particular concern to our client is Figure 39: Heritage assets in the Enterprise Quarter character area. This identifies a number of buildings within the Newington Triangle Site as being Possible Locally Listed Building's along both Borough Road and Newington Causeway and identifies a further building on Newington Causeway as a Building with Townscape Merit. The redevelopment of the Newington Triangle has been discussed in partnership between Hollybrook and the London Borough of Southwark for a number of years. Representations have been made to the Draft Enterprise Quarter SPD in 2007 and later again in 2008. Extensive discussions have been undertaken with Southwark Council and the GLA regarding the redevelopment of the Newington Triangle Site in the last 3 years. At the start of discussions with the Southwark and Elephant and Castle Regeneration</p>	<p>urban design quality, historic and architectural interest. Section 3.3 of the 2008 SPD indicated that such buildings should be incorporated into new development, unless it can be demonstrated that an alternative solution brings significant urban design benefit. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally list them. The council will consult formally on the Local List and a Heritage SPD later in the year. At that point, there will be an opportunity for Hollybrook to make representations on individual buildings, prior to the finalisation and adoption of the list. The council recognises the fact that a pre-application discussion has taken place for the Newington Triangle site and is aware of the outcomes of that process. The council accepted Hollybrook's reasoning that the quality of their pre-application proposal justified a demolition of a number of the existing buildings. However, the planning application has not yet been submitted. Until a scheme has consent and implementation has occurred, the council considers it would be premature to make the changes proposed by Hollybrook. If an application is submitted, Hollybrook will have the opportunity to justify their proposal and as was previously the case, the council will consider the merits of the scheme with regard its impact on urban design and the architectural and historic environment.</p>

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					<p>team it was jointly decided to establish a Planning performance Agreement for the Triangle site. Under the PPA a number of development principles were agreed. Of particular relevance to this section of the SPD it was agreed that within the Triangle there were a number of buildings which were considered to have some architectural merit, but equally it was agreed with officers that there were a number of buildings which did not, and which in turn could be demolished in support of the redevelopment of the site. It was further identified that none of the buildings were listed and the site was not in a conservation area. As identified in the PPA and in the letter from the Head of Planning dated 22 December 2009, all buildings on the site with the exception of the Baptist Chapel and 78-80 Borough Road could be demolished to allow for the comprehensive development to achieve the Masterplan for the site.. A review of the quality of the buildings was undertaken by Chris Miele and was submitted with the representations to the Draft Enterprise Quarter SPD in April 2008, along with a Townscape Analysis (prepared by Lifschutz Davidson Sandilands). We enclose copies of these documents to demonstrate the previous correspondence with the Council on this matter. The principles for the redevelopment were agreed with the Council and were discussed with the Southwark Design Review Panel, Local residents and the GLA. All parties were supportive of the comprehensive approach taken. We append the pre Application note from the GLA which highlights their support for thee development approach on the site. We are disappointed therefore since these previous extensive discussions with a number of stakeholders that this most recent iteration of the SPD includes buildings within Figure 39 which have previously been acceptable to exclude to achieve the comprehensive development of the site. The inclusion of these buildings within Figure 39 of the SPD and reference to their retention within policy SPD.16 has significant implications for the comprehensive redevelopment of the Triangle site and would unnecessarily prohibit future development from coming forward. The delivery of the Newington Triangle is important to achieving the objectives of the SPD and in delivering 4000 new homes, new jobs and</p>	

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					<p>new retail and leisure uses as well as assisting in meeting the need for student housing in the borough. Proposed Change: Figure 39 be amended as follows: Removal of the following buildings identified as Possible Locally Listed Buildings • London School of Musical Theatre – 83 Borough Road • Institute of Optometry – 56-62 Newington Causeway • London School of Accountancy building (annex to MORI building) – 77 Borough Road • 81 Borough Road Removal of the following buildings identified as Buildings of Townscape Merit • No. 38 Newington Causeway Reference to 77-81 Borough Road should be amended to indicate 78-80 Borough Road as potentially a locally listed building and 77 and 81 Borough Road as not being possible locally listed buildings.</p>	
710	713	4 -The preferred option/options	SPD 17 - Building heights		<p>We support the inclusion of tall buildings within the Elephant and Castle Opportunity Area and agree that this will help signal its regeneration, and further support the statement that tall buildings act as focal points in views towards the Elephant and Castle along main roads and strengthen gateways into the central area. Our concern lies with the associated diagrams Figure 14 and 15 which indicate where tall buildings should be positioned as viewed from both the northern and southern entrances into the Elephant and Castle. Within previous iterations of the Elephant and Castle SPG and Enterprise Quarter SPD, Newington Triangle was earmarked for the development of a tall building which Hollybrook fully supported. It was considered that the Triangle site was a gateway location for people travelling southwards to the Elephant and Castle and that the size of the site was such that it could and should accommodate a tall building. In discussions with officers, the GLA and the Southwark Design Review Panel a building of 30 storeys was considered to be acceptable subject to further design development and assessment of key and long distance views. The current Enterprise Quarter SPD identifies Newington Triangle as being an appropriate location for a tall landmark building, terminating views from Borough High Street, marking the location of the green route and acting as a focus for the activities on the lower floors. Figures 4.8 and 4.9 of the document highlight the objective of providing a tall</p>	<p>We have amended the position of the indicative gateway location to show more clearly it extends to the north of the viaduct. The position of the arrow has also been amended to show that there may be a transition in heights across the site.</p>

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					<p>building on the site. However Figure 14 and 15 indicate that height should increase along Newington Causeway from north to south (which we do not disagree with), however the preferred location of tall buildings is to the south of the railway viaduct. We do not consider that this either supports the comprehensive redevelopment of the Newington Triangle nor does it recognise the importance of the Triangle as a main gateway into the Elephant and Castle. We consider that a tall building on Newington Triangle sits with the cluster of tall buildings proposed to the south of the viaduct (87 Newington Causeway and Eileen House). However we consider that the role of a gateway building should be to the north of the viaduct as the position of a tall building south of the viaduct places the building more into the centre of the opportunity area. The logical position of a gateway tall building would be north of the viaduct so as to provide a focus in views for those people travelling to the Elephant and Castle from the north. We consider this location would perform two functions; first as a gateway building from the north and secondly as part of the northern cluster of tall buildings in the Elephant and Castle which supports the provision of mixed use development in the Enterprise Quarter. The position of a tall building should be used as a signal to more important spaces and as such it should be recognised that the Newington Triangle is the gateway to the Elephant and Castle. The policy and supporting Figures 14 and 15 should be representative of this. Further to this it should be recognised that the Newington Triangle site at nearly 1 hectare in size presents an ideal opportunity to support a tall building. Given the overall footprint that is available for development it would be simpler to achieve visual separation from adjoining development, particularly as the southern most neighbour is the railway viaduct and railway line. It would be more achievable to develop a tall building which is considerate of neighbouring property amenity and create a positive relationship with the surrounding buildings. The intention is to redevelop the entire Newington triangle through a series of phases which has been presented as a comprehensive Masterplan which has been subject to a number of discussions over the past three</p>	

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					years and resulted in the joint development of a Planning Performance Agreement with Southwark Council. As highlighted in the appended documents the provision of a tall building on the site has been supported over the past years and we consider the SPD should be drafted to provide clear and unequivocal support for a tall building on the site. Proposed Change: Figure 14 and 15 should be amended to extend the gateway location on Newington Causeway onto Newington Triangle.	
710	714	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		We wish to object to the standard charge which is being presented within this policy in relation to the strategic transport tariff for residential development, which is proposed at £104 per square metre. It is considered that this tariff for residential development is extremely high and does not reflect the number of people anticipated as a result of the development when compared with other uses such as offices where the tariff is set at zero. It is considered that the burden of the combined CrossRail tariff (£35/sqm) and strategic transport tariff (£104/sqm) will be borne unfairly by residential development. It seems that this will result in a double counting, and that residential development in the Elephant and Castle will be required to pay for both the CrossRail development and the redevelopment of the Northern Line Ticket Hall. It is considered that the tariff is set too high for residential development and is unfairly weighted towards this form of development over and above other uses. We consider that the tariff should be applied flexibly and that each development should be given the opportunity to present a viability argument where it is considered that the delivery of the tariff (alongside all other S106 contributions) would render the scheme unviable. The delivery of housing and employment opportunities are paramount within the Elephant and Castle and the strategic transport tariff should not stifle the opportunity for residential development from coming forward. It is considered that the introduction of a 'CIL' tariff within a SPD is premature ahead of the Council's CIL schedule and that this tariff should be the subject of the procedure set out within the CIL Regulations. . Proposed Change: All reference to the Strategic Transport tariff should be deleted.	The tariff is required to help fund infrastructure which is needed to mitigate the impact of development. We have undertaken an impact of the proposed tariff on the viability of development. This study is published on our website. The study showed that generally the developments tested should be able to provide 35% of homes as affordable housing and provide funding for the tariff. Viability is a material planning consideration. Where developers consider that they cannot meet the policy requirement, this should be demonstrated through a financial appraisal. The council will be consulting on a draft preliminary CIL schedule in June 2012.

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710	715	5 - Character Areas		Enterprise Quarter SPD 49 - Land uses	<p>As with SPD17 and Figures 14 and 15 the final bullet point of this section of the SPD states that the strategy for the Enterprise Quarter is to enable a cluster of tall buildings in Newington Causeway and that height should diminish moving northwards along Newington Causeway. We support the reference within this paragraph to the cluster of tall buildings on Newington Causeway, however as stated in the comments to SPD 17 there should be recognition that the development of a tall building would also be appropriate within the Newington Triangle north of the railway viaduct. As highlighted within the representation on Policy SPD17 it is considered that the Triangle site represents the true gateway to the Elephant and Castle and as such this should be reflected through the provision of a tall building to signify the entrance to the centre. This follows the guidance within the current Enterprise Quarter SPD which identifies the opportunity for a tall building on the Triangle Site as a gateway to the Elephant and Castle from Borough High Street. The tall building on the Triangle would sit as part of a tall building cluster with sites already coming forward south of the viaduct. However none of these sites actually performs the function of a gateway site as they sit towards the centre of the Elephant and Castle. The position of a tall building should be used as a signal to more important spaces and as such a tall building on the Newington Triangle is the proper gateway to the Elephant and Castle. Further to this it should be recognised that the Newington Triangle at nearly 1 hectare in size presents an ideal opportunity to support a tall building. Given the overall footprint that is available for development it would be simpler to achieve visual separation from adjoining development, particularly as the southern most neighbour is the railway viaduct and railway line. It would be more achievable to develop a tall building which is considerate of neighbouring property amenity and create a positive relationship with the surrounding buildings. The intention is to redevelop the entire Newington triangle through a series of phases which has been presented as a comprehensive masterplan which has been subject to a number of discussions over the past three years and resulted in the joint development of a Planning Performance</p>	<p>The council recognises that there is scope for tall buildings in the Enterprise Quarter. However, within the section on the Enterprise Quarter, the council has not referred to the merits or otherwise of individual sites. The approach set out in SPD 17 and SPD51 provides a framework and criteria within which developers and landowners can work. We have amended the position of the indicative gateway location shown in Figures 14 and 15 to show more clearly it extends to the north of the viaduct. The position of the arrow has also been amended to show that there may be a transition in heights across the Newington Triangle site.</p>

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					<p>Agreement with Southwark Council. Proposed Change: Paragraph 5.8.7 final bullet point to be reworded as follows: 'Enable a cluster of tall buildings on Newington Causeway including a tall gateway building on the Newington Triangle site. Heights should generally diminish moving northwards however should take account of the opportunity for a gateway building on the Triangle Site.....'</p>	
710	717	5 - Character Areas		Enterprise Quarter SPD 49 - Land uses	<p>We consider the wording of the policy is too prescriptive and does not support a number of uses for which there is need and for which sites within the Enterprise Quarter such as Newington Triangle have been identified as being able to accommodate. As highlighted in the appended documents strong support has been forthcoming previously for the provision of residential and student housing on the Newington Triangle Site. This support is not seen in the wording of Policy SPD 49. Residential use should be a priority use within the area and should not be considered only appropriate if it fits in within existing occupiers operations. It is considered that far too much weight is being given to a very small number of existing occupiers who's operation may be affected by new development and not enough support being given to the need to meet and exceed the objective of securing over 4000 new homes for the Elephant and Castle. Site such as large as Newington Triangle which can deliver significant provision of new housing should be encouraged through the policy. Existing uses within the area should not be seen as obstacles to the introduction of new development which provides uses wholly in accordance with the overall objectives of the Council's Core Strategy, the London Plan and the land use policies of the SPD itself. Whilst existing businesses should be protected where they support the economy and vitality of the area they cannot blight parts of the Opportunity Area. We consider the lack of reference to student housing is wrong particularly given the character of the Enterprise Quarter and the strong support previously given for the provision of this use on the Triangle Site. The SPD highlights the need for student housing in the Opportunity Area and it is considered that the Enterprise Quarter and in particular Newington Triangle is the most appropriate part of the Opportunity Area</p>	<p>We have amended the text to SPD49 to state that we will support residential use in the area. We have also amended SPD49 to set out we will support student housing. The provision of active ground floor frontages in this area will help it to become more integrated with the surrounding areas by attracting more pedestrian footfall through towards the town centre.</p>

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					<p>for this to be located. The previous discussions with the Council on the Newington Triangle included strong support for residential use and student housing use on the site. The current Enterprise Quarter SPD highlights the strong support for residential and higher education uses. We append the PPA signed by the Council and Hollybrook which notes in Section 2 – Broad Objectives that the uses for the site would include student housing and residential. This support was further confirmed in the letter from the Head of Planning dated 22 December 2009 highlighting the support for student housing and residential uses. These uses were also supported in the Pre Application note from the GLA. The reference to active frontages along main roads is noted. Whilst the theory of this is supported there has to be recognition that in many locations within the Enterprise Quarter such as Borough Road and part of Newington Causeway there is not sufficient footfall to support retail uses. Proposed Change: We consider the wording of the fifth bullet point should be amended. The wording should read: 'Residential use will be encouraged. ' A new bullet point should be added: 'Student housing will be supported on appropriate site where in accordance with Policy SP8 of the Core Strategy and Policy 3.8 of the London Plan.' Final bullet point should be amended to note that active frontages will be only be sought where it is appropriate and viable to provide such uses.</p>	
710	718	5 - Character Areas		Enterprise Quarter SPD 51 - Built Environment	<p>First Bullet Point: We question the townscape benefits of providing smaller footprints to encourage pedestrian movement through the blocks. An approach providing reduced footprints is not always an appropriate response to site layout and often on larger sites maintaining longer street elevations with larger footprints can be the correct approach. For example in the discussions the Newington Triangle Site the DRP encouraged less permeability larger footprints, maintaining a consistent built form to Newington Causeway. We consider that whilst the approach noted in the first bullet point can be appropriate other design approaches are just as relevant. Second Bullet Point: We consider that it is wholly wrong in design terms to provide a consistent height on Newington Causeway. All of the western Newington</p>	<p>1st bullet: The word "smaller" has been deleted. 2nd bullet: Newington Causeway has a consistent height which is an important part of its character. The policy emphasises that taller buildings should be set back from the frontages but it would not be consistent with the wording of the policy to refer specifically to a tall building on the Newington Triangle. We have amended the position of the indicative gateway location shown in Figures 14 and 15 to show more clearly it extends to the north of the viaduct. The position of the arrow has also been amended to show that there may be a transition in heights across the Newington Triangle site. 4th bullet: It is appropriate for an SPD to provide place specific guidance. St George's Circus and the Inner London court are a historic asset and it is</p>

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					<p>Causeway frontage lies within the Triangle site and as highlighted in the previous design discussions varying the building heights and position of the buildings provided for greater design quality than a consistent height. The reference to the taller elements being set back should be replaced with a reference to a tall building. As highlighted in the representations on tall buildings on SPD 17 and SPD 51 the Triangle Site is a wholly appropriate location for a tall building. This should be clearly demonstrated in the wording of the bullet point. Fourth Bullet Point: The reference to conserve and enhance listed buildings in particular around St Georges Circus and South London Inner Sessions Court on Newington Causeway seems superfluous. PPS5 provides clear guidance on the determination of schemes which have an impact of designated heritage assets and it does not seem appropriate to repeat this. Proposed Change: First Bullet Point. We consider the word 'smaller' should be deleted Second Bullet Point: We consider the wording should be deleted and replaced with ' Provide a varied building height consistent with the context including provision of a tall building set back from Newington Causeway on the Newington Triangle site. ' Fourth Bullet Point: Delete this bullet point as it repeats PPS5.</p>	<p>appropriate to mention them. Of course, any consideration of impacts of a particular scheme would be carried out in accordance with PPS5.</p>
710	719	5 - Character Areas		Enterprise Quarter SPD 51 - Built Environment	<p>Our concern lies with the associated diagrams Figure 14 and 15 which indicate where tall buildings should be positioned as viewed from both the northern and southern entrances into the Elephant and Castle. Within previous iterations of the Elephant and Castle SPG and Enterprise Quarter SPD, Newington Triangle was earmarked for the development of a tall building which Hollybrook fully supported. It was considered that the Triangle site was a gateway location for people travelling southwards to the Elephant and Castle and that the size of the site was such that it could and should accommodate a tall building. In discussions with officers, the GLA and the Southwark Design Review Panel a building of 30 storeys was considered to be acceptable subject to further design development and assessment of key and long distance views. The current Enterprise Quarter SPD identifies Newington Triangle as being an appropriate location for a tall landmark building, terminating views from</p>	<p>The council recognises that there is scope for tall buildings in the Enterprise Quarter. However, within the section on the Enterprise Quarter, the council has not referred to the merits or otherwise of individual sites. The approach set out in SPD 17 and SPD51 provides a framework and criteria within which developers and landowners can work. We have amended the position of the indicative gateway location shown in Figures 14 and 15 to show more clearly it extends to the north of the viaduct. The position of the arrow has also been amended to show that there may be a transition in heights across the Newington Triangle site.</p>

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					<p>Borough High Street, marking the location of the green route and acting as a focus for the activities on the lower floors. Figures 4.8 and 4.9 of the document highlight the objective of providing a tall building on the site. However Figure 14 and 15 indicate that height should increase along Newington Causeway from north to south (which we do not disagree with), however the preferred location for tall buildings is to the south of the railway viaduct. We do not consider that this either supports the comprehensive redevelopment of the Newington Triangle nor does it recognise the importance of the Triangle as a main gateway into the Elephant and Castle. We consider that a tall building on Newington Triangle sits with the cluster of tall buildings proposed to the south of the viaduct (87 Newington Causeway and Eileen House). However we consider that the role of a gateway building should be to the north of the viaduct as the position of a tall building south of the viaduct places the building more into the centre of the opportunity area. The logical position of a gateway tall building is to the north of the viaduct so as to provide a focus in views for those people travelling to the Elephant and Castle from the north. We consider this location would perform two functions; first as a gateway building from the north and secondly as part of the northern cluster of tall buildings in the Elephant and Castle which supports the provision of mixed use development in the Enterprise Quarter. The position of a tall building should be used as a signal to more important spaces and as such it should be recognised that the Newington Triangle is the gateway to the Elephant and Castle. The policy and supporting Figures 14 and 15 should be representative of this. Further to this it should be recognised that the Newington Triangle at nearly 1 hectare in size presents an ideal opportunity to support a tall building. Given the overall footprint that is available for development it would be simpler to achieve visual separation from adjoining development, particularly as the southern most neighbour is the railway viaduct and railway line. It would be more achievable to develop a tall building which is considerate of neighbouring property amenity and create a positive relationship with the surrounding buildings. The intention is to redevelop the entire</p>	

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					<p>Newington triangle through a series of phases which has been presented as a comprehensive Masterplan which has been subject to a number of discussions over the past three years and resulted in the joint development of a Planning Performance Agreement with Southwark Council. As highlighted in the appended documents the provision of a tall building on the site has been supported over the past years and we consider the SPD should be drafted to provide clear and unequivocal support for a tall building on the site.</p> <p>Proposed Change: Figure 14 and 15 should be amended to extend the gateway location on Newington Causeway onto Newington Triangle and identify Newington Triangle as a gateway location.</p>	
710	721	5 - Character Areas		Enterprise Quarter SPD 51 - Built Environment	<p>Hollybrook Ltd owns a very significant portion of land within the Enterprise Quarter, which is bounded by Newington Causeway, Borough Road and the railway viaduct known as the Newington Triangle. This site equates to nearly a hectare of land and is currently under-occupied with a series of ad hoc business units and commercial properties. Discussions with the Council have been on going for a number of years with planning officers about the proposals for the site. These discussions have centred on the delivery of a comprehensive development of the site with a large mixed use scheme. As demonstrated in these discussions this comprehensive approach is only possible if the majority of buildings within the Triangle are demolished. These discussions included dialogue with the GLA who were supportive of the scheme and the delivery of the mixed use comprehensive scheme. Of particular concern to our client is Figure 39: Heritage assets in the Enterprise Quarter character area. This identifies a number of buildings within the Newington Triangle Site as being Possible Locally Listed Buildings along both Borough Road and Newington Causeway and identifies a further building on Newington Causeway as a Building with Townscape Merit. The redevelopment of the Newington Triangle has been discussed in partnership between Hollybrook and the London Borough of Southwark for a number of years. Representations have been made to the Draft Enterprise Quarter SPD in 2007 and later again in 2008. Extensive discussions have been undertaken with</p>	<p>The council's approach is consistent with its approach in the 2008 SPD which shows both the Institute of Optometry and the café as being buildings with urban design quality, historic and architectural interest. Section 3.3 of the 2008 SPD indicated that such buildings should be incorporated into new development, unless it can be demonstrated that an alternative solution brings significant urban design benefit. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally them. The council will consult formally on the Local List and a Heritage SPD later in the year. At that point, there will be an opportunity for Hollybrook to make representations on individual buildings, prior to the finalisation and adoption of the list. The council recognises the fact that a pre-application discussion has taken place for the Newington Triangle site and is aware of the outcomes of that process. The council accepted Hollybrook's reasoning that the quality of their pre-application proposal justified a demolition of a number of the existing buildings. However, the planning application has not yet been submitted. Until a scheme has consent and implementation has occurred, the council considers it would be premature to make the changes proposed by Hollybrook. If an application is submitted, Hollybrook will have the opportunity to justify their proposal and as was previously the case, the council will consider the merits of the scheme with regard its impact on urban design and the</p>

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					<p>Southwark Council and the GLA regarding the redevelopment of the Newington Triangle Site in the last 3 years. At the start of discussions with the Southwark and Elephant and Castle Regeneration team it was jointly decided to establish a Planning performance Agreement for the Triangle site. Under the PPA a number of development principles were agreed. Of particular relevance to this section of the SPD it was agreed that within the Triangle there were a number of buildings which were considered to have some architectural merit, but equally it was agreed with officers that there were a number of buildings which did not, and which in turn could be demolished in support of the redevelopment of the site. It was further identified that none of the buildings were listed and the site was not in a conservation area. As identified in the PPA and in the letter from the Head of Planning dated 22 December 2009, all buildings on the site with the exception of the Baptist Chapel and 78-80 Borough Road could be demolished to allow for the comprehensive development to achieve the Masterplan for the site.. A review of the quality of the buildings was undertaken by Chris Miele of Montagu Evans and was submitted with the representations to the Draft Enterprise Quarter SPD in April 2008, along with a Townscape Analysis (prepared by Lifschutz Davidson Sandilands). We enclose copies of these documents to demonstrate the previous correspondence with the Council on this matter. The principles for the redevelopment were agreed with the Council and were discussed with the Southwark Design Review Panel, Local residents and the GLA. All parties were supportive of the comprehensive approach taken. We append the pre Application note from the GLA which highlights their support for thee development approach on the site. We are disappointed therefore since these previous extensive discussions with a number of stakeholders that this most recent iteration of the SPD includes buildings within Figure 39 which have previously been acceptable to exclude to achieve the comprehensive development of the site. The inclusion of these buildings within Figure 39 of the SPD and reference to their retention within policy SPD.16 has significant implications for the comprehensive redevelopment</p>	<p>architectural and historic environment.</p>

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					of the Triangle site and would unnecessarily prohibit future development from coming forward. The delivery of the Newington Triangle is important to achieving the objectives of the SPD and in delivering 4000 new homes, new jobs and new retail and leisure uses as well as assisting in meeting the need for student housing in the borough. Proposed Change: Figure 39 be amended as follows: Removal of the following buildings identified as Possible Locally Listed Buildings • London School of Musical Theatre – 83 Borough Road • Institute of Optometry – 56-62 Newington Causeway • London School of Accountancy building (annex to MORI building) – 77 Borough Road • 81 Borough Road Removal of the following buildings identified as Buildings of Townscape Merit • No. 38 Newington Causeway Reference to 77-81 Borough Road should be amended to indicate 78-80 Borough Road as potentially a locally listed building and 77 and 81 Borough Road as not being possible locally listed buildings.	
710	722	5 - Character Areas		Enterprise Quarter SPD 51 - Built Environment	Whilst Hollybrook support the creation of the proposed pedestrian routes shown on Figure 40 this would only be feasible through an agreement with a number of parties, namely Southbank University, Network Rail, the occupiers of the railway arches as well as Hollybrook. Whilst this vision is supported its delivery might not be deliverable. The provision of a pedestrian route through the Newington Triangle site is considered an important component of the redevelopment of the site and has been considered through the development of the Masterplan for the site, though the exact routes are liable to vary given the constraints as identified above so may not reflect the route as shown in this diagram. It should be made clear that the proposals within this Figure and supporting text are indicative only. We consider that Figure 40 should be amended to indicate opportunities for tall buildings within the Enterprise Quarter. We consider this should be similar to the approach in the current Enterprise Quarter which highlights on Figure 4.8 and 4.9. Proposed Change: Reference to routes being indicative only should be added. Locations for tall buildings should be added.	Support for the pedestrian route on Fig 40 is noted. The council do not consider it appropriate to show opportunities for tall buildings on the figure diagrams for the character areas. The strategy for tall buildings is illustrated in Figures 14 and 15.
710	723	Appendix 2-			Proposed Change: To ensure consistency with the	The Elephant and Castle SPD flags buildings which are

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		Public Realm strategy(Ent Qtr)			recommended amendments to Figure 39, we consider that Appendix 2 should also be amended to remove reference to the following: • London School of Musical Theatre – 83 Borough Road • Institute of Optometry – 56-62 Newington Causeway • London School of Accountancy building (annex to MORI building) – 77 Borough Road • 81 Borough Road Secondly, reference to 77-81 Borough Road as ‘South Bank University’ is incorrect. This building is occupied by MORI Ipsos and we consider this would be a more appropriate reference. Reference to 77-81 Borough Road should be amended to indicate 78-80 Borough Road as potentially a locally listed building and 77 and 81 Borough Road as not being possible locally listed buildings.	potentially locally listable. However, it does not in itself locally list them. We are proposing to amend the SPD to make sure that this is clear. We will consult formally on the Local List and a Heritage SPD later in the year. At that point, there will be an opportunity for the local community, developers and landowners, to make representations and provide evidence on individual buildings, prior to the finalisation and adoption of the list.
711	728	4 -The preferred option/options	SPD 1- Shopping		Support for the proposal to create a more attractive pedestrian route from the shopping centre along Walworth Road by providing active ground floor uses in new buildings on the redeveloped Heygate estate facing Walworth Road.	Support noted.
711	732	4 -The preferred option/options	SPD 11 - Walkng and cycling		Support for Wansey's Street's (Fig 12 p49) proposed status as a secondary pedestrian route, and not as a through route for vehicles.	Support noted.
711	736	4 -The preferred option/options	SPD 12 - Parking		Notwithstanding parking limitations on new development in the central activities zone, on street parking facilities for residents already living in Wansey Street should be maintained.	There are no plans to affect parking opportunities for existing residents, and our planning policies seek to ensure that there is no detrimental effect from new developments.
711	741	4 -The preferred option/options	SPD 17 - Building heights		Support for most of the general principles about local and design of tall buildings, but object to the wording of the second bullet point. Tall buildings can only conserve the settings of heritage assets by not being located near to them. The wording of this clause should be strengthened to reflect this.	We disagree. Developers seeking approval for tall buildings must demonstrate the impact on the significance of the Heritage Assets within their applications. According to English Heritage and Planning Policy Statement 5: Planning for the Historic Environment this consists of an applicant providing a description of the significance of the heritage assets affected and the contribution of their setting to that significance. The level of detail should be proportionate to the importance of the heritage asset. As circumstances vary with each development and the heritage assets concerned, this will be done on a specific basis by case.

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711	742	4 -The preferred option/options	SPD 18 - Open spaces		Figure 16 p62 needs to show the proposed Walworth Square (see detailed comments under SPD 27 below)	Figure 16 shows existing park provision as opposed to public squares and hard landscaped areas.
711	743	5 - Character Areas		Heygate Street SPD 25 - Land uses	Support in principle for the proposed secondary retail street running north from Wansey Street and parallel to Walworth Road. A good idea in principle but there is a lack retail viability evidence, from either Southwark or Lend Lease, to demonstrate whether a further shopping street would actually work commercially. To create a street with ground floor commercial space which subsequently remains boarded up and empty would immediately blight the area. Evidence is needed to support the proposal.	Support noted. It is crucial that the provision of a mix of uses is promoted on the Heygate site to achieve the vision of consolidated Elephant and Castle and the Walworth Road in to a major town centre and increase its appeal to a wider catchment. We set out in the Heygate Character Area guidance that we require a strategy to be provided for the provision of retail space on the site to ensure that it will contribute to improving choice in the town centre and to make sure it can be delivered successfully. This will include the provision of a retail impact assessment which will look at both current and future likely demand for additional development, taking into account population projections, forecast expenditure of comparison and convenience goods, and forecast improvements in productivity in the use of retail floorspace.
711	744	5 - Character Areas		Heygate Street SPD 26 - Transport and movement	On street parking for residents already living in Wansey Street should be maintained, even if it is to be limited for new residents.	There are no plans to affect parking opportunities for existing residents, and our planning policies seek to ensure that there is no detrimental effect from new developments.
711	745	5 - Character Areas		Heygate Street SPD 27 - Built environment	Built form - Support for the general design principles in this section, and in particular the standards on plot widths for apartment blocks which will help retain a human scale on local streets such as Wansey Street.	Support noted.
711	747	5 - Character Areas		Heygate Street	Public Realm - Qualified support for the proposed Walworth Square, next to the old town hall There is great concern among Garland Court residents that if too large or	We have signalled the general opportunity to improve the area in para 5.2.19 under SPD 27. There are opportunities to create significant new public spaces, including a market

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				SPD 27 - Built environment	inappropriately designed such a place could just become a focus for anti-social behaviour. To succeed it should be a small, green, landscaped space rather than a large, hard-landscaped square, brought to life by surrounding ground floor commercial activities and overlooked to create security by residents in new homes on upper floors in that section of the Heygate redevelopment. Fig 22 p87 should be amended to indicate a smaller square focussed around the front part of the old town hall, and SPD 27 text amended accordingly.	square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the Old Town Hall. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings
711	749	5 - Character Areas		Heygate Street SPD 27 - Built environment	Support for the proposed policies to protect the setting of the listed town hall and potential Larcom Street conservation area, by limiting the heights on new buildings to be consistent with either the height of the old town hall, or to three storeys on the northern side of Wansey Street opposite Garland Court and its Victorian terraced neighbours.	Support noted.
711	751	5 - Character Areas		Brandon Street SPD 29 - Land uses	Support for the strategy to maintain the residential character of the area.	Support noted
711	754	5 - Character Areas		Walworth Road SPD 33 - Land uses	Support for the proposal to maintain and support a lively commercial high street, and for the proposals to limit the proportion of hot food takeaways.	Support noted
711	758	5 - Character Areas		Brandon	Support for the proposed Larcom Street conservation area. The proposed conservation area should include Garland	Support noted.

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				Street SPD 31 - Built form and public realm	Court (an excellent example of how a modern building can be designed to integrate successfully with its historic neighbours) as well as the listed town hall and health centre (as the integral, civic component of the wider Brandon Street and Walworth community). Southwark is urged to designate this and the other conservation areas now if the associated built form policies are to be relevant.	
711	759	5 - Character Areas		Brand on Street SPD 31 - Built form and public realm	Fig 25 p93 Indicative proposals for the Brandon Street character area Objection to the proposal to identify the Stead Street car park as an opportunity site. It provides a valuable parking facility for local businesses and residents who need occasional parking facilities. There appears to be no material or evidence in the text of the draft SPD to support or justify the proposal, which presumably would lead to the site's residential re-development.	This site is allocated in the Southwark Plan. The justification for the inclusion of the car park in the Southwark Plan was set out in its preparation and was subject to consultation and a public inquiry.
712	756				Recent research shows there are over 300 local creative industries in the Elephant and Castle area. These range from larger national and international public venues (Imperial war museum, Ministry of Sound, The Coronet, Corsica Studios, Hotel Elephant Gallery), University establishments (London College of Communication and South Bank), clusters of artisan workshops (Pullen's Workshops) to individuals working from small premises and their homes. These cultural activities provide broad benefits to the community. They provide work for local people and bolster the local economy. Noted examples offer educational support. All contribute to a diversity and bring character and culture to the area. There continues to be interest in relocating, consolidating and expanding in the area.	Comments noted. We have out in the SPD the strategy of continuing to support creative and cultural industries within the Elephant and Castle area.
712	757	4 -The preferred option/options	SPD 6 - Wellbei ng - Social and commu		The SPD : The arts and cultural community in the Elephant and Castle feel that the planning framework and document (SPD) for Elephant and Castle should support the spirit of mayors cultural strategy. mailto: http://www.london.gov.uk/sites/default/files/Cultural-Metropolis-summary.pdf "If we don't constantly remind ourselves of the value of our cultural riches, if we don't invest	The SPD has recognised there is an opportunity to build upon the positive reputation of the Elephant and Castle as a creative area, improve its arts and cultural offer and strengthen and diversify the evening economy. This is set out in SPD6. We have amended SPD6 to include further encouragement of strengthening links with the two learning centres (London College of Communication and London

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			nity infrastructure		<p>in our infrastructure, if we don't protect our treasures, our buildings and heritage, and if we don't educate and introduce future generations to the pleasures and value of experiencing and producing culture, then much of this will be lost." The E&C planning framework should continue to work with the established London Cultural Strategy Group, "London is renowned for its national and international cultural riches, but it is equally important that the city's inhabitants have access to high quality local cultural services." "improve access and participation in high quality arts and cultural activities, this includes addressing specific transport issues" "There is a strong connection between London's physical environment and its cultural offer. It is crucial that the planning and development processes in the city continue to encourage culture to flourish in the capital's venues and public spaces." The arts community supports the point made in 4.5 of SPD to create attractive neighbourhoods with their own character. Supporting and reinforcing existing cultural industries in the area can only help this area to be a better /more attractive place to live and work . Benefits of Cultural Industries: The role of creative industries (CI) is about making a place that people want to be and to live; CI provide the life affirming pleasure everyone wants; CI brings the community together and acts towards developing that community in a diverse area; Continually we see the erosion of community spirit and community activity as England gets more corporate and more bland - places where people can meet and share are reducing; CI have proven to galvanise areas (Camden, Hoxton, Shoreditch) and create a sense of place where people want to be; CI are proven to be the first areas of business that redevelop post recession; If local people don't need to travel to seek their leisure activity this will be more sustainable in terms of transport; Culture spans all aspects of community and regeneration and is linked to business development; Educating young people into CI can only assist with aims to develop our communities and reduce crime and anti social behaviour as young people get inspired; In terms of viability CI should be linked to business development as music venues, galleries, local production help generate wealth; In any new town centre culture is an</p>	<p>Southbank University) and the wider arts scene. We have amended the supporting text to SPD6 to provide recognition of the importance of fostering partnerships between the educational institutions, local arts organisations and community groups in order to help broaden access to, participation in and understanding of the arts within the wider community, as the area physically develops. We have acknowledged that a vibrant arts, leisure and cultural scene, will bring employment, engage students, local people and visitors, and create opportunities for training and learning. The Council actively promotes and supports cultural events through various communication channels, such as the Council's Events webpage on the Council's website. The Arts and Culture team also offer support and resources to organisations and community groups throughout the area to help them deliver activities, events and workshops. With regard to Creative Industries, We recognise in the supporting text to SPD6 (Arts, Culture, Leisure and Entertainment) the contribution and importance this sector has in the context of the economic future of the borough. We set out that we will ensure new workspaces are designed flexibly to help ensure small creative and cultural businesses can continue to contribute to the success of the area. We have also added reference in SPD4 (Jobs and Business) to support the provision of incubator units and we continue to support the provision of flexible new business space in a range of sizes. We have also included support for the provision of creative and cultural industries in the railway arches (set out in SPD4) and included additional references in the supporting text to ensure the SPD supports the growth of creative and cultural industries in the borough.</p>

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					<p>important aspect; Activity across the day increases safety and reduces crime; CI can act to preserve heritage and bridge change as it can act as a cultural marker, much of which is being witnessed by activity currently taking place through a myriad of projects; CI has demonstrable links to health and many local projects work in this arena. By the same token the Elephant by way of its location lends itself as cultural destination which in itself could be built on.</p> <p>“Community, creativity and culture all will play a role in shaping the place that the Elephant and Castle will become, and in bringing forward the area’s potential as a cultural hub of London.” From Elephant and Castle website (Lend Lease)</p> <p>Without cultural life the area will become a huge new housing estate with little social activity, a replication of what was before. The local population is not mobile or wealthy, we all have a specific need to elevate the horizons of this local population, to improve skills and careers opportunities, to create a sense of ownership over its cultural legacy and its dynamic changes. The Mayor’s Cultural Strategy again reiterates “I want to make sure that at the local level, the spirit of participation and engagement in culture is unlocked, so that all Londoners, wherever they live and whatever their background, can fully enjoy what is on offer.” The cultural strategy must recognise the benefits that cultural industries brings to an area So what is it that the SPD should seek? CI are at risk “And London is a world city with a huge population where the demand for culture is both ever present and under threat if not protected” Mayor’s Cultural Strategy. Moving the emphasis from retail to culture: A creative economy Culture bolsters retail and works in conjunction with it - much of it is commercial but planning law does not differentiate. At an early stage the emphasis on embedding cultural activity and building on the businesses we have needs to be explored, before this is lost. Culture should have higher priority in document as at present relegated below other commercial activity and there is no reason not to link CI with shopping for instance. It is just as able to produce revenue. In other words the emphasis of the document is on retail overlooking the benefits of culture as a viable source of revenue and benefit to a wide community. Culture is more deeply rooted and</p>	

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					<p>sustainable in an area such as the Elephant and given an uncertain future for much of the retail sector and the local sustainable benefits of small to medium sized businesses in CI we would argue the emphasis needs re-evaluation. Culture community and business Undeniably there is a hidden high level of cultural activity in the area that could be under threat. This needs examination as culture bolsters commercial activity by providing an attractive destination to come to. and for people to live. Southwark and the developers should work with the London Cultural Strategy Group to look at infrastructural issues and the concerns of local businesses that wish to remain in the area, the universities that seek to retain alumini in the area, create and foster the right balance of premises (affordable, incubator and other models such as trusts). There are models in the area such as Pullens an integrated cultural/residential entity. Most CI develop (organically or embryonically) and thus rely on a site or premises that are affordable and not necessarily pre-judged as being the right space - its about space that is flexible and yes cheap, interesting examples exist in the borough and elsewhere in central London (Peckham). The E&C has a host of creative people and enterprises that could flourish alongside the bigger players like Ministry of Sound and others and nearby cultural icons like the Tate and Imperial War Museum and Siobhan Davies etc. The location is highly accessible in any event to develop a new sophisticated area for all areas of CI. London is a world city with a huge population where the demand for this is both ever present and more under threat. It all hinges on building on what you have, not letting this aspect of the new development be sidelined CI have track record of being first industries to flourish after a recession. Standards and space requirements and percentages need to be considered. We recognise that percent for art never worked as art and culture should be at the heart of a new redevelopment not an afterthought. None of this is easy but a place like the Elephant is steeped in history and culture and we must not lose this, but at the same time recognise its a dynamic and evolving area and must not be stifled by property developers that seek to gain profit but not respect local people and their</p>	

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					aspirations and needs, So much of London is losing its individuality and upcoming CI talent is stifled We seek a review of actual percentages of minimum land, a range of premises and land, both short term and embedded in the future development of affordable and other property and land for the use of CI businesses and community schemes defined. This should be set as conditions on developers and developments. Finally that the planning document should seek to develop a CI project bank for any available funds such as Section 106. Infrastructural conditions should reflect this. Finally, we consider a localised CI Trust to reflect these concerns be put forward as the best delivery mechanism to represent the diverse local interest. Supporting Partners: Diana Lees. Imperial War Museum Pullen's Studios Elefest Hotel Elephant Gallery Community TV Trust	
712	884		SPD 6 - Wellbei ng - Social and commu nity infrastr ucture		Please can this letter of support be added to the Hotel Elephant/Elefest representation ? See below: The director of SAF was nable to send support yesterday	Noted.
713	755	4 -The preferred option/options	SPD 6 - Wellbei ng - Social and commu nity infrastr ucture		I fully endorse the efforts being made to protect and develop existing cultural industries in and around The Elephant and Castle. The area has a unique, invaluable and, quite simply, irreplaceable cultural offer that brings credit to the area and greatly enhances its standing beyond being, what it has been seen as for so long, as a traffic interchange, a dangerous place to navigate and an area with little or no cultural standing. The rich veins of cultural workshops and activities that run through the area should be seen as potentially hugely attractive feature whose presence in an area commanding as little respect as the Elephant and Castle does, should be treasured and nurtured. I cannot emphasize strongly enough, from my personal and professional acquaintance with the area over the last 35 years, the	Comments noted. We have out in the SPD the strategy of continuing to support creative and cultural industries within the Elephant and Castle area.

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					massive value that the cultural industries bring to the area. I would urge you to make every effort to sustain and build on these and not risk their neglect, loss or migration. I am sure any area would be proud to boast of such a wealth of talent and creativity, which the borough should see as a source of pride, to be vaunted and brandished as a major plus in the area.	
714	760	4 -The preferred option/options	SPD 3 - Hotels		Description SPD 3 recommends the delivery of additional hotel bed spaces within the town centre and on the main roads leading into it. The GLA's Hotel Demand Study 2006 identifies the need for around 2,500 rooms (net) for Southwark to be provided between 2007-2026. Observations We strongly support the intention of SPD 3 to encourage the delivery of hotel bed spaces into the town centre and on the main roads leading into it. We consider that the core main roads, or areas, to which hotel development would be supportable, should be identified within the SPD. Newington Causeway, for example, could have the potential to deliver highly accessible hotel bed spaces in an area identified by Southwark as an 'Enterprise Quarter' an area with a concentration of education and employment uses which are characterised by a visiting population by providing temporary sleeping accommodation. Furthermore Newington Causeway is ideally located to provide access both to Borough and London Bridge to the north and the Elephant and Castle to the south with access to the underground and national rail networks. Conversely, main roads leading to and from the Elephant and Castle to the south are less accessible and do not provide easy access to activity hubs such as London Bridge and to central London. Recently permitted development, for example 89-93 Newington Causeway, and potential future permissions at Elieen House and Newington Triangle support the physical regeneration of the Enterprise Quarter and through exemplary high quality design will significantly enhance the appearance and character of this area, making it an area within which visitors would want to stay.	Support noted. SPD 3 is consistent with the overarching policy 10 in the Core Strategy which sets out policy where we will allow development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. We cannot be prescriptive about the size or type of hotel in the SPD. We would assess at the planning application stage, matters of design, relationship with other buildings and the impacts on local amenity.
714	761	4 -The preferred option/options	SPD 5 - New		Consultation Point Paragraph 4.2.4 Description The SPD requires developments within the opportunity area to comply	The Core Strategy and saved Southwark Plan policies provide sufficient flexibility. The Core Strategy sets out a

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			Homes		<p>with density policy guidelines set out within the Core Strategy to ensure that densities are appropriate for the character of the area and take account of the accessibility of public transport services. The Core Strategy supports a density level of 650-1100 hr/ha in this location. This accords with the 2011 adopted London Plan density matrix. The supporting 'Fact Box' to the density guidance identifies that the only exception to this should be when development has an exemplary standard of design. Observations We consider that the role of high quality design in determining acceptable levels of density should be afforded greater acknowledgement within the SPD. Furthermore, the characteristics and context of the site should also inform the level of density assumed acceptable. Recent developments that have been granted planning permission within the opportunity area support this; 89-93 Newington Causeway a significantly higher density was achieved and supported by Planning and Design officers at Southwark Council. This was attributed to the compact nature of the site that inevitably demanded high density levels, and the exemplary standard of design and residential accommodation offered. The development at 89-93 Newington Causeway, proposed to deliver 38 residential units over 22 storeys on a 0.026 hectare site, achieving 126 habitable rooms. Relative to the size of the site, a density of 4,962 habitable rooms per hectare was achieved. This clearly far exceeds the upper limit of 1100 hr/ha as required by the draft SPD, the Core Strategy and the London Plan, yet Officers supported the density on the grounds of the nature of the site and the high quality design approach proposed. Had the density guidelines been strictly applied, the site would deliver significantly less market, and consequently fewer affordable, new residential units and thus impacted upon the opportunity area and wider Borough attainment of housing, including affordable, delivery. The development at 89-93 Newington Causeway indicates that flexibility is essential to ensure that opportunities to achieve the vision set out for Elephant and Castle is fulfilled. The London Plan identifies opportunity areas as London's major reservoirs of brownfield land, with significant capacity to accommodate new housing and</p>	<p>wide density range, as repeated in the Core Strategy policies fact box in the SPD. It also allows development to exceed the density ranges in the opportunity area where exemplary standards of design are met. We feel that this provide adequate flexibility to take into account site specific circumstances, whilst ensuring that higher density schemes are excellently designed. The density policies are used alongside other important policies including saved Southwark Plan policy 3.11 on the Efficient Use of Land. The SPD maintains this approach.</p>

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					commercial space; typically 2,500 new homes or 5,000 new jobs or a combination of the two. The vision for Elephant and Castle is to regenerate the area into somewhere people wish to live, work and visit and which includes good housing, safe and attractive public realm and good connections. To achieve this vision, sites that are capable of delivering residential accommodation should be optimised upon and ensure that the greatest reasonable amount of new dwellings are provided. The quality of the proposed design and characteristics of the site should be identified as key determinants of what a site can reasonable achieve and we would recommend that that was reiterated throughout the SPD.	
714	763	4 -The preferred option/options	SPD 17 - Building heights		Consultation point Paragraph 5.8.4 Description The SPD seeks to create a more consistent townscape, by providing a higher quality of architecture and improving the relationship between buildings and streets. Observations We support the intention of the SPD to create a more consistent townscape and consider that examples of opportunities where this has, or could, occur should be included within the text of the SPD. For example, the recently permitted scheme at 89-93 Newington Causeway will significantly enhance the existing townscape, and in the event that Eileen House is granted planning permission, an overall more coherent and consistent townscape will begin to emerge. Futhermore, a site such as Northwoods Garage, which falls adjacent to the north of 89-93 Newignton Causeway, presents an opportunity where redevelopment would contribute to a more consistent townscape relative to proximate development activity. We consider that named examples such as these identify the principal opportunities within the opportunity area to create a more consistent townscape. They also emphasise that the vision of the SPD will not be achieved through the redevelopment of individual buildings; a comprehensive approach that addresses multiple sites and buildings is required to secure area-wide regeneration.	We recognise that changes are required within the Enterprise Quarter in relation to the quality of architecture and public realm. The purpose of the SPD is to coordinate an overall vision and framework within which planning applications from a variety of different leaseholders and developers can be assessed to attain good quality design and consistency within that framework.
714	764	4 -The preferred option/options	SPD 17 - Buildin		Consultation point SPD 17 Description The SPD supports the introduction of tall buildings within the opportunity area; the guidance recommends that these should act as focal	The support for the policy is noted. The council agrees that tall buildings should have an exemplary standard of design. This is stated in SPD17.

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			g heights		<p>points and strengthen gateways into the central area. The SPD requires tall buildings to be appropriate to the surrounding area and demonstrate an exemplary standard of design. Observations We support the intention of the SPD to encourage tall buildings within the opportunity area, and consider that they should be particularly encouraged as a gateway to the Elephant and Castle roundabout, for example along Newington Causeway within the Enterprise Quarter. Newington Causeway has begun to identify itself as a newly emerging local regeneration cluster within the opportunity area as a result of recent and potentially forthcoming planning permissions for developments which comprise tall elements at 89-93 Newington causeway, Eileen House and the Newington Triangle site. A precedent has been set for tall buildings within this area and future planning applications which include tall buildings should be viewed favourably as forming part of this cluster and reinforcing the gateway to Elephant and Castle. Furthermore, whilst the guidance identifies the value of high quality design we consider that this should be emphasised as a key determinant of the acceptability of a tall building and its overall contribution to the townscape should also be a consideration. The exemplary quality of design at 89-93 Newington Causeway was identified by Officers as central to its acceptability as a tall building.</p>	
714	765	5 - Character Areas		Enterprise Quarter SPD 49 - Land uses	<p>Consultation point Paragraph 5.8.7 Description The SPD seeks to promote the redevelopment or refurbishment of underused land and buildings through development which demonstrates high quality architecture and which helps to create a more consistent townscape. Observations We support the intention of the SPD to address underused land and buildings. However, we consider that reference should be made to specific sites or areas where this could be applied. Within the Enterprise Quarter, Northwoods Garage presents a currently underused site that detracts from the existing street scene, this will be exacerbated following the redevelopment of buildings falling directly adjacent or opposite to the site, for example 89-93 Newington Causeway, Eileen House and Newington Triangle. The Northwoods Garage should be identified within the SPD as</p>	The site is identified in Figure 6 as a potential development opportunity site

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					an example of a site requiring redevelopment, as its current physical appearance has the potential to negatively impact upon the regeneration of the wider Enterprise Quarter and detract from the efforts of surrounding redevelopment in achieving a consistent townscape.	
714	766	5 - Character Areas		Enterprise Quarter SPD 51 - Built Environment	<p>Consultation Point SPD 51 Built environment Description</p> <p>SPD 51 provides guidance on future development within the Enterprise Quarter, with reference to public realm improvements, the built form and building heights. The SPD seeks public realm improvements to establish a character for Newington Causeway as an 'urban street', to maintain a consistent height within the built form on Newington Causeway as an 'Urban Street', to maintain a consistent height within the built form on Newington Causeway, which should then diminish moving north to manage the transition to surrounding building development. Observations We broadly support the guidance relating to the Enterprise Quarter; however consider that the guidance could be improved by making reference to specific examples and sites of where the guidance should be applied in order to achieve the wider versions of the SPD. For example, in order to establish the character of Newington Causeway as an 'urban street' through public realm enhancements, there needs to be comprehensive redevelopment within this area. The impact of recent permissions such as 89-93 Newington Causeway, and the potential for future redevelopment at Eileen House and Newington Triangle will have a positive impact upon the street scene however the presence of poor quality, incongruous existing buildings that fall adjacent to these sites could potentially detract from this. The future redevelopment of Northwoods Garage for example should be supported and informed by what will be achieved by 89-93, in order to develop a consistent townscape and further establish the character of Newington Causeway. Whilst we support consistent heights on Newington Causeway, we consider that the extent of where these are acceptable and where heights should begin to diminish should be clarified. Recently permitted development at 89-93 Newington Causeway indicates that twenty storeys is acceptable; in the event that Eileen House is granted planning permission this</p>	SPD 51 notes that building heights should be consistent north of the viaduct. It is recognised that tall buildings in this area should be set back from the street frontages. The council considers that SPD together with SPD17 provide adequate guidance for tall buildings. Figures 14 and 15 illustrate the principles referred to in SPD 17. The council has deliberately avoided a prescriptive approach, preferring instead to put in place a framework backed up by detailed criteria. The approach suggested by Neobrand would not be consistent with this approach.

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					<p>development will be far taller and we understand that Newington Triangle could also accommodate a tall building in the future. The location of these three sites in close proximity to one another suggests that tall buildings should be introduced on available sites within this concentrated area, for example Northwoods Garage, adjacent to 89-93, in order to maintain a cluster of tall buildings and reinforce the gateway from the Enterprise Quarter to central Elephant and Castle. We consider that the SPD should clarify, or diagrammatically express, where taller buildings are acceptable and where heights should begin to diminish. However we do not consider that the extent to which building heights should diminish should be solely informed by the surrounding building development; this does not account for potential changes during the plan period to these heights and may unnecessarily limit the quantum of development that a site could reasonably achieve. The quality of the design, the contribution to objectives such as housing delivery and public realm enhancements, and the overall contribution to supporting the vision of the SPD should also be identified as determinants of the form of future development in the peripheral parts of the Enterprise Quarter as opposed to purely existing buildings types.</p>	
715	762	5 - Character Areas		Heygate Street SPD 27 - Built environment	<p>I have a shared ownership flat in Garland Court on Wansey Street, which directly overlooks the area outlined on the plans described as 'public realm', beside the council offices (formally the old Town Hall) The proposal to use the space for a public square concerns me because Wansey Street is a quiet no-through road, and apart from on weekdays, when there are people coming and going from the council offices, it is a relatively peaceful place to live. My concern is that people using the public square in the evenings, and at the weekends, will have no reason to consider residents living close by because a public square is designed to be used by people to congregate. There are no details in the SPD about how the square will be used, whether it will be a concreted or a grassed area. A paved area would attract skateboarders for example, and the square could be used for public events and possibly for demonstrations. Can you please add my concerns to the other comments from residents in Garland</p>	<p>This proposal has been identified as a development site in the next stage of the SPD. We have signalled the general opportunity to improve the area in para 5.2.19 under SPD 27. Further detail on the design of the space will be worked up through the application for the Heygate estate and public consultation will be undertaken on this. There are opportunities to create significant new public spaces, including a market square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the Old Town Hall. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications.</p>

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					Court, who are not opposed to the public square, but do not want this area to become a focal point for people to congregate and disturb residents living nearby, putting residents in an unfair position. I look forward to my comments being heard by the planning policy committee, and taken into serious consideration when they draft the master plan for Walworth Square.	They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings
716	767	4 -The preferred option/options	SPD 6 - Wellbeing - Social and community infrastructure		Corsica Studios is located in Units 4 + 5 Farrell Court, roughly in the centre of the row of railway arches located in the southern most part of Elephant Road. We moved into the Elephant and Castle in 2002 and over the last ten years we have developed the premises into a successful and award winning arts and music venue. Since 2004 we have had an ongoing dialogue with the council and, particularly, Jon Abbott in the Regeneration Team, in relation to the positive contribution that our business brings to the area and how the redevelopment will effect our organisation. Several references have been made in the current plans about some of the railway arches in Elephant Road being "opened up" in order to improve pedestrian access from one side of the railway line to the other and obviously we are concerned about whether our premises are likely to be affected by this scheme. Furthermore, it now seems that there is the potential for a residential development to be considered as part of the re-modelling of the Shopping Centre and, since this is immediately at the rear of our premises, we also have concerns about how our business may be affected by this if the scheme goes ahead. Should these plans be approved we are expecting these developments to have a significant impact on our current operations and would like to formally raise our concerns about this. At a recent meeting with the consulting team located on Walworth Road I was also informed about the proposed improvements of the Thameslink Station on Elephant Road and I have been told that this may also impact on our business. In any large regeneration project there are obviously likely to be many major changes but it seems that a lot of ideas are being proposed without any consultation with or regard for the existing, long-established businesses that are in the area and the fact that these ideas are consistently being	1. The Council will work with Network Rail, the shopping centre owner, and its development partner Lend Lease to achieve the objective of regenerating the railway arches. The area around Elephant Road and the arches is an important transition area between the Heygate development site and the shopping centre. (see comments below) 2. SPD5 sets out noise standards for new residential development which will help ensure appropriate sound insulation is built so that future occupiers and users of development do not suffer a loss of amenity from transportation and other environmental sources. We will require the submission of a noise assessment to ensure all potential noise impacts and mitigation measures have been properly considered. There is further guidance on this issue set out in our Sustainable Design and Construction SPD 2008. 3. The SPD supports the retention of existing businesses through SPD1, SPD2, SPD4 and SPD6. With regards to the railway arches, the SPD sets out the aspiration to reduce the barrier which the railway create and to make the central area more accessible from the Heygate development site and 50 New Kent Road site to the east. It is envisaged that the area will provide a new market square as well as shops, office and leisure space, cafes and restaurants. Providing strong links through the railway viaduct and shopping centre is critical to drawing pedestrian movement east of the viaduct and enabling commercial development on the Heygate and 50 New Kent Road development sites to flourish. The objective will therefore require opening up of some of the arches to create a through route. The Council's objective is to work with Network Rail, the shopping centre owner, and the Council's development partner Lend Lease to investigate options of how to achieve this objective. No decisions have

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					<p>mentioned throughout the literature being published shows little regard for the consequences of the development and the effect that this may have on our livelihoods. We would like to know whether certain decisions have already been made about the future of the railway arches, whether our premises is likely to be affected by any of the various schemes and, if so, to what degree. We would also like to see what remedial strategies are in place for businesses incurring business disruption in Elephant Road. We are extremely concerned that we would either have to close our business for an unspecified amount of time or that a worst-case scenario will occur and our business will have to close permanently and we will be displaced from the area. If there is even the slightest chance that this would be an outcome of the regeneration then we would like to request information about what measures might be in place to support any loss of business and potential relocation. Since moving into the area we have given a considerable amount of personal time participating in regular meetings with Southwark Council, Universities, creative and community organisations with the aim of creating a strategy for the Arts in the Elephant and Castle. Anya Whitehead, Head of Culture at Southwark Council, has been closely involved in much of this work and I understand that the documentation that we produced has been presented to the developers. It is our understanding that one of the main original aims of the regeneration was to focus on the potential for making the Elephant and Castle a creative and cultural hub and we believe that we are already a major contributor to this so I would like to receive some feedback on how these strategies and considerations will be realised from a practical point of view. In the Mayors Cultural Strategy, Boris Johnson describes London as a “cultural powerhouse” renowned all over the world. It is organisations like Corsica Studios that are the engine of these fine forces. “It isn’t just our national museums, landmark visitor attractions, beautiful buildings and illustrious institutions. Creativity, beauty and history resonate throughout the city and for some, their most valued cultural experiences will not be a treasure in a famous museum, but visiting an art gallery in the East End, watching a band play in Camden or</p>	<p>been made. Any business units which are displaced as a result of the opening up of rail way arches will be prioritised for new affordable space elsewhere in the area in accordance with SPD1. SPD4 supports the continued active use of the railway arches for a range of uses including small business space, light industrial uses and appropriate A or D class uses as these all make a positive contribution to the local economy. 4. SPD 6 recognises that the Elephant and Castle has a positive reputation as a creative area and it hosts many successful businesses, such as Corsica Studios, and organisations, vibrant arts festivals and a thriving multi-cultural arts scene. We have added additional supporting text to SPD6 to recognise that provision of new space which will bring value and opportunity to Elephant and Castle. Fostering partnerships between the educational institutions, local arts organisations and community groups will help to broaden access to, participation in and understanding of the arts within the wider community, as the area physically develops. A vibrant arts, leisure and cultural scene, will bring employment, engage students, local people and visitors, and create opportunities for training and learning. SPD 6 also recognises the growth of creative and cultural businesses in Elephant and Castle which provide significant employment and showcases the area’s talent. The SPD supports the continued growth of these industries as they are of great importance in the context of the economic future of the borough.</p>

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					<p>discovering an exemplar of 17th century baroque architecture. For many others of course, culture is not just a leisure activity but also a living – our dynamic, commercial creative industries provide employment for hundreds of thousands of Londoners.” Boris Johnson – Cultural Metropolis London is one of the most significant centres of cultural, artistic and intellectual life, with unrivalled collections of art, historical artefacts and architecture stretching across centuries and continents. At the same time, the city sets cutting-edge trends in contemporary culture, attracting the best and brightest of the world’s talent in art, fashion, film, design, music and theatre. Corsica Studios fosters all relationships with artistic excellence and provides the environment for this to grow and flourish. There is a strong connection between London’s physical environment and its cultural offer. It is crucial that the planning and development processes in the city continue to encourage culture to flourish in the capital’s venues and public spaces. It is vitally important that within any new development there is recognition of the significance of the cultural and creative sectors in making London a world city, and advocates continued support and investment. At this time of considerable economic uncertainty and rapid change, it must be considered how within this context we can maximise opportunities for the cultural life of London to flourish. As well as raising our concerns we would also like to express that we are excited by the prospect of being part of the new development and feel that we have both knowledge and capability to contribute enormously to the creative future of The Elephant and Castle. We are therefore eager to discuss the various opportunities that are on offer to existing businesses and to find out in more detail the timescales and provision for business disruption. So far, all the timescales have been vague and no-one has been able to say for sure what the final shape of the development will be nor make any reliable assurances for the future. We have been assured of how much our organisation brings to the area and how important our brand is for Southwark, both culturally and economically, but we would like to make these representations so that we can move the dialogue forward to</p>	

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					explore how this will be manifest within the new development	
717	769	4 -The preferred option/options	SPD 10 - Public Transport		<p>I fully endorse the proposals to convert London Road to two-way buses only traffic as stated in para 4.4.4 of the draft SPD. I also urge LB Southwark to press TfL to bring forward these proposals as a matter of urgency. I have witnessed in the past nine months two horrific accidents involving unwary pedestrians crossing London Road, and being hit by buses in the contra-flow lane. The sooner this lane is removed the better. There have been many comments on the implications of this change, and I would suggest that many would be positive: re-opening Lambeth Road to traffic from St George's Circus. This was closed some ten years ago in order to introduce the bus contra-flow lane. The effect has been to pointlessly divert car traffic up London Road, along Garden Row and then down St George's Road back to the the junction with Lambeth Road at the War Museum. This stretch of Lambeth Road has railway sidings on one side and only one residential buildings on the other. St George's Road is, in places, four lanes all going one way, and drivers enjoy the absence of oncoming traffic. I would not find it difficult to believe that two-way traffic would contribute to calming the mad rush. London Road is narrower and so could be more suited to a single lane of buses each way with a generous bike lane each side. Of course, in the long run, to have most of the buses replaced by the cross-river tram (as expressed in para 4.4.3) would be the preferred solution. When one counts the numbers of new commuters from the new tower blocks at Heygate and around, I simply don't see how existing buses and the Northern Line will cope. There are a lot of two and three bedroom family flats on Garden Row that face closely onto what is a busy cut-through (as per the first point above). The buildings are three or four stories and the close frontages create a tight sense of enclosure. Inappropriately large vehicles (such as fully-loaded skip lorries) cut down this road between London Road and St George's Road. Those of us with younger children are particularly unhappy about the existing traffic arrangements here. In the event of TfL taking forward proposals, all local residents and groups should be fully consulted on options and proposals. This is often not done in the case of road</p>	Support noted.

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					schemes, although they can have a much larger effect than buildings which require planning permission. I hope this case would be an exception.	
717	772	4 -The preferred option/options	SPD 18 - Open spaces		In order to value and pay adequate regard to the many endangered mature trees in the area, I request that CAVAT apply to all trees that are publicly owned, not only those with TPOs. Also that, as per City of London's SPD, large species trees MUST be replaced with large species trees on a ratio to be determined using the CAVAT mechanism of valuation. There are plenty of native as well as non-native large species trees that fit the bill. They define large species as a tree that grows to at least 15 metres and therefore offers meaningful and necessary canopy cover. I hope you will use all efforts to avoid the destruction of happy and healthy large trees.	SPD 18 states that the valuation of trees will be calculated using the Capital Asset Value for Amenity Trees (CAVAT) methodology. This applies to all trees in the opportunity area and not just those trees covered by Tree Preservation Orders. SPD 18 also states that replacement trees should result in a net improvement in canopy cover as measured by stem girth at the time of planting. This means that any replacement tree would be larger in terms of its proportion of canopy cover than the tree it is replacing.
718	783	2- History, Elephant and Castle today, challenges and opportunities			Harriet Harman has produced a telling report regarding the proliferation of betting shops in the walworth area, this is a major problem in economically deprived areas. These shops prey on the desperate and economically vulnerable in society as do the the loan and pawn shops prevalent in these areas. http://www.harrietharman.org/uploads/d2535bc1-c54e-6114-a910-cce7a3eff966.pdf	Local planning authorities have very little control over uses such as betting shops, pawnbrokers and pay-day loan shops. This is because often these uses do not require planning permission. Uses such as betting shops, pay-day loan shops, banks, estate agents and travel agents are categorised in the same "use class" (A2, financial services). Planning permission is not required for changes within the same use class. There is also a permitted change of use to A2 uses from a restaurant, pub or cafe. The council recently responded to a government consultation arguing that betting shops should be placed in their own use class which would give the LPA more control. However, this would require a change to the planning regulations.
718	784	4 -The preferred option/options	SPD 1- Shopping		A temporary capping of rents or subsidies would help small local businesses with a positive contribution to the area, during tough economic times	SPD1 requires at least 10% of new floorspace (GIA) in large retail developments (including refurbishments) over 1,000 sqm to be made available as affordable space. This includes discounted rents by not less than a total reduction of 40% below market rate averaged over a five year period. The imposition of a rent cap beyond the five year period would not be appropriate as it would be too prescriptive and it raises concern on how this could be monitored effectively, how enforceable it would be and how it would relate to other occupational costs such as the landlords

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						operating expenses, service charges and business rates. The provision of new shopping floorspace at Elephant and Castle will help consolidate its role as a major centre in our hierarchy of town centres in the borough. Over the coming years, increases in population and disposable income will help to increase expenditure and by providing more of a choice of shopping in the area will help to boost the local economy by attracting more shoppers from the local area and further away. This will aid in the overall success and revenue generation of independent retailers in the area and affordability of any potential rent increases.
718	785	4 -The preferred option/options	SPD 1- Shopping		Kennedy's butchers shop and other listed/significant properties should be part of any redevelopment strategy. The introduction of temporary uses/licenses to invigorate tired shop fronts and highlight the need for intervention are needed. Recognising a leisure/retail need or commercial opportunity for national and international companies to gain local exposure could provide much needed capital or limelight in moving troubled properties forward and breathing new life into shops such as Kennedy's. During the long-term redevelopment empty spaces should be temporarily used if possible (eg a Boxpark at the Shell garage next to Wansey Street is a very good idea. Try and keep the grass area next to it open so that a cafe, say, could spread onto it in the summer). A definite marriage between existing uses and recreational space should be sought. Warm weather should provide an opportunity for increased profits for local businesses	The SPD supports the improvement of shops fronts in the area. For example part of the strategy for Walworth Road is to reinforce the character by improving shop fronts and redeveloping buildings which are of low architectural quality. The Council has a programme called 'Improving Local Retail Environments' (ILRE) which provides funds to improve shop fronts and the public realm in shopping parades in the borough. The shops for improvement have already been chosen in each of the borough's Community Council areas for the current ILRE funding stream. There will be opportunity in the next funding stream to address more shop fronts in the area. The SPD supports interim use. We have amended Theme 3: Wellbeing: Social and community infrastructure with the objective of providing more and improved educational, health and community facilities which meet the needs of existing and future residents and support interim uses which promote these. Theme 7: Delivery: Making regeneration happen sets out the objective of ensuring that comprehensive redevelopment does not compromise safety and maximises opportunities to make use of vacant sites on an interim basis. The Heygate Street Character Area SPD25 encourages interim uses of development sites.
718	786	4 -The preferred option/options	SPD 2 - Markets		East Street Market: I think the current east street market should serve the local community and focus on affordable basics, from food to clothing... it obviously does this to a certain level as it stands. However, a little more variety and thought is needed with respect to the number of stalls selling	The SPD supports the continued operation of markets, including East Street market, and also the provision of new markets in the area. Markets can help enliven town centres, reinforce the identity of an area and help provide a more varied shopping experience. Markets also contribute

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					exactly the same produce, it would benefit from some diversity	towards promoting community cohesion and a new market square will be provided to the east of the railway viaduct (SPD 2). The Council is developing a Street Trading and Markets Strategy which will provide further emphasis on improving the operation of East Street market.
718	787	4 -The preferred option/options	SPD 6 - Wellbeing - Social and community infrastructure		E&C Shopping Centre: The centre needs a complete overhaul... some of the current retail and restaurant uses would remain and benefit from a rethink of the use of elephant and castle as an entertainment destination. An expanded cinema to tie in with current uses such as the bingo and bowling would help to add to its attraction. http://www.farmersmarketla.com/special_events/index.asp The grove farmers market in Los Angeles is a very successful entertainment destination with cinema, food court, shopping mall and small farmers market which could serve as a draw/destination for those out of the immediate area... not something to compete with the lower prices of east street market, or the high street of walworth road but something that feeds from east street and compliments it as an alternative. Putting elephant and castle on the regional/national map of destination retail and leisure.	Comments noted. SPD1 promotes expansion of retail floorspace in the centre to help consolidate its role as a major centre in our hierarchy of town centres. We set out that we will work with the landowner to transform the shopping centre through redevelopment or remodelling, supporting the introduction of new large 'anchor tenants' and promoting a wider mix of retail uses to strengthen the appeal of the town centre to a wider catchment. SPD2 (Markets) includes the objective of providing a new market square to the east of the railway. We have added additional supporting text setting out that a market could help bring vitality to the central area. Markets are part of the overall retail economy of the area and we will consider how they work with other forms of retail to enhance the economy of the area rather than compete with it or detract from it
718	788	4 -The preferred option/options	SPD 5 - New Homes		The definition of affordable housing should be revisited. Also, the percentage of displaced residents rehoused in the new scheme should be strictly assessed, families that have formed part of the walworth community for generations are lost in the 'gentrification' of such areas. A percentage of affordable housing provided is deceptive, I feel this is used as a smoke screen for dispersing lower income tenants.	The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. Within the Affordable Housing SPD we set out the income thresholds at which social rented and intermediate housing should be affordable. The SPD refers to both the minimum 35% target and the minimum numerical target of 1,400 new affordable homes. Appendix 1 of the SPD on implementation sets out some key committed

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						developments underway to help deliver more affordable housing. We have also updated our housing background paper and our development capacity assessment to show how much affordable housing we expect to come forward up to 2026.
718	789	4 -The preferred option/options	SPD 12 - Parking		The extended use of Streetcar spaces should be encouraged, I'd like to see the council work closely with positive commercial schemes offering incentive for 'take up' in the Walworth area	The Council supports the use of car clubs. We have one of the highest numbers of on-street car club spaces among London Boroughs, and will normally require developers to include provisions for car clubs within their Travel Plans.
719	818	4 -The preferred option/options	SPD 5 - New Homes		<p>SOCIAL HOUSING: Southwark, along with many other boroughs, has a housing crisis. There is a particular need for larger 3/4 bedroom properties which are not available at affordable rates in the increasingly inflationary private rental market. The stress of overcrowding on families leads to many social problems. Government benefit cuts will exacerbate the problems of local people with low incomes being able to remain in the area, leading to more social disruption as the links between families and communities are broken. The Council is already providing extensive subsidies to Lend Lease through demolition costs, interest and land sales and a large proportion of any new development must therefore provide genuinely affordable social housing.</p> <p>TENURE: Many developments in London are now being sold to buy-to-let landlords as there are very few mortgages available for first time buyers and increasing private rents make it almost impossible for, young people in particular, to save for a deposit. Restrictions should be placed on the number of properties available for private landlords and for second home buyers. Current legislation for private tenants does not provide for security of tenure. Most tenancies are for short periods only and increasing numbers of such short term tenancies do not allow tenants to become part of the community, and combined with the large number of current and proposed student accommodation in the area, only leads to the development of a transient population with no long term benefits for the people at the Elephant or the rest of Southwark. No further student accommodation should be allowed.</p>	<p>Social housing/Family homes. In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. Furthermore the Core Strategy requires a minimum of 60% of units with 2 or more bedrooms. This recognises the need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes. The Elephant and Castle SPD cannot amend these policies. In addition our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. These minimum space standards are approximately 10% larger than our previous standards and will help us to ensure the new development provides an adequate amount of space to create good living conditions. Tenure / buy-to-let - We cannot prevent new private homes becoming buy-to-let, but we can seek to improve the homes and area so that people who buy the properties want to live in the opportunity area.</p>
719	819	4 -The preferred	SPD 4		ECONOMY: Given the levels of multiple deprivation in	The SPD recognises the contribution which small and

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		option/options	- Jobs and Business		<p>Southwark and particularly around the Elephant and Castle, only an introduction of well paid jobs and training opportunities for local residents will bring any improvement to local businesses. Many shops in the Walworth Road and the shopping centre are empty and the only increase in lettings has been for poundshops, betting shops and loans sharks (loan shops). Recent developments (Strata, 120 Walworth Road, Printworks, the New Kent Road and Crampton Street) have also been unable to attract businesses. High rents have probably been a major part of this problem. The recently approved development in Steedman Street is proposing subsidised units for the graduates of the University of the Arts, though this will not necessarily provide any jobs for local people. All developers must be made to provide local people with job and training opportunities, not just in manual construction jobs, but at all levels. This will have to be rigorously enforced for all contractors, all the way down the sub-contractors chain. Developers and contractors should also draw up plans for involving local schools and colleges in their training programmes and recruitment. The redevelopment of the Elephant and Castle will take place over many years and must provide many opportunities for local youngsters, in a wide variety of skills, to have the chances for well paid careers.</p>	<p>medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's.</p>
719	820	4 -The preferred option/options	SPD 18 - Open spaces		<p>ENVIRONMENT: Publicly accessible green space should be increased as much as possible.</p>	<p>We set out in SPD 18 how we will expect all development to improve the overall greenness of places, through measures such as living walls and roofs and high quality landscaping. SPD 18 also states how we will expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest. SPD 18 also sets out how we will promote strategic green routes across the opportunity area. Our open spaces strategy sets out further information on improving open spaces and green links in the borough. We have set a final standard of 0.76 per 1,000 population in the SPD in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate</p>

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						redevelopment will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026.
719	821	4 -The preferred option/options	SPD 16 - Built form		MATERIALS: The traditional building material, prior to the 60s and 70s development of the Elephant, was London Stock brick. This should be the predominant material used in the redevelopment to prevent the reoccurrence of the concrete and steel architectural fad of that period.	SPD 16 Built Form refers to high quality design and the use of appropriate and attractive materials. The wording in this policy expresses a general principle. The aim is to create an environment which uses high quality materials and where appropriate the traditional materials that have been used in the area.
719	822	4 -The preferred option/options	SPD 10 - Public Transport		TRANSPORT: The Elephant and Castle is a major traffic hub. This brings large amounts of pollution to the area with increased health risks for local people. Public transport should play a greater role in order to decrease road traffic. Cycling needs to be encouraged by the improvement of facilities. Traffic lights should include filters for cyclists to avoid the many accidents caused by turning traffic. Lower stop signals should also be installed for cyclists to increase safety awareness among cyclists. More street level crossings should be provided to decrease the risk to pedestrians in a very high traffic area. Crossing times for pedestrians should also be increased to comply with Age Discrimination and Disability Discrimination legislation. The areas under the railway bridges along the Walworth Road and Newington Causeway need vastly improved lighting and the replacement of damaged anti-pigeon measures in order to make the streets under them less of an eyesore.	Support noted. All comments are addressed by general transport and planning policies including those in the SPD.
719	824				CONSULTATION: The redevelopment of the area will take place over many years and it is essential that local people are involved at all stages. The current policy of only informing residents in a very narrow area around a proposal is insufficient if any sense of community is to be fostered. Planning proposals should also be sent to Tenants and Residents Associations and other community groups, especially schools and youth groups, to enable much more widespread participation and encouragement of a community response to what is going to be a major and long term redevelopment. Regeneration has to be much more than just the bricks and mortar – it has to be about the people as well and they have to be included from the start.	Our Statement of Community Involvement 2008 (a statutory document) sets out how and when we will involve the community in the alteration and development of town planning documents and applications for planning permission. National planning laws set out the minimum standards for public consultation. For the SPD consultation, we have gone beyond these standards and have set out how we have engaged with the community, stakeholders and businesses in the preparation of the SPD in the Consultation Report. In undertaking the consultation programme for the SPD, we have needed to take into account the important roles played by the different groups and communities within the area to find out the best ways of involving people in the consultation. We have worked

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						with established networks and partnerships to try to make sure that people are being involved effectively. Our SCI also sets out our expectations on developers to undertake effective community consultation and engagement in preparing proposals.
720	830	4 -The preferred option/options	SPD 11 - Walkn g and cycling		As someone that often cycles through and around Elephant and Castle, I believe the opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
721	831	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
722	832	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
723	833	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
724	834	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate

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						and the cycle network beyond.
725	835	4 -The preferred option/options	SPD 11 - Walkn g and cycling		cycle to work most days. By far the most stressful and difficult bit of my journey is switching from the South East side of the E&C system to the North West - I cycle from Peckham to Holborn. This is a great opportunity to make a difficult journey fast, direct and car free - it's a choice of brave the roundabout and pray, or take a circuitous route that takes upwards of 10 minutes. A route from Hampton Street to Meadow Row, should be included in the SPD. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
727	826	4 -The preferred option/options	SPD 5 - New Homes		These representations are submitted to Southwark Council (the "Council") on behalf of our client Merryvale No.6 International Limited in respect of the Elephant and Castle Supplementary Planning Document / Opportunity Area Planning Framework (the "draft SPD / OAPF"). Our client has a land ownership interest in the Eileen House site, located at 80-94 Newington Causeway. A planning application for redevelopment of the site to provide residential, commercial and retail uses was submitted in March 2009 and subsequently reported to the Council's planning committee in October 2011 with a recommendation for approval (LPA Ref: 09/AP/0343). Members overturned the recommendation and resolved to refuse planning permission for the scheme. The planning application has subsequently been recovered by the Mayor of London and will be considered at a hearing on 12 March 2012. Our client and its professional consultant team have been involved in detailed discussions with officers at the Council for a number of years and welcome that the Eileen House site continues to be identified as a key redevelopment site within the Opportunity Area. We support the strategic objectives for the Opportunity Area, but would also like to make the following detailed comments on the draft SPD / OAPF Policy SPD 5: New Homes In order to be consistent with the Development Plan and to acknowledge that individual site constraints and circumstances could result in a lower provision of affordable or private housing subject to viability testing, we propose the following rewording of Policy SPD 5: "SPD 5: New homes • Development in the opportunity area will provide a minimum of 4,000 net new	This point referred to in the proposed change is already covered in existing policy and guidance. However, we have added in further wording for clarification from Core Strategy policy 6 into the fact box to include " Requiring as much affordable housing on developments of 10 or more units as is financially viable". The Core Strategy sets the policy of a minimum of 35% affordable housing and a numerical target of 1,400 affordable homes within the Elephant and Castle opportunity area. Our evidence in our Affordable Housing Viability Study (2010) and our studies looking at housing need justify this approach for the lifetime of the Core Strategy. The housing background paper which supports the Core Strategy sets out that a financial appraisal can be submitted to justify a departure from this policy if it is not viable on a specific site. Our Affordable Housing SPDs (both draft and adopted) provide further detailed guidance on requiring a financial appraisal to justify this. We will continue to follow this approach

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					homes between 2011 and 2026, including at least 1,400 affordable homes. Most of these homes will be delivered on proposals sites. • In accordance with Core Strategy Strategic Policy 6, development should provide as much affordable housing as is reasonably possible whilst also meeting the needs for other types of development and encouraging mixed communities. This will be done by requiring as much affordable housing as is financially viable. The Council will seek We will apply our Core Strategy policies to ensure that at least 35% of homes are affordable within the Opportunity Area and at least 35% are private and that a range of sizes of homes are provided. The noise levels required for new homes should be amended to reflect World Health Organisation (WHO) guidelines. The criteria for bedrooms and external spaces reflects WHO Guidelines and British Standards, however the criteria for living rooms does not reflect the Opportunity Area's central London location and requires noise levels aimed at preventing sleep disturbance. This is not considered appropriate for a living room and should be increased from 30dB LAeq to 35 dB LAeq.	
727	827	4 -The preferred option/options	SPD 15 - Public realm		Policy SPD 15: Public Realm We welcome the guidance set out in SPD 15 which seeks a partnership approach between TfL, developers and the local community to transform the quality of the public realm in the opportunity area. The redevelopment proposals for the Eileen House site have been progressed in close consultation with a variety of stakeholders and include a comprehensive area of new public realm that will act as a gateway to London Southbank University. Figure 15: Tall Buildings Strategy (north) We welcome the identification of the Eileen House site as a gateway location to the Elephant & Castle town centre Policy SPD 16: Built form We propose the following rewording of Policy SPD 16 in order to ensure compliance with PPS5, the Adopted London Plan and to acknowledge that a reduction in massing is not and should not be the only option to develop a human scale: Development proposals should: • Be of high density, appropriate to their location, existing building form and massing and the index of public transport accessibility (PTAL). • Help to create a sense of place and distinctive neighbourhoods, reinforcing elements of the existing	We already have a policy on density in SPD 5 and Core Strategy policy 5. We generally require development to consider the setting of heritage assets. Further policy and guidance on considerations of setting will be set out in a Heritage SPD. We will change the wording in SPD 16 to consider that the design buildings of an appropriate massing of buildings to create a human scale of development at street level. SPD 17 has been amended. The height to width ratio has been changed to 1:4-1:6. It has also been clarified that it is an important consideration where buildings will have a significant impact on the skyline.

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					<p>environment which have good character. • Conserve and enhance the character of designated heritage assets and their settings unless it can be demonstrated that the development proposal meets the criteria specified in Policy HE 9 of PPS5. • Retain locally listed buildings wherever possible. • Consider the retention of buildings which are identified as having townscape merit or ensure that the design, scale and massing of replacement buildings reinforces the character of the surrounding townscape. • Provide an appropriate sense of enclosure, helping create well defined streets and public spaces. • Introduce a finer grain of development by: -- Creating blocks which pedestrians and cyclists find easy to move around. -- Creating an interesting and varied roofline. -- Reducing the Design buildings of an appropriate massing of buildings to create a human scale of development at street level. -- Interacting with the streetscape through providing active ground floor frontages with frequent windows and entrances and active ground floor uses in appropriate locations. • ...”</p> <p>Policy SPD 17: Tall Buildings We consider the reference to width to height ratios within Policy SPD 17 to overly prescriptive and should be deleted, or reference should be made to the EH-CABE Guidance paragraph 4.1.5 which states: “The architectural quality of the building and its scale, form, massing, proportion and silhouette, facing materials and relationship to other structures. The design of the top of a tall building will be of particular importance when considering the effect on the skyline...” Paragraph 4.5.16 We submit that it is not appropriate to set a defined height to width ratio for tall buildings that does not take into account individual site characteristics, surrounding context and key views, and therefore propose the deletion of this reference within paragraph 4.5.16. We request that we are kept informed with the progress of the draft SPG / OAPF, including the changes resulting from Appendix 3: Schedule of buildings which have the potential to be locally listed. Should you have any queries regarding these representations please contact Richard Ward of this office.</p>	
727	828	5 - Character Areas		Enterprise	Paragraph 5.8.7 We submit that the strategy for the Enterprise Quarter should include a reference to its capacity	We have amended SPD 49 to state more clearly that residential use will be supported in the Enterprise Quarter.

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				Quarter SPD 49 - Land uses	to support new residential development subject to compliance with other policies within the SPD and Development Plan. Policy SPD 49: Land Uses We consider that Policy SPD 49 should also recognise that existing businesses in the Enterprise Quarter should not harm the reasonable operation of any proposed uses that will contribute towards the wider policy objectives for the Elephant & Castle opportunity area as set out in the Development Plan.	Para 5.8.8 also refers to the potential to introduce residential use into the area. We consider that this adequately addresses the point raised. SPD49 sets out that development should ensure that residential use does not harm the reasonable operation of surrounding businesses
727	841	5 - Character Areas	SPD 17 - Building heights	Enterprise Quarter SPD 51 - Built Environment	Paragraph 5.8.9 This paragraph should acknowledge that the 89-93 Newington Causeway site benefits from a planning permission for a residential tall building.	The paragraph referred to relates to land uses rather than building heights and consequently the proposed change would not be appropriate.
728	836	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
729	837	4 -The preferred option/options	SPD 11 - Walking and cycling		As a resident of the area and a user of the Cyble Hire Scheme I feel that there is an opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row. This should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
730	839	4 -The preferred option/options	SPD 11 - Walking and cycling		I am writing regarding the plans to develop Elephant and Castle over the next 15 years. While there is no question that the area needs regenerating and developing to provide a better environment for the future, I am concerned about the provision for bicycle traffic. At present the cycle facilities in the area are at best in the form of a slightly more visible cycle lane, at worst an inconvenient mess which even experienced riders like me would rather avoid all together.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond. While cycling infrastructure is appropriate in some places, the Council hopes to make

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					They provide a great disservice to people who have no choice but to use them. I am encouraged by the appearance of the following text in the supplementary planning document: "Supporting and encouraging the use of public transport, together with walking and cycling, is essential because the road network simply does not have the capacity to accommodate many more cars." But the opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the supplementary planning document. It should be a clear, direct route, enabling fast and traffic-free travel for bicycles and cyclists of all standards. Please amend the SPD to provide for this route.	all streets safe for cycling through a variety of measures, together with free cycle training for residents and workers in Southwark.
731	838	4 -The preferred option/options	SPD 11 - Walking and cycling		I'm a cyclist living in Lambeth who regularly cycles through Southwark on my way to work. The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
732	829	4 -The preferred option/options	SPD 11 - Walking and cycling		I am shocked to hear that the eastern cycle improvements to E&C might not be made. How can you lose this possibility, as cycling moves to the forefront of every council's agenda? Hampton St to Meadow Rise should be part of the SPD: a car-free, safe route. To do otherwise is shocking	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
733	843				I write on behalf of the Southwark Council Liberal Democrat group in response to the consultation on the Elephant & Castle SPD/OAPF. Having taken the difficult decision as an administration almost a decade ago to proceed with the regeneration of the area, including the demolition of the Heygate Estate, we are supportive of the Council's plans to bring improved transport, green spaces, and most importantly new affordable housing to the area. However, we do have a number of concerns as well as ideas on how the SPD/OAPF could be strengthened in order to more closely reflect the views of residents and community groups	The support for the overall regeneration of the area is noted. We address each of the concerns in detail.
733	844		SPD 5		Housing We believe that the council should be ambitious and	The Core Strategy and saved Southwark Plan set out our

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			- New Homes		aim to achieve at least 35% affordable housing within the SPD/OAPF area. We also feel strongly that affordable housing should be provided on site within new developments. We believe that an over concentration of student accommodation should be avoided in any of the communities which surround the Elephant & Castle. Any student accommodation should be part of a strategically approved plan and speculative generic student accommodation on windfall sites should be discouraged	policies for affordable housing across the whole of the borough. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6). The SPD cannot change our policies. This is a minimum and we will encourage developers to exceed this. With regard to student homes, SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character.
733	845		SPD 10 - Public Transport		Transport We support plans to limit the number of car parking spaces in new developments as part of wider work to reduce carbon emissions within the borough. Equally, we support the continued ambition to remodel the northern roundabout to create a more pedestrian and cycle friendly environment. Careful consideration should be given to the impact on residential amenity of existing properties from servicing points located in narrow side and back streets within new developments. As part of encouraging cycling, and increasing the use of public transport by new residents, we suggest that where feasible (and consistent with pedestrian safety) the Council and Transport for London look at installing segregated cycle lanes on existing main roads, and looks again at the possibility of future-proofing the area to allow for a 'light-tram'-type system to extend mass transit south towards Camberwell and Peckham. We would also like to draw attention to the very strong level of concerns that have been expressed by local residents about the potential for creating a 'bus-only street in London Road and revert St George's Road to two-way operation'. We urge the council to properly consult with local people as any changes must be seen as part of a wider review of traffic, cycle and pedestrian movement in the area.	Support noted. Our planning policies require developments to make adequate provision for servicing. Any proposal that would lead to disruption on any street would be resisted. While cycling infrastructure is appropriate in some places, the Council hopes to make all streets safe for cycling through a variety of measures, together with free cycle training for residents and workers in Southwark. A route for the "Cross River Tram" is safeguarded within the SPD. The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
733	846		SPD 16 -		Existing buildings We believe that the Council should assess the possibility of a conservation area covering the Walworth	The policies in the SPD were informed by a study of the character of the area. This study used current available

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			Built form		Rd to reflect the rich array of historic buildings	evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
733	847		SPD 18 - Open spaces		Green and open spaces We are supportive of the creation of new open spaces, such as those delivered at Nursery Row and St Mary's churchyard under the previous council administration. Where new space is created we feel it must be publicly accessible at all times. We also believe that there are opportunities to increase the number of 'play streets' in the area following the example of streets such as Liverpool Grove and the excellent work by local people around Mason Street and Chatham Street.	Support noted. Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces. Our draft Open Space strategy sets out further information on green links in the borough and recommendations for improving the quality of our existing open spaces, we will consider more detail on Play Streets as part of the consultation on the draft Open Space Strategy.
733	848		SPD 9 - Community facilities		Faith communities We are concerned that the place of faith communities and their buildings are not recognised as a resource properly within the document and that this issue should be addressed in a submission version of the SPD/OAPF	Southwark Council recognises the difficulties that faith groups experience in finding suitable premises. We are proposing to amend section 2 of the SPD to clarify that there are a range of faith communities in the opportunity area and that the current and future needs of these groups need to be taken into account as development takes place over the plan period. Policy SPD 9 provides a framework to consider impacts on faith premises. Places used in connection with worship are referred to in the list of community facilities in the "fact box" in SPD9. We are proposing to add a cross reference to Southwark Plan policy 2.1 to reflect the fact that we protect valued community facilities.
733	849		SPD 9 - Community facilities		Schools With the potential for up to 6,000 new homes, including more family sized housing we are concerned about the lack of new primary school provision within the document. With many local schools already at capacity we strongly urge the council to look again at providing more school places through the SPD/OAPF	There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work.
733	850		SPD 9		Health facilities In addition to our concerns about local school	We will work closely with NHS Southwark to determine

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			- Community facilities		places, we are equally anxious to ensure that local people are properly served by local health facilities. We are concerned that the SPD/OAPF lacks detail when it comes to how increased demand will be met.	whether there are sufficient health facilities in the area to support demand. Further detail is set out in the infrastructure plan in section 6.5 of Appendix 1. There are no proposals for new health facilities in the short to medium term. The infrastructure plan (6.5.24) has been amended to reflect a potential need for enhanced facilities in the Enterprise Quarter in the longer term. The need for health facilities will be kept under review as development takes place.
734	842	4 -The preferred option/options	SPD 15 - Public realm		1. As regards the proposed new Town Square on the corner of Walworth Road and Wansey Street, I believe the SPD does not give sufficient consideration in respect to local residents who live close to an open public realm space. My concern is that this space will be paved over and become something similar to Brixton Town Hall Square, where the space will not co-exist comfortably with a residential area. I would expect to see a majority landscaped space (rather than a grey faceless paved area) that would make a fitting entrance to Wansey Street, which could become a part-pedestrian area, with cycle paths and a speed restriction, and ear-marked as a conservation area. I am in favour of progress and regeneration, but not at the expense of the reasonable considerations of residents living on the boundary of the regeneration area. 2. The opportunity area landscape must be accessible and the split between public and private space needs clarification. Spaces must be well designed to encourage people to meet and linger outdoors.	We have signalled the general opportunity to improve the area in para 5.2.19 under SPD 27. This proposal has been identified as a development site in the next stage of the SPD. Further detail on the design of the space will be worked up through the application for the Heygate estate and public consultation will be undertaken on this. There are opportunities to create significant new public spaces, including a market square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the old Town Hall. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings We have amended the text in SPD 15 to include the following bullet points: • Makes clear the distinction between public and private space
734	851	4 -The preferred option/options	SPD 10 - Public Transport		3. Streets and roads in and around the opportunity area should be designed and designated as 20mph maximum to encourage walking and cycling 4. The TfL roads and especially the northern roundabout at the E&C and the New Kent Rd need to be made far safer for pedestrians and	Away from the main roads almost all the streets to the south/east of Newington Causeway and Newington Butts are already within 20mph zones. Policy SPD 27 is sufficient to allow for the introduction of further 20mph limits as nearby development comes forward. Policy SPD

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					cyclists	11 proposes considerable work for the northern roundabout, together with improvements to crossing facilities on New Kent Road.
734	852	4 -The preferred option/options	SPD 3 - Hotels		5. Whilst the SPD provides for a potential for up to 6,000 new homes, this will have a real impact on the requirements for new schools and additional school places. As there are no proposals for new schools within the SPD area, it is crucial that real targets are analysed, understood and set around school needs. All of the schools in the area are already more or less full. Therefore, more understanding of this issue is needed in the SPD and clear ideas set down as to how the education committee envisage provision of additional school places will work.	There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work.
734	853	4 -The preferred option/options	SPD 4 - Jobs and Business		6. Southwark Council should recognise the important contribution of small retail units (East Street, Rodney Road etc) and street markets to providing goods that local people can afford and as local employers. 7. Affordable retail units with only a 5 year tenure is not long enough to allow independent, locally developed businesses to become self-sustaining. 8. The SPD should also include a requirement to assess the retail need along Walworth Road and maximums need to be set for shops such as payday loans, pawn shops and betting shops etc.	1. SPD1 recognises the importance of small shops in the opportunity area and the contribution they make to the local economy. We have also amended the supporting text to SPD1 to provide further recognition of the value and contribution of local shops in the area. 2. Five years is considered a reasonable amount of time for a business to establish itself. The imposition of a rent cap beyond the five year period as set out in SPD1 is not considered appropriate as it would be too prescriptive and it raises concern on how this could be monitored effectively, how enforceable it would be and how it would relate to other occupational costs such as the landlords operating expenses, service charges and business rates. The Council's Economic Development currently funds Business Support advisors which are available to support businesses in the area. 3 Local planning authorities have very little control over uses such as betting shops, pawnbrokers and pay-day loan shops. This is because often these uses do not require planning permission. Uses such as betting shops, pay-day loan shops, banks, estate agents and travel agents are categorised in the same "use class" (A2, financial services). Planning permission is not required for changes within the same use class. There is also a permitted change of use to A2 uses from a restaurant, pub or cafe. The council recently responded to a government consultation arguing that betting shops

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						should be placed in their own use class which would give the LPA more control. However, this would require a change to the planning regulations.
734	854	4 -The preferred option/options	SPD 17 - Building heights		Tall buildings 9. The SPD must demand evidence that tall buildings will not have a negative effect on micro-climate in and around the opportunity area	SPD 17 states that tall buildings should avoid harmful microclimate effects. This would include effects on sunlight and wind patterns. Developers would need to demonstrate this in submitting applications.
734	855	4 -The preferred option/options	SPD 20 - S106 Planning obligations and the community infrastructure levy		10. The benefits of S106/Community Infrastructure Levy (CIL) payments from developers must be spend prioritised on community project such as green routes, social rented housing, affordable retail and improvements to community facilities. This budget needs to be ring fenced and protected. Much of the success of the SPD from the point of view of local people depends on the actual creation of the improvements set out in the SPD. At present there are real fears that the vast majority of the contributions by developers will be allocated to Transport for London for its high profile and extremely expensive transport improvements at the E&C. Although these may have an indirect benefit to local people the principal beneficiaries will be those travelling through the local area or coming into the area to shop or spend leisure time. Unless the improvements that are outlined in the SPD such as green links or improvements to community facilities are created then the regeneration will simply be shoehorning more people into a dense space without any improvements. The S106 spend must directly benefit the local community.	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible

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						than s106, there will be more certainty over the delivery of projects.
734	856	3 - Vision and objectives	SPD 16 - Built form		<p>11. Southwark Council should create a Conservation Area along the length of the Walworth Road in order to preserve the historical legacy of the Elephant and Castle area. Walworth Rd possesses a sufficiently rich array of historic buildings to justify its designation as a Conservation Area in the medium term. I would like to see this supported in the SPD and recognition of the capacity for heritage led regeneration for the area.</p> <p>12. I reject Southwark Council's brief report which determined that there was insufficient potential for a conservation area along the Walworth Road, particularly when comparing the area with that recently successfully designated in Peckham. Too much weight appears to be given in the assessment to the decline in integrity of historic shop fronts at ground floor level. Rather this should emphasise the urgency with which conservation area protection is required, in order that funding schemes such, as the HLF's Townscape Heritage Initiative, can be investigated to improve the situation and unlock the potential of the high street's historic character.</p> <p>13. Heritage assets in the enterprise quarter character area should be retained. I strongly support the retention of the terraces on Borough Road east of the railway line and the Georgian building on Newington Causeway. A major task will be to protect these buildings when previously the intention was to flatten the whole Newington Triangle site and offer that up the development.</p> <p>14. I believe the SPD should also detail a number of local heritage buildings that deserve to be included in the PSD, either in terms of being locally listed or having townscape merit. I feel the loss these buildings would be a grave loss to the local area and its character. Buildings include • Penton Place – south of Manor Place • Penrose Street – north side • Penrose St – corner of Penrose Grove • Walworth Road – the newsagents north of NatWest bank and buildings above Bagel King and Chicken Cottage • The buildings on East Street at its junction with the Walworth Road (which includes the Halal meat shop).</p> <p>15. Outside of the SPD area and existing local conservation areas, other buildings that I would like to recommend for local listing</p>	<p>The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road. The Elephant and Castle SPD flags buildings which are potentially locally listable. However, it does not in itself locally list them. We are proposing to amend the SPD to make sure that this is clear. We will consult formally on the Local List and a Heritage SPD later in the year. At that point, there will be an opportunity for the local community, developers and landowners, to make representations and provide evidence on individual buildings, prior to the finalisation and adoption of the list.</p>

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					include: a. The Surrey Memorial Gardens Hall. b. The Southwark Environment & Leisure building on Penrose St (opposite the vehicle entrance to Morrison's. This has 2 commemoration stones set into the front wall. c. The pub the Robert Peel on Hillingdon St. d. Manor Place Terrace 169-181 Manor Place SE17 e. The Royal Standard Pub. The only pre-Brandon Estate building that remains in the area f. Former National builders merchant Victorian buildings (2 from the early and one from late 1800s)	
734	857	4 -The preferred option/options	SPD 9 - Community facilities		16. Strict assessment of the creation of and provision of community facilities should be required at planning application stage to ensure the facilities created are viable and are carried through to completion. 17. There is insufficient recognition of faith communities and their buildings as a resource within the SPD and I feel that further work and comment should be made in respect of the social capital these group's offer to the wider community.	The provision of a range of community facilities is an important part of our vision for future growth at Elephant and Castle. For schools and health centres, we work closely with partners to understand the current demand for facilities and the future needs that will be created as development takes place in the opportunity area. When dealing with the provision of more general community facilities at the planning application stage, our role is largely limited to considering details about the space to be provided, as opposed to the eventual occupant. However, Core Strategy policy 4 sets out that we will we require new community facilities to be flexible enough to accommodate a range of different community uses, so that in the event that a particular use proves unviable, the space is suitable for other community groups and uses. We also require a management plan setting out who the identified users are and how they will use the facility. Southwark recognises the difficulties which faith groups experience in finding suitable premises. We are proposing to amend section 2 of the SPD to clarify that there are a range of faith communities in the opportunity area and that the current and future needs of these groups need to be taken into account as development takes place over the plan period. Policy SPD 9 provides a framework to consider impacts on faith premises. Places used in connection with worship are referred to in the list of community facilities in the "fact box" in SPD9. We are proposing to add a cross reference to Southwark Plan policy 2.1 to reflect the fact that we protect valued community facilities.
734	858	4 -The preferred	SPD		18.The Walworth area is extremely deprived (based on	We set out in SPD 18 how we will expect all development

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		option/options	18 - Open spaces		national green space rankings) in relation to public green space. Southwark Council should agree and set targets for access to open space as part of the SPD work (perhaps by ward or by Lower Super Output Area (LSOA) as these better reflect neighbourhoods that can be walked or cycled to). 19.Southwark Council should ensure that when development is considered, open space is also created that benefits both new and existing local residents and should be publicly accessible at all times. 20.Southwark Council should consider creating open/green space throughout the area. Innovative approaches can be used to turn streets with excess capacity (partly aided by the sharp decline in vehicle ownership throughout the local area) into green spaces or play streets. A good example of this might be Liverpool Grove between the Walworth Rd and St Peter's Church, and the Wansey Street and the southern edge of the Heygate opportunity area. 21.The SPD specifically references the Carter Place green/open space. Given the fact that the Planning Inspector has given the green light for its development, I do not understand its inclusion in the SPD as a meaningful site for consideration as publicly accessible green space. The SPD/Southwark Council needs to make clear what is now realistic.	to improve the overall greenness of places, through measures such as living walls and roofs and high quality landscaping. SPD 18 also states how we will expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest. SPD 18 also sets out how we will promote strategic green routes across the opportunity area. Our open spaces strategy sets out further information on green links in the borough. We have set a final standard of 0.76 per 1,000 population in the SPD in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate redevelopment will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026. We have included reference to Carter Place to safeguard this site, should development not take place and the site becomes available for protection in the future.
734	859	5 - Character Areas		Central Area SPD 21 - Land uses	33. Southwark Council should recognise that in the longer term the Arches can fully transform into a thriving Latin Quarter for London.	We agree and recognise this in paragraph 5.2.12. We have amended the background text to SPD4 to make the potential for arches clearer.
734	860	5 - Character Areas		Walworth Road SPD 35 - Built form and public realm	34. The Walworth Rd project needs to be completed	Policy SPD 39 seeks public realm improvements. This allows for consideration to be given to the implementation of improvements at the northern end of Walworth Road. Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of

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						further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.
735	908	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route. This is for the many cyclist who travels around the area and the many generations of cyclists to come. Plan and invest well in the interest of people who live, work and travel past E & C. Make Elephant and Castle stand out from the rest of London and make it future proof.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
736	915	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
737	924	4 -The preferred option/options	SPD 11 - Walkn g and cycling		I work in Southwark (though I live in Lambeth) and I use a bicycle to get around - to and from work, to do shopping and other day to day activities. I often find that I have to travel through Elephant and Castle. The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
738	867			Heygat e Street SPD 27 - Built environ ment	I very much welcome the opportunity to submit comments on the SPD and support many of the good proposals contained within the report. My personal submission concentrates mainly on Wansey Street, where I live. Garland Court Tenants' and Residents' Association Committee (of which I am Treasurer), has submitted a more widely focused response which I endorse. A key issue for me is that Wansey Street does not feature in the SPD (found only 3 times in the document). However, it directly borders the Heygate Estate Area and potentially will have a huge impact on Garland	The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to reflect this. The wording in SPD16 has also been

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					Court / Wansey Street residents. It will be important to consult with residents specifically about development plans for Wansey Street and I look forward to taking part in future discussions / consultation particularly in relation to any potential adverse impact on residents and what measures will be taken to address these. My specific comments regarding Wansey Street are set out as follows:	changed to ensure that development considers the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.
738	868		SPD 12 - Parking		Page 50, SPD 12 PARKING Concern: As a parking permit holder (M1 Zone), parking is a priority concern for myself and assume for other permit holders who live in Garland Court or Wansey Street. My concerns are: <ul style="list-style-type: none"> o SPD states car parking outside the 'central activity zone' (CAZ) should be minimised and car free developments will be supported. o Believe Garland Court / Wansey Street residents are just outside CAZ and border the Heygate Estate area. Specific clarification is needed to address residents' concerns regarding minimising parking. o Parking for new residents should not negatively impact or restrict parking for existing parking permit holders. o Many of the SPD maps show Wansey Street as a proposed pedestrian route. Fig 22 p87 sets out the proposed pedestrian route as stretching the full length of Wansey Street through to Rodney Road. What does this mean in terms of availability of parking space, clarification is needed here. o More pedestrians will increase potential for theft/ burglary – therefore Wansey Street will need sufficient lighting / police patrols in the area to minimise potential risk? o Currently many cars are parked on the estate, outside Swanbourne House (not by Garland Court residents). Potential that the demolition of Swanbourne House and the estate car park area will impact on Garland Court / Wansey Street residents, as the cars that currently park on the estate will need to be parked somewhere. o Residents have evidence of parking being restricted during building works. Bays are either suspended or used by large construction trucks. Garland Court / Wansey Street residents need to be advised on what plans will be put in place to minimise the impact. o A long term effect of reduced parking could impact on residents as they get older and need their own transport perhaps because they are unable to carry heavy shopping, want their independence or cannot afford 	The SPD does not contain any proposal to affect existing residents' parking schemes. The car-free policy applies to new development, and residents of it will not be able to obtain permits for parking on-street.

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					minicabs etc. o If it is planned to have wide ranging demographic and enjoy the benefits of a diverse community, then we need to ensure that older people who may have grown up in the area are not forced to leave or that older people are discouraged from moving into the area. Support: Fully support proposals to retain disabled parking.	
738	869		SPD 13 - Servicing and deliveries		Page 51, SPD 13 SERVICING AND DELIVERIES Concern: SPD states "Innovative solutions should be investigated to reduce the impact of waste collection".It will be important to remember that while developing solutions to reduce the impact of waste collection for new developments, not to apply blanket restrictions which may adversely affect existing buildings in Wansey Street by reducing the waste collection timetable. This would be a problem for Garland Court residents as the waste bins are situated directly below residents' windows, the bins are not large enough to cope with the volume of rubbish and residents already suffer problems with the smell, particularly those who live on the lower floors together with the problem of foxes and rats foraging for food from the overspill of rubbish	The SPD contains no proposals to change waste collection arrangements to existing properties.
738	870		SPD 17 - Building heights		Page 56, SPD 17 BUILDING HEIGHTS Concern: Not in favour of a high-rise development within Wansey Street and would consider any buildings of this nature to be out of scale with Garland Court. Development of tall buildings in Wansey Street would dwarf Garland Court and have potential to considerably impact negatively on the sense of space and restrict the amount of natural light. Fully support the SPD suggestion that tall buildings should be proportionate to the height of surrounding buildings and the amount of public space at the base of the building should relate to its height, ensuring that the space around the base of tall buildings does not appear cramped or unwelcoming. Important therefore that the height of new buildings fully take account of what is finally decided as an appropriate build where the development of a public square is proposed	Support for elements of the policy are noted. Proposals will need to take into account the scale of the Larcom Street conservation area, when designated. They will also need to demonstrate how they address the change in scale from the tallest elements down to the surrounding built environment.
738	871	5 - Character Areas		Heygate Street SPD	Page 85, SPD 27 BUILT ENVIRONMENT(RELATIONSHIP WITH THE STREET) Concern: SPD states "Homes at ground floor level should ensure that the privacy of occupants is protected through a range of measures	Existing policies are already in place to ensure that new and existing residents' amenity is protected. In addition saved Southwark Plan policy 3.2 - Protection of amenity, sets out that planning permission will not be granted where

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				27 - Built environment	including the use of privacy strips at the front of properties". It will be important to consider the privacy issues for existing residents at the same time as for new residents ensuring that new buildings will not overlook Garland Court. Consideration in relation to noise, dust, dirt, vibration and vehicle congestion during development and the impact on existing residents is also requested	it would cause loss of amenity to present and future occupiers.
738	872			Heygate Street SPD 27 - Built environment	Concern: SPD (5.2.19) makes reference to an opportunity to create a new public square on Walworth Road. Presumably this is the proposed square that will be situated on the corner of Walworth Road and Wansey Street opposite the old Town Hall at the site of the Shell Petrol station. Currently there is very little information about the proposed square and my main concern is that insufficient consideration is being made with regard to local residents who live close to an open space within the public realm. Fig 22 p87 depicts the area as far larger than the space of the current site (Shell petrol station) stretching along Wansey Street to opposite part of Garland Court. This would create an open and public space directly in front of Garland Court and should be scaled back in size and confined to the area in front of the old Town Hall. The open space will be used by non-residents who would have no reason to think about local residents, because they will view this as being a public place, which will inevitably create potential for anti-social behaviour. Local residents should be consulted when the plans are developed. In terms of buildings these should be in keeping with the design and build of the area. With regards to space, I would favour green spaces to concrete and welcome the beneficial role green spaces can play in helping to address climate change, public health, biodiversity and in particular community cohesion, which is supported by research. I am aware that the plans are part of a drive to activate the streets and bring together communities, which I fully support. I also support progress and regeneration, but not at the expense of the reasonable considerations of residents living on the boundary of the regeneration area	We have signalled the general opportunity to improve the area in para 5.2.19 under SPD 27. This proposal has been identified as a development site in the next stage of the SPD. Further detail on the design of the space will be worked up through the application for the Heygate estate and public consultation will be undertaken on this. There are opportunities to create significant new public spaces, including a market square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the Old Town Hall. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings
739	873		SPD 10 -		We have very recently moved into the borough and live on St Georges Road. I would like to provide my opinion on Section	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for

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			Public Transport		SPD 10: Public Transport as the last bullet point "...revert St George's Road to two-way operation.." is something I am opposed to. I object to this particular point for the following reasons: · Crossing St Georges Road is already very hazardous as cars drive extremely fast trying to catch the green lights ahead. This is particularly dangerous for the pupils of Notre Dame school as every morning and evening they run across the road opposite the school. Introducing two way traffic with undoubtedly increase the risk. · Pedestrians will not be able to enjoy historic landmarks as congestion will increase · It will make the road extremely noisy and congested and as a resident of St Georges Road whose bedroom looks out onto the main road, the noise pollution will become intolerable. · It will be more dangerous for cyclists especially those who hire the bikes who would, if the proposals went ahead, need to stop in the middle of the road to turn into Geraldine Street to park the bikes. This particular station is used by many people as they cycle to the netball and football games held in the Geraldine Mary Harmsworth Park. I will be following the development of the proposals with keen interest and am more than happy to discuss my concerns further.	which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
740	874		SPD 16 - Built form		In terms of the E&C redevelopment generally, I would like the historic buildings to be retained and included within the redevelopment	This point is adequately addressed in the second bullet point of SPD 16: Built Form
740	875			Heygate Street SPD 27 - Built environment	So far as Wansey Street is concerned, my wish is for it to remain as a cul-de-sac rather than becoming a thoroughfare.	Noted. The impacts of any proposal for Wansey Street will need to be demonstrated through a Transport Assessment.
740	876		SPD 12 - Parking		I would wish residents' parking to remain within Wansey Street as currently	There are no proposals to affect existing residents' parking schemes.
740	877			Heygate	So far as the planned square in the vicinity of the Shell	We have signalled the general opportunity to improve the

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				Elephant & Castle Street SPD 27 - Built environment	garage is concerned, I would like to see a traditional London square with lawns, trees and gardens which is closed from dusk until dawn and monitored for anti-social behaviour during opening hours	area in para 5.2.19 under SPD 27. This proposal has been identified as a development site in the next stage of the SPD. Further detail on the design of the space will be worked up through the application for the Heygate estate and public consultation will be undertaken on this. There are opportunities to create significant new public spaces, including a market square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the Old Town Hall. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: o safety o security o accessibility o the relationship between buildings and their surroundings
741	916	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
742	917	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
743	878		SPD 12 - Parking		I am concerned about the zero car parking policy proposed in the SPD on the grounds of the following points: Pollution • The majority of the pollution from traffic in the Elephant & Castle area is down to vehicles passing through, rather than	All development will be required to make adequate provision for parking for disabled drivers. We believe that the needs of all other residents can be met through a combination of walking, cycling, public transport, car clubs

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					<p>local resident vehicles. Therefore it is unfair to deny people moving into the area the opportunity to drive here when others can. • There is an assumption that people who own cars will be using them every day for work, but most current owners of cars in the Elephant will use public transport but the car gives them flexibility at the weekend etc. Council • The council wants to increase trees in streets, partly to increase the value of properties in the area. If this is applied, why then do something that will undermine the saleability of properties by having no car parking. Regeneration • The regeneration needs to fund cultural and other amenities, and affordable housing. Restricting the option to provide car parking will reduce the values that can be achieved on the units that need to fund these local benefits. • A good majority of the new homes in the opportunity area will be 2 or more bedrooms, therefore there is potential for a lot of young families to move in to the area, but they may be put off by having zero options for parking a car near to their home. • Sustainability depends upon a mixed community, and a more established community. Many will feel they need to move away when they have families if they are unable to own a car. Discrimination • Future residents in new developments are not allowed to apply for a parking permit and will pay high rent/mortgage and full council tax. To deny them parking amenity is unfair and discriminatory. • There should not be a differentiation in the SPD between old and new residents, and it is not clear in the SPD the difference between new residents in new buildings, as opposed to new residents in existing buildings. The implication is therefore that parking is allowed to new residents in existing buildings, and not to new residents in new developments (sometimes a short distance on the same street). Car ownership levels • Current analysis of low car ownership in the area is likely to be due to economic rather than ecological reasons. Long-Term benefits & Flexibility of use • In future decades the situation in London may be very different, with public transport very stretched around the Elephant, and private cars may all be electric. Developments need to be flexible to changing times, and therefore amenity needs to be flexible to future conditions, rather than reacting to a current ideological</p>	<p>and taxis, and so do not require private car parking. Agreements for car club spaces provided to support car-free development will include conditions to ensure a good level of availability of the cars. No evidence has yet been presented that the lack of car parking will affect viability. Approximately 60% of households in the area already manage without owning a car.</p>

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					clique. • There is a necessity to keep options open over the long term for both future residents and developments.	
744	898		SPD 10 - Public Transport		I fully endorse the proposals to convert London Road to two-way buses only traffic as stated in section 4.4.4 of the draft SPD. I also urge LB Southwark to press TfL to bring forward these proposals as a matter of urgency for public consideration.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
745	899		SPD 10 - Public Transport		I am writing to you to add my concerns to those of other residents in St Georges Road SE1, about the possibility that our road might, as part of the Elephant and Castle regeneration plan, be changed to a two-way traffic scheme in the future. As I am sure many others have pointed out, St Georges Road is an unusually residential, community-based and historically protected highway and the residents would be very concerned about the additional traffic, pollution and danger to ourselves and visitors to the area, of which there are many. It would be very much appreciated if you could bring these concerns to the attention of those considering these plans.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
746	914	4 -The preferred option/options	SPD 11 - Walking and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
747	923	4 -The preferred option/options	SPD 11 - Walking and cycling		I'd like to add my support to the Elephant Bypass Group's call for improvements on the eastern side. I currently commute using the Rodney Place version of the bypass and feel the Group's ideas make good sense when approaching a major rebuild. I was dismayed to see TfL block the council's plans for the redesigned north roundabout, and hope that perhaps these could be revisited after the mayoral elections. In the meantime, this new bypass route would improve things for cyclists if the northern roundabout is to stay. The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct,	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond. Earlier work by TfL has shown that the removal or peninsularisation of the northern roundabout is not feasible if it is still to serve its role as junction of a number of main roads.

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					fast and car free. Please amend the SPD to provide for this route	
748	913	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
749	879		SPD 10 - Public Transp ort		As you already know there are major concerns about the present traffic flows in London Road (I have sent you copies of the correspondence relating to our meeting with Caroline Pidgeon and TfL on 21 November 2011). Whilst I welcome new ideas, I have not seen any definite plans and cannot at this stage support a bus only route along London Road. I am concerned that yet another ill considered scheme will be introduced. Equally I cannot see how the road width can reasonably accommodate buses and trams. The present route could have been so much better if TfL and WS Atkins had been honest about the proposed changes and taken account of sensible comments made at the consultations nine years ago. I personally overheard the head of the WS Atkins group at the consultation saying that lots of people had said the same things but they were going with their design anyway. May I therefore ask that ALL facets of the proposed design are published and that proper consultation takes place BEFORE a final decision is made and that reasonable suggestions will be taken into account? The present design only considered the speed of buses as far as we can ascertain. Any future plan should take into consideration all road users, businesses, residents, travellers to and from the area, pollution and congestion.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
750	880		SPD 10 - Public Transp ort		Having obtained a copy of the Formal consultation on the draft Elephant and Castle Supplementary Planning Document/ Opportunity Area Framework, Sustainability Appraisal and Equalities Impact Assessment I am writing to state my objections/concerns. Although I live just outside the scope of your planning document, on St Georges Road just north of Lambeth Road, I would assume that any changes to	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					<p>traffic flow will affect us as well. 1. The traffic on St Georges Road is unacceptable as it is, particularly as goods vehicles appear to use Lambeth Road and St Georges road as a "rat run" For example, I cannot think that scrap metal lorries are delivering within this area. 2 St Georges Road is, to a large extent, residential and also schools and St Georges Cathedral as well as the Imperial War Museum and the park. Consequently there is an enormous amount of pedestrian traffic. St Georges Road is extremely dangerous for pedestrians as the speed limit is routinely broken and in particular the St Georges Road/Lambeth Road junction has been the scene of numerous accidents, including one last tuesday. 3. I note in your consultation you refer to the Grade 11 listed buildings within the redevelopment area. Our section of St Georges Road, from Lambeth Road to Morley College is a Grade II listed terrace, as well as being within the West Square conservation area, as is St Georges Cathedral and the air pollution and vibration from the heavy traffic is already enormously detrimental to the buildings. In conclusion, St Georges Road should be thought of as an asset to the area to be preserved and cared for due to its historical buildings, the religious significance of St George's Cathedral and its educational importance of the schools and the Museum and not as an expedient but short sighted, traffic solution.</p>	
751	900		SPD 10 - Public Transport		<p>The proposals to convert London Road to two-way buses only traffic as stated in section 4.4.4 of the draft SPD should be given careful consideration. What is beyond debate is that the present traffic flow is wholly unsatisfactory and highly dangerous to pedestrian users. I urge LB Southwark to press TfL to bring forward all the options for wide public consultation, with all the alternatives available for public scrutiny. The speed and frequency of bus movements should not be the over-riding factor</p>	<p>The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.</p>
752	901		SPD 10 - Public Transport		<p>We are pedestrians who also use tubes and buses regularly. We object to the proposal under SPD 10 to create a bus-only street in London Road and revert St George's Road to two-way operation. London Road Making this bus-only will do nothing to ease bus-on-bus congestion at bus stops – the</p>	<p>The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road</p>

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					<p>other traffic doesn't impact on this at all. And it will have no effect on bus reliability. Presumably bus stops will be sited at different points along the road which means that people will either have to give up on some alternative routes or be prepared to run from one stop to another. The example of Oxford Street, with its extremely user unfriendly positioning of bus stops, should serve as a warning that this does not work. The congestion on the pavement, already a huge obstacle for pedestrians, will become even worse (exiting from the tube station on London Road is rather like braving the dodgems). St Georges Road This is a residential road which already suffers a high degree of traffic noise. However it is currently fairly free of congestion and relatively safe to cross. It is busy with pedestrians using the schools, playing fields and churches in the road as well as visitors to the Imperial War Museum. Two-way traffic would immensely increase the noise and air pollution, would lead to congestion and would make crossing much more difficult. This would increase the dangers of traffic accidents for pupils of the three schools on the road. It would also significantly detract from its character as a residential area with many attractive heritage buildings and gardens. Further comments on the Proposals We support the efforts to redevelop the area and look forward to an enhanced environment. We would love to use Elephant & Castle as our local centre for culture, shopping and entertainment, which at the moment we don't, we use Borough and Bankside. But London is turning into one giant shopping mall, it's very boring. Let's not make yet another glass and steel shopping area that's indistinguishable from all the others in London, or indeed the rest of the world. As pedestrians and residents we particularly applaud the efforts to reduce private car use in the area.</p>	<p>safety, and extensive further consultation. XXXX Comment on design of shopping centre XXXX</p>
752	1013	3 - Vision and objectives			<p>Aim should be to encourage families and long term residents, not just students who won't spend much money in the retail outlets</p>	<p>The SPD encourages a range of housing types and tenures to create mixed and balanced communities. However we understand the importance of family housing and the SPD requires at least 10% of new homes to be 3 bedrooms or more. This is a minimum and developers are encouraged to exceed this target where appropriate.</p>

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752	1014	3 - Vision and objectives			Within reason, Elephant should be a local destination with a good community atmosphere, not try to pull huge crowds from further afield	Noted. However, our aim is to widen the catchment of the Elephant and Castle. Currently, most people shop for clothes, music etc outside the borough. Our aim is to provide more choice for Southwark's residents.
752	1015		SPD 5 - New Homes		Should encourage more families and permanent, working residents. Buy to let should be discouraged, especially by property companies.	The SPD aims to provide new homes and facilities for everyone who lives and works in the Elephant and Castle area. We cannot prevent new private homes becoming buy-to-let, but we can seek to improve the homes and area so that people who buy the properties want to live in the opportunity area.
752	1016		SPD 8 - Higher education and student housing		There is enough student accommodation in the area. Students contribute less to the local economy than long term local residents	SPD 8 refers to the Core Strategy policy which requires the delivery of student homes to be balanced with conventional affordable and family housing. By requiring a minimum of 35% of student developments to be affordable housing we work towards meeting the needs of both students and those in need of affordable housing. The Core Strategy also refers to only allowing student housing where it does not harm the local character. SPD 33 sets out that in part of the Walworth Road character area (north of Amelia Street) further student housing will not be supported because there is already a larger concentration of student housing in this section of the character area and we want to ensure there is housing choice to create mixed and balanced communities. Our view is that the Core Strategy policy will enable a balance between student and other types of housing, whilst SPD 33 will ensure there is no an over-concentration in the Walworth Road character area. Within other parts of the opportunity area, student housing may be acceptable, subject to the Core Strategy policies as we do not think there is an over-concentration of student housing in other parts of the opportunity area and as the two local universities both have expressed a need for more student accommodation.
752	1017				London Road should not be bus only, it will increase pavement congestion and make it difficult to run from one stop to another to catch a suitable bus. St Georges Road should not be 2 way, it is a residential road, with several schools. Two way traffic will increase congestion, add considerable noise and air pollution and make it difficult and	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					dangerous to cross.	
752	1018		SPD 16 - Built form		But making St Georges Road two way is not consistent with preserving distinctive, heritage neighbourhoods	Since the SPD was prepared, TfL have indicated that this proposal, while an aspiration, is no longer a priority. The SPD has been amended to indicate that this proposal would need to be explored further and that further consultation would need to take place if it were to be implemented.
752	1019		SPD 20 - S106 Planning obligations and the community infrastructure levy		: I don't know	Noted.
752	1020			West Square SPD 47 - Built form and public realm	: West Square area should include St Georges Road which has the oldest houses in the area plus many heritage buildings	Our current findings do not show enough evidence to justify the inclusion of St. Georges Rd into the West Square Conservation Area in this location. West Square is a self-contained, tightly-knit area of development largely centred around the Georgian square. Enlarging this could weaken the strong and compact character of the area. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally list them. The council will consult formally on the Local List and a Heritage SPD later in the year. At that point, there will be an opportunity for the local community, businesses and other organisations to make representations on individual buildings, prior to the finalisation and adoption of the list.
752	1021			West Square SPD 47 -	West Square area should include St Georges Road which has the oldest houses in the area plus many heritage buildings	Our current findings do not show enough evidence to justify the inclusion of St. Georges Rd into the West Square Conservation Area in this location. West Square is a self-contained, tightly-knit area of development largely

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				Built form and public realm		centred around the Georgian square. Enlarging this could weaken the strong and compact character of the area. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally list them. The council will consult formally on the Local List and a Heritage SPD later in the year. At that point, there will be an opportunity for the local community, businesses and other organisations to make representations on individual buildings, prior to the finalisation and adoption of the list.
753	922	4 -The preferred option/options	SPD 11 - Walkn g and cycling		may have already written to you about this, but as someone with contacts in the area, I just want to be sure you are aware of people's strength of feeling around the issue of the eastern cycling bypass, and to reiterate how important I think it is for the Elephant area to have good infrastructure for cycling. This would make for a much nicer people-friendly public space ... with consequently less crime, graffiti, etc. So please do take the opportunity to improve the eastern cycling bypass, via Hampton Street ... and ensure it is direct, and car free. Then you'll really see the route used by cyclists, with a consequent reduction in road congestion and pressure on parking spaces.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
754	902	4 -The preferred option/options	SPD 10 - Public Transport		With reference to Section 4 of the November 2011 Draft SPD for the Elephant and Castle (transport and movement): As a long time resident, I disagree most strongly with the proposal to " Create a bus-only street in London Road and revert St George's Road to two-way operation". I would urge (again) that instead London Road should revert to being one way only for all traffic from north (St George's Circus) to south (the Elephant). The contra -flow bus lane should be removed as soon as possible. The contra-flow bus lane has proved dangerous, has been unhelpful to bus passengers (location of stops), a "killer" to businesses along London Road, and the exit at St George's Circus most unhelpful to both vehicular and pedestrian traffic circulation and crossing. St George's Road should continue to be one way for all traffic from south to north	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
755	921				The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for

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					included in the SPD. This should be clear, direct, fast and car free. Although I am not a resident of Southwark, I know a lot of people who are and who should not have to risk their lives on the E&C gyratory. Please amend the SPD to provide for this route.	cyclists.
755	936	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Although I am not a resident of Southwark, I know a lot of people who are and who should not have to risk their lives on the E&C gyratory. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
756	881		SPD 10 - Public Transport		I have very recently moved into the borough and live on St Georges Road. I have reviewed the SPD and a particular section has caused considerable concern. Section SPD 10: Public Transport – the last bullet point “...revert St George’s Road to two-way operation..” I would like to provide my opinion on the above proposal as I am not only a driver and a pedestrian in London but also a regular cyclist on London Roads. I object to this particular point for the following reasons: · In my opinion, it will make the road more hazardous to cross. Already there have been near misses with pedestrians, particularly school children, trying to cross the road especially opposite the Notre Dame School. Introducing two way traffic will double the risk to children who will continue trying to run across the busy road to get to the school gates rather than to walk to the pedestrian crossings. If anything, speed bumps should be introduced as cars race from the intersection with Garden Row to the lights at the Lambeth Road intersection. · It will undoubtedly cause more congestion around historic landmarks as West Square, St Georges Cathedral and also the Imperial War Museum. The current one way system forces a very controlled flow of traffic and so pedestrians can enjoys these landmarks without the constant noise and pollution of additional vehicles. · Allowing London Road to become a bus only street would, I believe, lead to even more bus-on-bus congestion and make it incredibly dangerous for cyclists. One of the greatest hazards I have encountered as a cyclist is trying to cycle in	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					and amongst buses. In recent years, it is a fact that bus drivers are driving faster and there are more accidents involving London buses that ever before – I can vouch for this as I have worked within the TfL surface transport division. Though I support the overall regeneration plans in general, I do not accept that these proposed transport changes will have the desired effect and will have a huge negative impact on the residents of St Georges Road and neighbouring streets. I will be following the development of the proposals with keen interest and am more than happy to discuss my concerns further.	
757	912	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
758	911	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
759	882		SPD 10 - Public Transp ort		I am a resident of Southwark and am writing to object to two important elements of the borough plan. My first objection is to the proposal to convert London Road into a bus only road and convert St George's Road into a two way street. This element of the SPD will have a major impact on the local residents, schools, churches and park users, and was not made clear at the recent consultation events. I do not believe there has been adequate consultation on these important traffic changes. The proposal as described will leave the pedestrian and bus congestion on London Road almost unchanged, but will significantly increase the volume of traffic and pollution on St George's Road. This is inappropriate because: <ul style="list-style-type: none"> • Most of the buildings on St Georges Road are residential and at street level. This is not the case for London 	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					<p>Road where there are far fewer residential properties, and those that are there are not at street level. • There are 4 schools on St Georges Road - 3 of these are primary schools and one is secondary. The majority of children attending these schools walk there, and St George's Road is the main access route they use. There are hundreds of children using the street to get to those schools every day. • There is one Cathedral, one Church and 2 Missions on St George's Road. These also attract large numbers of pedestrians & community functions. • St George's Road is the main conduit for tourists & large school parties walking from the Elephant & Castle public transport systems to The Imperial War Museum • St George's Road is adjacent to the large open air sporting facility in The GMHP grounds. This attracts hundreds of regular users, and St George's Road is the access route to get there • There are 2 Art Centres : Siobhan Davies Studios and Morley College. Both attract a large number of pedestrians to St George's Road • The road is immediately adjacent to the very popular open spaces of the Geraldine Mary Harmsworth Park, and in particular the Tibetan Peace Garden St George's Road runs through the middle of the West Square conservation area with a number of listed buildings: the Georgian terraces & the Cathedral, is the main access point to one of the borough's finest Georgian Squares (West Square) and the planned Elliot Street conservation area. By contrast, London Road is almost entirely commercial or university campus use. The only residential properties are not at street level, there are no green spaces, churches or schools attracting large number of children. The vast majority of people using the street are either waiting at bus stops, or using it for access to Southbank University and the local shops. There is very little in the way of Community activity or Green Spaces along the route. The impact of this plan, if it goes ahead, will be to double the (large) volume of traffic in what is effectively a residential street running through a conservation area. This will significantly increase congestion and pollution for the residents, the large number of children using the street, and the hundreds of people using the park, sporting & community facilities. There are alternatives to the London/St Georges</p>	

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					<p>roads proposal, which may better deliver the intended benefit of improving the flow of buses, cars and pedestrians. One option would be to restrict traffic on St Georges Road: • Limit traffic on St Georges Road to north and westbound buses and emergency vehicles only. • London Road would then be two way to all traffic but carrying only southbound buses. • Reorganisation of the southerly bus stops on London Road would minimise their congestion. • St Georges Road could then be reorganised as 'shared use' in the manner of Exhibition Road in Kensington. This would give a wide "green corridor" linking the borough's main pedestrian hub with its biggest tourist attraction and all the schools, churches and community facilities Southwark has to offer on St Georges Road. • St Georges Circus would need to be fully reopened to traffic, making use of the eastern end of Lambeth Road. This would avoid creating a bottle-neck there as can happen now. • Diverting Westminster bound traffic via London road adds less than 200m compared to the most direct route. This is much more fuel efficient. Reopening the eastern portion of Lambeth road improves flow and traffic efficiency still further. This will also massively reduce traffic along Garden Row, a predominantly residential street</p>	
759	883		SPD 12 - Parking		<p>My second objection is to the lack of parking facilities proposed for the E&C Shopping Centre. The SPD/OAPF makes reference to the Elephant and Castle shopping centre becoming 'destination' retail space. This would only work if it were to include a large supermarket, which in turn would need some sort of parking facility provided. Without that, it is unlikely to attract higher volumes of shoppers than it currently has. Most residents do use cars to do their weekly supermarket shopping, and currently go to locations like Pimlico, Surrey Quays or Kennington Lane to do this. This is purely because they do have parking facilities. It is an important ingredient towards the success of the new revamped Shopping Centre which would be a great asset to the borough and local community. On the whole, I find the SPD very positive and think it will be beneficial for the wider community, but would urge the planning authorities to re-think these two important aspects of it</p>	<p>The shopping centre currently contains a car park for 140 cars and our policies would not necessarily require its removal in a future redevelopment. There will be a large increase in demand for shopping facilities from people in new residential developments which are within walking distance of the shopping centre. Improved cycling and public transport facilities will widen the catchment area.</p>

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759	1064		SPD 10 - Public Transport		SPD10 TG: I object to the Council's plan to convert St Georges Road into 2 way traffic, and making London Road a bus only route. Georges Road is lined with residential properties, a GP surgery, a pharmacy, one nursery, two primary schools and one secondary school, a large park and sports fields and the Imperial War Museum and more besides. London Road has a university along the length on one side, with a small strip of residential properties and a few shops and takeaways on the other. It is not just that traffic will be coming from two directions on St Georges Road should the proposed changes take place, but also that the volume of traffic will increase massively. None of us wants to see a child get hurt, but I fear that this is all the more likely should the proposed changes go through. It also is counterintuitive to suggest that your accepted bus on bus congestion can be eased by removing cars. Surely the as cars have nothing to do with buses occupying bus stops with other busses waiting, then they can have no impact on the solution. As for the pedestrian traffic of people waiting on these busses, surely these are a consequence of this bus on bus congestion and as such the solution is the same. You can either re-arrange the stops, spreading them out a little way to increase the numbers of busses that can sit at each stop. With the removal of the bendy busses this is surely an option, as if one of these could fit in a stop, it would not take much more space to fit two busses in the same stop. The other solution is to save the £10m budgeted to make the road changes, and add these funds to the upgrade of the shopping centre to include a bus station.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
760	920	4 -The preferred option/options	SPD 11 - Walking and cycling		Please build a proper cycle bypass of elephant and Castle. Taking the Boris bikes from there from Shopping Centre is very dangerous because you have to go through two junctions for Waterloo. I shouldn't have to do that. Certainly please do not remove any of the existing cycle facilities, if you can, make them better, faster, and extend them all the way around. If Heygate is being demolished then that should be possible. You might find that it's a nice place to visit unlike now where it is somewhere you try to escape from, alive.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
761	903		SPD		I understand that Southwark Council is proposing to make	The scheme for London Road was included at the request

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			10 - Public Transport		changes to the traffic arrangements in the London Road and St George's Road. This appears to be motivated by the wish "to improve reliability and reduce bus-on-bus congestion at stops". First, the Council provides no evidence that the proposals will achieve this. Secondly, I am amazed that, given the appalling record of accidents involving north-bound buses in London Road, there is no apparent consideration of the vastly more important and urgent need to improve safety	of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
762	885		SPD 10 - Public Transport		I'm a resident of Perronet House, a residential block which sits between London rd and St Georges rd and overlooks the roundabout. Our block was built with the living rooms of its 90 flats overlooking the very loud London rd but the bedrooms situated on the otherside of the building, looking onto the much quieter St Georges rd. I'm concerned that allowing two-way traffic on St George's rd will increase the traffic noise from it. This is from both the volume increase but more importantly from the nature of the traffic. It will back up on St George's road, like it now does on London rd. This will increase the volume hugely. This is my main worry. The additional source of noise from London road traffic is from emergency vehicles. The roundabout is a major hub for ambulances and police vehicles. Emergency vehicles switch their sirens on as the approach hazards like traffic backs before the roundabout. For this reason alone I am very concerned about the quality of life for my home. In short, one cannot sleep properly in our living rooms at the moment, due to traffic noise of slowing vehicles and loud sirens. Your plan will make it impossible to sleep in our bedrooms. To look at this from a macro viewpoint, one must consider the nature of the buildings on each road. St George's rd is a significantly residential whereas London rd is mostly commercial and university. London road has only two major residential buildings on it, the one next to Perronet House and the flats above the Southbank Art Company. Some of the shops further north on the road my have flats above them but they're Victorian terraces and don't look very inhabited. St George's road, by comparison, is full of high density residential blocks (Perronet House, Prospect House, Victorian mansion blocks) and then has a lengthy row of Georgian houses. The only non-residential bits are Imperial	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					War Museum and the school opposite further from the roundabout and as such not affected by traffic slowing for the roundabout. As such, it seems completely crazy to ruin the relatively quiet street in London's noisiest residential area. For some evidence, please look at the Defra sound map that I've annotated below. You can clearly see that the residential area of St George's road, the bit close the Elephant roundabout, is the part where the +70db area does not extend far off the road itself. ie. it's much quieter for the blocks on the road. The decision to allow traffic to run towards the roundabout will create the sort of noise that you see extending from the southern end of London road. The huge pink sprawl in other words! I implore you to give very careful consideration around this decision. The problems created by town planning in the 1950s plan for Elephant and Castle were created by prioritising cars over people (scary subways, high street shops removed, invasive traffic system). The role of the current project is to reverse this in some way. Please prioritise people over cars.	
763	904		SPD 10 - Public Transp ort		I write to express my full endorsement of the proposals to convert London Road to two-way buses only traffic as stated in section 4.4.4 of the draft SPD. I also urge LB Southwark to press TfL to bring forward these proposals as a matter of urgency.	Support noted.
764	905		SPD 10 - Public Transp ort		am a resident of Gladstone Street (between St George's road and London road) With regard to the proposed changes to St George's road and London road traffic flows (bus lanes and contra flows) I have to say I object to the proposed changes from the current system. I do not feel that there has been enough consideration to the wider traffic flow in the area, in particular I feel that if the changes were made then Westminster Bridge road would need to be made two-way and that Lambeth road east of St George's road would need to be opened up again to through traffic to St George's circus. This would allow traffic to pass from Borough road to Lambeth road freely. If these changes were made then the proposed changes could work, but I have not seen any mention of this so must object	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
765	886		SPD		I am writing in response to some aspects of the consultation	The scheme for London Road was included at the request

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			10 - Public Transport		<p>document for the development of the area around Elephant and Castle, issued last November (Elephant and Castle SPD/OAPF). The aspect I wish to address is mentioned in SPD10 and SPD22 and concerns the re-arrangement of traffic in London Road and St George's Road, specifically the proposal to convert St George's Road into 2-way traffic and restrict London Road to buses only. Briefly, my objection is based on a series of different concerns, to do with safety, impact on the local environment and the potential impact on traffic flow. Issues that I would like the committee to consider are the following: - St George's Road is primarily a residential street for its entire length. By contrast, London Road is much more mixed in terms of residential and business use on its western side and is, on the eastern side, taken up almost entirely by administrative and non-residential parts of London South Bank University. With more people living on, and therefore crossing, St George's Road, the corresponding increased risk of traffic accident created by increased traffic flow from 2-way traffic must be a key factor. - this increased risk to pedestrians of crossing a busier 2-way road must also be considered in the light of the fact that St George's Road has two schools along its length: Notre Dame School at the junction with Lambeth Road, and the Charlotte Sharman Primary School at the junction with Geraldine Street. Busier roads - especially with poor crossing facilities for school-age children - will lead to an increase in road traffic incidents involving pedestrians. - this same factor will, to a lesser effect, also affect members of the congregations of the three churches on St George's Road - the Roman Catholic Cathedral, St Jude's (which also hosts a children's playgroup) and the Salvation Army. - in terms of traffic flow, there are already problems with guaranteeing a smooth flow of traffic at the northern roundabout at Elephant, which St George's Road and London Road both feed into. Under these proposals, London Road would be no less busy, due to increased bus traffic; but St George's Road would now be feeding onto this roundabout, as opposed to being only an exit as at present. This will increase traffic flow - and therefore congestion - on the roundabout. - in conjunction with the above point, it should be considered that the</p>	<p>of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.</p>

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					<p>proposals would introduce traffic immediately to the right of the "bus-only" London Road. There would be a much greater risk of accidents from slow-moving buses pulling onto the roundabout just in front of traffic that has just joined the roundabout from St George's Road - currently, bus lanes may be used by motorbikes and pedal cycles. Following a spate of fatal and near-fatal collisions between cycles and buses in areas where there is increased bus activity, I am not convinced that increasing bus density on London Road would be a positive move in terms of cyclist safety.</p> <p>Remember that there is a cycle route crossing London Road and that the location of LSBU and its associated residences means that cycle traffic is common on London Road, but very rarely seen on St George's Road. - section 4.4.2 of the SPD/OAPF comments on the current congestion on London Road due to the numbers of buses and bus passengers. I fail to see how diverting more routes (presumably, the northbound 12, 53, 453, 344 and 360 routes) would help to alleviate this. Indeed, if the example of the "bus only" section of road outside Waterloo station is a guide, surely it would only make things much worse! - the points made in 5.1.11 and 5.1.12 on improving pedestrian access are sound, but they seem to relate to movement of pedestrians from the Heygate / Walworth Road areas into the chopping centre, Northern line tube station and British Rail station. I can't see how the changes to traffic flow on the other side of the Elephant roundabout would achieve that aim. Indeed, a busier St George's Road is likely to put people off from walking down towards the Elephant area from either Lambeth North tube station; or - more importantly - from the Imperial War Museum. The War Museum is not well-served by shops and anything that can attract tourists along St George's Road and towards Elephant (rather than scuttling back to Lambeth North) would be a benefit to the area economically. A very busy St George's Road would not be conducive to this aim. - Figure 35 of the SPD/OAPF shows a proposed character area based on West Square. This is a most commendable idea and is backed up by statement 5.7.4 saying "Most of the buildings in the conservation area are either listed or make a positive contribution to the urban</p>	

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					environment. Any new development should respect and add to the existing character. Given the quality of the townscape around Elliott's Row, we consider that there is scope to designate it as a conservation area." I note that this proposed character area includes all of St George's Road from the Elephant roundabout as far as Lambeth Road; whereas its boundary ceases at London Road. This is made even clearer by the distribution of assets shown in Figure 36 of the SPD/OAPF. Increased traffic flow would not add to the charm and character that the SPD/OAPF imparts to the West Square area and would, indeed, act contrary to the last two of the stated intentions in section 5.7.7. I hope that you will consider the points made in this submission and re-consider this part of the SPD/OAPF.	
765	1075	3 - Vision and objectives			Although some aspects of the themes - especially Theme 4 - will need to be revisited.	Noted. However, no indication of the changes sought is made.
765	1076		SPD 1- Shopping		These are all laudable aims, although care must be taken to balance the needs of retail outlets esp on Walworth Road. Consideration also needs to be given to the availability of parking, otherwise local streets will simply become parking areas for those who come into the area to shop.	We set out in SPD1 that we will continue to support a vibrant balance of uses in protected shopping frontages. The Saved Southwark Plan policy 1.7 'Development within town and local centres' will also be used alongside SPD1. This policy lists out criteria which need to be met in new proposals to ensure viability and vitality of the shopping parade is taken into account, and the range and critical mass of retail services on offer is maintained. With regard to car parking, the Elephant and Castle already has a very good public transportation network, and the road network does not have capacity to accommodate additional cars. SPD12 (Parking) sets out a requirement for car-free development in the CAZ, which in conjunction with proposed improvements to public transport, will help to reduce congestion and pollution in the area
765	1077		SPD 12 - Parking		Again, the provision of parking - if any - needs to be considered. Some modern housing developments do come with no parking.	Provision of car parking has been considered throughout the production of the SPD. SPD Policy 12 sets out that all development within the central activities zone should be car-free. In the remainder of the opportunity area, car parking should be minimised and we will encourage car-free development. This stance takes into account the excellent public transport links that are available within the Elephant and Castle opportunity area, and the range of

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						investments and improvements that are planned over the next 15 years to make active travel and public transport a more attractive travel options.
765	1078		SPD 6 - Wellbei ng - Social and commu nity infrastr ucture		The provision of cultural facilities is already very good, bearing in mind the proximity to the South Bank. The one real local need is for a cinema, yet this is not specifically mentioned in the plan.	The development at 50 New Kent Road has permission for new floorspace to accommodate D2 use, which will include a new cinema. Through SPD6 we promote the provision of a wide range of arts, cultural, leisure and entertainment uses, and this would not preclude the development of another cinema in the area.
765	1079		SPD 10 - Public Transp ort		I have made a separate submission over the proposals for London Road / St George's Road, which I believe to be inconsistent with the overall vision. The removal of the subways on the southern roundabout does not seem to have had a positive impact on road safety... I wonder if better, cleaner subways would be more beneficial? Street level crossings on the northern roundabout would add greatly to congestion on this already busy area of road.	On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings.
765	1080	4 -The preferred option/options	SPD 11 - Walkn g and cycling		As in the previous section, I believe the case for street-level crossings in place of subways needs further evidence.	On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings. Prior to implementing any scheme, TfL would consult and provide further information on the design of the scheme.
765	1081		SPD 20 - S106 Planni ng obligati ons and the commu nity infrastr ucture		There is an error in the question - the new tariff is on p66, not p56. It is not clear how this new tariff differs from the existing one.	The council currently negotiates around £6500 per home in s106 planning obligations. With the introduction of the new tariff, this will rise to around £15,000 per home. The uplift in contributions will be allocated to strategic transport improvements. We are proposing to amend SPD 20 to make it clearer how the tariff has been calculated.

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			levy			
766	918	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
766	919	4 -The preferred option/options	SPD 11 - Walkn g and cycling		I am a regular - more than once a week - user of the Elephant and Castle cycle bypass, and I'm writing to support Southwark Cyclists' proposal that it be preserved and improved in the SPD, with a clear, direct, fast and car free new route from Hampton Street to Meadow Row. This would materially improve my daily comfort and safety	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
767	910	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
768	906		SPD 10 - Public Transp ort		I write to express my full endorsement of the proposals to convert London Road to two-way buses only traffic as stated in section 4.4.4 of the draft SPD. I also urge LB Southwark to press TfL to bring forward these proposals as a matter of urgency.	Support noted.
769	907		SPD 10 - Public Transp ort		I write as secretary of the Albert Association, the residents' body that protects the interests of the Albert triangle. Whilst we are very appreciative of the work Sebastian Verney (one of our members) has done to raise the issue of the dangers to pedestrians of the London Road bus lane, I feel I should point out some concerns our committee has with your proposed changes. We discussed this at our last committee meeting, but do not currently have sufficient detail relating to your proposed changes to allow us to support them. We are very much in agreement that the existing bus lane is dangerous and that its removal will lead to safety improvements. However, we do not feel from the information	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					we have that a two way buses only solution would be of benefit. Surely all this would do is increase the speed of the buses and also result in St.Georges Road also having to become a two way street for other traffic otherwise access to the triangle would appear near impossible! Surely, the most logical solution is that London Road becomes a one way southbound street and St.Georges Road remains a one way northbound street with the London Road northbound buses simply diverted around the Elephant roundabout before travelling north on St.Georges Road causing only a minimal delay to the timetable. I would greatly appreciate you sharing with me the details of your proposed changes, but at present am unable to offer my support	
770	887		SPD 10 - Public Transp ort		I object to the planned changes to the traffic flow in St. Georges Road SE 1. The Road is full of SCHOOLS, LISTED BUILDINGS, A MAJOR MUSEUM and CHURCHES. There has been no consultation with residents. The information when found was cleverly hidden in the heavy document and even though we the residents of St Georges Road will be effected by any suggested change to the plan we have had no information. I believe the final dates for objections is the 7th and I don't have time for a more considered objection, I strongly wish to object to the proposal.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
771	909	4 -The preferred option/options	SPD 11 - Walkn g and cycling		The opportunity to improve the eastern cycling bypass, via a new route from Hampton Street to Meadow Row, should be included in the SPD. This should be clear, direct, fast and car free. Please amend the SPD to provide for this route.*	The Council is working with TfL to determine the best route for an eastern bypass to the main road junctions for cyclists. We recognise the value of safe and convenient links for cyclists and are proposing to amend SPD 11 to refer explicitly to the need to create a safe and convenient link between Walworth Road and the Rockingham Estate and the cycle network beyond.
772	888		SPD 17 - Buildin g heights		Building Height: Taller buildings will definitely have a negative effect on daylight patterns, potentially on wind patterns depending on clustering, and on views of historic buildings. The Strata tower is already an eyesore from many many miles away. Whilst the SPD is saying lots of the right things to minimise these negative effects, as planners often rely on precedents to guide their decisions about allowable building heights, once the 15 years of this plan have passed, there is a real danger that Elephant could become dominated	The plan will be kept under review and updated when necessary. The current SPD for example refreshes the council's existing guidance which was prepared in 2004.

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					by towers just like Canary Wharf or many other urban areas around the world. Assurances need to be built into the far future planning policy to guard against that	
772	889		SPD 12 - Parking		Disabled parking spaces: This policy needs to be much more specific. A general principle to consider that there should be enough disabled parking spaces is not enough. They need to be right next to the key locations (not a "short walk" [for a fit person) away), and there needs to be enough of them based on likely total footfall in each specific area. A target for the minimum number of spaces for any new development/ re-development should be set in the SPD. Otherwise developers seeking to maximise profits will probably cite practical reasons why such spaces cannot be provided and individual planning applications will be passed which will result in the area becoming inaccessible to a significant percentage of people.	Existing planning policies specify that developments must make adequate provision for disabled parking places, and naturally "adequate" takes account of their location.
772	890		SPD 13 - Servicing and deliveries		Pick up and drop off/ loading spaces: Whilst I agree with the aim to restrict the number of vehicles passing through and parking in the area, to fulfil the stated retail ambitions it must be considered that to encourage purchases of heavy/ bulk items, people need to be able to park a car within a reasonable distance, walk/ get a bus to do their shopping, and once finished bring the car to a collection/ loading point to take the items. The area next to John Lewis in Oxford Street is a good example- some people would drive many miles to buy the same items if they could not park briefly outside to collect. Such areas must be strictly policed (unlike the former pavement areas on Walworth Road which are intended to be pavement/ loading areas but are permanently occupied with vehicles).	Provision for customer collection by car will be considered where appropriate to support retail development.
772	891		SPD 20 - S106 Planning obligations and the		The Community Infrastructure Levy: It should be stated upfront in the SPD that this will not be applied to single residential and commercial units intended for owner-occupation. Applying it to such small-scale developments would discourage individual investors and make it more likely that professional developers will move in, bringing an unhealthy uniformity to the area	The tariff is required to help fund infrastructure which is needed to mitigate the impact of development. It will however be proportionate to the size of the development.

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			commu nity infrastr ucture levy			
772	892				<p>Planning Enforcement: The principles set out in the SPD are fine, but once they are applied to individual applications, the Council needs to strictly enforce all planning conditions. The wind turbines on top of Strata tower are never on, apparently because the noise/ vibration disturbs some of its tenants. The developer should have thought of that and if they have to pay compensation or pay for additional soundproofing it is their own fault. I am sure that planning was approved partly with a condition about renewable energy generation, therefore in my view the planning application has not been adhered to and enforcement proceedings should commence.</p>	Noted, however the SPD can only provide policy guidance.
772	893		SPD 1- Shoppi ng		<p>Affordable Retail Rents: 40% below market rent sounds fine, but market rents are very likely to rise steeply as a result of the regeneration, which could mean some existing long term traders still might not be able to afford to stay in the area. A five year window with protected affordable rent is not good enough- this is a 15 year plan! This risk is that large chains flood the area and make it no different to any other part of the country. Independent retailers and market traders are essential to achieve the aims of the regeneration. The SPD needs to have a stricter interpretation of "Affordable" than the current proposal. Increasing the CIL for new retail developments would be one way to fund a stronger affordable rent policy which lasts for a longer time period.</p>	<p>SPD1 – The provision of new shopping floorspace at Elephant and Castle will help consolidate its role as a major centre in our hierarchy of town centres in the borough. Over the coming years, increases in population and disposable income will help to increase expenditure and by providing more of a choice of shopping in the area will help to boost the local economy by attracting more shoppers from the local area and further away. This will aid in the overall success and revenue generation of independent retailers in the area and affordability of any potential rent increases. The imposition of a rent cap beyond the five year period as set out in SPD1 is not considered appropriate as it would be too prescriptive and it raises concern on how this could be monitored effectively, how enforceable it would be and how it would relate to other occupational costs such as the landlords operating expenses, service charges and business rates. Five years is considered a reasonable amount of time for a business to establish itself. While discounted rent will be appropriate to bring independent retailers into new spaces, once they gain traction and start making money, they will be able to afford to pay more rent. The Council's Economic Development currently funds Business Support advisors</p>

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						which are available to support businesses in the area. There is no single accepted definition of what constitutes an “affordable” rent for small businesses/retailers. We have derived the minimum affordable rental level by looking at overall rental values in the area.
772	894		SPD 5 - New Homes		Affordable Housing: Same point as above for retail rents: “affordable” has to relate to the average income of a council flat/ house tenant, not to an arbitrary percentage below the market rent, which your SPD document itself has forecast to increase steeply	The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. It explicitly refers to the London Plan definition. Within the Affordable Housing SPD we set out the income thresholds at which social rented and intermediate housing should be affordable. Through the Affordable housing SPD we set out our affordability thresholds for intermediate housing, which are significantly lower than the ranges for intermediate housing in the London Plan. See our website at www.southwark.gov.uk/ahspd for more information.
772	895		SPD 14 - Transp ort mitigati on		Roads: common sense is needed as well as computer modelling. The contra-flow bus lane on London Road (installed with great disruption and at great tax payer cost not that long ago) is just a few inches short of allowing buses to pass other buses which are collecting passengers, without having to stray onto the other side of the road markings (which is only possible when no cars are waiting at the lights in the other direction). The fact that they can't do so at peak times causes congestion onto the Northern Roundabout and onto St. George's Road, as well as delaying bus passengers and obstructing cars on the opposite carriageway of London Road when bus drivers go outside the bus lane anyway in order to get passed. A site visit with some buses to simulate what would really happen could have highlighted this	Noted. Comment will be passed to TfL which is the Highway Authority for the road.

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					problem and allowed it to be prevented- the computer model did not!	
772	896	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Cycle Routes and cycling safety: London Cycling Campaign and similar organisations need to be involved in the detail of the planning going forward. The AA, RAC, Licensed Taxi Drivers' Association, Road Haulage Association etc. also need to be consulted, to avoid undue bias in decisions. The plans need to keep many parties happy, if it doesn't it would be counter-productive if they lead to conflict between pedestrians, cyclists, and drivers	Road schemes are always the subject of wide consultation.
772	897		SPD 16 - Built form		Conservation Areas: Henshaw Street is frequently mentioned during the Council's consultations as an example of Victorian architecture which works, and several design principles have been incorporated into the SPD. It seems logical therefore that it (and Balfour Street, location of a Listed church building) should be included within the new St. John's Church (Larcom Street) conservation area, even though Rodney Road would run through the middle of the area.	We currently do not have enough supporting evidence to how that Henshaw or Balfour Street should be designated as a Conservation Area. Larcom Street is a self-contained, tightly-knit area of development largely centred around the church. Enlarging this could weaken the strong and compact character of the area.
773	925		SPD 4 - Jobs and Busine ss		The SPD needs to ensure new and existing businesses are sustained and supported in the wider developments and provided with the means to prosper in the area The E&C development should make a substantial contribution to the 5,000 jobs target and these - as far as possible through Section 106 agreements - should be secured for Southwark residents Affordable workspace- LEG members would like to see a measure for the provision of managed workspace/incubator units in the SPD	We have amended SPD4 to also include support for the provision of incubator space. The SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's.
774	926		SPD 10 - Public Transp ort		I am writing about the proposed change to traffic flow on London Road and St George's Road as stated in section 4.4.4 of the draft SPD. I am strongly opposed to this proposal. The risk of turning St George's into a two way road are great. It will make the road uncrossable. We have several schools in the near vicinity- St Judes Primary, Notre Dame and Charlotte Sharman Primary. I regularly see school children and their parents cross the road and the proposed scheme will be make the road very dangerous. I am extremely worried that we would be swapping one 'risk' on London Road for another.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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775	958	3 - Vision and objectives			<p>As far as I can ascertain from the aspirations described in Section 3 of the SPD, the 'vision' for the Elephant and Castle consists of the area 'undergoing major transformation' culminating in the creation of a new town centre and transport hub. Whilst I support the need for vast improvements to the area and agree there is a lot to be done to ensure the lives of local residents and existing communities are greatly enriched, I'm not at all convinced this is what will be delivered by these proposals. Although some of the ideas in the SPD seem ambitious they are in fact only aspirations and there has to date been no evidence of Southwark Council, Lend Lease or any of the other stakeholders involved in this project showing the kind of commitment and level of investment that will deliver anything other than mediocre designs lacking in inspiration, creativity and ambition. Indeed, I think many of the aspirational proposals run contrary to the main objectives that are themselves laid out in the SPD and even go against the basic principles of sustainable development, one of the key objectives of Southwark Council's regeneration in this area. In describing the Elephant and Castle redevelopment area as an 'opportunity area', one might ask, opportunity for who? By using this expression Southwark Council are giving the impression there is a chance for developers to make excessive profits, encouraging them to behave more speculatively and to ignore the community views. Developers are able to do this because they know they are likely to get approval from Planning Committees for their developments, even when they're outside the designated area. This reinforcement of a presumption in favour of development goes entirely against the main principles of 'sustainable development' and it is somewhat disingenuous of Southwark Council to use the phrase 'sustainable development' within a document that contains such a market led-vision of growth. I strongly disagree with the use of the expression 'opportunity area' and think it should be removed. I strongly disagree with the presumption in favour of development, it is not sustainable, it marginalises communities</p>	<p>The term 'opportunity area' is introduced in London Plan policy 2.13. Areas have been identified as 'opportunity areas' where there are a significant number of development sites and there is potential to provide a large number of new homes, commercial developments to encourage job creation and where accommodating growth is likely to require investment in transport infrastructure. Collectively, the opportunity areas are expected to deliver significant levels of growth that will, on a strategic level, support London as a whole. The role of the SPD is to set out a range of policies that acknowledge the strategic importance of growth and establish a framework for sustainable development that is appropriate for Elephant and Castle. An integral part of this is ensuring that the existing community shares the benefits of growth and investment. Our vision is clear that the SPD delivers improvements for the benefit of existing and future residents. Throughout the production of the SPD, we have carried out comprehensive community consultation to ensure that the SPD captures views of existing residents, businesses and other interested parties. It will be important to maintain this dialogue as new developments come forward and planning applications are submitted for consideration by the council.</p>
775	959	3 - Vision and objectives			<p>I strongly disagree with the presumption in favour of development, it is not sustainable, it marginalises</p>	<p>The detailed vision for the Elephant and Castle clearly sets out the ways in which we will pursue sustainable</p>

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					<p>communities and Southwark Council needs to change this and demonstrate its support and commitment to 'genuine' sustainable development. I agree that all development in Southwark, not just the Elephant and Castle should have sustainable development at its heart and should always include the local communities views. • I agree that all stakeholders in the Elephant and Castle redevelopment including Southwark Council, it's councillors and MP's should be able to demonstrate a commitment to sustainable communities. I agree that all development in the Elephant and Castle redevelopment needs to be better designed to ensure compliance with the Equality Act and the Disability Equality Duty in the Disability Discrimination Act. • I agree that all stakeholders in the Elephant and Castle redevelopment, including Southwark Council, it's councillors and MP's should be able to demonstrate a commitment to Corporate and Social Responsibility by providing at the very least a substantive Responsible Conduct Policy. • I agree that all consultation material, including this SPD should contain substantive and meaningful designs and commitments that are easy to follow, with transparent routes of delivery - not just vague aspirations as is the case of the consultation material that has been offered up to date. •</p>	<p>development. It focuses on making Elephant and Castle a more desirable place for both existing and future residents and refers to the range of facilities and investments that will be required to underpin growth. This vision is directly taken from our adopted Core Strategy (2011), which itself was subject to extensive consultation, and which sets out in Policy 1, the ways in which we will deliver sustainable development throughout the borough. The level of detail in the SPD reflects the fact that this is a 15 year plan and there needs to be sufficient flexibility to adapt to changing circumstances that will affect the delivery of particular schemes. Further detail on delivery is set out in Section 6 and in the infrastructure plan. This will be updated periodically as new mechanisms for delivery become apparent. All new development will be required to comply with the Equality Act and the Council will continue to conduct itself in accordance with the Disability Equality Duty in the Disability Discrimination Act. An equalities impact assessment (EQIA) was carried out as the SPD was prepared, to identify impacts on groups identified as having protected characteristics, either through the preparation of the SPD or through the delivery of its policies. The EQIA has informed the content of the final SPD.</p>
775	960	5 - Character Areas			<p>I agree the Elephant and Castle redevelopment scheme should comprise and deliver balanced communities providing employment opportunities, retail and housing to all its residents, inclusively. The following answers contain my views on the objectives for the Elephant and Castle in more detail</p>	<p>Support noted</p>
775	961		SPD 1- Shopping		<p>It has become widely recognised that large supermarket developments are not sustainable, often reducing retail diversity and resulting in a loss of jobs in an area. Over the years thousands of small shops have been lost in this takeover by the dominant supermarket companies. I'm opposed to these sorts of big supermarket developments. I feel they need to be resisted by the Council who should (in most cases) refuse planning applications for such things</p>	<p>The provision of new shopping floorspace at Elephant and Castle will help consolidate its role as a major centre in our hierarchy of town centres in the borough. Our evidence base has identified that there is capacity to provide additional 'Comparison Goods' floorspace in the area i.e. household goods, clothes, books etc. and also a small amount of convenience goods floorspace (food shopping). Over the coming years, increases in population and disposable income will help to increase expenditure and by</p>

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						providing more of a choice of shopping in the area this will help to boost the local economy by attracting more shoppers from the local area and further away. This will aid in the overall success and revenue generation of independent retailers in the area and affordability of any potential rent increases. We continue to support small shops in the opportunity area and set this out in SPD1. Applicants proposing large scale retail development will need to identify through a Retail Impact Assessment the impacts upon existing employment and propose mitigation measures to help address impacts. SPD1 requires the provision of affordable space which will be secured through s106 planning obligations attached to planning permissions.
775	962		SPD 2 - Markets		I am in favour of encouraging local markets, producers and suppliers. Apart from the obvious support to the local economy and increasing the diversity of choice, local markets can be vibrant places within a community where residents interact with each other and rendezvous. It is vital to have these places where people meet and communicate	Support noted
775	963		SPD 4 - Jobs and Business		There are many advantages in having small businesses in this area. I am in favour of this and I agree they need to be encouraged, with their needs being provided for at the planning stages and not in hindsight or as a rushed after thought. I think the Council could go much further in encouraging this kind of development. There needs to be more flexible and creative solutions in the designs of both homes and business accommodation that will go some way to help provide better support and growth. To help make any business enterprise sustainable, there also needs to be support in the community through training and the facilitation of knowledge. The proposed affordable retail units for 5 years is not long enough and the Council needs to demonstrate a stronger and longer term commitment in support of small businesses who, as suppliers of affordable goods and local employers will ultimately bring people into the area and will in many ways give the area it's character and distinctiveness. Live - work spaces, smaller more flexible retail areas and outlets, use of empty shops and buildings for	The SPD recognises the contribution which small and medium sized businesses (SMEs) make to the local economy (Section 2). More investment in the area will help bring more jobs and create business opportunities. Through our s106 planning obligations SPD we will require obligations from developers to target training and employment opportunities created by new development towards local people and also maximise the procurement opportunities for local SME's. The five year affordable retail requirement is considered a reasonable amount of time for a business to establish itself. While discounted rent will be appropriate to bring independent retailers into new spaces, once they gain traction and start making money, they will be able to afford to pay more rent. The Council's Economic Development currently funds Business Support advisors which are available to support businesses in the area. SPD1 and SPD 4 support the provision of flexible commercial space for retail and business uses. Our Saved Southwark Plan Policy 1.6 sets out assessment criteria for

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					<p>pop up stalls, freelance activity and indoor markets could all add to the mix and encourage community enlivenment, enterprise, jobs and business development. The existing Arches are a good example of this kind of flexible, local solution. It is already a local business community which, with the right kind of support and commitment could transform fully into a thriving Latin Quarter, helping to reflect one part of the areas cultural diversity. The existing local shops and independent traders of East Street, Rodney Road, New Kent Road and Harper Road continue to support their local community by supplying goods and services. They are a valuable asset and need to be preserved. With the almost total displacement of the residents of the Heygate Estate and the continual uncertainty about the redevelopment of the entire area, it has been very difficult for the existing traders at the Elephant and Castle shopping centre. They too need to be supported and to know they're able to remain in the centre during redevelopment when it starts and to return afterwards once it's finished. In this way they will hopefully be able to sustain their businesses throughout the duration of the redevelopment</p>	<p>Live-Work units. With regard to the comment on interim uses the SPD provides support. Theme 7: Delivery: Making regeneration happen sets out the objective of ensuring that comprehensive redevelopment does not compromise safety and maximises opportunities to make use of vacant sites on an interim basis. Also, the Heygate Street Character Area SPD25 encourages interim uses of development sites. To provide additional support we have amended the objective in Theme 3: Wellbeing: Social and community infrastructure which states - Providing more and improved educational, health and community facilities which meet the needs of existing and future residents and support interim uses which promote these. With regard to the railway arches, SPD4 sets out that the railway arches should continue in active use for a range of uses including small business space, light industrial uses and appropriate A or D class uses as we recognise that these all make a positive contribution to the local economy. SPD1 recognises the importance of protecting the local shops through SPD1. We have amended the supporting text to SPD1 to provide further recognition of the value and contribution of local shops in the area. Applicants will be required to prepare a phasing plan for development submitted as part of a planning application for a retail development proposal. The impacts on local businesses and the proposed mitigation measures will need to be identified. The Council's Economic Development currently funds Business Support advisors which are available to support businesses in the area.</p>
775	964		SPD 3 - Hotels		<p>Unless this kind of development is monitored very closely, they can have a rapidly negative impact on an area.</p>	<p>SPD 3 is consistent with the overarching policy 10 in the Core Strategy which sets out policy where we will allow development of hotels within the town centres, the strategic cultural areas, and places with good access to public transport services, providing that these do not harm the local character. We will also use the Saved Southwark Plan policies at the planning application stage, in terms of assessing design, relationship with other buildings and the impacts on local amenity</p>
775	965		SPD 5		<p>There's a preponderance of new one and two bedroom</p>	<p>In relation to 3 bedroom plus homes, the Core Strategy</p>

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			- New Homes		apartments, whereas there needs to be a higher proportion of 3 bedroom plus homes. I support the St Mary's residential development being of a 'mixed use' nature. However, I do not support the tall building designation of this site. I object to the provision of NO affordable homes within the St Mary's residential development and would like to know when and where the promised 35% missing from this development will be built. There needs to be at least 35% affordable homes throughout the opportunity area. I object to use of the word 'affordable' when what is being described is clearly not affordable to most people in this area Displaced Heygate residents who signed a right of return have seen their 7yrs pass. They need to be reassured their entitlement is still valid.	sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. The policy for the Elephant and Castle is a minimum of 35% affordable housing (as set out in Core Strategy policy 6) and a split of 50% social rented and 50% intermediate housing within the affordable housing (as set out in saved Southwark Plan policy 4.4). The policies seek to provide a range of housing types including private, social rented and intermediate housing to help create mixed and balanced communities. The definition of affordable housing in relation to planning policy needs to be defined with reference to national and regional policy definitions of affordable housing. PPS3 defines what is meant by affordable housing for planning policies, and the London Plan similarly defines affordable housing. We set out our definition of affordable housing in the Core Strategy, with reference to the London Plan definition, as required by the London Plan. We have updated the fact box on affordable and private housing within the Elephant and Castle SPD to more clearly refer to the Affordable Housing SPD which provides more detailed definitions of affordable housing. Former Heygate Estate tenants do have a right to return to a new home within the E&C area. Those who wanted to be re-housed have been offered homes in the Heygate Replacement Scheme sites, the last of which will be Stead St, and their needs are taken into account in agreeing the mix of the development.
775	966		SPD 6 - Wellbeing - Social		A vibrant cultural arts area needs support from across the community to ensure its longevity. I agree with supporting the arts.	Support noted. The SPD has recognised there is an opportunity to build upon the positive reputation of the Elephant and Castle as a creative area, improve its arts and cultural offer and strengthen and diversify the evening economy. We have amended SPD6 to include further

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			and commu nity infrastr ucture			encouragement of strengthening links with the two learning centres (London College of Communication and London Southbank University) and the wider arts scene. The Council actively promotes and supports cultural events through various communication channels, such as the Council's Events webpage on the Council's website. The Arts and Culture team also offer support and resources to organisations and community groups throughout the area to help them deliver activities, events and workshops. One example of partnership working is with the Southwark Arts Forum who provide a range of networking, advice and information services to its members.
775	967		SPD 7 - Sports facilitie s		The 2010 Elephant and Castle leisure centre public consultation report clearly shows a high rate of responses (16% return rate), indicating a keen interest in the provision of sports facilities in the area. The present set of proposals for the leisure centre shows a marked decrease in sports facilities and needs to go much further to match or ideally exceed the demands of the community, whose views have been expressed in the previous 2010 consultation round. I strongly object to these losses of sports facilities and think the plans need to be greatly improved. The stakeholders need to exceed the current proposals so they are sustainable and able to support the anticipated future growth in population for this area of London. There is a substantial unmet demand for swimming facilities in this area of south central London, as was acknowledged in the 2010 public consultation report. It is incumbent on Southwark Council and ALL the local councillors, no matter which borough or which party they represent, to support a far more ambitious plan for the area, with higher standards and provision of facilities all round. 10. Higher Education and student housing 11. Community facilities	Support for the new leisure centre is noted. The current leisure centre that is to be closed and demolished as part of the proposed redevelopment is outdated in terms of its facilities and is not running at full capacity, given that the swimming pools have not been open to the public for many years. Whilst the proposed new leisure centre does not provide an exact like for like replacement in terms of square metre footprint, it will in fact provide the community with a state of the art facility including: a six lane, 25m swimming pool; a learner pool; gym; four court sports hall; two exercise studios; a crèche; a café and an indoor cycle studio. The amount of visitors using this new leisure centre is expected to greatly increase compared to the current numbers, so whilst slightly smaller in size to the existing centre there will be an actual increase in the amount of local residents enjoying this council facility. In addition to this Southwark Council are committed to exploring improving public access to other existing leisure facilities within the Elephant & Castle Opportunity Area during the construction period and beyond.
775	968		SPD 10 - Public Transp ort		I'd like to see the Walworth Road project completed making it a single carriageway in each direction with broader pavements for pedestrian use and adequate bus stopping spaces. Making these sections quieter and slower and more attractive for pedestrians will benefit Walworth and The Elephant and Castle / Heygate regeneration.	Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The

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						exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.
775	969	4 -The preferred option/options	SPD 11 - Walking and cycling		The introduction of a 20mph speed limit will encourage pedestrians and cyclists and reduce the pressure on public transport between Walworth and the Elephant and Castle. The New Kent Road needs to be made safe for pedestrians and cyclists. 14. Parking 15. Servicing and deliveries	The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.
775	970		SPD 14 - Transport mitigation		16. Transport mitigation TfL roads need to be made safer. The northern roundabout at the Elephant and Castle has been reported as being London's most dangerous location in terms of road casualties and needs to see the following measures adopted: Reducing the capacity of road layout• Reducing the speeds of motor vehicles with the adoption and enforcement of a 20mph speed limit• Removing the wide lanes and high capacity that marks out the territory as being for motor vehicles and not for people•	We are working with TfL to develop the design for the northern roundabout. While measures to "humanise" it are a key priority for the council, we must recognise that it is a strategic part of the Transport for London Road Network and as such we cannot compromise traffic capacity.
775	971		SPD 15 - Public realm		There has been a marked shift in ownership of public assets such as our open spaces with much having been sold by Southwark Council, often without public knowledge, to private owners. Issues of right of ways and public access are exacerbated by gated communities gradually causing the lack of freedom of movement. I disagree with the sale of public space when it ends up in private hands and think Southwark Council should protect our interests better to prevent the gradual erosion and loss of this precious public asset. The landscape must remain accessible where possible and the split between private and public needs clarification	SPD 16: Built Form has been amended to say that developments should provide an appropriate sense of enclosure, helping create well defined, inclusive and defensible streets and public spaces.
775	972		SPD 16 - Built form		I support the creation of a Conservation Area along the length of the Walworth Road. I would however like to see a broader panel of decision makers to encourage distinctive neighbourhoods, heritage assets, listed buildings etc., being made up of more than just Victorian housing stock. There is a shortfall of protection of twentieth century buildings. Better elephant!! An innovative idea more interesting than anything	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new

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					I've seen to date. More sustainable, imaginative, creative solution!! What provision is there for community use?	evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road. The Urban Task Force and the creation of Commission for Architecture and the Built Environment (CABE) in the late 90's encouraged authorities to formalise and expand the role of design within the development control process. In response, the Southwark Design Review Panel (DRP) was established in February 2006. Since that time the panel has reviewed more than 60 development proposals ranging from a small innovative community church to large scale mixed use developments. The DRP consists of members with unique design attributes to offer highly skilled independent advice on all aspects of design and development. We are widely recognised for achievements in championing high quality architecture including winning three RIBA/RTPI housing design awards and achieving the CABE/RIBA award for promoting good architecture. Southwark's design review panel has a wide range of members. The pool of experts includes innovative and distinguished architecture and design practitioners. Many of the current members live locally and all have a keen interest in the built environment of Southwark. The panel meets monthly and reviews a wide range of proposals affecting all areas of Southwark. While the role of the panel is purely advisory, the panel's comments carry a lot of weight. Any comments from the panel are fed in to planning inspectors and any planning enquiry.
775	973		SPD 17 - Building heights		I disagree with Southwark Council's tall buildings strategy. It is not sustainable and evidence needs to be provided that tall buildings will not have a negative effect on micro-climate, particularly studies of sunlight, shading and ground level wind patterns.	SPD 17 states that tall buildings should avoid harmful microclimate effects. This would include effects on sunlight and wind patterns. Developers would need to demonstrate this in submitting applications.
775	974		SPD 18 - Open spaces		Natural Environment: Sustainable use of resources 20. Open Spaces Areas of hard surfacing throughout Southwark have increased at the expense of urban green space. This reduction of soak away areas exacerbates the risk of surface-water flooding and the urban heat island effect. Relentless urbanisation and regeneration has created a	This is a borough wide issue. Core Strategy policy 13 requires development to reduce the risk of flooding by reducing surface water run-off and using sustainable urban drainage systems. A Surface Water Management Plan for the borough is currently being prepared and we will look at taking forward the recommendations through our

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					massive loss of biodiversity and there is an urgent need to incorporate our native species back into our cities. The Urban Forest within the Heygate Estate is a unique place that remains rich in biodiversity. It's large canopied, mature trees still survive and should be protected at all cost. 21. Energy, water, waste	forthcoming Development Management DPD. Further guidance is also set out in our Sustainable Design and Construction SPD. We require all developments to consider the impact on biodiversity, saved policy 3.28 of the Southwark Plan states that biodiversity will be taken into account in the determination of all planning applications and we will encourage the inclusion of features which enhance biodiversity.
775	975		SPD 20 - S106 Planning obligations and the community infrastructure levy		22. S106 planning obligations and the community infrastructure levy (CIL) I agree that the spend on community projects such as green routes, social rented housing, affordable retail and improvements to community facilities should be prioritised and need to be ring-fenced.	As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects.
776	976		SPD 10 - Public Transport		I am totally against the proposed plans to make St Georges Road two way. It will become busier, noisier, more polluted and more dangerous. The buses will be able to travel even faster down London Road, making that more dangerous for pedestrians and cyclists. I also totally disagree with the plans to close the subways on the Northern roundabout. They are	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation. On balance the

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					well used and safe. They provide a safe, direct and dry route around the Elephant. Both plans seem to be an unnecessary expense, when so much else is needed here. I am also very sad to see that both of these major changes are buried within the SPD document and not up for wider consultation.	Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings.
776	1033		SPD 5 - New Homes		SPD5: More flexible housing for families. 3 bedroom and 4 bedroom properties. Space within those properties to generous with good noise insulation.	In relation to 3 bedroom plus homes, the Core Strategy sets out the overarching policy for the required amount of 3+ bedroom homes. As set out in the Core Strategy this is based on a balance between seeking to meet the housing need identified in our Housing Requirements Study (2009) and our Strategic Housing Market Assessment (2010), and looking at the density of the area and the ability of new developments to provide amenity space for families. The policy for the Elephant and Castle Opportunity Area is a minimum of 10% 3, 4 or 5 bedrooms. This is a minimum policy and we encourage developers to exceed this minimum where possible. Furthermore the Core Strategy requires a minimum of 60% of units with 2 or more bedrooms. This recognises the need to provide larger 2 bedroom units as they often house families due to the affordability of larger homes. In addition our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. The SPD also sets out the minimum noise levels that all new housing must be built to withstand.
776	1034		SPD 6 - Wellbeing - Social and community infrastructure		SPD 6 BAO: Green space is an important component to wellbeing and social infrastructure. I would like green and diverse space here please.	The SPD has recognised there is an opportunity to build upon the positive reputation of the Elephant and Castle as a creative area, improve its arts and cultural offer and strengthen and diversity the evening economy. We have amended SPD6 to include further encouragement of strengthening links with the two learning centres (London College of Communication and London Southbank University) and the wider arts scene. The Council actively promotes and supports cultural events through various communication channels, such as the Council's Events webpage on the Council's website. The Arts and Culture team also offer support and resources to organisations and

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						community groups throughout the area to help them deliver activities, events and workshops. One example of partnership working is with the Southwark Arts Forum who provide a range of networking, advice and information services to its members.
776	1035		SPD 10 - Public Transp ort		YES. London Road does not need to public transport only. The safety of the road is not related to the private traffic. It is related to busses going quickly, which is slowed down by the private traffic. Changes on London Road will only transfer danger to St Georges Road, which will become noisier and less safe. The subways on the Northern roundabout should not be filled in. I use them daily as do hundreds of other people. They ensure safe and direct crossings on a busy roundabout. Both of these major infrastructure changes should not be buried in this document.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
776	1036	4 -The preferred option/options	SPD 11 - Walkn g and cycling		Why is green space not mentioned in the environment? We need usable spaces where people can spend time. The subways do not need to be filled in and this should have a separate point not bundled together with pedestrianisation. This is not fair, you are going to be able to falsify evidence that people agree with now because it is not asked clearly. I do not agree with either actually. pedestrianisation of keyworth street is unnecessary and I use the subways and do not want them closed.	On balance the council agrees with TfL that surface crossings would be preferable to subways. We are amending SPD 18 to refer to green spaces in the highway network.
776	1037		SPD 18 - Open spaces		I would need to see more on what you mean with 'open space'. it is not just about links, it should be about biodiversity and joy and oppertunities for public intervention. More than just food growing there should be oppertunities for flowers and other plants too. What about trees?	Further detail on different types of open space and recommendations for improving the quality of open space is set out in our draft open space strategy which is available to view our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
776	1038		SPD 20 - S106 Planni ng obligati ons and the		They should go towards shared green space, social rented housing, affordable retail and improvements to community facilities.	As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these.

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			community infrastructure levy			
776	1039			Central Area SPD 22 - Transport and movement	: Do not close the subways. Do not make London Road public transport only. Recognise the giant green space in the middle.	Since the SPD was prepared, TfL have indicated that this proposal, while an aspiration, is no longer a priority. We are proposing to amend the SPD to indicate that this proposal would need to be explored further and that further consultation would need to take place if it were to be implemented. We have amended the reasoned justification for SPD 18 to refer to the value of housing amenity sites and other green areas such as those in the highway. We understand that some people wish the subways to be retained. On balance however, the council agrees with TfL that surface crossings would be preferable.
776	1040			Walworth Road SPD 33 - Land uses	I don't want high street chains to move in here, it should stay a largely independent high street as it is now.	The additional guidance in SPD33 states that we support a vibrant mix of retail uses along Walworth Road. Capping the proportion of hot food takeaways (A5) at 5% will provide more opportunities for retailers to locate on Walworth Road, but, ultimately, planning is unable to distinguish between independent retailers and high street chains.
777	984				1. As regards the proposed new Town Square on the corner of Walworth Road and Wansey Street, I believe the SPD does not give sufficient consideration in respect to local residents who live close to an open public realm space. My concern is that this space will be paved over and become something similar to Brixton Town Hall Square, where the space will not co-exist comfortably with a residential area. I would expect to see a majority landscaped space (rather than a grey faceless paved area) that would make a fitting entrance to Wansey Street, which could become a part-pedestrian area, with cycle paths and a speed restriction, and ear-marked as a conservation area. I am in favour of progress and regeneration, but not at the expense of the reasonable considerations of residents living on the boundary of the regeneration area	We have signalled the general opportunity to improve the area in para 5.2.19 under SPD 27. There are opportunities to create significant new public spaces, including a market square, park and a square on Walworth Road. A new public square on Walworth Road will help provide some relief from the busy frontages on Walworth Road and can also create an appropriate setting for the Old Town Hall. Our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and access statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example:

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						o safety o security o accessibility o the relationship between buildings and their surroundings
777	985		SPD 14 - Transp ort mitigati on		2. Streets and roads in and around the opportunity area should be designed and designated as 20mph maximum to encourage walking and cycling	The council's Transport Plan 2011 commits to making Southwark a 20mph borough. We will look at all options to achieve this.
777	986	4 -The preferred option/options	SPD 11 - Walkn g and cycling		3. The TfL roads and especially the northern roundabout at the E&C and the New Kent Rd need to be made far safer for pedestrians and cyclists	Where appropriate funding will be sought from adjacent developments to improve road safety and the public realm on the Transport for London Road Network.
777	987		SPD 2 - Market s		4. Southwark Council should recognise the important contribution of small retail units (East Street, Rodney Road etc) and street markets to providing goods that local people can afford and as local employers	We propose to address this comment by providing additional detail within the supporting text to SPD highlighting the valuable contribution small shops make to the local economy, local employment and also to sustainable travel.
777	988		SPD 4 - Jobs and Busine ss		5. Southwark Council should recognise that in the longer term the Arches can fully transform into a thriving Latin Quarter for London.	With regard to the railway arches, SPD4 sets out that the railway arches should continue in active use for a range of uses including small business space, light industrial uses and appropriate A or D class uses as we recognise that these all make a positive contribution to the local economy. We have amended the supporting text to SPD4 to provide further recognition that the railway arches are a key feature of the area and provide a significant amount of space for businesses.
777	989		SPD 1- Shoppi ng		6. Affordable retail units with only a 5 year tenure is not long enough to allow independent, locally developed businesses to become self-sustaining	We recognise the concerns of existing businesses that regeneration inevitably creates some uncertainty. The purpose of providing affordable retail space is to mitigate the impact of development on existing businesses which may be displaced by regeneration, helping them manage a period of transition. In this context, 5 years is considered a reasonable period to help existing businesses manage the period of transition and establish themselves.
777	990		SPD 17 - Buildin		7. The SPD must demand evidence that tall buildings will not have a negative effect on micro-climate in and around the opportunity area	SPD 17 states that tall buildings should avoid harmful microclimate effects. This would include effects on sunlight and wind patterns. Developers would need to demonstrate

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			g heights			this in submitting applications.
777	991		SPD 15 - Public realm		8. The opportunity area landscape must be accessible and the split between public and private space needs clarification. Spaces must be well designed to encourage people to meet and linger outdoors	SPD 16: Built Form has been amended to say that developments should provide an appropriate sense of enclosure, helping create well defined, inclusive and defensible streets and public spaces.
777	992		SPD 20 - S106 Planning obligations and the community infrastructure levy		9. The benefits of S106/Community Infrastructure Levy (CIL) payments from developers must be spend prioritised on community project such as green routes, social rented housing, affordable retail and improvements to community facilities. This budget needs to be ring fenced and protected. Much of the success of the SPD from the point of view of local people depends on the actual creation of the improvements set out in the SPD. At present there are real fears that the vast majority of the contributions by developers will be allocated to Transport for London for its high profile and extremely expensive transport improvements at the E&C. Although these may have an indirect benefit to local people the principal beneficiaries will be those travelling through the local area or coming into the area to shop or spend leisure time. Unless the improvements that are outlined in the SPD such as green links or improvements to community facilities are created then the regeneration will simply be shoehorning more people into a dense space without any improvements. The S106 spend must directly benefit the local community.	We recognise that the cost of improving the area's public transport infrastructure and in particular upgrading the lifts in the northern line station to improve capacity, is significant. However, it will be necessary to make these improvements in order to accommodate the growth in homes and jobs which is anticipated. Without adequate improvements to transport infrastructure, the regeneration of the area will be put at risk. As well as requiring contributions to the upgrade of public transport infrastructure we will also continue to collect contributions for other infrastructure items including open space improvements, new schools places, health facilities, community facilities and children's play space. In our s106 Planning Contributions SPD we set out standard charges for these items and we will continue to require these. The policy context to s106 planning obligations is changing. In 2010 the government introduced a new system called the community infrastructure levy (CIL). The community infrastructure levy will provide a new way of funding infrastructure, replacing many s106 obligations. The CIL will help fund the items we currently fund using s106. However it will provide additional flexibility to pool resources to fund larger projects than is currently possible. Also, because it will be a mandatory charge on developments, there is more certainty that it will be provided. We will be consulting on a CIL schedule over summer 2012 and expect to adopt the CIL in 2013. Over the spring we will also be updating the community project banks. These will be an important tool used to help identify projects which have local support and are a priority for the community. Because CIL is mandatory and more flexible than s106, there will be more certainty over the delivery of projects.

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777	993		SPD 10 - Public Transport		10. The Walworth Rd project needs to be completed	Policies 11 and 15 seek improvements to the urban realm, including specifically improving the walking and cycling environment and reducing the severance caused by main roads, and so we will seek such improvements as a matter of course. These policies would support an extension of the "Walworth Road Project" further north and south. The exact form of such proposals would be the subject of further design as and when the opportunity presents itself. We are also proposing to amend SPD 27 and SPD 35 to refer to the potential to use opportunities to improve the public realm north of the Old Town Hall and south of Fielding Street.
777	994		SPD 16 - Built form		11. Southwark Council should create a Conservation Area along the length of the Walworth Road in order to preserve the historical legacy of the Elephant and Castle area. Walworth Rd possesses a sufficiently rich array of historic buildings to justify its designation as a Conservation Area in the medium term. I would like to see this supported in the SPD and recognition of the capacity for heritage led regeneration for the area	The policies in the SPD were informed by a study of the character of the area. This study used current available evidence to make recommendations on the potential for new conservation areas. The study concluded that on balance and based on current evidence, the quality of buildings on Walworth Road would not warrant the designation of a new conservation area. However, if new evidence is forthcoming, we will consider it and have not ruled out the possibility of designating a conservation area on Walworth Road.
777	995		SPD 9 - Community facilities		12. Strict assessment of the creation of and provision of community facilities should be required at planning application stage to ensure the facilities created are viable and are carried through to completion	The provision of a range of community facilities is an important part of our vision for future growth at Elephant and Castle. For schools and health centres, we work closely with partners to understand the current demand for facilities and the future needs that will be created as development takes place in the opportunity area. When dealing with the provision of more general community facilities at the planning application stage, our role is largely limited to considering details about the space to be provided, as opposed to the eventual occupant. However, Core Strategy policy 4 sets out that we will require new community facilities to be flexible enough to accommodate a range of different community uses, so that in the event that a particular use proves unviable, the space is suitable for other community groups and uses. We also require a management plan setting out who the identified users are and how they will use the facility.

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777	996		SPD 16 - Built form		13. I reject Southwark Council's brief report which determined that there was insufficient potential for a conservation area along the Walworth Road, particularly when comparing the area with that recently successfully designated in Peckham. Too much weight appears to be given in the assessment to the decline in integrity of historic shop fronts at ground floor level. Rather this should emphasise the urgency with which conservation area protection is required, in order that funding schemes such, as the HLF's Townscape Heritage Initiative, can be investigated to improve the situation and unlock the potential of the high street's historic character.	Our current findings do not show enough evidence to justify the designation of a Conservation Area in this location. Should any further evidence come forward we would consider the potential for its designation at that time. While the Elephant and Castle flags buildings which are potentially locally listable, it does not in itself locally list them. Later in the year the Council will be consulting a Heritage SPD and a borough-wide local list will be formally consulted on as part of that process. At that point, there will be an opportunity to make representations on individual buildings, prior to the finalisation and adoption of the list.
777	997		SPD 18 - Open spaces		14.The Walworth area is extremely deprived (based on national green space rankings) in relation to public green space. Southwark Council should agree and set targets for access to open space as part of the SPD work (perhaps by ward or by Lower Super Output Area (LSOA) as these better reflect neighbourhoods that can be walked or cycled to). 15.Southwark Council should ensure that when development is considered, open space is also created that benefits both new and existing local residents and should be publicly accessible at all times. 16.Southwark Council should consider creating open/green space throughout the area. Innovative approaches can be used to turn streets with excess capacity (partly aided by the sharp decline in vehicle ownership throughout the local area) into green spaces or play streets. A good example of this might be Liverpool Grove between the Walworth Rd and St Peter's Church, and the Wansey Street and the southern edge of the Heygate opportunity area.	Our draft Open Space Strategy has identified Elephant and Castle is an area of open space deficiency. We will seek to ensure that all new open space is publicly accessible and improve the quality and accessibility of existing open spaces. We set out in SPD 18 how we will expect all development to improve the overall greenness of places, through measures such as living walls and roofs and high quality landscaping. SPD 18 also states how we will expect development to retain and enhance trees and canopy cover wherever possible as part of the urban forest. We will also seek to ensure that street trees are used to green streets and reinforce planting where trees are integral to the historic townscape. We have set a final standard of 0.76 per 1,000 population in the SPD in accordance with the draft Open Space Strategy. Elephant and Castle currently has a total of 0.7ha of park provision per 1,000 population. This is expected to fall to 0.56ha per 1,000 population in 2026 as a result of population growth. The provision of a public park as part of the Heygate redevelopment will help to raise the projected provision in the area to 0.61ha per 1,000 population in 2026.
777	998		SPD 9 - Community facilities		17. There is insufficient recognition of faith communities and their buildings as a resource within the SPD and I feel that further work and comment should be made in respect of the social capital these group's offer to the wider community.	Southwark Council recognises the difficulties which faith groups experience in finding suitable premises. We are proposing to amend section 2 of the SPD to clarify that there are a range of faith communities in the opportunity area and that the current and future needs of these groups need to be taken into account as development takes place

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						over the plan period. Policy SPD 9 provides a framework to consider impacts on faith premises. Places used in connection with worship are referred to in the list of community facilities in the "fact box" in SPD9. We are proposing to add a cross reference to Southwark Plan policy 2.1 to reflect the fact that we protect valued community facilities.
777	999		SPD 9 - Comm unity facilitie s		18. Whilst the SPD provides for a potential for up to 6,000 new homes, this will have a real impact on the requirements for new schools and additional school places. As there are no proposals for new schools within the SPD area, it is crucial that real targets are analysed, understood and set around school needs. All of the schools in the area are already more or less full. Therefore, more understanding of this issue is needed in the SPD and clear ideas set down as to how the education committee envisage provision of additional school places will work.	There is anticipated pressure for new secondary places which we are planning to meet by the provision of the new 5FE Aylesbury Academy in Walworth. It may be also be necessary over the life of the plan to increase primary school places in and around the opportunity area, which would be considered as part of standard primary place planning and strategy work.
777	1000		SPD 9 - Comm unity facilitie s		19. Although the SPD seeks to promote active lifestyles through walking, cycling, gardening etc more clarity is needed around discussions with NHS Southwark and what is being proposed. An impact study should be carried out to understand how existing facilities will absorb the additional population's requirements and examine the requirement and provision of for additional co-located services to the planned population hub.	We work closely with NHS Southwark to ensure that there are sufficient health facilities in the area to support demand. There are no proposals for new health facilities in the short to medium term. Further detail is set out in the infrastructure plan in section 6.5 of Appendix 1. The infrastructure plan has been amended to reflect a potential need for enhanced facilities in the Enterprise Quarter in the longer term as development takes place around South Bank University. We will continue to review the need for new or improved health facilities as new development takes place.
777	1001		SPD 1- Shoppi ng		The SPD should also include a requirement to assess the retail need along Walworth Road and maximums need to be set for shops such as payday loans, pawn shops and betting shops etc	Local planning authorities have very little control over uses such as betting shops, pawnbrokers and pay-day loan shops. This is because often these uses do not require planning permission. Uses such as betting shops, pay-day loan shops, banks, estate agents and travel agents are categorised in the same "use class" (A2, financial services). Planning permission is not required for changes within the same use class. There is also a permitted change of use to A2 uses from a restaurant, pub or cafe. The council recently responded to a government consultation arguing that betting shops should be placed in

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						their own use class which would give the LPA more control. However, this would require a change to the planning regulations.
777	1002		SPD 16 - Built form		21. Heritage assets in the enterprise quarter character area should be retained. I strongly support the retention of the terraces on Borough Road east of the railway line and the Georgian building on Newington Causeway. A major task will be to protect these buildings when previously the intention was to flatten the whole Newington Triangle site and offer that up the development	Heritage assets will be conserved and enhanced as set out in policies SPD 16: Built Form and SPD 51 Built Environment.
777	1003			Walwo rth Road SPD 35 - Built form and public realm	22. The SPD specifically references the Carter Place green/open space. Given the fact that the Planning Inspector has given the green light for its development, I do not understand its inclusion in the SPD as a meaningful site for consideration as publicly accessible green space. The SPD/Southwark Council needs to make clear what is now realistic.	Carter Place is referred to in the draft Open Space Strategy as a potential site for protection as open space. If development were not to occur on this site, we would wish to safeguard this site for protection as open space.
777	1004		SPD 16 - Built form		23. I believe the SPD should also detail a number of local heritage buildings that deserve to be included in the PSD, either in terms of being locally listed or having townscape merit. I feel the loss these buildings would be a grave loss to the local area and its character. Buildings include • Penton Place – south of Manor Place • Penrose Street – north side • Penrose St – corner of Penrose Grove • Walworth Road – the newsagents north of NatWest bank and buildings above Bagel King and Chicken Cottage • The buildings on East Street at its junction with the Walworth Road (which includes the Halal meat shop). 24. Outside of the SPD area and existing local conservation areas, other buildings that I would like to recommend for local listing include: a. The Surrey Memorial Gardens Hall. b. The Southwark Environment & Leisure building on Penrose St (opposite the vehicle entrance to Morrison's. This has 2 commemoration stones set into the front wall. c. The pub the Robert Peel on Hillingdon St. d. Manor Place Terrace 169-181 Manor Place SE17 e. The Royal Standard Pub. The only pre-Brandon	The Elephant and Castle SPD flags buildings which are potentially locally listable. However, it does not in itself locally list them. We are proposing to amend the SPD to make sure that this is clear. We will consult formally on the Local List and a Heritage SPD later in the year. At that point, there will be an opportunity for the local community, developers and landowners, to make representations and provide evidence on individual buildings, prior to the finalisation and adoption of the list.

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					Estate building that remains in the area f. Former National builders merchant Victorian buildings (2 from the early and one from late 1800s)	
778	1022	3 - Vision and objectives			The vision mentions escalators at the Northern Line station, but doesn't guarantee them. Please make this a priority, the lift service is always unreliable, and simply having more lifts might help but it won't be ideal. We'll still end up with many (more?) people crowding around waiting for lifts. I walk up/down the emergency stairs 99% of the time, escalators should be an option.	We agree that these changes are needed. We are working with TfL on a timetable to implement them.
778	1023		SPD 1- Shopping		SPD1 BAO: More shopping space is fine, but please don't just replace the old shopping centre with something similar but bigger. I hate indoor shopping centres, they're soulless. More street-level shopping would be good. Walworth Road has a nice community feel about it, although the standard of shops/restaurants is poor for the most part.	Noted. The advice for the Heygate Street character area supports a street based retail environment. We will use the SPD to seek to maximise permeability and accessibility through the shopping centre.
778	1024		SPD 16 - Built form		: Yes. Please don't build too many high-rise blocks. The problem with the area before was too many huge blocks, it seems to be going that way again. Granted they will be nicer, but the place needs a community/neighbourhood feel.	The London Plan indicates that tall buildings may be appropriate in the Central Activities Zone and the Opportunity Areas – one of which is Elephant and Castle. English Heritage and CABI have also produced guidance on tall buildings which has been endorsed by the government. This is also recognised in Strategic Policy 12 of the core Strategy which sets out that tall buildings can be accommodated in the Elephant and Castle. Tall buildings are of benefit to cities in a number of different ways, including: <ul style="list-style-type: none"> o Making positive contributions to places, making best use of land to accommodate much needed areas for housing or offices o Signifying the regeneration of an area o Reinforcing wayfinding and legibility o Creating a more interesting London skyline o Creating places which are more varied with distinctive character The principles set out in the SPD intend to ensure that the quality of the public realm is of a high standard, implemented well and conform to other standards set out such as in our Design and Access SPD. SPD 16 Built Form refers to high quality design and the use of appropriate and attractive materials. The wording in this policy will be changed to state that developments should consider the impact on neighbouring character areas as well as their own, and that edge

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						conditions of developments integrate well with adjacent surroundings. Also, our Design and Access Statement SPD provides guidance to developers and the wider community on how to prepare design and access statements for proposed developments in Southwark. Design and Access Statements are a legal requirement for certain planning applications and conservation area consent applications. They ensure important information is addressed before a planning application is submitted and include the design process and how certain design issues are addressed, for example: • safety • security • accessibility • the relationship between buildings and their surroundings
778	1025		SPD 6 - Wellbeing - Social and community infrastructure		SPD6 Please do support cultural and entertainment spaces, there's really nowhere to go in the evenings in the area.	SPD 6 supports a range of leisure and entertainment uses.
778	1026		SPD 7 - Sports facilities		SPD 7 MG: Looking forward to the new leisure centre, at the moment I walk to Camberwell to swim.	Support noted
778	1027		SPD 8 - Higher education and student housing		SPD8: Students are probably a good thing overall, but a bit wary of them disrupting local residents, please bear in mind when choosing locations for more housing	Comment noted. Existing policies are already in place to ensure that new and existing residents' amenity is protected. In addition saved Southwark Plan policy 3.2 - Protection of amenity, sets out that planning permission will not be granted where it would cause loss of amenity to present and future occupiers.
778	1028		SPD 10 - Public		SPD10 TG: The vision mentions escalators at the Northern Line station, but doesn't guarantee them. Please make this a priority, the lift service is always unreliable, and simply	Noted. We are working with TfL to bring forward improvements as expediently as possible.

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			Transp ort		having more lifts might help but it won't be ideal. We'll still end up with many (more?) people crowding around waiting for lifts. I walk up/down the emergency stairs 99% of the time, escalators should be an option.	
778	1029		SPD 17 - Buildin g heights		Please have the buildings on Heygate slowly build up in height. Starting at 3 storeys on Walworth Road and moving northwards. I live on the other side of Wansey St, and don't want huge buildings overlooking me if possible.	We consider that the SPD recognises the key principle that moving away from the tallest points, building heights should diminish to manage the transition in heights down to the existing context. This is explicit in SPD17 and in SPD 27 which relates specifically to the Heygate Street character area.
778	1030			Heygat e Street SPD 28 - Natural environ ment	SPD28 TC: Please keep all trees on Wansey Street.	SPD 18 states that trees should be retained wherever possible.
778	1031			Heygat e Street SPD 27 - Built environ ment	: Low-rise buildings north side of Wansey Street. Make the new Heygate development accessible and safe to walk through.	SPD 17 indicates that proposals must manage the transition in heights from the tallest elements of development, which will be towards Walworth Road, to the lower scale development in surrounding neighbourhoods. SPD 11 states that a key objective of the SPD is to improve accessibility and permeability through the area.
778	1032			Walwo rth Road SPD 35 - Built form and public realm	: Can something be done to improve the quality of shops/restaurants.	The SPD acknowledges in paragraph 5.4.5 that there is an opportunity to improve shop fronts along Walworth Road. As new developments come forward, or as shop fronts are replaced by shop owners, we will try to ensure that their appearance is of high quality and is in-keeping with local character.
779	1041		SPD 3 - Hotels		We already have lots of new hotels very near here just outside the E&C. Why more? We do not need lots of new retail, unless it's going to be really innovative or really	We consider the hotels can make a valuable contribution to the mix of uses at Elephant and Castle. They may also help relieve pressure in other areas such as Bankside. The

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					attractive to people from a wide area, like Westfield or Bluewater	GLA's 2006 Hotel Need study estimated that Southwark would need to provide around 2,500 new hotel beds by 2026 to help meet demand. Our aspiration is to transform the centre and ensure it appeals to a much wider catchment than it currently does.
779	1042	3 - Vision and objectives			It lacks ambition for really making Elephant and Castle compete with other central London districts. It sounds parochial and isolated from the bigger context. It needs to be more distinctive for visitors and more welcoming for families while still serving all the traffic and travellers.	Our vision is to consolidate the E&C as a major town centre which implies significantly boosting the facilities in the area and its offer to a wider catchment. The vision states that E&C has the potential to be an attractive central London destination and refers to the aim of having a diverse offer including shops, leisure facilities and cultural activities. The Core Strategy requires large developments to ensure that at least 10% of homes have 3 or more bedrooms in the opportunity area. 10% is the minimum which should be provided and we encourage developers to provide more family housing where possible across a range of tenures. The SPD cannot change policy in the Core Strategy.
779	1043	3 - Vision and objectives			: (1) It's not a "town centre" it's a capital city urban hub - let's be more ambitious, and it's not just about south London, the river is hardly a barrier, we need to draw people south from the busy north (2) 10% of housing of 3 bedrooms or more is not enough to encourage families to stay here (3) well being should acknowledge the importance of free open public green space (4) subways are not all bad, don't replace them all	1) The designation of "town centre" implies that it should be a focal point of town centre uses such as shopping, leisure and arts and culture, as well as a major transport hub. 2) The Core Strategy requires large developments to ensure that at least 10% of homes have 3 or more bedrooms in the opportunity area. 10% is the minimum which should be provided and we encourage developers to provide more family housing where possible across a range of tenures. The SPD cannot change policy in the Core Strategy. 3) We have amended the reasoned justification for SPD 18 to refer to the value of housing amenity sites and other green areas such as those in the highway. 4) We understand that some people wish the subways to be retained. On balance however, the council agrees with TfL that surface crossings would be preferable.
779	1044		SPD 5 - New Homes		Let's exceed space standards if at all possible, as standards are not what they once were. We benefit here at Perronet House from big rooms and we feel better for it.	Our Core Strategy sets out that all developments will be expected to meet the council's minimum overall floor sizes. Our residential design standards SPD 2011 sets out these standards for the whole of Southwark. These minimum space standards are approximately 10% larger than our previous standards and will help us to ensure the new

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						development provides an adequate amount of space to create good living conditions. This is a minimum policy and we encourage developers to exceed this minimum where possible.
779	1045		SPD 6 - Wellbeing - Social and community infrastructure		Do not forget the value of free open green space for well being. Too much of the green space has been ignored from your plans such as the space in the middle of Elephant and Castle roundabout	Theme 3: Wellbeing: Social and community infrastructure • Ensure that new development promotes healthy and active lifestyles.
779	1046		SPD 10 - Public Transport		Your questions role lots of points into one statement so I cannot agree with them. I am not against subways, I am strongly opposed to the plans to move London Road private traffic onto St George's Road. These are terribly badly designed questions. But I agree the Northern Line station should be improved and cycling and pedestrian safety encouraged. Subways safely keep pedestrians away from traffic	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
779	1047	4 -The preferred option/options	SPD 11 - Walkng and cycling		Again you are against subways and role the point into another one about a street which has no connection to subways. This seems really unprofessional of you.	On balance the Council supports TfL's aspiration of removing the subways and providing surface-level pedestrian crossings.
779	1048		SPD 18 - Open spaces		Please do value existing green spaces, verges, roundabouts, housing estates. These are very vulnerable at the moment.	We have an additional paragraph (para 4.6.5b) setting out more detail on how we will seek to improve the amenity value of land on housing estates and within the transport network. Further information is also set out in our draft Open Space Strategy which is available to view on our website at; http://www.southwark.gov.uk/info/856/planning_policy/2535/open_space_strategy
779	1049			West Square SPD 47 -	The division between the edge of West Square and Central Area is not strong. From the start of St George's Road the character of the area immediately changes from the Central Area as traffic volumes decrease and the residential nature	The character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The edges of the character areas are indicative and are not meant to imply a

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				Built form and public realm	dominates. West Square is just particularly fancy, but not really so different to places like Gaywood Street and Princess Street	sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to encourage development to consider the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.
779	1050			Central Area SPD 23 - Built Environment	Do not ignore the precious green space in this area, the grass, the shrubs, the flowers and mature trees. Reduce the dominance of the advertising hoardings here if possible.	We are proposing to amend SPD 18 to emphasise the value of housing amenity sites and green areas in the highway. We have also referred to the value of these in the open spaces strategy that we are currently consulting on.
779	1051			Heygate Street SPD 28 - Natural environment	Integrate this with the new park	Our open spaces strategy aims to make spaces work more effectively as a network. The new park on the Heygate development site would be an integral part of the network.
779	1052			Walworth Road SPD 36 - Natural environment	Extend the improvements northwards and link it to the new park	Figure 28 identifies provision of a new public square on Wansey Street at the top of Walworth Road. Figure 22 in the Heygate Character Area section highlights the need to provide new pedestrian links from this square to the new park.
779	1053			West Square SPD 47 - Built form	Extend this to include all of St George's Road and cut off a portion of the Central Area.	Our current findings do not show enough evidence to justify the inclusion of St. Georges Rd into the West Square Conservation Area in this location. West Square is a self-contained, tightly-knit area of development largely centred around the Georgian square. Enlarging this could weaken the strong and compact character of the area. The

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				and public realm		character areas are based on what existing places are like today, with the intention that developments will integrate across boundaries effectively. The West of the Walworth Road is different to the east as has been set out in the document. The edges of the character areas are indicative and are not meant to imply a sharp contrast between one side of a boundary to another. The boundaries are not hard and fast and wherever developments are close to a character boundary, they need to consider the character of the adjacent areas. The wording paragraph in paragraph 1.4.4 has been changed to reflect this. The wording in SPD16 has also been changed to ensure that development considers the impact on neighbouring character areas as well as their own, and where developments are close to the boundaries of another character area, ensuring that the edge conditions integrate well with adjacent surroundings.
780	1067	3 - Vision and objectives			Two way traffic on St. George's Road a serious backwards step.	Since the SPD was prepared, TfL have indicated that this proposal, while an aspiration, is no longer a priority. The SPD has been amended to indicate that this proposal would need to be explored further and that further consultation would need to take place if it were to be implemented.
780	1068		SPD 1- Shopping		This is all a happy progress	Support noted.
780	1069		SPD 10 - Public Transport		You do not seem to have considered the increased traffic of St George's Road -- ninety per cent residential, schools, park , museum and cathedral. What more traffic?	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
780	1070		SPD 19 - Energy , water and waste		What about traffic pollution, air quality and noise on St George's Road, Issues not addressed	The impact of development on the environment is a borough-wide issue. Core Strategy policy 13 sets how we will require all development to meet high environmental targets and reduce contributions towards pollution. In line with Strategic Policy 1, we will require a sustainability assessment to be submitted for all major developments that show how a scheme is the best possible development for a place by balancing economic, social and

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						environmental needs. Our Sustainable Design and Construction and Sustainability Assessment SPDs also sets out additional further information.
780	1071	4 -The preferred option/options	SPD 10 - Public Transport		No consultation with residents in my part of St George's Road. This is arrogant in its assumptions that we will encounter and 'improved' environment. Quite the opposite	Since the SPD was prepared, TfL have indicated that this proposal, while an aspiration, is no longer a priority. We are proposing to amend the SPD to indicate that this proposal would need to be explored further and that further consultation would need to take place if it were to be implemented.
780	1072			West Square SPD 46 - Transport and movement	What about St. George's Road?	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
780	1073		SPD 10 - Public Transport		St George's Road is in the West Square Conservation Area. The residents of listed buildings in the area have not been consulted.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
781	1074		SPD 10 - Public Transport		Making London road public transport only is an outrage. This will make st georges road a complete nightmare and will impact on the residents in Perronet house as all the bedrooms look out onto this road. I agree something needs to be done with regards to the queues of buses on London road wven though it's not creating a massive impact but the layout of bus stops could be improved. Also there are more residential properties on st George's road compared to London road and all these will be affected with regards to the increase in traffic. Also, it must be taken into account that there are 2 schools on st George's road and the safety of these children is paramount including the fact there is also a public park which within is the imperial war museum which again especially during the summer months has large groups of children visiting. The money set aside for this project can and should be better spent elsewhere locally	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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782	1082	3 - Vision and objectives			: I disagree with the proposals to reduce or eliminate local and shopping parking. For those with young children trying to shop, parking is essential. I currently travel outside the borough for my weekly shop. Help Southwark residents keep it local by allowing parking for shopping	The shopping centre currently contains a car park for 140 cars and our policies would not necessarily require its removal in a future redevelopment. There will be a large increase in demand for shopping facilities from people in new residential developments which are within walking distance of the shopping centre. Improved cycling and public transport facilities will widen the catchment area.
782	1083		SPD 1- Shopping		The aim must be to make E&C a destination retail space. Please should wish to travel here - as they do to the shops of Canary Wharf or Borough Market	The overall retail strategy for the area is to boost the amount of comparison goods floorspace (clothes household goods, footwear) in the centre, providing more choice for residents, support the local economy and reduce the need for people to make trips to destinations further away. SPD 1 supports (amongst others) the transformation of the shopping centre with the introduction of large 'anchor tenants' and a wider mix of retail uses and to promote active ground floor uses on the Heygate development site. We have recognised through Policy SPD 21 for the Central Character Area, that the shopping centre provides a significant opportunity to improve the retail offer in the area, and there is potential to increase the appeal of the centre to Southwark residents. SPD 21 sets out guidance for the redevelopment/remodelling of the shopping centre which promotes the improvement of the retail offer through the provision of a range of types of retail, including comparison goods.
782	1084		SPD 5 - New Homes		Given the proximity to central London, this area of the north of the borough should allow high quality development - which may not always be affordable to existing residents. If you hold down housing values you stifle the borough's development.	Comment noted. The SPD aims to provide a range of housing types and tenures including market and affordable housing.
782	1085		SPD 10 - Public Transport		SPD10 TG: The proposal to make London Road bus only is insane as this will push the traffic onto the residential roads e.g. St Georges Road. More parking is needed not less.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
782	1086		SPD 17 - Buildin		Why are you trying to build tall buildings? There is no need to do so.	The London Pan indicates that tall buildings may be appropriate in the Central Activities Zone and the Opportunity Areas – one of which is Elephant and Castle.

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			g heights			English Heritage and CABI have also produced guidance on tall buildings which has been endorsed by the government. This is also recognised in Strategic Policy 12 of the core Strategy which sets out that tall buildings can be accommodated in the Elephant and Castle. Tall buildings are of benefit to cities in a number of different ways, including: <ul style="list-style-type: none"> o Making positive contributions to places, making best use of land to accommodate much needed areas for housing or offices o Signifying the regeneration of an area o Reinforcing wayfinding and legibility o Creating a more interesting London skyline o Creating places which are more varied with distinctive character
782	1087		SPD 17 - Building heights		The green links proposal is hopeless if you increase traffic on the road next to the Geraldine Harmsworth park. Reduce vehicles on St Georges - make this a green link.	We have set out in the vision how we will seek to ensure development creates a more attractive and safe environment with priority for public transport users, cyclists and walkers over the car throughout the area. A minimum level of car parking and limitations on traffic will reduce pollution. We are also seeking to provide a new and improved street layout including public open spaces allowing those who live and work in the area to move around easily and safely.
782	1088		SPD 10 - Public Transport		Why are you threatening to put more traffic through the middle of the West Square area? This makes no sense if you (correctly) list it as some of the borough's finest heritage architecture.	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.
783	1089		SPD 5 - New Homes		This should be strictly enforced. No developer should be enabled to build without provisioning for affordable housing. I would like to see stronger wording in the SPD on this point.	Noted. As set out in the SPD, the Core Strategy and the saved Southwark Plan the policy is a minimum of 35% affordable housing, with a split of 50% social rented housing and 50% intermediate housing. As set out in both the adopted and the draft affordable housing supplementary planning documents, any departure from this policy needs to be justified to the satisfaction of the council through a financial appraisal.
783	1090		SPD 12 - Parking		SPD12 TG: There should be as little parking as possible in the town centre. In 2012 it makes no sense to have cars in London. People should get over it. I would rather have parking spaces in outer areas, and free buses towards the	Noted. SPD 12 supports car-free development in much of the opportunity area.

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					town centre.	
783	1091		SPD 17 - Building heights		I would like to see bolder wording on these points. Tall buildings should not coalesce to form a single mass, and from far away they should look separate and distinct from each other. Developers are already planning to go overboard with tall/dense buildings (see http://www.london-se1.co.uk/news/view/5831) and this should be enforced through stronger wording in the SPD and in every other possible way. We must not turn the Elephant and castle into a single mass of tall buildings, hard to navigate and looming for pedestrians underneath.	This point is adequately addressed in the wording of SPD17 Building Heights:”The tallest buildings should act as focal points in views towards the Elephant and Castle along main roads and strengthen gateways into the central area. Moving away from the tallest points, they should diminish in height to manage the transition down to the existing context. They should be used to add interest to London’s skyline and when viewed in a cluster, should be articulated to ensure that they do not coalesce to form a single mass.”
783	1092		SPD 20 - S106 Planning obligations and the community infrastructure levy		: Planning levies should be carefully calibrated so to provide a fair profit for the developers and at the same time avoid transforming E&C into a developer’s Mecca with cheap levies and high profits. E&C should be a liveable area, not a fearsome mass of buildings planned with the only criterion to make as much profit as possible for the developer.	Noted. Our policy on planning obligations has been informed by a viability study which considered the maximum reasonable charge which the council could negotiate.
784	1093	General			I have read through most of the document with interest and simply wanted to congratulate you and your team on putting this together and the aims and ambitions of the document.	Support noted.
785	1094		SPD 18 - Open spaces		Figure 2 of the document shows the boundaries of the opportunity area. I notice that on this map and on page 62 of your document (and possibly other maps) the area of Geraldine Mary Harmswoth park is inaccurate. A large chunk should be in green where there is currently an orchard and a woodland copse and the free play area of the sports pitches. On the map this is not coloured in green as part of Metropolitan Open land. It is important that this is rectified to safeguard that part of the park from future development. I suspect this map has been taken from a time when that part was a swimming pool. The eastern boundary should	We have amended SPD 48 to take into account the proposal for extending the boundary of the Metropolitan Open Land and Site of Importance for Nature Conservation of Geraldine Mary Harmswoth Park. We are proposing to extend the boundary to cover the south east corner of the park which was previously in use as a swimming pool. We cannot take this designation forward through the SPD but we have noted our aspirations to take this forward in a higher tier planning document, such as the forthcoming site allocations DPD. We will also amend the draft Open Space Strategy to set out a recommendation for this boundary

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					continue to the back of the houses in Brook Drive and the line paralell with Brook Drive continues until it meets the eastern boundary at a right angle.	change.
786	1095				Firstly, I would like to point out that I have only been made aware of the SPD quite recently. Secondly, having spoken to residents in my street (Henshaw Street) and residents in surrounding areas such as Chatham Street and the Peabody Estate in Rodney Road, I am horrified to find that the majority of them were not aware of the SPD or what its purpose is. It is apparent that local councillors and Lend Lease have not fully consulted with local residents; there has been no canvassing and certainly no leafleting. It was mentioned to one of our Henshaw Street TRA committee members Bob Brett, via e-mail that Lend Lease was going to address the residents and other local groups at a meeting. They were going to discuss the SPD and what they wanted to do in the area, especially regarding Phase 1 of the Heygate Estate. As yet there has been no meeting.	The council has endeavoured to consult thoroughly and over a 3 month period on the SPD. The consultation report provides further detail of consultation that has been carried out. Consultation on the SPD is a separate process however to the consultation exercise undertaken by Lend Lease. The council will be consulting formally on the Lend Lease proposal after the planning application has been submitted.
786	1096		SPD 16 - Built form		We have seen lovely sketches of buildings and tower blocks, but it is not acceptable to put tower blocks on Balfour Street, Rodney Road or any local vicinity. For many years now the area has welcomed the sunlight due to having low level buildings and any attempt to take this sunlight away will be met with a backlash from the whole of the local community. The vicarage and church on the corner of Chatham Street and Balfour Street has for over a hundred years now had the sunlight shining through their windows and over the roof tops, as have the residents in Henshaw Street. There were originally only a hundred or so houses on the Phase 1 sight, yet now it appears there is going to be approx 250 dwellings on the sight. This is not about sustainability, because if it were you would build 100 three bedroom dwellings, rather than trying to fit as many single dwellings into the space as can possibly fit. The sheer density of this is not sustainable.	We consider that the SPD recognises the key principle that moving away from the tallest points, building heights should diminish to manage the transition in heights down to the existing context. This is explicit in SPD17 and in SPD 27 which relates specifically to the Heygate Street character area.
786	1097		SPD 5 - New Homes		The community would like serious questions answered about the local area and social housing. This scheme will clearly segregate the community between private sector and the social housing sector. Local people are not going to be able to afford to live in these dwellings.	Through our planning policies we aim to ensure that a range of housing types are provided. The Core Strategy and the SPD set out that we are aiming to provide 4,000 new homes across the Elephant and Castle area. We also have policies which set out the proportion of the new

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						homes to be affordable, private, family sized etc. Our residential design standards SPD sets out that new housing should be integrated with no clear distinction between market and social housing.
786	1098				It appears that this whole process is being pushed through as quick as possible and is clearly a profit making exercise so that developers can get a quick profit without any consideration for the local community and its welfare. I re-iterate that you have not consulted the local community and suggest that you extend the deadline for the draft SPD so that the local community can be consulted and have its say on what is happening within the local area that we live in.	Our Statement of Community Involvement 2008 (a statutory document) sets out how and when we will involve the community in the alteration and development of town planning documents and applications for planning permission. National planning laws set out the minimum standards for public consultation. We have gone beyond these standards and have set out how we have engaged with the community, stakeholders and businesses in the preparation of the SPD in the Consultation Report. We consult for 12 weeks comprising 6 weeks informal and 6 weeks formal consultation on all of our Local Development Documents (which include SPDs). The council's Consultation Report sets out the consultation that has been carried out and shows how the planning regulations have been met, along with the council's SCI.
787	1100		SPD 10 - Public Transp ort		I object to the Council's plan to convert St Georges Road into 2 way traffic, and making London Road a bus only route. Georges Road is lined with residential properties, a GP surgery, a pharmacy, one nursery, two primary schools and one secondary school, a large park and sports fields and the Imperial War Museum and more besides. London Road has a university along the length on one side, with a small strip of residential properties and a few shops and takeaways on the other. It is not just that traffic will be coming from two directions on St Georges Road should the proposed changes take place, but also that the volume of traffic will increase massively. None of us wants to see a child get hurt, but I fear that this is all the more likely should the proposed changes go through. It also is counterintuitive to suggest that your accepted bus on bus congestion can be eased by removing cars. Surely the as cars have nothing to do with buses occupying bus stops with other busses waiting, then they can have no impact on the solution. As for the pedestrian traffic of people waiting on these busses, surely these are a consequence of this bus on bus congestion and as such the	The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.

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					<p>solution is the same. You can either re-arrange the stops, spreading them out a little way to increase the numbers of busses that can sit at each stop. With the removal of the bendy busses this is surely an option, as if one of these could fit in a stop, it would not take much more space to fit two busses in the same stop. The other solution is to save the £10m budgeted to make the road changes, and add these funds to the upgrade of the shopping centre to include a bus station.</p>	
788	1101	5 - Character Areas		Central Area SPD 22 - Transport and movement	<p>I am very worried about and opposed to the proposal to make this two way opposite St Georges cathedral where I live (when in London rather than studying) . I'm particularly concerned about the parking implications for residents.</p>	<p>The scheme for London Road was included at the request of Transport for London, and entirely consists of roads for which TfL is the Highway Authority. The scheme would only be implemented following further design work, which would include consideration of noise, pollution and road safety, and extensive further consultation.</p>