

PART 1

OVERALL STRATEGY

Introduction - General

OBJECTIONS

First Deposit

1 / 63 / 5570	Forgotten Corner of Camberwell
1 / 44 / 6127	Ms Sofia Roupakia
1 / 121 / 6267	Mr Peter Lawson
1 / 142 / 6651	Esmeralda Road Tenants & Resident Association
1 / 67 / 6774	Camberwell Society
1 / 208 / 7113	Gordon Dewar
1 / 38 / 7069	Bankside Business Partnership, c/o Better Bankside
1 / 159 / 7096	Canada Water Forum

Second Deposit

2 / 208 / 7187	Gordon Dewar
2 / 452 / 8187	Conrad Phoenix (Canada Water) Ltd
2 / 477 / 8398	Dulwich Society
2 / 68 / 8456	GLA
2 / 52 / 9068	GOL
2 / 21 / 9091	Harmsworth Quays Printing Ltd
2 / 353 / 9183	Mr Paul McQuail
2 / 6 / 9633	Barton Willmore
2 / 202 / 9790	Nunhead Action Group

MAIN ISSUES

1. Whether the UDP is sufficiently precise in its drafting and intentions;
2. Whether policies should be included in Part 1 of the UDP.

INSPECTOR’S REASONING AND CONCLUSIONS

- 1.1.1 I agree with **Mr Lawson**’s comments about ambiguity in the UDP. It would be much improved by more precise drafting, particularly with regard to the examples that he quotes. **The Camberwell Society** makes similar points. The Council agrees that the policies, for example, should be drafted more in line with the Good Practice Guide, and I urge it to adopt this approach. Policies should be clear and certain, with flexibility in their application being provided not by such words as *normally* but by the Planning and Compulsory Purchase Act 2004 Section 38(6). Essentially, this allows for material considerations to outweigh provisions of the development

plan. Precision in drafting is vital, hence my advice in my letter to the Chief Executive.

1.1.2 I agree with **Roger Tym and Partners** that paragraphs in the UDP should be individually numbered. This should result in easier reading and referencing. The **Greater London Authority** (GLA) requests that mobility impaired be replaced by disabled people. I agree with the Council, however, that these 2 terms relate to different issues. The Glossary in the Southwark Plan 18th July 2005 usefully defines both terms. I do wonder, however, if *people with disabilities* would be a better term than *disabled people*. A disability does not necessarily make a person disabled. I endorse the amended Glossary, but invite the Council to consider the point.

1.1.3 **The Bankside Business Partnership** refers to the need to minimise conflict between policies. In principle, that is desirable. But in the determination of a planning application it is for the decision-maker to have regard to the most relevant provisions of the development plan and to attach due weight to each one.

1.1.4 **The Nunhead Action Group** refers to the need for various minor corrections which the Council and I accept.

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1.1.5 On the second issue, I agree with the **Government Office for London** (GOL), as does the Council, that Part 1 of the UDP should contain policies. The Southwark Plan 18th July 2005 now rightly includes strategic policies and, although on occasion I comment on their drafting, I endorse this general approach. It accords with advice in Planning Policy Guidance (PPG) 12. Supplementary Planning Guidance (SPG) should not form part of the UDP, and the necessary change is proposed. That accords with PPG 12 paragraph 3.15. Similar guidance is to be found in the equivalent Planning Policy Statements (PPS).

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1.1.6 There are other matters. I agree that the enforcement of planning control is an important matter, but it is for the Council to decide the best ways of undertaking it. That includes keeping an eye on developments permitted and with the compliance or otherwise with any conditions attached to those permissions. The possible effect of undue vehicle noise on residential amenity is a material consideration, but it is not for me to review the Council’s determination of particular planning applications.

1.1.7 As mentioned in my letter to the Chief Executive, I am satisfied that the Council has abided by the statutory requirements concerning consultation on the UDP. Whatever the time of year chosen for this part of the process of plan making, it will always be less convenient for some members of the public than for others. But in my opinion, the 6 weeks statutory period should give everybody a reasonable opportunity to make his or her views known. I note, however, that

the **Esmeralda Road Tenants’ and Residents’ Association** was given additional time to submit its objection.

- 1.1.8 **Mr Dewar’s** objections are essentially about provisions for compulsory acquisition and opportunities for any owner occupiers affected to purchase properties similar to those acquired and in the same locality. These considerations are, however, more for discussion and negotiation between freeholders and the Council with resort to statutory provisions where need be. I am not convinced that these are details, however important to the people involved, that should be set out in the UDP.
- 1.1.8 The SPG for Canada Water has been redrafted and the UDP proposed to be changed to take account of various objections. The SPG should usefully provide a more detailed basis for the determination of planning applications in this part of Southwark.
- 1.1.10 In response to **Mr McQuail’s** point, I agree with the Council that the UDP should continue to be prepared within the framework of the Town and Country Planning Act 1990 and the Town and Country Planning Regulations 1999. I understand that the Council has started the preparation of a Local Development Framework, and no doubt it will accord with the requirements of the Planning and Compulsory Purchase Act 2004 and consequent Regulations.
- 1.1.11 The Glossary is more comprehensive and certain Sections re-arranged, as requested by the **Dulwich Society**.
- 1.1.12 I deal in more detail later with the Council’s proposals for Canada Water and Peckham.

RECOMMENDATION

- 1.1.13 I recommend that Introduction - General in Part 1 of the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Section 1 - Introduction

OBJECTIONS

First Deposit

1 / 57 / 5640	Ms Pauline Benington
1 / 2 / 5650	St George (South London) Ltd
1 / 5 / 5651	Berkeley Group Plc & St James Group Plc
1 / 3 / 5653	George Wimpey Central London
1 / 21 / 5655 (CW)	Harmsworth Quays Printing Ltd
1 / 20 / 6124	Capcount Kings Reach (Jersey) Ltd
1 / 18 / 6125	Minerva Plc
1 / 19 / 6126	City Estates
1 / 14 / 6136	Royal London Asset Management Ltd
1 / 7 / 6142	Fairview New Homes Ltd
1 / 26 / 6146 (CW)	St Martins Property Investments
1 / 26 / 6148 (CW)	St Martins Property Investments
1 / 16 / 6419 (CW)	Mr J H Taylor
1 / 47 / 6153	Berkeley Homes (City and East London)
1 / 110 / 6178	Defence Estates (SE & G)
1 / 4 / 6255	Bellway Homes Ltd
1 / 52 / 6316	GOL
1 / 52 / 6319 (CW)	GOL
1 / 52 / 6323	GOL
1 / 52 / 6330	GOL
1 / 174 / 6370	Dulwich Society Wildlife Committee
1 / 6 / 6730	Barton Willmore
1 / 25 / 6770 (CW)	Land Securities Group Plc
1 / 52 / 6850	GOL
1 / 51 / 6945	Berkeley Homes Plc
1 / 68 / 6985	GLA
1 / 90 / 6989	London Borough of Lambeth
1 / 90 / 6992	London Borough of Lambeth
1 / 183 / 7078	English Nature
1 / 142 / 7079	Esmeralda Road Tenants’ & Residents’ Association
1 / 59 / 7081	Southwark Friends of the Earth

Pre-Inquiry Changes

2 / 16 / 7600	Mr J H Taylor
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MAIN ISSUES

1. Whether this section of the UDP provides a suitable framework for the determination of planning applications in the Elephant and Castle area;
2. Whether the term *Local Planning Authority* (LPA) is confusing.

INSPECTOR’S REASONING AND CONCLUSIONS

1.1.14 The Southwark Plan 18th July 2005 sets out a Vision for the whole Borough. Its various aspects are especially relevant to the Council’s proposals for the regeneration of the Elephant and Castle area. It provides a useful context for the Council’s more detailed aspirations which come later in the UDP. The status of SPG is now correctly defined, thereby meeting a number of valid points made by Objectors. As many say, it should be subject to different consultation procedures and should not form part of the UDP.

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1.1.15 On the second issue, I see little scope for confusion. As a local authority, the London Borough of Southwark has a number of duties. These include those of a local planning authority, and it is in that capacity that it is preparing the UDP and determining applications for planning permission. *Local planning authority* is a term used in legislation and is common parlance in the development process. I am sorry to disagree with **Mr Taylor** on this point, but I think that the Southwark Plan 18th July 2005 unambiguously makes the relevant points.

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1.1.16 On other matters, the Southwark Plan 18th July 2005 helpfully clarifies the plan period, until 2016. This meets the objection made by the **Government Office for London**. The level of housing provision is reasonably considered later in the UDP. The Vision and the addition of Strategic Policies (SP) to the UDP, especially SPs 1, 2 and 3, meet the objection made by the **Dulwich Society Wildlife Committee** concerning the objective of improving quality of life.

1.1.17 I deal with related points of objection above in Introduction - General. These include precision in the drafting of policies.

RECOMMENDATION

1.1.18 I recommend that Section 1 - Introduction in Part 1 of the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Section 2 – Plan Format

OBJECTIONS

Second Deposit

2 / 16 / 7601	Mr J H Taylor
2 / 459 / 8332	Malcolm Judd & Partners
2 / 122 / 9213	Friends of East Dulwich Station
2 / 122 / 9214	Friends of East Dulwich Station

MAIN ISSUE

Whether the role of Supplementary Planning Guidance (SPG) is made sufficiently clear.

INSPECTOR’S REASONING AND CONCLUSIONS

1.2.1 The Southwark Plan 18th July 2005 paragraphs Part 1 Sections 2.2 and 12.2 make it clear that SPG may be a material consideration in the determination of planning applications. *May* rightly implies that that will not always be the case. SPG can be an important document in amplifying the policies and proposals of a development plan and by guiding prospective developers in the preparation of their schemes. Owing to that importance, I agree with **Mr Taylor** that there should be some reference to their adoption.

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1.2.2 On other matters, the Council accepts the point about evaluation made by the **Friends of East Dulwich Station**. So do I. Consultation on the prospective Local Development Framework will have to accord with statutory requirements, as has the preparation of the UDP. Paragraph 2.3 will have to be updated at the time of adoption of the UDP to acknowledge, for example, the Planning and Compulsory Purchase Act 2004.

1.2.3 The reference to SPG could be improved somewhat, as I recommend.

1.2.4 I deal with the objection made by Malcolm Judd & Partners concerning the extent of the Priority Neighbourhood and Regeneration Area at Canada Water in Part 1 Section 9.4 of my Report.

RECOMMENDATION

1.2.5 I recommend that Section 2 – Plan Format in Part 1 of the UDP be modified in accordance with the Southwark Plan 18th July 2005 apart from:

1.019

.....They will usually be adopted by the Council and may be material considerations in its determination of planning applications.

Section 3 – External Influences

OBJECTIONS

First Deposit

1 / 43 / 6209	Mr Richard Lee
1 / 93 / 6311	Derek Kinrade
1 / 68 / 6419	GLA
1 / 182 / 6452	English Heritage
1 / 185 / 6479	Crystal Palace Community Association
1 / 198 / 6640 (CW)	SBEG
1/182/6637	English Heritage
1 / 82 / 6647 (CW)	Trinity Newington Residents' Association
1 / 76 / 7073 (CW)	Oakmayne Properties
1 / 159 / 7111	Canada Water Forum
1 / 75 / 7133	Access Self Storage Ltd

Second Deposit

2 / 488 / 8577	Sylvia Smith
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MAIN ISSUE

Whether the UDP adequately promotes community cohesion and suitably refers to regional, national and international planning policies.

INSPECTOR’S REASONING AND CONCLUSIONS

- 1.3.1 The Southwark Plan July 18th 2005 introduces useful additions to the UDP which appear to me to meet the substance of **Mr R Lee**’s valid points in his objection. I agree with the Council that community cohesion is a legitimate, indeed highly desirable, objective for a development plan and that effective community involvement is a vital ingredient in its preparation. For those reasons I endorse SP2 Participation.
- 1.3.2 In my judgement, the Council has adopted a thorough and most conscientious approach to community cohesion and community involvement. The UDP has been the subject of a Sustainability Appraisal (CD 1.5.2) at each of its stages of preparation. The Second Deposit version has been the subject of an Equalities Impact Assessment (CD 4.17), which *goes beyond race to include gender, disability, age, faith and sexual orientation*. I note also the contents of the Statement of Community Involvement (CD 4.13), and conclude that the Southwark Plan July 18th 2005, as a land use plan, admirably promotes community cohesion.
- 1.3.3 Concerning the extent to which the UDP should refer to, or repeat, European, national and regional guidance and policies, I consider that the Southwark Plan July 18th 2005 provides a useful context for the

land use policies and proposals of the UDP. Reference to the London Plan, with which the UDP must generally conform, is particularly apt. Together, they form the development plan for Southwark

- 1.3.4 Any widening of that context, by including more references to national and international policies, would be superfluous and unduly lengthen the UDP. I agree with the Council that it is *not necessary to list every piece of national policy*. The absence of a reference to a particular PPG or PPS, for example, would not prevent the Council from relying on it, or any European legislation or Directive, as a material consideration in the determination of a planning application. Nevertheless, the UDP should refer to PPGs and PPSs in general at this point. A reference to the important matter of previously-developed land should also be made.
- 1.3.5 **Mr Kincade** refers to intensification. In general, but depending upon local circumstances, local planning authorities should seek the full and efficient use of land, especially for housing. That is also a requirement of the London Plan. I deal with the **Canada Water Forum’s** point about the proposed Action Area at Canada Water and the envisaged density of development there in my examination of Canada Water in Part 1 Section 9.4 of my Report.
- 1.3.6 The Council has reviewed land allocated for employment use, as urged by **Oakmayne Properties** and **Access Self Storage Ltd**, and has released about 100 ha of it for other uses.

RECOMMENDATION

- 1.3.7 I recommend that Section 3 – External Influences in Part 1 of the UDP be modified in accordance with the Southwark Plan July 18th 2005, apart from:

1.024

The Southwark Plan must comply with Government policies, including those set out in Planning Policy Guidance (PPG) and Planning Policy Statements (PPS), unless local circumstances justify a departure, and:

.....more re-use of previously-developed land.....

Section 5 – The Southwark Plan Policies

OBJECTIONS

First Deposit

1 / 15 / 5462	Dulwich Estate
1 / 39 / 5470	National Car Parks Ltd
1 / 59 / 5542	Southwark Friends of the Earth
1 / 65 / 5743	Blackfriars Investments Ltd
1 / 43 / 6160	Mr Richard Lee
1 / 10 / 6308 (CW)	Teighmore Ltd
1 / 52 / 6324	GOL
1 / 95 / 6344	Ms E Conn
1 / 16 / 6347	Mr J H Taylor
1 / 32 / 6348	Creekside Forum
1/ 174/ 6370	Dulwich Society Wildlife Committee
1 / 15 / 6407	Dulwich Estate
1 / 68 / 6438	GLA
1 / 193 / 6594	Mr Peter Todd
1 / 195 / 6615	Sport England
1 / 174 / 6633	Dulwich Society Wildlife Committee
1 / 174 / 6634	Dulwich Society Wildlife Committee
1 / 59 / 6652	Southwark Friends of the Earth
1 / 59 / 6653	Southwark Friends of the Earth
1 / 59 / 6654	Southwark Friends of the Earth
1 / 59 / 6655	Southwark Friends of the Earth
1 / 59 / 6656	Southwark Friends of the Earth
1 / 59 / 6657	Southwark Friends of the Earth
1 / 59 / 6658	Southwark Friends of the Earth
1 / 32 / 6731	Creekside Forum
1 / 54 / 6913	Camberwell Traders Association
1 / 170 / 6943 (CW)	Bankside Open Spaces Trust
1 / 185 / 6973	Crystal Palace Community Association
1 / 24 / 7066	Corporation of London
1/ 59/ 7081	Southwark Friends of the Earth

Second Deposit

2 / 93 / 7141	Mr Derek Kinrade
2 / 202 / 7177 (CW)	Nunhead Action Group
2 / 213 / 7328	Woodland Views LTD
2 / 274 / 7522 (CW)	Michael Dillon Architect & Urban Designer
2 / 274 / 7523 (CW)	Michael Dillon Architect & Urban Designer
2 / 274 / 7524 (CW)	Michael Dillon Architect & Urban Designer
2 / 274 / 7525	Michael Dillon Architect & Urban Designer
2 / 274 / 7526	Michael Dillon Architect & Urban Designer
2 / 16 / 7607	Mr J H Taylor
2 / 400 / 7833	Living Streets
2 / 401 / 7847	Environment Agency

2 / 401 / 8031	Environment Agency
2 / 58 / 8213	North Southwark Community Development Group
2 / 452 / 8237	Conrad Phoenix (Canada Water)
2 / 68 / 8407	GLA
2 / 22 / 8892	Department of Health
2 / 122 / 9215	Friends of East Dulwich Station
2 / 122 / 9216	Friends of East Dulwich Station
2 / 122 / 9217	Friends of East Dulwich Station
2 / 122 / 9218	Friends of East Dulwich Station
2 / 28 / 9241	Tesco Stores Ltd
2 / 198 / 9385	SBEG
2 / 40 / 9649	Mr Donnachadh McCarthy

Pre-Inquiry Changes

P / 104 / 9661 (CW)	Guy's and St Thomas' Hospital NHS Trust
P / 28 / 9778	Tesco Stores Ltd
P / 202 / 9782 (CW)	Nunhead Action Group
P / 68 / 9812	GLA
P / 58 / 9900	North Southwark Community Development Group
P / 88 / 9904	Laing Homes South East Thames
P / 43 / 9932	Mr Richard Lee
P / 403 / 9943	Berkley Homes (South East London) Ltd
P / 213 / 9977	Woodland Views Ltd
P / 2 / 9997	St George (South London) Ltd
P / 43 / 10025	Mr Richard Lee
P / 43 / 10026	Mr Richard Lee
P / 43 / 10027	Mr Richard Lee
P / 43 / 10028	Mr Richard Lee

MAIN ISSUES

1. Whether the UDP pays sufficient attention to community cohesion, community involvement, community/social enterprise and local management of community assets as the key to sustainability;
2. Whether more attention should be given to the River Thames;
3. Whether certain Strategic Policies (SP) are suitably drafted and/or should be augmented.

INSPECTOR’S REASONING AND CONCLUSIONS

- 1.5.1 I deal in more detail with a number of points made in these objections elsewhere in my Report. The Southwark Plan 18th July 2005 includes substantial changes to earlier editions of the UDP and meets many of the valid points in a number of objections. This comment applies especially to the SPs, previously Objectives of the UDP.

1.5.2 On the first issue, I consider that the Southwark Plan July 18th 2005 introduces useful additions on these matters. It goes as far as it should, as a plan devised to guide the use and development of land, in taking them into account. In particular, as a result of **Mr Lee’s** helpful contribution to the Inquiry, the Introduction now refers to the 6 equality target groups. SPs 1, 2 and 3 set out guiding principles that apply to all members of the community in the development process and in the determination of planning applications. I emphasise, however, that in most cases it is for the Council, as local planning authority, to determine applications for planning permission, having carried out the consultations that it deems necessary in the particular circumstances. For that reason I do not support **Mr Lee’s** suggestion *to effect a sharing of power between people and the statutory agencies which serve them*, well-intentioned though it is.

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1.5.3 Secondly, I agree with **Mr Taylor** and the **Creekside Forum** about the importance of the River Thames to the Borough. As **Mr Taylor** says, it has contributed to Southwark’s history and it shapes much of its present character. Councillor Catherine Bowman touches on the historic aspects of the River in her Foreword. No doubt the River has more potential for transport, and SPs 16 and 18 go a good way to meeting valid points. The Glossary includes *water transport* in its definition of sustainable transport, and that would include the carriage of passengers and freight on the River. I note **SBEG’s** concerns about illegal trading alongside the River, but I can add nothing to the Council’s stated commitment to dealing with it.

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1.5.4 I turn now to the third issue. The SPs as they now appear in the Southwark Plan 18th July 2005 seek in total to improve quality of life and well-being in the Borough. This meets the objection made by the **Dulwich Society Wildlife Committee**. *Development* is defined in the planning Acts, and I see no need for the term to be included in an SP or in the Glossary. SP 1 and the definition of sustainable development in the Glossary appear to me to accord with generally accepted definitions of this term. No further change is required.

1.5.5 SP 3 is broad enough to cover all reasonable anticipated needs and services, including health. I see no need to distinguish in SPs 4 or 5 **Mr Lee’s** *protection of small businesses, promoting diversity in employment, social enterprises and not-for-profit organisations*. There is a limit to the extent that a land use plan can achieve these objectives, worthy though they might be. The policies in Part 2 Section 1 of the UDP, modified as I recommend, will go as far as they can in these respects.

1.5.6 SP 5 deals with regeneration; no doubt many organisations will be involved in it, and again it would be better to name none rather than some.

- 1.5.7 SP 9 is designed to meet community needs. This embraces many aspects. It includes **Mr Lee’s development of self-managed community facilities independent of the statutory sector**. Similarly, there is no need to distinguish these, or any other types. The **NHS Estates** is concerned about the provision of new facilities commensurate with an increase in population. SP 9 covers this point in general and as far as is needed. I would expect the Council to consult the Objector on large development proposals and ensure that any such schemes contributed to health and other services in accordance with tests in Circulars 11/95 and 05/2005.
- 1.5.8 I share some of the concern that **Woodland Views Ltd** has about the *positive impact* to which SP 10 refers. I think that these words are a contradiction in terms but, more to the point, a development should generally cause no harm to relevant matters. Any benefits deriving from it should be reasonably related to it. It would be better, however, to consider this objection in terms of design. Government policy is to encourage good design which is seen as indivisible from good planning. It is a vital aspect of sustainable development. It should be the aim of all those involved in the development process and it positively contributes to making places better for people to live in and for their communities. The Policy should be recast along these lines.
- 1.5.9 **Laing Homes South East Thames** says that SP 13 implies a more onerous test than that which applies to Conservation Areas which is to pay special attention to *the desirability of preserving or enhancing the character or appearance of that area*. I also have my doubts about the drafting of this Policy. It seems to me to purport to apply control in Conservation Areas to the entire Borough, and that is misleading. I accept that it is meant to be a general policy designed to protect all that is good in the Borough’s built environment, and that is a laudable aim. Nevertheless, it could be better phrased and in such a way as not to preclude the acceptable re-use of previously-developed land and achievement of higher densities where suitable.
- 1.5.10 SP 15 protects open space, and there is no need to qualify other SPs with duplication. The Council agrees with the comments of the **GLA** concerning this Policy; a sentence should therefore be added to it, as set out in CD/5.5.32.
- 1.5.11 I see little point in merging SPs 18 and 19. Although related, they are sufficiently important to qualify as separate policies. I particularly support the objective of minimising the need to travel, *especially by car*. Retailing can assist regeneration, but SP 7 is concerned with arts, culture and tourism. In any event, the inference is that retailing is a service included within other SPs, particularly SP 5 and 6.
- 1.5.12 SP 20 should be retained in this part of the UDP because it helpfully explains the Council’s approach to the development of all these Development Sites throughout the Borough. **Berkeley Homes (South East London) Limited** says that this Policy should acknowledge that there might be exceptional circumstances that

would outweigh the benefits of the required use and justify an alternative use on one or more of these Sites. Essentially, the Company seeks flexibility in the Policy, but in my judgement that is already provided throughout the UDP’s policies and proposals and by the Planning and Compulsory Purchase Act 2004 Section 38 (6). That flexibility could outweigh *must be provided*. Yet more flexibility would too much dilute the Policy.

- 1.5.13 I endorse the deletion in SP20 of *once the uses required have been met* and the change that the Southwark Plan July 18th 2005 introduces. I say that for the reasons discussed at the Inquiry. *Secured* is more definite and certain. It implies such considerations as the retention of sufficient land on the site for the required use and that a scheme has been, or can be, designed that will not prejudice the required use. Conditions and/or planning obligations also come to mind to ensure that the required use has been, or is, secured.
- 1.5.14 The **Environment Agency** requests an objective or SP concerning protection from flooding, but the Council says that Southwark is not considered to be at risk. Bearing in mind the frontages to the River Thames and the low lying nature of much of the northern parts of the Borough, I am not so confident. No doubt flood protection measures could be put in place by way of condition or obligation, but I must ask the Council and the **Environment Agency** to have another look at this matter. Maybe a SP on the topic is justified.
- 1.5.15 **Blackfriars Investments Ltd** suggests the inclusion of a SP that requires the preparation of masterplan for strategic redevelopment involving a mix of uses. It is the Council’s intention, however, to prepare planning briefs to guide the redevelopment of large sites, and Action Area Plans and SPG or its equivalent for larger areas. This is a better way forward.

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- 1.5.16 There are other matters. **National Car Parks Ltd** considers that the UDP should promote off-street car parks at appropriate public transport hubs close to the Congestion Charging Zone and managed to favour off-peak and essential users. I do not doubt that some existing off-street car parks in Southwark perform a useful function, but the general encouragement of more would be likely to increase the use of cars in localities where roads are already busy and where noise and other pollution is all too evident.
- 1.5.17 The emphasis is better placed upon encouraging public transport and reducing the need to travel, especially by the private car. **Mr Todd** and others make good points about the need to reduce traffic, encourage home-working and promote walking and cycle routes. I commend them to the Council. In view, however, of the policies in Part 2 Section 5 Sustainable Transport and the definition of Sustainable Transport in the Glossary, I suspect that I am preaching to the converted.

1.5.18 Generally, public transport in Southwark is good. I am especially impressed by the frequency of buses within, to and from it. Some parts, however, are better served than others, as the Council accepts in the Southwark Plan 18th July 2005 paragraph 2.307 in its response to the **Camberwell Traders Association**. No doubt some services could be improved, and not just at Canada Water, but this is more a matter for the transport companies than for the Council as a local planning authority. Subject to my Conclusions in Part 2 Section 5, I consider that the UDP goes as far as it can in promoting sustainable transport.

1.5.19 I deal with the relationship between Public Transport Accessibility Zones and density of development mainly in Part 2 Section 4 of my Report.

RECOMMENDATION

1.5.20 I recommend that Section 5 – The Southwark Plan Policies in Part 1 of the UDP be modified in accordance with the Southwark Plan 18th July 2005 apart from:

SP 10

ALL DEVELOPMENTS SHOULD BE OF GOOD DESIGN TO ENSURE THAT THEY CONTRIBUTE POSITIVELY TO THE CHARACTER AND QUALITY OF THE SURROUNDINGS, THEREBY MAKING PLACES BETTER FOR PEOPLE TO LIVE IN AND IMPROVING THE COMMUNITIES TO WHICH THEY BELONG.

SP 13

ALL DEVELOPMENTS SHOULD RESPECT THE QUALITY OF THEIR SURROUNDINGS, ESPECIALLY THE HISTORIC ENVIRONMENT, BY BEING OF A HIGH STANDARD OF DESIGN AND APPEARANCE AND, WHERE REQUIRED, SHOULD PRESERVE OR ENHANCE CHARACTER OR APPEARANCE.

SP 15

.....THE BENEFITS OF OPEN SPACE INCLUDE THOSE ASSOCIATED WITH HEALTH, SPORT, RECREATION, CHILDREN’S PLAY, REGENERATION, THE ECONOMY, CULTURE, BIODIVERSITY AND THE ENVIRONMENT.

Section 6 – Setting out the Strategy for the Use and Development of Land

OBJECTIONS

First Deposit

1 / 0 / 5452	Unknown
1 / 31 / 5453	Ms Margot Lindsay
1 / 32 / 5454	Creekside Forum
1 / 33 / 5456	D Way
1 / 34 / 5457	Friends of Burgess Park
1 / 32 / 5458	Creekside Forum
1 / 32 / 5459	Creekside Forum
1 / 35 / 5464	Old Lindley TA
1 / 48 / 5502	Alvey Tenants and Leaseholders Association
1 / 59 / 5544	Southwark Friends of the Earth
1 / 63 / 5547	Forgotten Corner of Camberwell
1 / 64 / 5549	Mr John Paxton
1 / 24 / 5556	Corporation of London
1 / 63 / 5563	Forgotten Corner of Camberwell
1 / 67 / 5565	Camberwell Society
1 / 68 / 5568	GLA
1 / 68 / 5575	GLA
1 / 58 / 5587	North Southwark Community Development Group
1 / 72 / 5593	Unite
1 / 77 / 5603	GLE Properties
1 / 78 / 5604	Asda Stores Ltd
1 / 79 / 5605	Ebury Management Ltd
1 / 79 / 5606	Ebury Management Ltd
1 / 80 / 5608	Co-operative Insurance Society Limited
1 / 50 / 5614	Hays Plc
1 / 84 / 5616	Messrs P & J Bevington & Mrs JM Pickford
1 / 27 / 5660	Shopping Centres Ltd
1 / 82 / 5661 (CW)	Trinity Newington Residents' Association
1 / 12 / 5662 (CW)	Cross River Partnership - Westminster City Council
1 / 90 / 5668 (CW)	London Borough of Lambeth
1 / 68 / 5670	GLA
1 / 19 / 5674	City Estates
1 / 75 / 5675	Access Self Storage Ltd
1 / 76 / 5676 (CW)	Oakmayne Properties
1 / 14 / 5688	Royal London Asset Management Ltd
1 / 92 / 5695	Cliveden Estates Limited
1 / 67 / 5697 (CW)	Camberwell Society
1 / 54 / 5699	Camberwell Traders Association
1 / 50 / 5704	Hays Plc
1 / 65 / 5710	Blackfriars Investments Ltd
1 / 46 / 5711	London Transport Property
1 / 56 / 5712	B&Q plc

1 / 14 / 5714	Royal London Asset Management Ltd
1 / 50 / 5718	Hays Plc
1 / 68 / 5720	GLA
1 / 20 / 5722	Capcount Kings Reach (Jersey) Ltd
1 / 58 / 5723	North Southwark Community Development Group
1 / 19 / 5724	City Estates
1 / 18 / 5725	Minerva Plc
1 / 20 / 5726	Capcount Kings Reach (Jersey) Ltd
1 / 13 / 5727	Mr Martin Cook
1 / 65 / 5728	Blackfriars Investments Ltd
1 / 19 / 5730	City Estates
1 / 82 / 5732 (CW)	Trinity Newington Residents' Association
1 / 11 / 5805	Pool of London Partnership
1 / 115 / 5919	Mr David Bradbury - Cllr
1 / 87 / 5927	London & Cleveland Investment
1 / 127 / 6022	Mr Justin Carr
1 / 97 / 6080	Mr Simon Hughes - MP
1 / 97 / 6190	Mr Simon Hughes - MP
1 / 68 / 6196	GLA
1 / 68 / 6205	GLA
1 / 100 / 6208	BROAD - Bankside Residents for Appropriate Development
1 / 99 / 6218	Mr Adrian Greenwood
1 / 34 / 6222	Friends of Burgess Park
1 / 34 / 6224	Friends of Burgess Park
1 / 97 / 6226	Mr Simon Hughes - MP
1 / 10 / 6241 (CW)	Teighmore Ltd
1 / 20 / 6244	Capcount Kings Reach (Jersey) Ltd
1 / 126 / 6245	London Wildlife Trust Centre for Wildlife Gardening
1 / 19 / 6246	City Estates
1 / 92 / 6250	Cliveden Estates Limited
1 / 9 / 6253	London Town Plc
1 / 158 / 6256	Baylight Properties plc
1 / 32 / 6259	Creekside Forum
1 / 32 / 6261	Creekside Forum
1 / 15 / 6262 (CW)	Dulwich Estate
1 / 90 / 6264 (CW)	London Borough of Lambeth
1 / 14 / 6268	Royal London Asset Management Ltd
1 / 14 / 6270	Royal London Asset Management Ltd
1 / 32 / 6272	Creekside Forum
1 / 32 / 6273	Creekside Forum
1 / 23 / 6274 (CW)	Newington Trust Estate
1 / 24 / 6283	Corporation of London
1 / 13 / 6299	Mr Martin Cook
1 / 165 / 6303	National Grid Company Plc.
1 / 13 / 6322	Mr Martin Cook
1 / 52 / 6326	GOL
1 / 170 / 6343	Bankside Open Spaces Trust
1 / 171 / 6349 (CW)	SecondSite Property Holdings
1 / 175 / 6351	Ms Mairi Mills
1 / 82 / 6371 (CW)	Trinity Newington Residents' Association

1 / 82 / 6372 (CW)	Trinity Newington Residents' Association
1 / 68 / 6439	GLA
1 / 157 / 6446	Peckham Society
1 / 183 / 6462	English Nature
1 / 180 / 6522	Mr Brian Addis
1 / 11 / 6530 (CW)	Pool of London Partnership
1 / 163 / 6535	Sainsbury's Supermarket Ltd
1 / 163 / 6536	Sainsbury's Supermarket Ltd
1 / 50 / 6553	Hays Plc
1 / 50 / 6556	Hays Plc
1 / 50 / 6558	Hays Plc
1 / 70 / 6564	Threadneedle Property Investments Ltd
1 / 194 / 6596	Bonamy TA
1 / 197 / 6600	R Squires
1 / 199 / 6620	Ms Caroline Pidgeon - Cllr
1 / 59 / 6666	Southwark Friends of the Earth
1 / 54 / 6673	Camberwell Traders Association
1 / 35 / 6696	Old Lindley TA
1 / 82 / 6725	Trinity Newington Residents' Association
1 / 68 / 6741	GLA
1 / 54 / 6743	Camberwell Traders Association
1 / 54 / 6744	Camberwell Traders Association
1 / 142 / 6747	Esmeralda Road Tenants & Resident Association
1 / 142 / 6764	Esmeralda Road Tenants & Resident Association
1 / 142 / 6766	Esmeralda Road Tenants & Resident Association
1 / 90 / 6767 (CW)	London Borough of Lambeth
1 / 55 / 6768	Cyclists Touring Club
1 / 63 / 6786	Forgotten Corner of Camberwell
1 / 201 / 6804	Bankside Residents Forum
1 / 201 / 6806	Bankside Residents Forum
1 / 201 / 6813 (CW)	Bankside Residents Forum
1 / 69 / 6815	Lake Estates Ltd/ Union Street Ltd/ Dorrington Properties Plc
1 / 70 / 6816	Threadneedle Property Investments Ltd
1 / 201 / 6818	Bankside Residents Forum
1 / 23 / 6862 (CW)	Newington Trust Estate
1 / 27 / 6895	Shopping Centres Ltd
1 / 61 / 6929	Falcon Point Management Committee
1 / 52 / 6970 (CW)	GOL
1 / 52 / 6974	GOL
1 / 68 / 6981	GLA
1 / 67 / 7017	Camberwell Society
1 / 62 / 7062	Mr Toby Eckersley - Cllr
1 / 185 / 7067	Crystal Palace Community Association
1 / 11 / 7100 (CW)	Pool of London Partnership
1 / 11 / 7105 (CW)	Pool of London Partnership
1 / 11 / 7106 (CW)	Pool of London Partnership
1 / 160 / 7124	H.M Prison Service
1 / 94 / 7125 (CW)	Mr Donald Phillips
1 / 94 / 7126 (CW)	Mr Donald Phillips

1 / 51 / 7127	Berkeley Homes Plc
1 / 77 / 7132	GLE Properties
1 / 123 / 7134	Mr Henry Bottomley
1 / 80 / 7136	Co-operative Insurance Society Limited

Second Deposit

2 / 260 / 7253	Prime Estates Limited
2 / 213 / 7324	Woodland Views LTD
2 / 11 / 7389 (CW)	Pool of London Partnership
2 / 123 / 7440	Mr Henry Bottomley
2 / 287 / 7652	London Wildlife Trust
2 / 287 / 7655	London Wildlife Trust
2 / 287 / 7656	London Wildlife Trust
2 / 289 / 7672	R Wilmhurst
2 / 401 / 7851	Environment Agency
2 / 67 / 8198	Camberwell Society
2 / 459 / 8325	Malcolm Judd & Partners
2 / 68 / 8431	GLA
2 / 68 / 8432	GLA
2 / 52 / 9080 (CW)	GOL
2 / 459 / 9712	Malcolm Judd & Partners

MAIN ISSUES

- 1) Whether the route indicated for the proposed Cross River Transit (Tram) system is justified;
- 2) Whether land at Queen’s Road and St Mary’s Road, Peckham should be allocated for residential development;
- 3) Whether land at Quebec Way, Canada water, should be allocated for residential development;
- 4) Whether policies and proposals on the Proposals Map could be made clearer and whether *Protection Areas* should be better defined.

INSPECTOR’S REASONING AND CONCLUSIONS

Introduction

- 1.6.1 Some of these objections relate to land use proposals at, for example, Bermondsey, Canada Water, Dulwich and Old Kent Road. To avoid needless repetition, I deal with them in other parts of my Report. In particular, I consider employment and related matters in Part 2 Section 1.
- 1.6.2 The Council made substantial changes to the UDP at the Revised Deposit stage, especially to the Proposals Map. Many changes appear to have met the valid concerns of a number of Objectors, although the objections have not always been withdrawn. The

changes include the de-designation of the Newington Industrial Estate as a Preferred Industrial Location (PIL).

The Main Issues

- 1.6.3 I deal with objections to the proposed tram depot at Peckham (Site 63P) in Part 1 Section 9.3 of my Report, and I consider the indicated tram route through the Borough in more detail in my examination of Policy 5.4 in Part 2 of my Report. Suffice it to say here that the indicated route generally traverses those parts of Southwark where a substantial amount of investment is envisaged. These include Elephant and Castle, an Opportunity Area with the capacity to accommodate about 4,200 new homes, 4,200 jobs and 75,000 sq m of retail and leisure development. I regard better public transport as a key component of that investment.
- 1.6.4 The route passes through parts of Peckham, Aylesbury and Walworth, areas identified by the London Index of Deprivation as being amongst the 20% most deprived wards in London. Some of these areas, or parts thereof, have poor public transport services when compared with other parts of Southwark. The tram would improve those services, and thereby give people living in these areas better access to the new jobs and improved retail and leisure opportunities at Elephant and Castle and elsewhere, including Central London.
- 1.6.5 Some Objectors suggest alternative routes. These include those along New/Old Kent Road and Walworth Road. Such routes would presumably not, however, traverse areas like North Peckham and so there would be less scope for promoting new, and sustaining recent, investment. New/Old Kent Road is already an important transport corridor and is part of the Transport for London Road Network. It already carries heavy volumes of traffic and is an important bus route. The priority that should be accorded to frequent and often fast-moving trams would considerably reduce road capacity and might divert a significant amount of traffic on to local road less able to cope with it, with serious environmental consequences.
- 1.6.6 Much the same applies to Walworth Road. Additionally, it is a District Shopping Centre and its importance for shopping is likely to continue and perhaps increase. The **Camberwell Traders Association** refers, I assume hopefully, to the widening of footways which, although perhaps not a UDP matter, could reduce the width of the carriageway. All these considerations imply frequent bus stops, bus priority lanes, service delivery bays and pedestrian crossing points. They are all vital elements of its present shopping function. The introduction of a tram route and frequent trams passing through would cause substantial disruption to that function. Competition for space and clash of interests would disrupt the trams, reducing the advantages that are rightly claimed for them when on a suitable route.

- 1.6.7 I understand that there will be a good deal more public consultation on the indicated route. On the evidence before me, however, I consider that it is probably the best one. In principle, I see no reason why extensions to it should not be investigated with a view to the tram serving other parts of the Borough. Camberwell seems to be a likely candidate, especially in view of the objections concerning the comparatively poor public transport that serves it at present.
- 1.6.8 The precise alignment of the route has yet to be determined, and I share many of the concerns expressed by various Objectors. The Council accepts that further design work, testing, public consultation and evaluations are needed before final alignment proposals can be agreed. The 3 main areas where this is so are Elephant and Castle, Burgess Park and North Peckham. Transport for London will undertake this further work, and presumably in close consultation with the Council and the public. Nevertheless, I offer a few comments on each in the meantime.
- 1.6.9 The Proposals Map shows the route entering Site 43P at Elephant and Castle along London Road and leaving it at Rodney Road. No alignment is, or could be, shown between these 2 points. It will have to be an integral part of the redevelopment proposals for this part of Southwark. It should be linked to other existing and/or proposed public transport routes and provide ease of access to and from main residential areas, shops, leisure and other key parts of the proposed comprehensive redevelopment scheme.
- 1.6.10 Burgess Park is a jewel to behold. Its space, its trees, the peace and quiet that so much of it provides in this generally busy, closely built-up urban area should be afforded maximum protection. It is already traversed by several roads, but that is no good reason for yet more incursions by noise or physical presence. The indicated route stops at Albany Road on the northern side of the Park and resumes on the southern side at Chandler Way. The problem of closing the gap formed by the Park is not an easy one to solve. But every effort should be made to protect the integrity of the Park. The Council’s potential options of full closure to cars, and presumably other road vehicles, along Wells Way, and alignment of the tramway alongside Wells Way, need careful consideration, but complete avoidance of the Park would be better, if feasible and in accordance with other environmental considerations.
- 1.6.11 At Peckham, the route stops at Commercial Way and resumes at the Depot, Site 63P. Here, again, disruption to relevant interests should be kept to a minimum, and the Council will be aware of my serious concerns about any significant loss of jobs at this Site. As with all these 3 more problematic areas, public consultation will be an important part of the process. In my view, the UDP goes as far as it can in indicating a route for Cross River Transit, and by showing Cross River Tram Consultation Zones on the Proposals Map.

1.6.12 The second issue concerns 2 sites at Peckham, and the objection made by **London and Cleveland Investment**. The land includes premises used for the storage of antiques and paintings. It is within a mainly residential area and close to Queen’s Road Peckham railway station. Its location, availability of public transport and the urgent need for housing in the Borough are good reasons for releasing the land for residential redevelopment. It is not unusual, however, for land to be suitable for a number of purposes, and this is a good example.

1.6.13 There is a generally good demand in the Borough for employment land, and there is no evidence of this land being any exception to that general rule. It has good access to local and strategic roads and its location near a railway station could be convenient for employees. It is important to retain employment land to provide jobs for local people, thereby minimising the need to travel. There is no reason to believe that continued employment use here would result in any disturbance that could not be sufficiently mitigated. And so on balance I consider that the land should be kept for some employment use, and I see that planning permission for a mixed use scheme has recently been granted.

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1.6.14 Thirdly, the land at Canada Water to which **Prime Estates Limited** refers lies to the north west of Site 36P which it adjoins. In Part 1 Section 9.4 of my Report I endorse the Council’s proposals for Site 36P as set out in the Southwark Plan 18th July 2005 Appendix 4. I also extol the virtues of residential-led mixed use development for several sites at Canada Water. In particular, I note the advantages of retaining some land for employment purposes. These advantages include meeting the need for employment floorspace and the greater opportunities provided for people to work locally, thereby reducing the need to travel, especially by car.

1.6.15 Those considerations apply here. It is difficult to estimate the amount of floorspace for employment uses that should be retained on redevelopment, but I agree with the Council that Class B Uses should be required on this land. Owing to its modest size and its location in any event within the Action Area, I see no great need to treat it as a separate Proposals Site in Appendix 4. Thus the Company’s land could be redeveloped, provided that a reasonable amount of employment floorspace was retained in accordance with policies in Part 2 of the UDP, and that it caused no detriment to nearby existing or proposed schools. The Council estimates that at least 70% of the new floorspace could be residential, and that would be reasonable.

1.6.16 The third issue concerns the Proposals Map and Protection Areas. The Proposals Map at the Revised Deposit stage considerably clarifies matters, but in my view it now suffers from an overload of information. Where different policies apply to the same or similar areas, it is sometimes difficult to identify boundaries. I realise that

the Council has tried to show all or most information on one map, and there is much merit in that approach. All I can do is to ask the Council to try to simplify the Proposals Map. Insets and/or several Proposals Maps showing different policies/proposals may be the way forward. It is not an easy task, but I believe that more could be done to improve understanding of the Council’s land use policies, to the general benefit of the public.

- 1.6.17 I agree that it is not necessary for the Proposals Map to show all topographical features, like the mean high water mark which the **Creekside Forum** requests. Railways and stations are shown on the Proposals Map as well as various transport proposals. This is welcome, but I agree with the Council that there appears to be no land extensive enough and suitably located near a railway and in all other respects suitable for a railway-served waste terminal site, as requested by **Mr Cook**.
- 1.6.18 I agree with the Council that the boundaries of sites and areas shown on the Proposals Map are fixed, not diagrammatic. Uncertainty and flexibility at these boundaries and the interpretation of them would result in vagueness and confusion. Generally any permission granted contrary to a designation on the Proposals Map should be as an exception for which statute provides.
- 1.6.19 It is *Aldgate*, not *Algate*. Well spotted, **Mr Bottomley!**
- 1.6.20 The Proposals Map should not be changed solely as a result of consultation on SPG or similar, as **B & Q Plc** requests. It must be revised or amended only in accordance with statutory procedures.
- 1.6.21 The Southwark Plan 18th July 2005 assists in the understanding of Protection Areas. The Glossary provides further assistance. The **Crystal Palace Community Association**, however, considers that Conservation Areas and Archaeological Priority Zones should be mentioned in this part of the UDP. I accept that the Borough has a rich heritage in these respects, of special note being its elegant squares and terraces which are usually included in Conservation Areas. I agree with the Association, and recommend accordingly.
- 1.6.22 There are related matters. “Key Diagram” is a term found in legislation and national policies and guidance. The UDP is right to include one, and it should bear that title. Useful changes are made to the Key Diagram at the Revised Deposit stage. I note also the reference to *London South Central* which meets the useful point made by the **Cross River Partnership – Westminster City Council**.

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Other Matters

- 1.6.23 These mostly relate more to other Sections of the UDP and hence to other parts of my Report.

- 1.6.24 **The Forgotten Corner of Camberwell** says that any future Camberwell railway station should be at the Walworth Bus Garage site adjacent to the railway and along a widened Medlar Street. On such evidence as there is, however, I prefer Site 54P at Camberwell Station Road. It appears to have sufficient space, although it could result in disruption to small businesses. I am not convinced that the Objector’s suggestion would improve the UDP. Policy 1.9 should ensure that any retail development associated with a new station, or close to it, is of suitable scale and design.
- 1.6.25 I deal with various open spaces in Part 2 Section 3 of my Report. I note here, however, that the Kirkwood Road Nature Garden is now designated as Borough Open Land and a Site of Importance for Nature Conservation (SINC), as requested by the **London Wildlife Trust**. I see that the extent of each SINC is based upon information which the London Ecology Unit provided in 1995. Hopefully this will be updated and changes made to the UDP or included in the Council’s Local Development Framework as soon as possible.
- 1.6.26 There may be opportunities to extend green chains, as the **Peckham Society** suggests, but the Proposals Map should not indicate them unless there is a reasonable prospect of such changes taking place. Existing ones are included and protected within designated open spaces, which seems reasonable. Planning obligations might be a means of extending them, irrespective of designation at this stage. I note that Paterson Park is designated Other Open Land. This is a reflection of its modest size, and I therefore consider that the designation is more appropriate than as more extensive Borough Open Lands.
- 1.6.27 I conclude in Part 2 Section 3 of my Report that the Greendale Playing Field, owing mainly to its extent and openness, should remain designated as Metropolitan Open Land. **Cliveden Estates Limited** says that the land contains no features of landscape, historic, nature conservation or habitat interest at a national or metropolitan level, but I aver that openness and its consequent contribution to the character of the Borough are substantial assets and more important considerations.
- 1.6.28 I deal with the matter of car parking at Peckham in Part 1 Section 9.3 of my Report. I note here, however, that enough spaces must be ensured to meet requirements through improvements to, or provision of, car parking opportunities elsewhere before Sites 61P and 64P can be redeveloped. Car parking could be provided as part of the redevelopment of Site 63P for a Tram depot, and the Council is no longer promoting the redevelopment of the Choumert Road car park. I endorse all these intentions.
- 1.6.29 I examine employment and related matters, including its floorspace at Bankside and The Borough and at other parts of Southwark, in Part 2 Section 1 of my Report. These matters include the number and extent of Preferred Office Locations (POL). Also the retention of

the Parkhouse Street industrial area as a PIL, owing mainly to the need to keep land such as this for uses for which alternative sites are difficult to find, the local employment provided and the buoyant demand as evidenced by the limited number of vacant premises on this land.

- 1.6.30 **Threadneedle Property Investments Ltd** suggests that locations should be specified within Opportunity Areas where tall buildings would be permitted. I do not think that this would be a good idea. It would be too sweeping an approach and a hostage to fortune when very careful consideration indeed is needed in deciding whether a particular site is suitable for such development, and whether a particular development is suitable for the site in question. A criteria-based, case by case method is better, thereby according with the London Plan Policies 4B.8 and 4B.9 and UDP Policy 3.20.
- 1.6.31 **BROAD** requests the designation of the former Musset Paper Works at 44 Holland Street be designated for Class D Uses. This objection, however, appears to have been overtaken by events in that planning permission was granted on appeal in October 2002 for a 20 storey building at 44-47 Holland Street.
- 1.6.32 I accept the Council’s point that policies for the River Thames, including Policy 3.31 Protection of Riverside Facilities, will protect the ferrymans stairs. This should meet **Mr Squires**’s objection. It should also serve to protect open land that is part of the Thames Path. This includes open land at and near Tate Modern.
- 1.6.33 I deal with objections to the proposed waste transfer station at Old Kent Road in Part 2 Section 3 of my Report. I examine density and car parking standards in Part 2 Sections 4 and 5 of my Report, noting the flexibility with which they are proposed to be applied. This should meet the points made by **Hays Plc**.
- 1.6.34 Some objections relate to archaeology, tall buildings and strategic and local views. I take them into account in my examination of Policies 3.19, 3.20, 3.21 and 3.22 respectively. Of particular concern to some Objectors, including **Cllr Mr Eckersley**, is the need to protect views of St Paul’s Cathedral, especially from Camberwell Road.
- 1.6.35 In response to the objection made by the **Environment Agency**, I consider that Policy 3.28 Biodiversity, coupled with national policy on the matter, will provide sufficient protection.

RECOMMENDATION

- 1.6.36 I recommend that Section 6 – Setting out the Strategy for the Use and Development of Land in Part 1 of the UDP be modified in accordance with the Southwark Plan July 18th 2005, apart from **Aldgate** and any changes following my Conclusions in paragraphs 1.6.16 and as follows:

1.080

- iv Protection Areas for particular types of land use which allow certain areas to continue to fulfil an important function. These include Archaeological Priority Zones, Conservation Areas, employment,.....*

Section 7 – Special Policy Areas

OBJECTIONS

First Deposit

1 / 16 / 5460 (CW)	Mr J H Taylor
1 / 90 / 5663	London Borough of Lambeth
1 / 13 / 5664	Mr Martin Cook
1 / 24 / 5665	Corporation of London
1 / 82 / 5669 (CW)	Trinity Newington Residents' Association
1 / 32 / 6745	Creekside Forum

Second Deposit

2 / 401 / 7859	Environment Agency
2 / 23 / 8257	Newington Trust Estate
2 / 58 / 8807	North Southwark Community Development Group

MAIN ISSUES

1. Whether the London South Central Special Policy Area should experience general intensification of development during the lifetime of the UDP;
2. Whether sufficient emphasis is placed upon the character and attributes of the River Thames.

INSPECTOR’S REASONING AND CONCLUSIONS

- 1.7.1 The Southwark Plan 18th July 2005 rightly includes Strategic Policies and London South Central as a Local Policy Area. This meets the objection made by the **London Borough of Lambeth**.
- 1.7.2 The London Plan requires central London densities for London South Central. As **Mr Cook** says, however, this part of the Borough is of historic interest and is not well blessed with parks and other open amenity areas. In some cases, I agree that modest and piecemeal development or re-development may be better than a more intensive and comprehensive approach. Bearing in mind the closeness of this Area to the City and the good public transport available, however, the overall approach should be to conform with the London Plan and to seek an intensification of development where this does not undermine important aspects of character.
- 1.7.3 On related matters, the **Newington Trust Estate** requests less emphasis on employment generation and a more flexible approach, encouraging residential development where employment sites are no longer viable or are harmful to the surroundings. The Council’s general approach relies much on Government policy and encourages a

mix of uses throughout the Borough. Thus residential development is not precluded in principle. References to, for example, the promotion of business development and the *growing number of people who live in, work in and visit London South Central* meet the point made by the **Corporation of London** about the importance of a high quality environment in which to do business. It also meets the point about meeting the needs of the local community.

*

- 1.7.4 On the second issue, the designation of the Thames Special Policy Area and the text in the Southwark Plan 18th July 2005 which refers to the *special control of developments adjacent to the riverside* meet the valid points made by the **Creekside Forum**. I agree that the River Thames should be much more than *merely a backdrop to development*. There is no need for the UDP at this point to refer to the enhancement of the ecological and archaeological importance of the River Thames and its surroundings. The text rightly refers to the enhancement of the character of this Policy Area, and the river is designated Metropolitan Open Land and as a Site of Interest for Nature Conservation. That should suffice. Policy 3.31 for the protection of riverside facilities now includes piers.
- 1.7.5 This Section of the Southwark Plan 18th July 2005, together with its Policies 3.29 and 3.31 and other relevant provisions place sufficient emphasis upon the character and attributes of the River Thames.

RECOMMENDATION

- 1.7.6 I recommend that Section 7 – Special Policy Areas in Part 1 of the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Section 8.2 – Opportunity Areas – Elephant & Castle (Including Walworth Road)

OBJECTIONS

First Deposit

1 / 43 / 5667	Mr Richard Lee
1 / 44 / 5673	Ms Sofia Roupakia
1 / 68 / 5677	GLA
1 / 52 / 5678	GOL
1 / 67 / 5679 (CW)	Camberwell Society
1 / 67 / 5680	Camberwell Society
1 / 82 / 5682 (CW)	Trinity Newington Residents' Association
1 / 90 / 5684	London Borough of Lambeth
1 / 59 / 6667	Southwark Friends of the Earth
1 / 163 / 6837	Sainsbury's Supermarket Ltd
1 / 207 / 7099	M Wyman

Second Deposit

2 / 231 / 7214 (CW)	Bricklayers Arms T & RA
2 / 267 / 7470	Darwin Court TA
2 / 67 / 8196	Camberwell Society
2 / 462 / 8327	St George's Circus Group
2 / 480 / 8446	Robinson, William
2 / 2 / 8592	St George (South London) Ltd
2 / 2 / 8593	St George (South London) Ltd
2 / 52 / 9073 (CW)	GOL
2 / 76 / 9143 (CW)	Oakmayne Properties
2 / 60 / 9180	Castle House
2 / 60 / 9201	Castle House
2 / 28 / 9238	Tesco Stores Ltd
2 / 43 / 9254	Mr Richard Lee
2 / 269 / 9430	Mr Lionel Wright
2 / 269 / 9431	Mr Lionel Wright

Pre-Inquiry Changes

P / 68 / 9813	GLA
P / 43 / 9925	Mr Richard Lee
P / 43 / 10023	Mr Richard Lee
P / 43 / 10024	Mr Richard Lee

MAIN ISSUES

- 1.
- 2.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.
- 2.

RECOMMENDATION

- 1.
- 2.

Section 8.3 – Opportunity Areas – London Bridge and Proposals Sites 3P and 4P

OBJECTIONS

First Deposit

1 / 13 / 5467	Mr Martin Cook
1 / 14 / 5475	Royal London Asset Management Ltd
1 / 68 / 5691	GLA
1 / 82 / 5692 (CW)	Trinity Newington Residents' Association
1 / 59 / 6663	Southwark Friends of the Earth
1 / 90 / 6993	London Borough of Lambeth

Second Deposit

2 / 104 / 7271	Guy's and St Thomas' Hospital NHS Trust
2 / 82 / 7369	Trinity Newington Residents' Association
2 / 267 / 7456	Darwin Court TA
2 / 403 / 7846	Berkeley Homes (South East London) Ltd
2 / 403 / 7848	Berkeley Homes (South East London) Ltd
2 / 401 / 7860	Environment Agency
2 / 26 / 8295/6	St Martins Property Investments Ltd
2 / 26 / 8299	St Martins Property Investments Ltd
2 / 26 / 8318	St Martins Property Investments Ltd
2 / 52 / 9075 (CW)	GOL

Pre-Inquiry Changes

P / 2 / 9983	St George (South London) Ltd
P / 403 / 9934	Berkeley Homes (South East London) Ltd

Appendix 4 – Proposals Site 3P (Potters Field Coach Park)

Second Deposit

2 / 11 / 7420	Pool of London Partnership
2 / 403 / 7845/6	Berkeley Homes (South East London) Ltd
2 / 26 / 8313	St Martins Property Investments Ltd
2 / 114 / 9043	Southwark Green Party

Pre-Inquiry Changes

P / 403 / 9974	Berkeley Homes (South East London) Ltd
P / 403 / 9980	Berkeley Homes (South East London) Ltd
P / 2 / 9990	St George (South London) Ltd
P / 26 / 10011	St Martins Property Investments Ltd

Appendix 4 – Proposals Site 4P (Potters Field Lambeth College)

Second Deposit

2 / 11 / 7421	Pool of London Partnership
2 / 403 / 7857	Berkeley Homes (South East London) Ltd
2 / 403 / 7858	Berkeley Homes (South East London) Ltd
2 / 403 / 7863	Berkeley Homes (South East London) Ltd
2 / 403 / 7865	Berkeley Homes (South East London) Ltd

MAIN ISSUES

1. Whether the UDP pays sufficient attention to the character of the London Bridge area and whether too much is being expected from it;
2. Whether the requirement that 40% of new conventional homes in the London Bridge Opportunity Area should be affordable is a reasonable requirement;
3. Whether the Council's intentions for Sites 3P (Potters Field Coach Park) and 4P (Lambeth College) suitably reflect their potential, especially with regard to location.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.3.1 I agree with **Mr Cook** that London Bridge has an outstanding historic character and that it has little public, or private, open space. The London Plan designates London Bridge as an Opportunity Area on the basis that it is capable of accommodating a substantial number of new jobs and homes and that its potential should be maximised. Of especial relevance are London Plan Policies 2A.2 and 5B.4. The former refers to the preparation of planning frameworks for Opportunity Areas, the supporting text stating that typically an Opportunity Area would accommodate at least 5000 jobs or 2500 homes or a mix of the two, together with other uses.
- 1.8.3.2 Policy 5B.4 states that London Bridge, an area of 30 ha, should accommodate 24,000 new jobs and 500 new homes by 2016. The London Plan thus provides for a considerable amount of new development in this part of the Borough, including a tall, landmark mixed use scheme, and the UDP must generally accord with this other part of the development plan. It does so, but the application of other development plan policies of sufficient force should ensure that the scale of change envisaged will not be at the expense of character.
- 1.8.3.3 The challenge for the Council is to ensure that development takes account of the historic environment, especially where a Listed Building or a Conservation Area is affected. The Vision for London Bridge takes the relevant points into account, especially its reference to the preservation or enhancement of historic character and improvements in the quality and distribution of public open space. This, together with the potential of the Development Sites at

London Bridge Station and at Potters Field, persuades me that not too much is being expected of the area.

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1.8.3.4 Secondly, I deal in more detail with affordable housing in my examination of the relevant policies, especially Policy 4.4. **Berkeley Homes (South East London) Ltd** suggests a modification whereby the Council would seek the *maximum reasonable proportion of additional homes as affordable housing, consistent with the provisions of Policy 4.4*. I agree with the thrust of the intention, but it is not sufficiently precise and certain. Prospective developers should know from the outset the proportion of affordable homes that they will be expected to provide in a residential scheme at London Bridge. As I conclude later, this proportion and the tenure mix are reasonable, especially as the Council envisages a flexible approach.

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1.8.3.5 Turning now to the third issue, I note that the adopted (1995) UDP includes Site 3P within a Regeneration Area and a Central Area of Community Need. An important purpose of the UDP which is the subject of my Inquiry, however, is to look further into the future and to set out land use policies and proposals to guide development in the Borough up to 2016. I therefore place more emphasis on relevant policies in the London Plan as well as on national guidance in PPGs and PPSs.

1.8.3.6 There is no doubt about the importance and potential of this site in terms of its location. It is near such buildings of world renown as Tower Bridge and, on the north side of the River Thames, the Tower of London. Its current use as a coach park, though no doubt of service, falls well short of its potential. In its present condition, it is of little visual merit. Any scheme on it should be clearly seen, prominent in its setting and make an impressive architectural contribution to this part of London. It should make what the Mayor describes as a *bold architectural statement* and be a building of world class design of which Londoners would be proud.

1.8.3.7 Both the Council and various Objectors make excellent points. The land fronts the Thames Walkway, itself an important tourist attraction, and is close to many others on this southern side of the River. These include Tate Modern, the Globe Theatre, Borough Market, Vinopolis and Southwark Cathedral. There is general agreement on the importance of tourism to London, and the potential of this site to this vital aspect of our capital city's economy should be realised. Any scheme should therefore include a large arts and/or cultural use(s) of London or nation-wide importance. It should also include some open space to complement Potters Field Park and to provide a suitable setting for the development. Owing to the location and potential of this previously-developed land,

however, I do not agree with **Darwin Court TA** that it should remain open in its entirety.

- 1.8.3.8 The UDP should provide enough land to meet the Borough's housing needs, in line with the requirements of the London Plan. In my judgement it does so, but this is a minimum requirement and, in principle, I consider that a maximum amount of new dwellings should be provided in suitable locations so as to ensure that this requirement is met and preferably exceeded. That would also increase the number of affordable homes. Site 3P is well located in terms of its access to local shops and services, public transport and employment. As it is within convenient walking distance of the City, it is difficult to imagine a better placed site for housing. For this reason, I regard the 500 dwellings to which the London Plan refers as very much a minimum target. A substantial residential use on this land would accord with the principle of sustainable development, as outlined in PPS 1, especially its paragraph 27 on the General Approach to this concept.
- 1.8.3.9 The Council should seek the maximisation of residential development compatible with the arts and/or cultural uses. That is a more beneficial approach than of stipulating at this stage a range in the number of dwellings that should be sought, and making them subordinate to those uses. The regeneration of this previously-developed land in accordance with PPG3 paragraph 31 should bring no conflict between the 3 main objectives of architectural quality, arts/cultural uses and residential development. I congratulate the appearing parties at the Inquiry on their seeking to agree a form of wording to guide the development of the site, and in achieving it. I endorse it and the flexibility that it offers, and urge early and continuing discussions between relevant parties so as to meet these worthy objectives. This should realise the full potential of the land, and the *win-win situation* as eloquently described at the Inquiry.
- 1.8.3.10 In its letter of 8 June 2005, **Berkeley Homes (South East London) Ltd** states that it no longer *wishes to co-join Proposals Site Schedule 3P and former Proposal Site Schedule 4P of the Replacement UDP, as identified in objection references 7845 & 7858*. Site 4P was originally designated on the basis of projected increases in primary school children in the north of the Borough arising from planned housing growth. Later estimates suggest that these increases are likely to take place more slowly and that the need for additional places will be spread more evenly during the plan period.
- 1.8.3.11 As the Council states in its letter to me of 3 May 2005, the timing of the need for, and delivery of, a primary school on Site 4P is subject to a very high level of uncertainty, and the allocation of this land at this stage may lead to its sterilization in the medium term. This is the best evidence that I have on this matter, and I agree with the Council that Site 4P should be deleted from the Schedule at Appendix 4 and from the Proposals Map. That is what the

Southwark Plan 18th July 2005 proposes. A beneficial use should, however, be found for this attractive and well located building.

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- 1.8.3.12 There are a few other matters. I welcome the introduction of the objective *to protect and expand cultural, arts and entertainment uses*. This is in line with various policies in the London Plan, especially Policy 5B.1 which is *to promote and protect the vital mix of culture, government, leisure and commerce together with its historic buildings.....that are central London's unique attraction for residents, visitors and business*. And I endorse the deletion of larger units suitable for supermarkets and other mainstream retailers. It is unlikely that such large outlets would be compatible with the character of the locality, with its preponderance of small shops.
- 1.8.3.13 The Vision for London Bridge refers to the area as a mixed use district town centre. This does not conjure up an image of unbound regeneration, as the **London Borough of Lambeth** suggests. I would expect any retail schemes to be of modest size and have little or no impact on town centres elsewhere. The Proposals Map March 2004 does not indicate the boundaries of town centres, but the Southwark Plan 18th July 2005 which includes Pre-Inquiry Changes puts the matter right. Appendix 2 Figure 8 applies. London Bridge lies within the Strategic Cultural Area which is shown on the Proposals Map. This meets the objection made by **Trinity Newington Residents' Association**.
- 1.8.3.14 In response to an objection made by **St Martins Property Investments Ltd**, the Southwark Plan 18th July 2005 refers to *high quality homes* in the Vision for London Bridge. The only point I would make is that such homes should be sought throughout the Borough, in line with the statements in PPG 3 about the need to create high quality living environments and the importance of ensuring that everyone has the opportunity of a decent home. Policies on design, for example, will assist the Council in its judgements on quality in particular circumstances.
- 1.8.3.15 Rightly, the objectives now include a reference to the Thames Special Policy Area.
- 1.8.3.16 I suggest a minor modification to the start of the Vision, in line with my later conclusions on Peckham.

RECOMMENDATION

- 1.8.3.16 I recommend that Section 8.3 – Opportunity Areas – London Bridge in Part 1 of the UDP and Proposals Sites 3P and 4P in Appendix 4 of the UDP be modified in accordance with the Southwark Plan 18th July 2005 apart from:

1.112

The Vision for London Bridge is for:

A successful central London mixed use district town centre, full of vitality and providing.....

8.2 – Opportunity Areas – Elephant & Castle (including Walworth Road), Proposals Site 50P (Manor Place Depot, Manor Place) & Early Housing Sites (Appendix 4)

Elephant and Castle (including Walworth Road)

OBJECTIONS

First Deposit

1 / 43 / 5667	Mr Richard Lee
1 / 44 / 5673	Ms Sofia Roupakia
1 / 68 / 5677	GLA
1 / 52 / 5678	GOL
1 / 67 / 5679 (CW)	Camberwell Society
1 / 67 / 5680	Camberwell Society
1 / 82 / 5682 (CW)	Trinity Newington Residents' Association
1 / 90 / 5684	London Borough of Lambeth
1 / 59 / 6667	Southwark Friends of the Earth
1 / 163 / 6837	Sainsbury's Supermarket Ltd
1 / 207 / 7099	M Wyman

Second Deposit

2 / 231 / 7214 (CW)	Bricklayers Arms T & R A
2 / 267 / 7470	Darwin Court TA
2 / 67 / 8196	Camberwell Society
2 / 462 / 8327	St George's Circus Group
2 / 480 / 8446	Robinson, William
2 / 2 / 8592	St George (South London) Ltd
2 / 2 / 8593	St George (South London) Ltd
2 / 52 / 9073 (CW)	GOL
2 / 76 / 9143 (CW)	Oakmayne Properties
2 / 60 / 9180	Owners of Castle House Walworth
2 / 60 / 9201	Owners of Castle House Walworth
2 / 28 / 9238	Tesco Stores Ltd
2 / 43 / 9254	Mr Richard Lee
2 / 269 / 9430	Mr Lionel Wright
2 / 269 / 9431	Mr Lionel Wright

Pre-Inquiry Changes

P / 68 / 9813	GLA
P / 43 / 9925	Mr Richard Lee
P / 43 / 10023	Mr Richard Lee
P / 43 / 10024	Mr Richard Lee

Proposals Site 50P: Manor Place Depot, Manor Place

Second Deposit

2 / 49 / 7154

Network Rail

MAIN ISSUES

1. Whether the Council has identified too much land for the provision of Early Housing;
2. Whether there should be a greater emphasis on the need for small businesses, community facilities and arts and cultural facilities.
3. Whether up to 75,000 sq m of new retail floorspace is a suitable objective, bearing in mind the location of other shopping centres;
4. Whether *a target ratio within the affordable element of new schemes of 50:50 for social rented and intermediate* is a suitable basis upon which to proceed;
5. Whether the UDP provides sufficient protection for buildings and areas of historic and architectural value.

INSPECTOR'S REASONING AND CONCLUSIONS

Introduction

- 1.8.2.1 The Council's Elephant and Castle Topic Paper CD 1.3 gives a useful summary of national and regional policies which are especially applicable to this part of the Borough. Some Planning Policy Guidance (PPG) Notes to which it refers have since been replaced by Planning Policy Statements (PPS), but that has made no material difference to the thrust of this background evidence. Of particular note is PPS 1 which sets out a general approach to delivering sustainable development. Of special relevance to Elephant and Castle is its promotion of urban regeneration to improve the well-being of the community, the creation of new opportunities, the need for mixed use developments, respect for the diverse needs of communities and improved access to better facilities. In my view, these matters are inter-related and include the Government's objective that everyone should have the opportunity of a decent home, a vital aspect of the regeneration of Elephant and Castle. Key factors concerning sustainability are the re-use of previously-developed land and the reduction in the need to travel, especially by private car. That implies good public transport.
- 1.8.2.2 The London Plan identifies Elephant and Castle as an Opportunity Area within the Central Activities Zone, its Key Diagram showing it as an area of mixed use with strong retail character. It is seen as having the potential to accommodate 4,200 new jobs and 4,200

new homes during the period up to 2016. Developments within Opportunity Areas will be expected to maximise residential and non-residential densities and to contain mixed uses. It states that *the planning framework for the area around the Elephant and Castle should draw on its good public transport accessibility, closeness to the Central Activities Zone and relatively affordable land. This could be a suitable location to meet some of London's longer term needs for extra office space and is generally suitable for tall buildings. Large scale car based retail development should not be encouraged. The framework should seek a significant increase in housing and integrate this with a more efficient transport interchange.*

- 1.8.2.3 The Topic Paper convincingly sets out the main problems in the Elephant and Castle area, and I see no need to repeat them in full. Some, like aspects and consequences of deprivation, apply more widely in the Borough. Local opinion research shows that the top 3 concerns in the area are with crime, housing and lack of leisure facilities. Significantly, the research shows a strong desire for a very substantial change to achieve long term improvement, the realisation that this means disruption and that there must be a focus on local people and their needs during and after regeneration. The Council's Retail Study shows a general loss of retail expenditure from the Borough to other parts of London, thereby damaging its economic well-being, denying its residents reasonable choice and creating unsustainable travel patterns. This has particular implications for Elephant and Castle which, as a locality identified as an Opportunity Area, should be a major attraction for both convenience and comparison shopping to the benefit of those living nearby and in the Borough as a whole.
- 1.8.2.4 The Council has undertaken a survey of Environmental Baseline Conditions and a Townscape Analysis of the area, and my inspections do not lead me to disagree with the findings. For example, the noise level around the central parts of Elephant and Castle is very noticeable. Owing to the importance of the main roads in the vicinity I am not surprised to learn that there is little difference in the level between day and night. I agree that there are *monolithic single uses that dominate the area* and that it is generally unsympathetic to the needs of pedestrians. Pedestrians either risk life or limb in crossing the busy roads at ground level or are forced to use a system of subways that are invariably dirty, show signs of flooding and are described as unsafe. In my experience, they are not easy to navigate, and I am not surprised that the Council says that the system is disorienting.
- 1.8.2.5 The area is highly accessible. It is at the junction of the Inner Ring Road and roads leading to the centre of London. Two Zone 1 underground stations serve it. There are Thameslink connections to the City and about 35 bus services connecting it to all parts of Central London. It is likely to have a tram service to and from Peckham, Central London and north of the River Thames at King's Cross. Although connections between these modes of transport are

not always obvious, the frequency and range of public transport services make the area an excellent location in principle for employment uses and the provision of retail, leisure and other services. It is also suitable in principle for large scale, high density residential development.

- 1.8.2.6 National and regional policies act in concert in providing the context for regeneration. The scale of change envisaged is substantial, and the implications are that redevelopment should be comprehensive. This compares somewhat with the smaller regeneration area, which did not include the Heygate Estate, in the adopted (1995) UDP, and the more modest policies for it. The Council adopted Supplementary Planning Guidance (SPG) to the adopted UDP in February 2004. This SPG supersedes a Comprehensive Development Framework and so I see no need for the UDP to refer to this now replaced document. The SPG and the Southwark Plan March 2004 (the UDP which is the subject of my Inquiry) have been prepared in parallel, with the one influencing the other. Rightly, the SPG contains a good deal more detailed information than the UDP. The UDP seeks to amplify national and regional policies at the local level, taking into account the current problems of the area, many of which are plain to see. I examine the objections to Section 8.2 and related provisions to it in this context.
- 1.8.2.7 The Council's approach should be one of comprehensive redevelopment of the core area (Site 43P). It should include the scale of development which the London Plan envisages for it, and should result in an environment which is a good deal friendlier towards people than it is at present. This implies good quality housing in terms of living conditions, layout and amenity open space and ease of access to and from each part of the mixed use area. It also implies ease of access to employment, retail, leisure, health, social, education and public realm uses and public transport services and the creation of routes which are inviting to pedestrians because of their actual and perceived safety and general attractiveness. The scale of redevelopment with its potential demands upon road transport, together with national and regional policy aimed at reducing the need to travel, especially by car, means that the entire redevelopment should be based upon good public transport. That should include an attractive, efficient interchange between buses, trains, underground lines and trams.
- 1.8.2.8 I do not dispute the Council's list of problems concerning the Heygate Estate which are due mainly to its design, *problems that are all too common to 1960s estates*. But I do not lose sight of the many things that are good about it and its surroundings. Nor should the Council. My impression is that it has a strong sense of community, with many people wishing to remain in the area. An indication of this is the pride that many residents take in their gardens. I have been surprised by the quietness in the centre of the Heygate Estate. **Mr Wright** correctly points out that the regeneration proposals will result in the loss of existing open space.

I deal with the Early Housing Sites individually later in this Section, but I accept that there are attractive areas of incidental open space, often with trees and play equipment. They make a vital contribution to amenity in its various guises. As **Mr Lee** says, these spaces play a vital role in shaping the landscape and character of Southwark as well as the quality of life opportunities that benefit the communities who live around them. They appear to be generally well used and are no doubt much valued by local residents. That is a conclusion of the study undertaken by Suzanne Michaelis of the University of Bonn and University College London. Their often convenient location within, or close to, residential neighbourhoods can be of greater consequence than more extensive areas of open space in parks at a greater distance from homes. This is a principle that should be adopted in the regeneration proposals.

- 1.8.2.9 It is therefore important that the new residential neighbourhoods at Elephant and Castle include amenity areas of a quality and quantity at least as good as that which is there at present. Generally, that should mean ample green areas as well as harder landscaped areas like the *concrete squares and rooftop gardens* to which **Mr Lee** refers. A new Town Park of 0.78 ha is envisaged. These are the Council's intentions concerning open space and I enthusiastically support them. No doubt the Council will rely to some extent upon Section 106 Agreements where they meet the tests of Circular 05/2005. But the fact remains that substantial regeneration will result in the loss of existing amenity areas in the process of obtaining the greater benefit of decent homes and a better living, working, leisure, retail, cultural and community environment. That approach accords with the spirit of the advice in PPG 17 that local authorities should weigh any benefits being offered to the community against the loss of open space that will occur. In my judgement, regeneration is a substantial and outweighing benefit.
- 1.8.2.10 There are many small businesses, a good deal of which are BME and which offer a variety of goods and services. Retail outlets always appear to be well patronised at the time of my inspections. They also provide employment. Despite all the inevitable disruption as a result of comprehensive redevelopment, the Council must do everything possible to ensure that these businesses survive and continue to flourish. I urge full consultation with the people affected so as to meet their reasonable requirements with regard to alternative accommodation.
- 1.8.2.11 There are many buildings, mainly outside Site 43P, which are interesting and attractive or potentially so. That applies particularly to those in the 2 Conservation Areas of West Square and St George's Circus. The Metropolitan Tabernacle at the centre of Elephant and Castle is an imposing building and should make a vital contribution to the redeveloped area and help to establish a sense of place. The UDP could better acknowledge this heritage, as I recommend.

- 1.8.2.12 A good way of describing the approach that should be taken to regeneration is to use what can be retained of the best of the area as a foundation for its substantial improvement. This should provide a better living environment and better access to a greater range of jobs, leisure and other facilities to the benefit of local residents and other people attracted to it for the high quality and wide range of goods and services offered.
- 1.8.2.13 In taking matters forward, the Council should continue to consult residents and everybody else who has an interest in the area. The Council must continue to work with the community, securing a high level of community involvement. This is vitally important to planning and the achievement of sustainable development. Steps to achieve this should be set out in the Statement of Community Involvement. Although I suspect that for some Objectors the consultation exercises may never be of sufficient length, extent or rigour, I have no doubt that the Council will continue to involve all concerned in a responsible way.
- 1.8.2.14 Several Objectors say that there should be a tripartite arrangement for decision-making between the Council, the community and the developers. Certainly all 3 main parties should work together from the inception of any scheme, but it must not be forgotten that it is the Council which is the local planning authority and in that role is charged with the duty of making decisions on planning matters on behalf of all the people of Southwark. That duty cannot be diluted, shared or usurped. I agree with **Mr Flynn**, however, that this Section of the UDP should acknowledge the importance of full and effective consultation on the regeneration proposals.

Main Issues

- 1.8.2.15 The first issue concerns the amount of Early Housing provision, a matter that should be considered within a certain context. This is the need to regenerate Elephant and Castle, of which the 10.2 ha or so late 1960s early 1970s Heygate Estate with its 1212 dwellings forms an extensive part. I agree with the Council that nobody has seriously challenged the need for this regeneration scheme, essentially because of the evident problems outlined in the forgoing paragraphs. Some Objectors suggest a piecemeal approach to the redevelopment of this part of the Opportunity Area, but in my view that would be undesirable and impracticable. It would involve piece by piece demolition and rebuilding, a "bit at a time" process that would frustrate the wholesale, though phased, comprehensive approach that is required. A comprehensive approach would be more likely to result in a fuller and more effective use of previously-developed land, creating more dwellings on essentially the same areas. That would accord more with Government policies on these matters.
- 1.8.2.16 A piecemeal approach would be bound to result in temporary moves for residents, causing inconvenience and disturbance in their lives additional to that arising from the works of demolition and

construction close to their temporary accommodation. The demolition of buildings in which asbestos has been used could be a serious risk to health, and no responsible authority should countenance it. Furthermore, it would be especially disruptive for families with young children and for the elderly. I accept that some residents would be willing to be moved twice within a year or so, but I doubt whether this is a majority view. Experience might cause them to question the wisdom of having done so. Significantly, one reason for the Council's rejection of a piecemeal approach comes from the lessons learnt during the regeneration of Peckham where residents experienced serious disruption. I therefore support the Council's strategy of comprehensive redevelopment of the Heygate Estate.

1.8.2.17 Sixteen Early Housing Sites are identified, providing nearly 1000 dwellings. I deal later with the objections made to them. Some Objectors say that the Council over-estimates the number of households on the Heygate Estate who will need to be decanted to these Sites. Hence, they say, fewer, or none, of these Sites are required for the stated purpose. In its Response (LD/LBS/8) to **Mr Lee's** objection, the Council says that for 1 June 2005 the potential number of Heygate households to be re-housed is 942 (808 tenanted properties and 134 leasehold properties). The same response includes an estimate, based upon various assumptions, of the total number of new homes needed. The wide range of 778-1033 illustrates the uncertainties that attend forecasts of this nature, as the Council rightly accepts. Hence my recommendations concerning individual Sites must be considered in the light of the latest surveys and estimates concerning the number of households to be accommodated on these Sites.

1.8.2.18 A key consideration in the estimates is the number of vacant dwellings. The Council's evidence at the Inquiry in June 2005 is that *around 200 are now vacant and have been let on a licence basis to households drawn from the Council's re-housing waiting list.* This compares with the 180 void properties mentioned in the Committee Report of 18 May 2004 which notes that *it is likely that the number of tenanted properties on the estate will continue to fall, prior to the commencement of active decanting.* That appears to me to be a reasonable assumption. I note also reference to the 142 vacant units (subject to licences for homeless occupation) to which the Committee report of 17 June 2003 refers. In their evidence to the Inquiry, several Objectors say that there are at least 300 vacant properties, not that much different from the Council's estimate of 270 voids at 1 June 2005.

1.8.2.19 The Council expects that the rate of increase in void properties will decrease as certainty and confidence in regeneration grows. Tenants, it says, *will not want to forego the opportunity of accessing a new home by leaving the Estate unless they absolutely have to.* The Council may be right on this point, but vacancies may themselves generate more and more of them as the Estate suffers

an increasingly "run-down" appearance and an atmosphere of neglect. The fact is that the trend in vacancies during June 2003 (142), May 2004 (180) and June 2005 (270) has continued upwards at an increasing rate and it seems reasonable to expect it to continue to do so for the foreseeable future. The Council states that it intends to select partners for the development of the Early Housing Sites in July 2005. Development on them is expected to start in mid/late 2006, but it may be a year or more after that before a significant amount of decanting starts. There may not be as many as 450 or many more vacancies by 2007 or 2008 as **Mr Lee** suggests, but 425 or so in 2008 may not be too wide of the mark. That is the figure that I adopt.

1.8.2.20 Another consideration is the effect of the Council's acquisition of leasehold properties and the desires and requirements of the households affected. They may, or may not, want to stay in the general area. Not surprisingly, there is little accurate information on the matter and so I do not take it into account in these estimates. The implication from the assumed number of vacancies is that the Early Housing Sites need to provide 150 or so fewer dwellings than the Council expects from them. There is also the general uncertainty of the assumptions that the Council sets out in its Response to **Mr Lee's** objections. As it says, the precise scope of the re-housing programme is difficult to define with certainty. Owing to the Council's status and experience as a housing authority, I rely heavily on its assumptions and estimates. But these will have to be closely monitored and revised if need be.

1.8.2.21 Too much land has been allocated for the provision of early Housing. As things stand, my conclusions about vacancies together with the special attributes of Proposals Sites 7P and 9P, lead to my recommendation that these 2 sites should not be allocated as Early Housing Sites.

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1.8.2.22 On the second issue, **Mr Lee** and others say that Elephant and Castle should be an area for small businesses, community facilities and arts and cultural facilities. I agree, and the Southwark Plan 18th July 2005 includes suitable changes to acknowledge the points. Small businesses are an important part of the local economy and provision should be made for them to continue and flourish. I therefore welcome the references to *incubator units, managed workspace and accommodation for small businesses and the cultural industry sector* and I would see no harm in a reference here to **Mr Lee's social enterprises**. These matters should be a vital component of the mixed use approach to the redevelopment of the Elephant and Castle area.

1.8.2.23 In the Officer Comment concerning the objection made by the **Camberwell Society**, the Council says that it *would assist existing occupiers in finding new premises if necessary*. I strongly urge the Council to do so. Good community facilities are also important, and

I see no reason in principle why they should not include the new, multi-purpose, centrally located community facility to which **Mr Lee** refers. Culture, in my view, includes the arts. The considerations to which these objections refer are vital ingredients of a large and successful mixed use scheme, and they are accorded sufficient emphasis.

- 1.8.2.24 On a related point, **Mr Lee** refers to the Elephant and Castle Residents Regeneration Group's 14 guiding principles for the regeneration and social inclusion programme. I have studied this document, and it contains some useful suggested guidelines in so far as land use matters are concerned. In particular, I note the references to better public transport and better shopping, community, leisure and education facilities for local people and the emphasis to *be placed upon the design of spaces and buildings in any regeneration proposal*. It was produced in 2000 during a previous phase of the regeneration proposals for the area. Further proposals in the UDP and SPG have since been published. It seems to me that the Council has taken account of these suggestions and included them as appropriate in the Southwark Plan 18th July 2005. There is therefore no need for a reference to it in a statutory development plan, an entry which would run the risk, additionally, of according the document a higher status than it should have.

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- 1.8.2.25 The third issue is about retail floorspace. The Government Office for London (**GOL**) objects to the lack of any evidence of an assessment of the suitability of the proposed 75,000 sq m of new retail, leisure and ancillary uses and its likely impact upon existing centres. In my opinion, however, the Council's Retail Study provides convincing justification for this proposal and, in view also of the additions at PIC015 to the Southwark Plan 18th July 2005, the objection is conditionally withdrawn.
- 1.8.2.26 The **GLA** requests the deletion of *metropolitan town centre* in favour of *major town centre*. It points out that the current threshold of a metropolitan town centre is 100,000 sq m of retail floorspace, and that this is well above the 75,000 sq m to which the Council refers. The Council estimates that the combined floorspace at Elephant and Castle, as proposed to be redeveloped, and Walworth Road amounts to over 100,000 sq m. The Objector advises that it would be *more realistic for the Council to outline its aspirations in terms of seeking to upgrade this District Centre to a Major Centre and then to review its potential to expand as a true Metropolitan Centre in the light of the provision, need and sustainable forms of retail behaviour then prevailing across this quadrant of London*. This makes sense and I note the Council's agreement in CD/5.8.32 to the suggested change. I support it.
- 1.8.2.27 **Tesco Stores Ltd** suggests a revision to that part of the text which refers to 75,000 sq m of new retail uses. PIC019 includes much of the Company's requested change, apart from *including large*

convenience and comparison anchor traders. On the evidence, I am not convinced that there is any objection in principle to more floorspace for these types of retailing, although the Retail Study indicates that there is no great need for a large convenience store. My inspections around the area suggest to me that this part of the Borough is reasonably well provided with convenience shopping, although some small scale increase in provision might be justified by the envisaged scale of additional residential development.

- 1.8.2.28 Hence I see no reason to question the estimated additional 3,275 sq m of convenience floorspace likely to be required by 2011. In summary, it would be better to consider any proposals for either such large scale retail developments in the light of more detailed regeneration proposals. Only 10% or so of shopping trips for comparison goods that the people of Southwark make are to shopping centres within the Borough, and that also persuades me that the emphasis at Elephant and Castle should be on the provision of comparison retail floorspace. The inclusion of the Company's suggested clause in the UDP would therefore be too much of a hostage to fortune. I prefer the Council's text.
- 1.8.2.29 In conclusion on this issue, I consider that up to 75,000 sq m of new retail floorspace is a suitable objective. As a major town centre, this scale of development should have no material impact upon other similar shopping centres in London. The findings of the Retail Study and the conditional withdrawal of the objections made by the **GLA** and **GOL** are especially telling considerations in my coming to this conclusion.
- 1.8.2.30 There are related matters. The **Southwark Friends of the Earth** wants the retail mix *to meet the needs of local people and encourages local businesses rather than just large high street chains.* The **Camberwell Society** makes similar points, requesting the protection of small scale commerce. These are laudable aims and accord with the vision of the Elephant and Castle as a mixed use major town centre. Although the proposals when implemented should ensure that there is a suitable amount of floorspace available for small shops and other businesses, the goods sold will much reflect supply and demand. I therefore agree with the Society that local businesses such as those found along the Walworth Road are likely better to reflect the diversity of Southwark. The Council cannot, of course, usually insist on certain goods being sold, or withheld from sale, from the floorspace that becomes available.
- 1.8.2.31 The **Camberwell Society** and the **Southwark Friends of the Earth** are concerned that the provision of extensive shopping floorspace at Elephant and Castle will draw in an unacceptable volume of cars. But the Council is aware of this danger, the text referring to *a mainly car-free centre* and making it clear that regeneration will be based upon *a highly integrated public transport system.* I have no doubt that the eventual proposals will be based upon these, and other important, principles.

1.8.2.32 I note that the Council proposes a market to the east of the railway viaduct. This is excellent news, mainly because it should provide opportunities for small businesses and also contribute to the character of Southwark with its variety of street and similar markets and stalls. I also welcome the Council's response to **Network Rail** concerning Proposals Site 50P (Manor Place Depot, Manor Road). The Southwark Plan 18th July 2005 accepts the suitability in principle of Use Classes A, B and D within railway arches.

1.8.2.33 **Oakmayne Properties**, whose objection is conditionally withdrawn, will note my comments on Supplementary Planning Guidance (SPG) in Part 1 Section 2 – Plan Format – of my Report.

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1.8.2.34 The fourth issue concerns different types of affordable housing, a matter which I consider in some detail in Part 2 Section 4.4 of my Report. The **Owners of Castle House Walworth** and others say that there should not be a blanket requirement to split the affordable housing component of any scheme on a 50:50 basis between social rented housing and intermediate housing. There may be instances, the Objector says, where a greater proportion of intermediate housing is justified. Other Objectors argue that the Council is seeking too high a proportion of intermediate housing. **Mr Lee** says that the ratio should be 70% social housing and 30% intermediate. In my view, any ratio is bound to be arbitrary to some extent, as much may depend upon the particular circumstances of individual schemes. I therefore support the Council's intention to take a flexible approach towards these ratios, at Elephant and Castle and elsewhere. Nevertheless, prospective developers should be given clear guidance on what is likely to be expected of them.

1.8.2.35 In its Response to **Mr Lee's** objections, the Council states that the provision of affordable housing on the Early Housing Sites will be at a much higher level than the policies require. Depending upon such matters as site characteristics and funding mix the affordable element will be 55-70% of the total number of dwellings. I welcome this commitment. It should go some way towards meeting the concerns of those Objectors who argue for more affordable homes in the regeneration scheme. I also agree with the Council that the Heygate Estate residents can best be served by what Mr Abbott describes as *a dedicated programme of new housing based upon sites over which it has direct control*, those being the Early Housing Sites.

1.8.2.36 There is already a high level of social rented accommodation at Elephant and Castle, and part of the Council's approach should be to ensure that existing residents requiring this type of accommodation are provided with it. It should be within the regeneration scheme if that is what they wish. Indeed, the Southwark Plan 18th July 2005 states that within the core of the Opportunity Area no fewer than 5,300 mixed tenure new homes will be provided, including 1,100 to

replace those lost through the demolition of the Heygate Estate. Those new 1100 dwellings would, I consider, be of immense benefit to the existing community, especially to those existing residents looking forward to a better home. Thus, 4,200 dwellings will presumably be available generally for those people moving into the area. At least 35% of them will be affordable. As the Council says, these 1470 or more dwellings will make a *very significant addition to, and contribution to, the Borough's needs*. This is one aspect of the Council's evidence which convinces me of its commitment to increase the amount of affordable housing in the Borough, part of which is the off-setting of any unavoidable losses.

- 1.8.2.37 In specifying the ratio that should be generally sought in new schemes at Elephant and Castle, the Council should take the above figures into account, paying particular attention to the existing amount of social housing in the area, as well as the Government's policies for mixed and balanced sustainable communities. In that regard, the representations made on Policy 4.4 Affordable Housing by such Objectors as the **Guy's and St Thomas' Hospital Trust** and the **Metropolitan Policy Authority** are especially telling. Essentially they point to the shortage of suitable affordable accommodation and the consequent problems of recruiting and retaining staff in the public sector. Indeed, I would suggest that this matter is fairly common knowledge. It has grave implications for public and other services including the already quoted *many of the aspirations set out in your plan as a whole*.
- 1.8.2.38 **St George (South London) Ltd** says that the proportion of affordable housing *should be determined in accordance with the relevant UDP policy and on the merits of each development proposal*. New development, the Company says, should *provide a reasonable proportion of affordable housing*. But any such modification would result in guidance too vague and uncertain. There is an urgent need for affordable homes in the Borough and, as I say, prospective developers should be left in no doubt about what is expected of them. The provisions of the UDP provide a suitable basis for negotiations between the Council and developers on this vital matter.
- 1.8.2.39 Paragraph 1.096 refers to *a large proportion of affordable, intermediate and key worker housing*. Presumably *large* refers to the *at least 35% of all new housing as affordable housing* for schemes of a suitable size in the Elephant and Castle Opportunity Area. To avoid any possible doubt, *large* should be deleted and a fuller reference be made to the affordable housing policies.
- 1.8.2.40 As stated, any ratio is to some extent arbitrary, but the points which the Council makes, including its flexible approach, are persuasive. There is convincing evidence of the need for a good proportion of intermediate housing in this part of the Borough to complement the extent of existing and proposed social rented housing, to provide for key workers and to contribute towards a balanced community. The evidence from Objectors does not convince me that there is a better

ratio that would improve the UDP. The 50:50 ratio should stay, and the Council should proceed accordingly.

- 1.8.2.41 On a related matter, **Mr Lee** says that at least 40% of private development at Elephant and Castle, not 35% as the Council proposes, should be in the form of affordable housing. Whilst in theory this would result in more affordable homes, it might reduce the financial incentives for developers and introduce an element of risk to the regeneration proposals. I am not convinced that his suggestion would result in a better policy and thereby improve the UDP.
- 1.8.2.42 **Mr Wright** asks that any housing development on the early Housing Sites be solely for Council housing. My inference from Circular 6/98 Affordable Housing is that registered social landlords, a term that includes housing associations, will usually be involved as an effective way of achieving control over future occupancy. The Council as landlord is not precluded, but I consider that this is more a management than a land use matter. Tenancies and the level of rents are also more a matter of management than of land use planning.
- 1.8.2.43 Nevertheless, I trust that the Council will take account of the preferences expressed by those people to be re-housed, and accord with their wishes as far as is practicable. Indeed, I congratulate the Council on its guarantee that every tenant on the Heygate Estate who wants to stay at Elephant and Castle will be offered a new home in the area.
- 1.8.2.44 **Mr Wright** says that the majority of the new dwellings should be for families with at least half of them having 3 or more bedrooms. I deal with the composition of the additional housing stock in Part 2 of my Report, especially in my examination of Policy 4.3 Mix of Dwellings. Access for families with young children to secure private outdoor space is an important consideration. Rather than prescribing the mix of housing for Elephant and Castle in the UDP and at this stage, it would be better to seek to accord that mix with the individual requirements of the occupiers who are to be re-housed.
- 1.8.2.45 The Council's Housing Department is, or has been, undertaking the necessary consultations and initial results suggest that as much as 55% of the need is for one-bedroom, and as little as 15% is for 3-bedroom, accommodation. This present need appears to me to accord with likely future trends, especially in view of the Government's statement in PPG 3 that the majority of the projected housing growth will be in one person households. The Council's more targeted approach is to be preferred. It also implies Central Activities Zone higher density development which accords with Government policy in PPG 3 for seeking a *greater intensity of development at places with good public transport accessibility*.

- 1.8.2.46 On the fifth issue, the **St George's Circus Group** makes good points in its *Defending Southwark's Heritage* about the need to acknowledge the value of historic buildings and areas which are in the Opportunity Area. It says that there are 130 or more Listed Buildings in those parts of the Opportunity Area outside the Core Area, and the Proposals Map shows 2 Conservation Areas. I am grateful to the Group for the splendid photographs included in its submissions, as well as for the fascinating plans of St George's Fields (1788) and of its Proposed Layout (circa 1807). They made my unaccompanied inspections of this part of Southwark all the more interesting.
- 1.8.2.47 Irrespective of the Council's proposals for the Opportunity Area as currently defined, the Listed Buildings and Conservation Areas will continue to enjoy the protection that the Planning (Listed Buildings and Conservation Areas) Act 1990 provides, as well as that proffered by related development plan policies. Listed Buildings enjoy statutory protection whether or not within a Conservation Area. I am in no doubt that any wholesale redevelopment of these Buildings or Areas would be totally unacceptable and the UDP should make it abundantly clear that this is not the Council's intention. Most redevelopment and regeneration will take place in the central and southern parts of the Opportunity Area, broadly equivalent with Site 43P. Again, this should be made plain.
- 1.8.2.48 The Council points out that the St George's Circus Conservation Area faces very different development pressures from those at the West Square Conservation Area. This derives to some extent from the location of the former at a busy road junction and good access to the City, but far more from the nature of its land uses and the presence of an expanding University. But these considerations, though important, must be seen in the context of a Conservation Area and the statutory protection that it enjoys. To quote from the 1990 Act Section 72, I consider that it is desirable to preserve or enhance the character or appearance of this area, and applications for planning permission should be determined on that basis.
- 1.8.2.49 One of the great attractions of Southwark is its heritage of high quality historic buildings and areas, and this character should be protected, not eroded. Much of the St George's Circus Conservation Area is part of, and adjoins, a University precinct. The buildings that front London Road, the Duke of Clarence public house and buildings along the western end of Borough Road have a distinctive character, despite their often poor state of repair and the hoardings and scaffolding to them at the time of my inspections. The view from McClaren House, across the Circus with its obelisk, a Grade II* Listed Building, towards the corner of London Road and Borough Road, could be particularly exhilarating. I trust that it will become so when the restoration is completed.
- 1.8.2.50 The assurance from Mr Peter Holliday that the London South Bank University seeks *to carry out work to stabilise and improve the appearance of the terraces and former Duke of Clarence pub* is

reassuring, as is his statement that *we are very keen to engage interested parties in the debate to arrive at the best possible solution for everyone with a stake in the University and these buildings*. I note also the point about *respecting its heritage dimension*. There is no reason to doubt the University's commitment to realising the full architectural and historic quality of these buildings, and I look forward to admiring the completed works.

- 1.8.2.51 I am very doubtful about the Council's proposal to balance the need to protect and enhance the integrity of St George's Circus Conservation Area with the objective of supporting the further development of the University campus and mixed-use development along the route of Borough Road to increase pedestrian movement and activity. Either it is a Conservation Area or it isn't. It most definitely is, it should remain so and it should enjoy the certain, undiluted protection that statute provides.
- 1.8.2.52 Two alternatives present themselves. Either the Conservation Areas should be taken out of the Opportunity Area or they should remain within it but with strong support and commitment in the UDP for their preservation or enhancement. I prefer the former. It would emphasise the difference between wholesale redevelopment for much of the Opportunity Area and the emphasis on protection of land and buildings to the north of the Area. That protection need not thwart the Council's laudable intention for *the physical re-integration of the core area of the Elephant and Castle with adjoining residential neighbourhoods through the provision of new pedestrian crossings, safer and greener routes*. I see the 2 considerations as complementary enhancements.
- 1.8.2.53 It would also overcome the uncertainty whereby the boundary of the Opportunity Area cuts through each of the Conservation Areas. The Opportunity Area should be re-defined to exclude the Conservation Areas in their entirety. I am also concerned about the possible implications of including those parts of London Road, outside the Conservation Areas, inside the Opportunity Area. Many of these buildings have a quality worthy of protection, and at the very least the UDP should acknowledge the importance of their historic character and contribution to sense of place.
- 1.8.2.54 The Group suggests that the Conservation Areas be brought into the Bankside and The Borough Action Area. I am not persuaded. It would be better for them to be outside both Opportunity and Action Areas. Statute and development plan policies should give them adequate means for their preservation and enhancement. I have examined the Group's suggested re-drafts of text on this basis and conclude that, following my recommended revision of the boundary of the Opportunity Area, many are rendered unnecessary.
- 1.8.2.55 In summary, I believe that acceptance of my recommendation will provide sufficient protection for buildings and areas of historic and architectural value.

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- 1.8.2.56 There are other matters. **Mr Robinson** requests the removal of the Newington Estate at Crampton Street from the Opportunity Area. The railway line, he says, is the logical westernmost boundary of the Opportunity Area in this locality. He fears that the present inclusion of the Estate will result in a high density, high rise redevelopment out of scale and harmony with the local character of the area of low-rise houses and flats. I deal with the Newington Estate in Part 2 of my Report at paragraphs 2.1.52 and 53, concluding that it should not be a Preferred Industrial Location but should be part of the Opportunity Area. It is in a part of the Borough where public transport is good, and this is a consideration in favour of high density redevelopment. Other considerations include the efficient use of previously-developed land, the proposed design and layout and respect for the character of the area. These circumstances make acceptable in principle the continued presence of the land in the Opportunity Area.
- 1.8.2.57 **St George (South London) Ltd** suggests that the Council should consider the merits of each development proposal when assessing the number of parking spaces that should be provided. That would be preferable, the Company says, to *simply limiting development in a high-density public transport rich locations to the minimum standards*. I deal with parking standards later in my Report in Part 2 Section 5. My only comments here are that developers are entitled to reasonably certain guidance in the adopted development plan about parking standards, and that is the Council's approach. And that the good public transport at Elephant and Castle and its likely improvement as a result of, for example, a tram service implies a generally low level of parking provision.
- 1.8.2.58 The **Camberwell Society** says that the UDP should state that Traffic Impact Assessments are obligatory. But there is no need for this. There would be little point in insisting on such a requirement for proposals that were likely to generate little or no traffic. It would be better to rely on Policy 5.2 Transport Impacts which in effect requires a Transport Assessment only where traffic could have a significant impact on the surroundings.
- 1.8.2.59 There is no need to qualify paragraph 8.2.3 with *unless exceptional circumstances can be demonstrated*. The Planning and Compulsory Purchase Act 2004 Section 38 (6) gives the means for outweighing the provisions of the development plan.
- 1.8.2.60 In conclusion and subject to my recommendation, I consider that the Southwark Plan 18th July 2005 goes as far as it should in setting out the Council's objectives for the use and development of land at the Elephant and Castle area. It provides a useful foundation for investment through a partnership between the Council and prospective developers, and a platform for consultation and discussion with all those persons and organisations interested in the

drawing up and implementation of more detailed proposals for regeneration. I commend it to all concerned.

RECOMMENDATION

1.8.2.61 I recommend that the UDP be modified in accordance with the Southwark Plan 18th July 2005 apart from:

8.2.2

The Elephant and Castle (Site 43P) will undergo major redevelopment in the coming years....

High quality places in which to live are a priority and new residential schemes should include a suitable proportion of affordable, intermediate and key worker housing in line with the Council's affordable housing policies.

8.2.3 (i)

A thriving and successful mixed use major town centre, safe, full of vitality and accessible to and from a highly integrated public transport system and combining historic character with a high quality design and layout of new buildings. A place where people will want to live.....

8.2.3.ii

To encourage the restoration and beneficial re-use of buildings that contribute to the architectural and historic character and sense of place of their surroundings.

8.2.3.iii

A minimum of 45,000 sq m of Class B1 Use space, including incubator units, managed workspace and accommodation for small businesses, social enterprises and the cultural industry sector.

the exclusion of the West Square and St George's Circus Conservation Areas from the Opportunity Area;

and the inclusion in the text where appropriate of:

Consultation on the regeneration of Elephant and Castle will be comprehensive and tripartite, involving the Council, the developer(s) and all relevant interests including community groups.

Early Housing Sites

Introduction

- 1.8.2.62 There are 16 Early Housing Sites. They are included in the Southwark Plan 18th July 2005 Appendix 4 and I deal below with each one in turn.
- 1.8.2.63 At the beginning of the Inquiry session held on 15 July 2005, I stated that I had inspected certain Early Housing Sites, noting their prevailing openness, their greenery and their occurrence within a generally well built-up urban environment where open space is at a premium. All these considerations, I said, as well as the consultation exercises that had taken place, had brought me to a preliminary conclusion. This was that the local communities place a very high value on these open spaces for reasons that included to varying degrees their openness, their landscaping and ecology (especially Site 9P Dickens Square), the opportunities that they provided for play, the enjoyment of nature, social and community activities and the simple pleasures derived from their appearance and quietness. That conclusion still holds good, but it must be weighed in the balance with other important considerations including the need to reserve land for Early Housing as part of the regeneration of Elephant and Castle.
- 1.8.2.64 The Council's Early Housing Sites – Appraisal (CD/1.3.9) includes illustrative proposals for these sites, their main purpose being to indicate the type of development and number of dwellings on the sites that might be found suitable. At the time of the Inquiry, no illustrative scheme had been granted planning permission, and at the time of writing I presume that still to be the case. Unfortunately, the numbering of these sites does not always accord with that in the Southwark Plan 18th July 2005 Appendix 4. I use the system in the latter.
- 1.8.2.65 My conclusions and recommendations concerning those Sites where I consider that residential development should take place are based upon the assumption that all relevant surveys have taken, or will take, place and that they demonstrate the suitability of the sites for the proposed use. Those surveys include any required of an ecological nature.

Proposals Site 6P: Manna Ash House, Pocock Street

OBJECTIONS

There are no specific objections to this land as an Early Housing Site. But some representations are by way of objection to all the Early Housing Sites, including objections by **Mr Al-Issa Munu**, and so I deal with it. Indeed, I keep this point in mind throughout my consideration of all these Sites.

MAIN ISSUE

Whether this land is suitable as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

1.8.2.66 This is a small site of no more than 0.15 ha or so. It is used mainly for the garaging and parking of cars, with some of the 45 garages being in good condition with recently installed doors. The surroundings are mainly residential, with 4 and 5 storey blocks nearby. The loss of parking facilities would no doubt result in great inconvenience for the people who use them, but the location of this previously-developed land makes it eminently suitable for residential redevelopment. I consider that the urgent need to provide for those residents of the Heybridge Estate who will need to be re-housed should take precedence over that inconvenience.

1.8.2.67 The illustrative plans suggest a suitably high density leading to a scheme of 48 units. In devising final plans, however, the Council should take account of the need to provide reasonable protection of the living conditions of nearby residents. In principle, however, the land is suitable as an Early Housing Site and for a high density scheme.

1.8.2.68 I note the boundary change in the Southwark Plan 18th July 2005.

RECOMMENDATION

1.8.2.69 I recommend Proposals Site 6P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 7P: Library Street Neighbourhood housing office and land between Library Street, St James Street, Milcote Street and Devidge Street

OBJECTIONS

First Deposit

1/170/6343	Bankside Open Spaces Trust
1/170/10077	Bankside Open Spaces trust

MAIN ISSUE

Whether, in view of the activities that take place on this land, it should be identified as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.70 This is a small site of about 0.24 ha which accommodates a number of uses. These include The Borough and Bankside Neighbourhood Housing Office, 4 "prefabs" and a most delightful Diversity Garden with a greenhouse, vegetables, herbs and flowers. The **Bankside Open Spaces Trust (BOST)** says that the garden takes up about 88% of the land. Benches allow the visitor to sit and savour the charm and tranquillity of this open space which thankfully is open to the public. I should like to pay tribute to the excellent work that the Trust does to *support and inspire local communities to improve, create, enjoy and sustain the environment for the benefit of all.*
- 1.8.2.71 The Council points out that the land is subdivided into 5 plots, 4 being occupied by "prefabs" and one being the Diversity Garden. Up until their demolition in 1990, 2 other "prefabs" stood on this fifth plot. The Trust holds it under the terms of a temporary licence granted by the Council which can be terminated at any time for *other purposes* including redevelopment. For many years the Council has intended to use this previously-developed land for permanent residential use, and the illustrative plans indicate a scheme with a useful net gain of 46 dwellings towards Early Housing provision. There is nothing that I can do to overturn or amend the terms of this licence. All I can do, however, is to seek to distinguish its terms from relevant land use matters.
- 1.8.2.72 I agree with just about everything that the Trust says. My inspections confirm the impression gained at the Inquiry that the nature of this land and the activities that take place on it point to retention in its present state. I say that despite its previously-developed nature and its location within a mainly residential area. No doubt alternative land could be found for a venture of this type within the Elephant and Castle regeneration scheme, but this would cause significant inconvenience, frustrate ambitions and cause too much dismay to all those involved in such a worthwhile endeavour.

Although there is a long-standing commitment to re-house the occupants of the "pre-fabs", the disruption caused to these long established residents is another consideration which leads to my recommendation that this land should not be identified as an Early Housing Site. My main concern, however, is about the loss of open space and its particular attributes.

1.8.2.73 I agree with the Council that the land is not large enough to qualify as Borough Open Space or Other Open Land. But I hope that the Trust will take comfort from my recommendation and from my suggestion at the Inquiry that a paragraph be inserted in the Southwark Plan 18th July 2005 concerning the importance that the Council attaches to *smaller areas of open space*.

1.8.2.74 **BOST** says that a compromise might be possible, with the residential redevelopment of the land previously occupied by the library and now accommodating the Housing Office. This is worth pursuing in the spirit of the goodwill that obviously exists between **BOST** and the Council, although presumably alternative accommodation would have to be found for the Housing Office.

RECOMMENDATION

1.8.2.75 I recommend that the UDP be modified by the deletion of Proposals Site 7P from Appendix 4, but that the Council investigates the possibility of some of the land being allocated for housing, in line with paragraph 1.8.2.64.

Proposals Site 8P: 21 Harper Road

OBJECTIONS

Second Deposit

2 / 220 / 7181	RCA
2 / 453 / 8218	Mr Al-Issa Munu
2 / 454 / 8222	Mrs Mary Munu
2 / 475 / 8375	R Simpson
2 / 478 / 8442	Rockingham Community Centre
2 / 530 / 9257	A M Bentley

MAIN ISSUE

Whether this site should be allocated as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.76 This site includes a 2, 3 and 4 storey building with a rear courtyard. It is occupied by Southwark Social Services Children's Services and a self-storage building. It is within a mainly built-up area, although there is some open space to the south and south-east. This is not a site with public access to open space. Several Objectors refer to the loss of open space on this site. This would not be the case, and I wonder if they are referring to land on the opposite, south-eastern side of Swan Street which is not identified as an Early Housing Site.
- 1.8.2.77 Provided that suitable and conveniently located alternative accommodation can be found, if needed, for the existing uses I see no objection in principle to the use of this land for residential development. The illustrative plans give a good indication of the type of scheme likely to be acceptable, and the estimate of 60 dwellings on this Early Housing Site appears to me to be reasonable in terms of such matters as density and design.

RECOMMENDATION

- 1.8.2.78 I recommend that Proposals Site 8P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 9P: Dickens Square

OBJECTIONS

Second Deposit

2 / 236 / 7222	Southwark Mysteries
2 / 269 / 7476	Mr Lionel Wright
2 / 43 / 7594	Mr Richard Lee
2 / 440 / 7975	Mr Michael Doyle
2 / 432 / 7976	Ms Auriol Bishop
2 / 442 / 7977	Ms Julia Dunsdon
2 / 433 / 7978	Ms Nicola Callingham
2 / 434 / 7979	Mr John Smith
2 / 435 / 7980	Afeez Odutayo
2 / 436 / 7981	Mahita Mehari
2 / 437 / 7982	Mr Daniel Walters
2 / 422 / 7983	Mr Simon Ashley Grant
2 / 423 / 7984	Mr Kenny Ayeni
2 / 424 / 7985	Yomi Sode
2 / 425 / 7986	Ashad Ali
2 / 441 / 7987	Ershadul Alam
2 / 427 / 7989	Mr Abdul Hassan
2 / 428 / 7991	Mr Simon Gazader
2 / 429 / 7992	R Isliaam
2 / 430 / 7993	Mr John O'Grady
2 / 431 / 7994	Yowza
2 / 421 / 7995	Femi Odutayo
2 / 420 / 7996	Mr Daniel Gray
2 / 419 / 7997	Tao MacLeod
2 / 418 / 7998	Mr Garry Eccles
2 / 414 / 7999	Ms Sarah Thickbroom
2 / 413 / 8000	Ms June McCluskey
2 / 412 / 8001	Ms Tracey Kelly
2 / 411 / 8002	Mustie Fikret
2 / 410 / 8003	Ms Eliza Grainger
2 / 409 / 8004	Ms Kellie Bennett
2 / 407 / 8005	Zomir Uddin
2 / 443 / 8006	Mr Abdul Jibul
2 / 406 / 8008	Ms Amanda Penfold
2 / 405 / 8010	Misc - Details Not Given
2 / 404 / 8011	Nizari, N
2 / 408 / 8012	Ms Shereen Nizari
2 / 444 / 8013	Mr and Mrs Kaley
2 / 415 / 8014	Ms Juanita Quinn
2 / 416 / 8015	K Pettengell
2 / 438 / 8016	Ms Olivia Bishop
2 / 439 / 8017	Mr Simon Macer-Wright
2 / 445 / 8018	Ms Rachael Preston
2 / 451 / 8145	West Bermondsey Planning Group
2 / 453 / 8219	Mr Al-Issa Munu

2 / 454 / 8223	Mrs Mary Munu
2 / 465 / 8319	Mr Jeremiah Flynn
2 / 475 / 8376	R Simpson
2 / 68 / 8419	GLA
2 / 492 / 8747	Mr Jay Hall
2 / 114 / 9035	Southwark Green Party
2 / 530 / 9274	A M Bentley
2 / 220 / 9414	RCA
2 / 478 / 9578	Rockingham Community Centre

MAIN ISSUE

Whether, despite the need for Early Housing Sites, the attributes of this land make it unsuitable for residential development.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.79 I conclude in my examination of Site 43P that there is a substantial need for land for housing to assist in the regeneration of Elephant and Castle. Proposals Site 9P is, of course, one of the sites that the Council puts forward for this purpose. Its main attributes are its prevailing openness, the trees and other vegetation within it, its value for nature conservation and recreation, its location within a generally well built-up area and its part inclusion in the Trinity Church Square Conservation Area. I deal with each in turn.
- 1.8.2.80 Little can be said about its prevailing openness. It is there for all to see, and it is part of its charm that **Ms Amanda Penfold** describes. The land accommodates the Rockingham Estate Playground Association (REPA) building and facilities, but this does not greatly detract from the openness of this 0.57 ha site. The extent of the land and its almost entire absence of buildings provide a pleasing contrast to the generally built-up nature of the surroundings. The height and size of many of these neighbouring buildings makes that contrast particularly valuable, providing visual relief in a predominantly urban area. Even so, I do not consider that this attribute, by itself, is enough to thwart the Council's proposals.
- 1.8.2.81 There is a great variety of trees and other vegetation on the land. I understand that the site was levelled as a result of enemy action during the Second World War, and no doubt some of the mature and attractive trees date from that time. They are particularly in evidence along the north-west boundary of the site. But there are others elsewhere, and this combination results in a most pleasing sylvan quality. Other vegetation is to be found along Butterfly Walk, a hardly surprising sobriquet in view of the prevalence of the butterfly bush, buddleia. These trees and shrubs make a vital visual contribution to the land itself and to the surroundings.
- 1.8.2.82 I accept the Council's point that this land has no great nature conservation value in that habitats are considered to be of no more than parish/neighbourhood importance. But in my opinion even this

value is significant, and it must be appreciated in its local context. The vegetation and the wildlife that it attracts to it are of vital importance in this built up area. In that context, the Major Negative impact to which the Council refers in CD/1.3.27 becomes a consideration of substantial weight. As a person brought up in the countryside, I believe that children should be introduced to, and be given the chance to marvel at, the wonders and beauty of nature at as early an age as possible. They are able to do so here in what appears to me to be a relatively safe and quiet environment. I make similar points in Part 1 Section 9.4 about Russia Dock Woodland. This approach accords with the Government's view in PPG 9 about conserving the natural heritage for the benefit of this and future generations. The blackcap is an uncommon bird in an urban area, but I note that one visits the site. And I hope that the famous green woodpecker is still being admired!

- 1.8.2.83 Irrespective of the amount and location of other open land in this part of the Borough, I am persuaded by the evidence that the land is of great importance to local people for the opportunities that it provides for recreation and community uses. There is some formal play equipment associated with the REPA Centre, but the extent of the land, its openness, quietness, relative safety and location near extensive residential areas with a limited number and size of gardens make it an ideal place for children to use for play. The evidence of **Miss Adama Munu** (aged 14), who speaks from personal experience of having played from an even earlier age on this land with her many friends, is especially convincing on this point.
- 1.8.2.84 My conclusions above deal with much of the importance of the land in terms of its location in what the Council describes as a *dense urban environment*. But yet another matter concerns me. Some of the south-easterly parts of the land are in a Conservation Area, an area that includes an elegant church and terraces. The openness of the land provides a pleasing setting to them, and I am not convinced that the erection of perhaps the 94 dwellings of the illustrative plan on land within and close to the Conservation Area would preserve or enhance its character or appearance. These squares and terraces, here and elsewhere, are so important to the Borough in terms of architectural heritage, and all should be done to protect them and their settings.
- 1.8.2.85 With suitable management and good behaviour, I do not consider that activities in or near the REPA building need result in material harm to living conditions. Nor need residential development undermine the excellent work that REPA undertakes. The Council would ensure that a residential scheme would include all practicable measures of mitigation to limit harm to relevant interests. The exclusion of Butterfly Walk from the Proposal Site is a good start, but it does not go nearly far enough. The erection of as many as 94 dwellings on this land, or even considerably less than that number, would radically alter the character of the land and substantially

reduce its value to the local community. I doubt whether the management of the land resulting from a planning obligation could do much to protect its assets from the pressures on it arising from the scale of development on this site that the Council envisages.

1.8.2.86 Despite the undoubted pressures for residential development, this land is unsuitable for it. It should be protected and enhanced, generally along the lines indicated in the Report on Research into Use and Local Perception of Site 9P. Any enhancement should not rely on development taking place on part of it. The fact that more open space than that which exists at present will be provided in the regenerated Elephant and Castle is poor compensation for the loss of part of this land to development. Loss of attractive, mature trees would be especially deplorable in this respect. The best way forward is to protect this land by extending the Open Space (OS) 44 (Borough Open Land) designation to include it. That is the view of **Mr Simon Hughes MP**, the **GLA** and others, and I concur.

1.8.2.87 I should like to pay tribute to the enthusiasm of those local people who appeared at the Inquiry and of all the others who relied on their written representations. The response in the number of representations suggests that publicity for the proposal has been effective. I agree with just about everything that the Objectors say, although this part of my Report has to be a good deal shorter than is the large volume of representations. Finally, I hope that the Objectors, their neighbours and local children will continue to enjoy the amenities that this land affords. I agree with **Mr Lee** that it is *at the heart of the local community*.

RECOMMENDATION

1.8.2.88 I recommend that the UDP be modified by the deletion of Proposals Site 9P Dickens Square and by the extension of the designation of OS44 as Borough Open Land to include it.

Proposals Site 39P: Prospect House Playground, St George's Road

OBJECTIONS

Second Deposit

2 / 472 / 8359
2 / 465 / 9420
2 / 269 / 9427
2 / 43 / 9585

Ms Daniela Nugneri
Mr Jeremiah Flynn
Mr Lionel Wright
Mr Richard Lee

MAIN ISSUE

Whether this land should be identified as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.89 This 0.24 ha site consists mainly of a children's play area and kick-about area, together with 6 or so car parking spaces. Squirrels, foxes and birds are attracted to its open space. It is located at the frontage of St George's Road between residential blocks of 4/5 storeys to the east and 4 storeys to the west. Prospect House is to the north, a block of 11 storeys. The surroundings are thus mainly residential, being part of the Gaywood Estate. There should be no objection to further residential development here, and the 14 dwellings noted in the illustrative plans is a reasonable ambition.
- 1.8.2.90 Prospect House is sited in the centre of an open space which contains some good trees, and there should be ample opportunity to relocate the children's play area and kick-about area in it, or perhaps close to it. A position for these areas further away from the road frontage should result in less noisy surroundings. That would be of benefit to the children.
- 1.8.2.91 **Ms Nugneri** and **Mr Flynn** say that any residential development on this land should be for social housing only. I agree that affordable housing policies should apply, but special consideration should be given to the wishes of the people to be re-housed here. The mix of new dwellings should reflect the wishes of the same people, the capacity of the site and relevant housing policies, including Policy 4.3 Mix of Dwellings. The terms of the tenancies are more a matter of management than of land use planning.
- 1.8.2.92 This land is suitable in principle as an Early Housing Site and should provide a modest, but useful, contribution to the identified need.

RECOMMENDATION

- 1.8.2.93 I recommend that Proposals Site 39P be allocated as an early Housing Site and that the UDP be modified in accordance with the Southwark UDP 18th July 2005.

Proposals Site 40P: 153-163 Harper Road

OBJECTIONS

Second Deposit

2 / 408 / 7923	Shereen Nizari
2 / 402 / 7925	D Hughes
2 / 404 / 7928	N Nizari
2 / 405 / 7931	Misc - Details Not Given
2 / 406 / 7932	Ms Amanda Penfold
2 / 407 / 7935	Zomir Uddin
2 / 409 / 7937	Ms Kellie Bennett
2 / 410 / 7939	Ms Eliza Grainger
2 / 411 / 7940	Mustie Fikret
2 / 412 / 7944	Ms Tracey Kelly
2 / 413 / 7946	Ms June McCluskey
2 / 414 / 7948	Ms Sarah Thickbroom
2 / 415 / 7950	Ms Juanita Quinn
2 / 416 / 7951	K Pettengell
2 / 418 / 7952	Mr Garry Eccles
2 / 419 / 7953	Tao MacLeod
2 / 420 / 7954	Mr Daniel Gray
2 / 421 / 7955	Femi Odutayo
2 / 422 / 7956	Grant, Simon Ashley
2 / 423 / 7958	Kenny Ayeni
2 / 424 / 7959	Yomi Sode
2 / 425 / 7960	Ashad Ali
2 / 427 / 7961	Mr Abdul Hassan
2 / 428 / 7962	Mr Simon Gazader
2 / 429 / 7963	R Isliaam
2 / 430 / 7965	John O'Grady
2 / 431 / 7966	Yowza
2 / 432 / 7967	Auriol Bishop
2 / 433 / 7968	Ms Nicola Callingham
2 / 434 / 7969	Mr John Smith
2 / 435 / 7970	Afeez Odutayo
2 / 436 / 7971	Mahita Mehari
2 / 437 / 7972	Mr Daniel Walters
2 / 438 / 7973	Ms Olivia Bishop
2 / 439 / 7974	Mr Simon Macer-Wright
2 / 441 / 7988	Ershadul Alam
2 / 443 / 8007	Abdul Jibul
2 / 453 / 8220	Mr Al-Issa Munu
2 / 454 / 8224	Mrs Mary Munu
2 / 472 / 8360	Ms Daniela Nugneri
2 / 475 / 8377	R Simpson
2 / 530 / 9275	A M Bentley
2 / 220 / 9413	RCA
2 / 465 / 9421	Mr Jeremiah Flynn
2 / 269 / 9428	Mr Lionel Wright

2 / 43 / 9435
2 / 478 / 9579

Mr Richard Lee
Rockingham Community Centre

MAIN ISSUE

Whether this land is suitable as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.94 This land includes 20 flats in a 2 storey block sited roughly at its centre. They are occupied mainly or entirely by elderly people. The surroundings include mainly lawns with mature birch and other trees. Other features include rose gardens, landscaped courtyard, children's play area and residents' car park. In the generally well built up urban area, including the 11 storey Symington House to the north east of the site, the impression gained is of a low density development of a modest number of flats in lawned, spacious surroundings. I have no doubt that the residents appreciate the open space, and that the land is more widely appreciated for the pleasing visual contrast that it provides in the neighbourhood.
- 1.8.2.95 The Council proposes the demolition of the block of flats. The illustrative plans show a redevelopment of the entire site for 122 dwellings, a net increase of 102 dwellings. The scheme would include 5/6 storey parts with lower rise development towards the centre of the site. Ground floor uses along the Harper Road frontage would include retail/community and live/work units. This is intended to reinforce the local centre.
- 1.8.2.96 As the list of objections shows, there is considerable local opposition to the scheme with many people saying that this is a high density area with few green spaces. These spaces, they say, are especially valuable in this part of the Borough where few people have gardens. There is concern about the effect of the scheme of neighbouring residential properties, mainly as a result of traffic generation, pollution and loss of daylight, sunlight and privacy. Rather than redeveloping the land with its consequent disturbance to, and re-housing of, existing residents, it should be protected and enhanced.
- 1.8.2.97 I do, of course, have considerable sympathy with all the points made. They are of considerable force, and I accept in particular the need to retain open space in a closely built urban area for visual and other vital needs. There is no doubt that this open land around the block of flats admirably fulfils this role. The Council says that the residential scheme would accord with all relevant policies concerning, for example, provision of incidental open space and the reasonable protection of amenity including that of neighbouring occupiers. That must apply to every scheme on an Early Housing Site. The density proposed on this land is suitable in these immediate surroundings and more widely in this part of the Borough.

1.8.2.98 My main concern is the inevitable disruption of the lives of elderly people and the loss of open space. I understand that some residents value their accommodation on the ground floor because of medical conditions. They must be given every reasonable consideration in finding alternative homes for them. All these important considerations must be weighed in the balance with the need to regenerate Elephant and Castle and to provide a decent home for those whose living accommodation is not as good as it should be. The retention of this land would serve to thwart the comprehensive approach to redevelopment that the scale of existing problems demands. The envisaged net increase of 102 dwellings on this site would make a useful contribution to early housing provision which is a vital precondition of comprehensive redevelopment.

1.8.2.99 Although much open space would be lost on this site, the Council states that there will be a net increase in open space, including incidental open space closely associated with residential schemes, in the comprehensive redevelopment of Elephant and Castle. That is an undertaking of crucial importance. The open space replacing the existing areas must be of at least equivalent size and quality within the new local catchment areas and should be available for similar or enhanced use before redevelopment starts.

1.8.2.100 The replacement open space should be provided in the context of the comprehensive redevelopment scheme. In conclusion, therefore, I consider that the loss of open space on this site is justified by the greater good to the wider community of the Council's intentions for Elephant and Castle, including the provision of decent homes in line with Government policy.

1.8.2.101 I note that Appendix 4 of the Southwark Plan 18th July 2005 ascribes 42 dwellings to this site instead of the aforementioned 102. It ascribes the 102 dwellings to Proposals Site 41P. Transposition is required.

RECOMMENDATION

1.8.2.102 I recommend that, apart from the transposition to which I refer in the above paragraph, Proposals Site 40P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 41P: Albert Barnes House, New Kent Road

OBJECTIONS

Second Deposit

2 / 453 / 8221	Mr Al-Issa Munu
2 / 454 / 8225	Mrs Mary Munu
2 / 472 / 8361	Ms Daniela Nugneri
2 / 475 / 8378	R Simpson
2 / 530 / 9276	A M Bentley
2 / 220 / 9412	RCA
2 / 465 / 9422	Mr Jeremiah Flynn
2 / 269 / 9429	Mr Lionel Wright
2 / 43 / 9436	Mr Richard Lee
2 / 478 / 9580	Rockingham Community Centre

MAIN ISSUE

Whether this land should be identified as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.103 This is a small site of about 0.25 ha. It includes a lawned area, hard surfaced play area and a basketball court. Some say that it is a baseball court. There are some attractive ornamental trees on it. As with many other proposed Early Housing Sites, the openness of the land provides pleasing visual relief in a closely built up urban area. I do not doubt that its play and other recreation facilities are greatly valued by those who use them. This is a general conclusion that applies to many, if not all, of these Sites.
- 1.8.2.104 The illustrative plans show a scheme of 42 dwellings, with no demolition of any existing ones. The proximity of the land to the centre of Elephant and Castle implies a high density of development, and the illustrated scheme appears to me to be suitable in principle in this and other relevant ways. Some of the open space would be retained within an internal landscaped courtyard, although the reduced area and its position would result in significantly less value to those who benefit from the present amenity. Some recompense will presumably continue to be available at the nearby Newington Gardens.
- 1.8.2.105 My conclusion is essentially the same as with Proposals Site 40P. The wider good and the greater benefit which would be served by the development of this land outweighs the advantages of keeping it in its present state.

RECOMMENDATION

1.8.2.106I recommend that, apart from the transposition to which I refer in paragraph 1.8.2.102, Proposals Site 41P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

**Proposals Site 42P: Land to the south-west of Stewart House,
bound by Leroy Street and Aberdour Street**

OBJECTIONS

Second Deposit

2 / 472 / 8362

Ms Daniela Nugneri

2 / 465 / 9423

Mr Jeremiah Flynn

2 / 43 / 9437

Mr Richard Lee

MAIN ISSUE

Whether, bearing in mind the loss of garages and parking spaces, this land is suitable for Early Housing.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.107 This is a small site of about 0.12 ha and is used mainly for the parking and garaging of vehicles and the storage of various materials. I counted 20 lock-up garages in 3 blocks. There would be no need to demolish any dwellings, and the illustrative plans show a scheme of 20 dwellings. Access to the site is from Leroy Street where parking restrictions apply in the form of double yellow lines on one side of the road and a "pay and display" regime on the other side. The surroundings are primarily residential and my inspections confirm that there is intense pressure for the parking of vehicles in this neighbourhood. This is not an unusual state of affairs in a well built-up urban area, and the 20 garages and the 7 parking spaces for the residents at Ujima usefully ease some of that pressure.
- 1.8.2.108 Objection is made to the loss of existing open space but, owing to the presence of the garages and accesses to them, this land neither gives the appearance nor functions as open space. As with other Early Housing Sites, the Objectors seek an assurance that if the land is redeveloped for residential use it will be solely for social housing, tenancies will be the same as Council tenancies and that a proportion of the dwellings will have at least 3 bedrooms. I deal with these matters above at paragraphs 1.8.2.42-44, and there is nothing that I can add here to those conclusions.
- 1.8.2.109 A judgement must be made on the competing objectives of retaining this previously-developed land for the garaging of cars and storage purposes and of releasing it for residential development as a contribution to the need for Early Housing. That judgement should be made in the context of the significant benefits that will result from the regeneration of Elephant and Castle, benefits that include the provision of decent homes for those people whose present accommodation will be demolished as part of the regeneration. Despite the inconvenience that will result from the loss of garage

and storage space, I consider that the land should be redeveloped for housing.

1.8.2.110I note the proposed change to the boundary of this site as shown in the Southwark Plan 18th July 2005. The eventual scheme should provide for the retention of the best trees along the perimeter of the land.

RECOMMENDATION

1.8.2.111I recommend that Proposals Site 42P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 43P: Elephant and Castle Core Area

OBJECTIONS

Second Deposit

2 / 472 / 8363	Ms Daniela Nugneri
2 / 68 / 8478	GLA
2 / 465 / 9424	Mr Jeremiah Flynn
2 / 43 / 9438	Mr Richard Lee
2 / 120 / 9584	Thames Water Property Services
2 / 68 / 9615	GLA
2 / 68 / 9616	GLA
2 / 120 / 9619	Thames Water Property Services
2 / 120 / 9620	Thames Water Property Services
2 / 465 / 9621	Mr Jeremiah Flynn
2 / 269 / 9622	Mr Lionel Wright

MAIN ISSUE

Whether this previously-developed land is suitable for Early Housing.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.99 This is the area where most redevelopment will take place. Most of the matters to which the Objectors refer are considered in my examination of issues and in my conclusions above on the various Proposals Sites. These include mix of dwellings, loss of open space and its replacement as part of the regeneration of Elephant and Castle, scale of retail provision, mix of dwellings and tenancies.
- 1.8.2.100 I note the inclusion of such detailed matters as the envisaged number of dwellings and the amount of retail and Class B1 Use floorspace. This should assist in the provision of infrastructure by such bodies as the **Thames Water Property Services** and meet the objection made by the **GLA**.
- 1.8.2.101 As already indicated, I consider that Elephant and Castle is in urgent need of regeneration. Owing to its size, location, good and potentially better public transport and the previously developed nature of the land, it should be capable of accommodating the scale of new housing envisaged. I see no reason why the 4,200 dwellings to which the Southwark Plan 18th July 2005 refers should not include a substantial element of replacement and Early Housing.

RECOMMENDATION

- 1.8.2.102 I recommend that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 45P: Land bounded by Brandon Street and Larcom Street south west

OBJECTIONS

See note above under Proposals Site 6P.

MAIN ISSUE

Whether this land is suitable as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

1.8.2.103 This is a small site of only 0.05 ha. The Council describes it as vacant, but it has a hard surface and a high fence surrounds it. It is next to the St John's Institute, and it looks to me that it is used as a children's play area, possibly for football or similar activities. Maybe this is in association with the Institute which provides such attractions as an after-school club. Again, I have no doubt that it is valued by local people, especially youngsters.

1.8.2.104 The previously-developed nature of this land and its position within a predominantly residential area makes it a strong candidate for residential redevelopment, despite its location in a neighbourhood where there is not an abundance of open space. Its loss as play area would be regrettable, but it should be seen as a temporary loss in that the Elephant and Castle regeneration scheme will include more open space for purposes such as this than occur at present. The disadvantage of the loss is outweighed by the overall benefits of the regeneration which include decent homes for all concerned. The illustrative plans show a scheme of 18 dwellings, a reasonable solution in my opinion. This should be welcomed for the contribution which they would make to Early Housing provision, thereby serving to achieve regeneration to the benefit of the wider community.

RECOMMENDATION

1.8.2.105 I recommend that Proposals Site 45P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 46P: Nursery Row Park car parks, Wadding Street and Brandon Street

OBJECTION

Second Deposit

2 / 68 / 8425

GLA

MAIN ISSUE

Whether this land is suitable as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.106 This land is one of the larger proposed Early Housing Sites, extending to about 1.13 ha. Its main uses are for car parking and public open space, being part of Nursery Row Park which the Council regards as a Local Park. There are trees around its edge, with bench seats and a well-equipped children's play area. At its southern end, 2 car parking spaces would be lost as well as a small grassed area with trees, shrubs and wild flowers. The illustrative plans show a residential scheme of 3,4,5 and 6 storeys, including 42 3-bedroom flats and 8 3-bedroom houses. Retail and live/work units would be clustered along Brandon Street, possibly providing alternative accommodation for any uses ceasing in the locality. This should be made clear in the text.
- 1.8.2.107 A total of 218 dwellings is envisaged, the major part of the 253 dwellings sought on this site and Proposals Sites 47P and 48P. A link to the Park would be retained and a new public square included which would adjoin the main body of the Park. Environmental improvements are proposed for the Stead Street car park, although the illustrative plans are unclear on this point. The availability of a suitable number of public car parking spaces for East Street Market and other local attractions is an important matter that the Council should take into account in its proposals for this Early Housing Site.
- 1.8.2.108 The **GLA** points out in its conditionally withdrawn objection that the loss of open space following any residential scheme on the land *could create a deficiency in the area for publicly accessible open space*. The Council's skeleton report does not refer to other objections made to the Early Housing Sites, and hence to the identification of this land for this purpose. They are essentially to the loss of open space, and hence are similar in this respect to the objection made by the GLA. In my view, similar considerations apply in the weighing of these disadvantages and any others against the undoubted benefits of the regeneration scheme with its inclusion of better provision of open space.

1.8.2.109 In making a judgement on these competing considerations, I take account of the amenity value of this open space. It comprises only about one fifth of the proposed Early Housing Site and its main function is to provide routes into the main body of the adjoining Nursery Row Park. The rest of this Park is a far larger area and it would continue to be designated Borough Open Land (BOL) and enjoy the ensuing protection. Owing to the function and the modest size of this part of the site and the closeness to it of a much larger area of public open space, its retention as open space is not crucial. A suitable amount of public car parking space should be provided if possible here or elsewhere, but the urgent need for early housing as a vital part of the Elephant and Castle regeneration scheme justifies the use of the land for residential development.

RECOMMENDATION

1.8.2.110 I recommend that Proposals Site 46P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005 apart from the inclusion in Other Acceptable Uses of ***Use Class A1 Shops***.

Proposals Site 47P: The Crown, Brandon Street

OBJECTIONS

See note above under Proposals Site 6P.

MAIN ISSUE

Whether this land should be identified as an Early Housing Site

INSPECTOR'S REASONING AND CONCLUSIONS

1.8.2.111 This is a small parcel of land which the illustrative plans show as an adjunct to Proposals Site 46P. There would be some loss of open land which forms part of the Park, but the overall loss would be marginal. Development here would be similar to infilling, and the land should be identified as an Early Housing Site.

RECOMMENDATION

1.8.2.112 I recommend that Proposals Site 47P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 48P – Nursery Row Park, Brandon Street

OBJECTIONS

Second Deposit

2 / 472 / 8364	Ms Daniela Nugneri
2 / 465 / 9425	Mr Jeremiah Flynn
2 / 269 / 9432	Mr Lionel Wright
2 / 43 / 9439	Mr Richard Lee
2 / 68 / 9581	GLA

MAIN ISSUE

Whether the loss of existing open space to residential development is justified.

INSPECTOR'S REASONING AND CONCLUSIONS

- 1.8.2.113 This is a small site of about 0.1 ha which the illustrative plans include as a detachment to Site 46P. It is to be found on the east side of Brandon Street to the south of The Crown public house. It is frontage land forming part of Nursery Row Park and providing an entrance to it. It also includes a small lawned area and flowering cherry trees along its frontage to Brandon Street, and these are attractive features in the urban scene.
- 1.8.2.114 Its development would result in the loss of some public open space, and this is regrettable. Nevertheless, there are dwellings and other buildings close to it on this side of the road and the erection of other dwellings would be akin to infilling. They would not appear incongruous in these surroundings. There would be no great loss in the amount of public open space lost, and a residential scheme could and should improve access to the Park.
- 1.8.2.115 Once again a judgement must be made on the competing considerations to which I have already referred. It is the same one. This land would make a small, but useful, contribution to Early Housing needs and serve to promote the regeneration of Elephant and Castle. It should be allocated for residential development.
- 1.8.2.116 Similar considerations already considered are raised concerning dwelling mix, composition, type of affordable housing, tenancies and level of rents.

RECOMMENDATION

- 1.8.2.117 I recommend that Proposals Site 48P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 49P: Thornton House, Beckway Street and Comus House

OBJECTIONS

Second Deposit

2 / 472 / 8365

Ms Daniela Nugneri

2 / 465 / 9426

Mr Jeremiah Flynn

2 / 269 / 9433

Mr Lionel Wright

2 / 43 / 9440

Mr Richard Lee

MAIN ISSUE

Whether this land should be identified as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

1.8.2.118 This is a small parcel of land between Thornton House and Comus House, which are of 4 and 5 floors respectively. It extends to about 0.19 ha and includes 3 2-storey blocks each containing 4 vacant and seemingly disused flats. A vacant area is used as a car park, and a lawned, landscaped area contains 6 or so mature trees. This is a pleasant open area and no doubt much appreciated by residents. There is a heavy demand for parking spaces in the vicinity, including along Congreve Street, and the loss of existing ones would cause inconvenience to those who use them.

1.8.2.119 The illustrative plans show a 5-6 storey scheme providing a net gain of 46 dwellings. Objections are made to the loss of open space, but it is for the use of residents rather than for the public as a whole. This loss is regrettable, but in view of the open space that will be provided as part of the Elephant and Castle regeneration scheme and the way in which these dwellings will serve the achievement of that scheme by the provision of Early Housing, I consider that the loss is justified. My conclusion is the same about the loss of parking space.

1.8.2.120 In the event of redevelopment taking place, the Objectors seek guarantees concerning tenancies, rents and the provision of a proportion of 3 bedroom dwellings and solely social housing. I deal with these matters above at paragraphs 1.8.2.42-44. My main concern is the effect of a development of the scale and height envisaged in the illustrative plans on the living conditions of existing residents. It may be that a more modest scheme would be a better way forward, although I accept that this would in all probability provide fewer dwellings.

RECOMMENDATION

1.8.2.121 I recommend that Proposals Site 49P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 53P: Land located immediately to the south east of Bolton Crescent and Camberwell New Road intersection

OBJECTIONS

See note above under Proposals Site 6P.

MAIN ISSUE

Whether the loss of open space at this site for Early Housing is justified.

INSPECTOR'S REASONING AND CONCLUSIONS

1.8.2.122 This 0.55 ha site is part of an attractive area of public open space which contains 2 magnificent trees. Neighbouring development is mainly residential, with an 8 storey block of flats (Hanworth House) to the east, and retail. The loss of this open space would be regrettable, but the locality is well endowed with this resource, both to the east and beyond the Borough boundary to the north and west.

1.8.2.123 The Council states *that Kennington Park (east) can be upgraded by introducing new landscape and new recreational activities*. This would go some way towards compensating for the loss. The illustrative plans show a scheme of 112 dwellings, although Appendix 4 says 110. This order of number would make a substantial contribution to the provision of Early Housing and hence serve to bring regeneration of Elephant and Castle to fruition. In these circumstances, I consider that the loss is justified and that the land should be promoted for Early Housing.

1.8.2.124 The land is at some distance from Elephant and Castle and the Heybridge Estate, but this does not mean that new housing here will not appeal to some of the families to be re-housed.

RECOMMENDATION

1.8.2.125 I recommend that Proposals Site 53P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 65P: Welsford Street garages/parking area south of Thorburn Square

OBJECTIONS

See note above under Proposals Site 6P.

MAIN ISSUE

Whether this land should be identified as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

1.8.2.126 This site extends to about 0.4 ha and is used for garaging and the parking of vehicles. I counted 30 garages in the garage court. There are some trees on the land, mainly along its centre and at its boundaries. My inspection confirmed that there is a good deal of pressure for parking spaces in the locality, a not unusual state of affairs in many urban areas where residential use predominates.

1.8.2.127 The illustrative plans show a scheme for 48 dwellings. Again, a judgement must be made on the comparison of loss of amenity and convenience to the advantages of providing for Early Housing and its assistance towards the implementation of the regeneration proposals for Elephant and Castle. These 48 dwellings should make a useful contribution to those advantages, and the loss of existing uses on this previously-developed land is justified.

RECOMMENDATION

1.8.2.128 I recommend that Proposals Site 65P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Proposals Site 66P: Royal Road – former Social Services Day Centre

OBJECTIONS

See note above under Proposals Site 6P.

MAIN ISSUE

Whether this land should be identified as an Early Housing Site.

INSPECTOR'S REASONING AND CONCLUSIONS

1.8.2.129 Although this land comprises a former Social Services Day Centre, its curtilage and what appear to be ancillary buildings, parts of the accommodation seem to be occupied, presumably on a temporary licence. In addition to the buildings, there is a considerable amount of vegetation on the land, mainly in the form of trees, shrubs and grassed areas. This, and the openness of parts of the land, gives it an attractive appearance. Everything reasonable should be done to retain its best features in any scheme for redevelopment.

1.8.2.130 The illustrative plans show a scheme of 76 dwellings, and this would make another useful contribution to Early Housing and its assistance towards regeneration. On the presumption that alternative suitable provision has been, or will be, made for day care, I consider that this previously-developed land should be identified for Early Housing.

RECOMMENDATION

1.8.2.131 I recommend that Proposals Site 66P be allocated as an Early Housing Site and that the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Section 9.1 – Local Policy Areas

OBJECTION

Second Deposit

2 / 93 / 7143

Mr Derek Kincade

MAIN ISSUE

Whether there is sufficient emphasis on catering for the transport needs of people with disabilities.

INSPECTOR’S REASONING AND CONCLUSIONS

- 1.9.9.1 There is a limit to what the Council as a local planning authority can do in making life more convenient and pleasant for people with disabilities. Strategic Policy SP 6 does, however, provide the right context for ensuring that town centres will be the focus for the provision of services, public and otherwise. These are the places to, from and within which public transport is generally better than elsewhere, and where the potential for its improvement is greater.
- 1.9.9.2 The Policy should also guide the Council in its determination of planning applications, so that it takes account of the reasonable requirements of all members of the community in getting to these services and in conveniently entering and leaving the buildings and other land concerned. I have no doubt that the Council already adopts this responsible approach.

RECOMMENDATION

- 1.9.9.3 I recommend that Section 9.1 – Local Policy Areas in Part 1 of the UDP be modified in accordance with the Southwark Plan 18th July 2005.

Section 9.3 – Peckham, including Associated Proposals Sites

OBJECTIONS

Second Deposit

2 / 225 / 7191	Mr R Lobb
2 / 238 / 7202/3	C F Vening
2 / 239 / 7204	Mrs I Clark
2 / 240 / 7205/8	Mr B Jenkins
2 / 232 / 7220 (CW)	Haynes House
2 / 237 / 7223	B Smith
2 / 233 / 7224	Mrs Church
2 / 241 / 7225	Ms June Bradlonny
2 / 242 / 7226	J Shephern
2 / 243 / 7227	Ms Tracy Nield
2 / 244 / 7228	F Fowler
2 / 258 / 7266	S Yates and T Kall
2 / 157 / 7332	Peckham Society
2 / 157 / 7333	Peckham Society
2 / 266 / 7345	C. L Grinling
2 / 266 / 7346	C. L Grinling
2 / 266 / 7347	C. L Grinling
2 / 266 / 7349	C. L Grinling
2 / 266 / 7352	C. L Grinling
2 / 266 / 7354	C. L Grinling
2 / 266 / 7365	C. L Grinling
2 / 274 / 7527 (CW)	Michael Dillon Architect & Urban Designer
2 / 274 / 7528 (CW)	Michael Dillon Architect & Urban Designer
2 / 274 / 7529	Michael Dillon Architect & Urban Designer
2 / 274 / 7530 (CW)	Michael Dillon Architect & Urban Designer
2 / 274 / 7531 (CW)	Michael Dillon Architect & Urban Designer
2 / 274 / 7532 (CW)	Michael Dillon Architect & Urban Designer
2 / 290 / 7621	Ms Clare Colvin
2 / 290 / 7622	Ms Clare Colvin
2 / 290 / 7623	Ms Clare Colvin
2 / 290 / 7624	Ms Clare Colvin
2 / 290 / 7628	Ms Clare Colvin
2 / 290 / 7629	Ms Clare Colvin
2 / 289 / 7666	R Wilmhurst
2 / 289 / 7667	R Wilmhurst
2 / 289 / 7668	R Wilmhurst
2 / 289 / 7673	R Wilmhurst
2 / 289 / 7675	R Wilmhurst
2 / 289 / 7676	R Wilmhurst
2 / 289 / 7677	R Wilmhurst
2 / 289 / 7678	R Wilmhurst
2 / 95 / 7787	Ms E Conn
2 / 95 / 7788	Ms E Conn
2 / 95 / 7789	Ms E Conn
2 / 95 / 7790	Ms E Conn
2 / 95 / 7791	Ms E Conn

2 / 95 / 7792	Ms E Conn
2 / 95 / 7793	Ms E Conn
2 / 95 / 7795	Ms E Conn
2 / 95 / 7796	Ms E Conn
2 / 95 / 7797	Ms E Conn
2 / 95 / 7798	Ms E Conn
2 / 95 / 7799	Ms E Conn
2 / 95 / 7800	Ms E Conn
2 / 95 / 7801	Ms E Conn
2 / 95 / 7802	Ms E Conn
2 / 95 / 7803	Ms E Conn
2 / 468 / 8084	Ms Jean H. Clark
2 / 468 / 8095	Ms Jean H. Clark
2 / 460 / 8337/8/9	St James’s Investments Ltd
2 / 461 / 8344	Ms Kay Nooney
2 / 461 / 8346	Ms Kay Nooney
2 / 461 / 8347 (CW)	Ms Kay Nooney
2 / 461 / 8348 (CW)	Ms Kay Nooney
2 / 461 / 8349	Ms Kay Nooney
2 / 461 / 8350	Ms Kay Nooney
2 / 461 / 8351	Ms Kay Nooney
2 / 461 / 8352 (CW)	Ms Kay Nooney
2 / 471 / 8357	S Cowling
2 / 474 / 8370	Mr Eric Smith
2 / 474 / 8371	Mr Eric Smith
2 / 474 / 8372	Mr Eric Smith
2 / 474 / 8374	Mr Eric Smith
2 / 484 / 8482	Bellenden Residents Group
2 / 484 / 8488	Bellenden Residents Group
2 / 484 / 8489 (CW)	Bellenden Residents Group
2 / 484 / 8490	Bellenden Residents Group
2 / 484 / 8491	Bellenden Residents Group
2 / 484 / 8492	Bellenden Residents Group
2 / 484 / 8497	Bellenden Residents Group
2 / 484 / 8499 (CW)	Bellenden Residents Group
2 / 484 / 8501 (CW)	Bellenden Residents Group
2 / 484 / 8506	Bellenden Residents Group
2 / 484 / 8507	Bellenden Residents Group
2 / 484 / 8508	Bellenden Residents Group
2 / 487 / 8530	Peckham Town Centre Management Group
2 / 487 / 8531	Peckham Town Centre Management Group
2 / 487 / 8533	Peckham Town Centre Management Group
2 / 487 / 8534	Peckham Town Centre Management Group
2 / 487 / 8541	Peckham Town Centre Management Group
2 / 484 / 8558	Bellenden Residents Group
2 / 484 / 8559	Bellenden Residents Group
2 / 484 / 8560	Bellenden Residents Group

2 / 488 / 8561	Ms Sylvia Smith
2 / 488 / 8562	Ms Sylvia Smith
2 / 488 / 8563	Ms Sylvia Smith
2 / 488 / 8564	Ms Sylvia Smith
2 / 488 / 8565	Ms Sylvia Smith
2 / 488 / 8566	Ms Sylvia Smith
2 / 488 / 8567	Ms Sylvia Smith
2 / 488 / 8568	Ms Sylvia Smith
2 / 488 / 8569	Ms Sylvia Smith
2 / 488 / 8570	Ms Sylvia Smith
2 / 488 / 8572	Ms Sylvia Smith
2 / 488 / 8573	Ms Sylvia Smith
2 / 488 / 8574	Ms Sylvia Smith
2 / 488 / 8575	Ms Sylvia Smith
2 / 488 / 8576	Ms Sylvia Smith
2 / 507 / 9062	Cares of Life Project
2 / 507 / 9063	Cares of Life Project
2 / 507 / 9064	Cares of Life Project
2 / 353 / 9181	Mr Paul McQuail
2 / 353 / 9182	Mr Paul McQuail
2 / 353 / 9184	Mr Paul McQuail
2 / 353 / 9185	Mr Paul McQuail
2 / 353 / 9186	Mr Paul McQuail
2 / 353 / 9187 (CW)	Mr Paul McQuail
2 / 353 / 9188 (CW)	Mr Paul McQuail
2 / 353 / 9189 (CW)	Mr Paul McQuail
2 / 353 / 9190	Mr Paul McQuail
2 / 353 / 9191	Mr Paul McQuail
2 / 353 / 9192	Mr Paul McQuail
2 / 353 / 9193	Mr Paul McQuail
2 / 353 / 9194	Mr Paul McQuail
2 / 353 / 9195	Mr Paul McQuail
2 / 515 / 9196	Mr William Morris
2 / 515 / 9197	Mr William Morris
2 / 515 / 9198	Mr William Morris
2 / 28 / 9234	Tesco Stores Ltd
2 / 156 / 9353/4/5 & 6	Peckham Voluntary Sector Forum
2 / 484 / 9419	Bellenden Residents Group
2 / 95 / 9441	Ms E Conn
2 / 487 / 9591	Peckham Town Centre Management Group
2 / 244 / 9602	F Fowler
2 / 244 / 9603	F Fowler
2 / 551 / 9625	Mr Andy Simmons - Cllr
2 / 551 / 9626	Mr Andy Simmons - Cllr
2 / 551 / 9627	Mr Andy Simmons – Cllr
2 / 551 / 9628	Mr Andy Simmons – Cllr
2 / 551 / 9629	Mr Andy Simmons - Cllr
2 / 8 / 9665	Mr Jim Whitehead
2 / 468 / 9729	Ms Jean H Clark

Pre-Inquiry Changes

P / 40 / 9807	Mr Donnachadh McCarthy
P / 156 / 9848	Peckham Voluntary Sector Forum
P / 484 / 9865	Bellenden Residents Group
P / 484 / 9874	Bellenden Residents Group
P / 484 / 9879	Bellenden Residents Group
P / 484 / 9881	Bellenden Residents Group
P / 484 / 9890	Bellenden Residents Group
P / 549 / 10037	MacNiven & Cameron

Appendix 4 – Proposals Site 56P (Cator Street, Commercial Way)

Second Deposit

2 / 156 / 9349	Peckham Voluntary Sector Forum
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Appendix 4 – Proposals Site 57P (Sumner House)

Second Deposit

2 / 460 / 8337	St James's Investments
2 / 156 / 9351	Peckham Voluntary Sector Forum

Appendix 4 – Proposals Site 58P (Flaxyards Site, 1-51 Peckham High Street)

Second Deposit

2 / 460 / 8338	St James's Investments
2 / 460 / 8339	St James's Investments
2 / 156 / 9353	Peckham Voluntary Sector Forum

Appendix 4 – Proposals Site 59P (Peckham Wharf, Peckham Hill Street)

Second Deposit

2 / 266 / 7367	C L Grinling
2 / 289 / 7669	R Wilmhurst
2 / 95 / 7794	Ms E Conn
2 / 484 / 8493	Bellenden Residents Group
2 / 156 / 9355	Peckham Voluntary Sector Forum
2 / 156 / 9354	Peckham Voluntary Sector Forum

Appendix 4 – Proposals Site 60P (Tuke School and 2 Wood’s Road)

Second Deposit

2 / 114 / 9042

Southwark Green Party

Appendix 4 – Proposals Site 61P (Cinema Site and multi-storey car park, Moncrieff Street)

Second Deposit

2 / 225 / 7191

Mr Roger Lobb

2 / 235 / 7221

Ms Sonia Kidson

2 / 263 / 7250

H R Leach

2 / 224 / 7274

Miss D C Doyle

2 / 273 / 7518

Ms Elaine Carrigan

2 / 290 / 7625

Ms Clare Colvin

2 / 289 / 7670

R Wilmhurst

2 / 474 / 8373

Mr Eric Smith

2 / 484 / 8494

Bellenden Residents Group

2 / 487 / 8537

Peckham Town Centre Management Group

2 / 340 / 9442

M Khan

2 / 341 / 9443

Argos

2 / 342 / 9444

Peacocks

2 / 343 / 9445

Ronalds Remmies

2 / 344 / 9446

F&F

2 / 345 / 9447

Salim

2 / 346 / 9448

Umit

2 / 347 / 9449

Mr John Brooke

2 / 348 / 9450

Iceland

2 / 349 / 9451

Ali Green Grocery

2 / 350 / 9452

Azar Communications

2 / 351 / 9453

Assad's Fishmongers

2 / 352 / 9454

F&F

2 / 354 / 9455

A. R Cash & Carry

2 / 355 / 9456

Jenney Burger

2 / 356 / 9457

Genny Lewis

2 / 357 / 9458

Ethel Austin

2 / 358 / 9459

A Khan

2 / 303 / 9460

H Rahim

2 / 304 / 9461

S Sritham

2 / 305 / 9462

Homewares

2 / 307 / 9463

Jaffa Foods

2 / 306 / 9464

J Willis

2 / 308 / 9465

Ms Ellen Molloy

2 / 309 / 9466

Abewi Aima,

2 / 310 / 9467

Cost Price

2 / 311 / 9468

Amanuel Fissehay

2 / 312 / 9469	Peckham Discount
2 / 313 / 9470	Discount Decorating
2 / 314 / 9471	Khan
2 / 315 / 9472	C Bradshaw
2 / 316 / 9473	H Grant
2 / 317 / 9474	Ayoobali
2 / 318 / 9475	Ms Sonya Allen
2 / 319 / 9476	Feng Wu
2 / 320 / 9477	Ropharm Chemist
2 / 321 / 9478	Sibtain Sadlaur
2 / 322 / 9479	Bethel Bakery
2 / 323 / 9480	Connexions
2 / 324 / 9481	Brown
2 / 325 / 9482	J&J Butcher
2 / 326 / 9483	Mahmood
2 / 327 / 9484	Jilani
2 / 328 / 9485	Mohamed
2 / 329 / 9486	M Manzoor Abid
2 / 330 / 9487	R Anbionlo
2 / 331 / 9488	Moneyshop
2 / 332 / 9489	Stella Africa Food Shop
2 / 333 / 9490	Faiz Food Store
2 / 334 / 9491	K Ennisin
2 / 335 / 9492	C Ihyls
2 / 336 / 9493	Primark
2 / 337 / 9494	L Bartley
2 / 338 / 9495	Shoefayre
2 / 339 / 9496	Pebbles
2 / 359 / 9497	K Hudson
2 / 360 / 9499	T Ahmed
2 / 361 / 9500	Noshan
2 / 362 / 9501	Norman
2 / 363 / 9502	Zeeshan
2 / 364 / 9503	Adeena
2 / 365 / 9504	Mr Martin Bonehill
2 / 366 / 9505	Fazal Merchant
2 / 367 / 9506	Ajbar
2 / 368 / 9507	Ajbar
2 / 369 / 9508	Mr Foz
2 / 370 / 9509	Mackays
2 / 371 / 9510	Thambyrasah
2 / 372 / 9511	Ms Janet Robinson
2 / 373 / 9512	Mr Matthew Street
2 / 374 / 9513	Mr Barry Jenkins
2 / 375 / 9514	Ms Carol Willis
2 / 376 / 9515	Ms Elaine Carrigan
2 / 377 / 9516	Yassine Melki
2 / 378 / 9517	Mr Martin Denton
2 / 379 / 9519	Mr Albert Turamah
2 / 380 / 9520	Ms Beverley Haffenden
2 / 381 / 9521	Ms Theresa Jude
2 / 382 / 9522	H Hamad
2 / 383 / 9523	D Carrigan

2 / 384 / 9524	Ms Jenny Simpson
2 / 385 / 9525	Ms Wendy Pemial
2 / 386 / 9526	H Akhtan
2 / 387 / 9527	Abdul
2 / 388 / 9528	Abdul Gulfoor
2 / 389 / 9529	Bola Amole
2 / 390 / 9530	A Kimosho
2 / 391 / 9531	J M C
2 / 392 / 9532	C Elvy
2 / 393 / 9533	G Andreou
2 / 394 / 9534	Elegance Pho
2 / 395 / 9535	Sidney Dacosta
2 / 396 / 9536	S Mendes
2 / 397 / 9537	Ras Nakori
2 / 398 / 9538	J C Mendes
2 / 399 / 9539	C Mendes

Appendix 4 – Proposals Site 62P (Choumert Grove car park, Choumert Grove)

Second Deposit

2 / 209 / 7140	Mr Roger Easterbrook
2 / 238 / 7203	C F Vening
2 / 263 / 7319	H R Leach
2 / 273 / 7519	Ms Elaine Carrigan
2 / 224 / 7557	Miss D C Doyle
2 / 284 / 7616	Ms Clarence Rochester
2 / 289 / 7671	R Wilmhurst
2 / 289 / 7674	R Wilmhurst
2 / 290 / 7626	Ms Clare Colvin
2 / 291 / 7613	Kellie Laurence
2 / 303 / 7683	H Rahim
2 / 304 / 7684	S Sritham
2 / 305 / 7685	Homewares
2 / 307 / 7686	Jaffa Foods
2 / 306 / 7687	J Willis
2 / 308 / 7688	Ms Ellen Molloy
2 / 309 / 7689	Abewi Aima,
2 / 310 / 7690	Cost Price
2 / 311 / 7691	Amanuel Fissehay
2 / 312 / 7692	Peckham Discount
2 / 313 / 7693	Discount Decorating
2 / 314 / 7694	Khan
2 / 315 / 7695	C Bradshaw
2 / 316 / 7696	H Grant
2 / 317 / 7697	Ayoobali
2 / 318 / 7698	Ms Sonya Allen
2 / 319 / 7699	Feng Wu
2 / 320 / 7700	Ropharm Chemist
2 / 321 / 7701	Sibtain Sadlauk

2 / 322 / 7702	Bethel Bakery
2 / 323 / 7703	Connexions
2 / 324 / 7704	Brown
2 / 325 / 7705	J&J Butcher
2 / 326 / 7706	Mahmood
2 / 327 / 7707	Jilani
2 / 328 / 7708	Mohamed
2 / 329 / 7709	M Manzoor Abid
2 / 330 / 7710	R Anbionlo
2 / 331 / 7711	Moneyshop
2 / 332 / 7712	Stella Africa Food Shop
2 / 333 / 7713	Faiz Food Store
2 / 334 / 7714	K Ennisin
2 / 335 / 7715	C Ihyls
2 / 336 / 7716	Primark
2 / 337 / 7717	L Bartley
2 / 338 / 7718	Shoefayre
2 / 339 / 7719	Pebbles
2 / 340 / 7724	M Khan
2 / 341 / 7725	Argos
2 / 342 / 7726	Peacocks
2 / 343 / 7727	Ronalds Remmies
2 / 344 / 7728	F&F
2 / 345 / 7729	Salim
2 / 346 / 7730	Umit
2 / 347 / 7731	Mr John Brooke
2 / 348 / 7732	Iceland
2 / 349 / 7733	Ali Green Grocery
2 / 350 / 7734	Azar Communications
2 / 351 / 7735	Assad's Fishmongers
2 / 352 / 7737	F&F
2 / 354 / 7740	A. R Cash & Carry
2 / 355 / 7741	Jenney Burger
2 / 356 / 7742	Genny Lewis
2 / 357 / 7743	Ethel Austin
2 / 358 / 7744	A Khan
2 / 359 / 7745	K Hudson
2 / 360 / 7746	T Ahmed
2 / 361 / 7747	Noshan
2 / 362 / 7748	Norman
2 / 363 / 7749	Zeeshan
2 / 364 / 7750	Adeena
2 / 365 / 7751	Mr Martin Bonehill
2 / 366 / 7752	Fazal Merchant
2 / 367 / 7753	Ajbar
2 / 368 / 7754	Ajbar
2 / 369 / 7755	Mr Foz
2 / 370 / 7756	Mackays
2 / 371 / 7757	Thambyrasah
2 / 372 / 7758	Ms Janet Robinson
2 / 373 / 7759	Mr Matthew Street
2 / 374 / 7760	Mr Barry Jenkins
2 / 375 / 7761	Ms Carol Willis

2 / 376 / 7762	Ms Elaine Carrigan
2 / 377 / 7763	Yassine Melki
2 / 378 / 7764	Mr Martin Denton
2 / 379 / 7766	Mr Albert Turamah
2 / 380 / 7767	Ms Beverley Haffenden
2 / 381 / 7768	Ms Theresa Jude
2 / 382 / 7769	H Hamad
2 / 383 / 7770	D Carrigan
2 / 384 / 7771	Ms Jenny Simpson
2 / 385 / 7772	Ms Wendy Pemial
2 / 386 / 7773	H Akhtan
2 / 387 / 7774	Abdul
2 / 388 / 7775	Abdul Gulfoor
2 / 389 / 7776	Bola Amole
2 / 390 / 7777	A Kimosho
2 / 391 / 7778	J M C
2 / 392 / 7779	C Elvy
2 / 393 / 7780	G Andreou
2 / 394 / 7781	Elegance Pho
2 / 395 / 7782	Sidney Dacosta
2 / 396 / 7783	S Mendes
2 / 397 / 7784	Ras Nakori
2 / 398 / 7785	J C Mendes
2 / 399 / 7786	C Mendes
2 / 449 / 8083	Ms Isabelle Gregory
2 / 484 / 8495	Bellenden Residents Group
2 / 487 / 8535	Peckham Town Centre Management Group
2 / 508 / 9146	Ms Clare McKeown
2 / 340 / 9415	M Khan

**Appendix 4 - Proposals Site 63P (Copeland Road bus garage,
117-149 Rye Lane, 1-27 Bournemouth Road and 133-151
Copeland Road)**

Second Deposit

2 / 240 / 7209	B Jenkins
2 / 157 / 7334	Peckham Society
2 / 273 / 7520	Elaine Carrigan
2 / 291 / 7614	Ms Kellie Laurence
2 / 284 / 7617	Clarence Rochester
2 / 285 / 7619	S Nield
2 / 484 / 8496	Bellenden Residents Group
2 / 487 / 8536	Peckham Town Centre Management Group
2 / 533 / 9291	Miss D Martin
2 / 156 / 9356	Peckham Voluntary Sector Forum

**Appendix 4 – Proposals Site 64P (Copeland Road car park and
site on corner of Copeland Road and Rye lane)**

Second Deposit

2 / 291 / 7615	Ms Kellie Laurence
2 / 284 / 7618	Clarence Rochester
2 / 285 / 7620	S Nield
2 / 290 / 7627	Ms Clare Colvin
2 / 487 / 8539	Peckham Town Centre Management Group
2 / 546 / 9219	Miss Sandra McKenzie
2 / 533 / 9293	Miss D Martin
2 / 289 / 9418	R Wilmhurst

MAIN ISSUES

1. Whether the stated vision and objectives for Peckham are sufficiently clear, realistic and comprehensive;
2. Whether the right balance is achieved between the need for quality retailing and the encouragement and support of BME businesses;
3. Whether such terms as *vibrant* and *major town centre* and others such as *active frontages* and *limited* are appropriate with respect to retailing;
4. Whether the UDP should promote stronger pedestrian links between Rye Lane and the Bellenden Road Shopping Area;
5. Whether the UDP gives suitable guidance on the density of development, particularly in Public Transport Accessibility Zones (PTAZ);
6. Whether its approach to, and strategy concerning, car parking is realistic, especially as regards Sites 61P, 62P, 63P and 64P;
7. Whether the guidance in Appendix 4 concerning Sites 59P and 61P is appropriate, with especial regard to the cinema;
8. Whether the provision of leisure and community uses, especially at Peckham Square and Peckham Wharf increases or decreases vitality, and whether the UDP provides sufficient opportunity for community uses by way of allocations and/or planning obligations particularly related to the increase in housing;
9. Whether Sites 57P and 58P should be redeveloped in a comprehensive manner;
10. Whether the Council’s proposals for Site 60P (Tuke School and 2 Woods Road) are reasonable;
11. Whether there is sufficient information on the likely effect on Peckham of the Cross River Tram (CRT) proposal.

INSPECTOR’S REASONING AND CONCLUSIONS

- 1.9.3.1 The Southwark Plan 18th July 2005 is a marked improvement on the Revised Deposit UDP, mainly because it takes account of the majority of the valid points made by Objectors. It accords with national policy and with the London Plan, as I seek to show in my examination of some of the following issues. By allocating land for various uses, the adopted UDP will provide a framework for further regeneration. Within that framework, the Council will prepare an Action Area Plan and possibly SPG or a Supplementary Planning Statement (SPS) for more detailed considerations, some of which certain Objectors mention.
- 1.9.3.2 The Council points to the substantial amount of regeneration that has taken place in Peckham since the early 1990s. This has been mainly in the form of a 10 year £250m programme of physical and social renewal based upon the North Peckham estates and the Town Centre. From the Council’s description of these parts of the Borough and the problems that it experienced, I accept that this regeneration has resulted in substantial improvements. My inspections convince me that there is a greater confidence in the housing market and I see no reason to doubt the Council’s view about the increased stability in the local population and a significant increase in the area’s prosperity.
- 1.9.3.3 To ensure that environmental and social improvements continue, the Council is promoting neighbourhood management. It is working with local businesses to upgrade the commercial centre and improve local enterprise projects. Rightly, it is seeking to build upon success and to improve the assets and advantages of Peckham. A forward-looking, comprehensive approach is adopted in improving the inter-related matters of employment prospects, retailing, local health facilities and in developing local skills and cultural activities. The symptoms of decline must not be ignored, but I prefer the Council’s positive approach to one that might have concentrated on present problems.
- 1.9.3.4 There is no evidence to suggest that too much attention is being focussed upon one particular aspect of physical, social and economic regeneration at the expense of another. The Council’s comprehensive approach is reasonable and practicable, and I endorse it. In this context, the Vision for Peckham and the listed objectives that developments should achieve are clear and realistic. Subject to a few recommended minor modifications, I endorse them.
- *
- 1.9.3.5 On the second issue, I consider that the attention given to improving retailing is especially welcome. I agree that the UDP could have sought to reduce the amount of shopping floorspace in the town centre, but this would be undesirable. It would result in a less efficient use of existing buildings, it would provide fewer

opportunities for more shops and tend to undermine the status of Peckham as a Major Town Centre that the London Plan accords it. Shopping in Rye Lane is, in my opinion, interesting, exciting and challenging in the best sense of the word. This derives essentially from the many, varied and often small BME businesses. It is a strength to be built upon, as research and the Southwark Plan 18th July 2005 rightly acknowledge. Any dilution of this recognition should be resisted. As I suggested at the Inquiry, shopping in Rye Lane is quite different from the Chelmsford experience, good though that is.

- 1.9.3.6 It is difficult to see how this approach would be to the detriment of other businesses, existing or potential, or how it might limit the range of goods sold. On the contrary, the attraction of more people to Peckham as a result of its ethnic retail offer and the consequent special character and experience should bring in more investment, to the benefit of traders and customers. It should result in more quality retailing, which in this context I take to mean comparison shopping. This seems to have happened in Brixton, as the Council says. And provided that shops along the eastern side of Rye Lane could be ensured adequate depth, a tram depot somewhere at the back of them should cause them no serious harm.
- 1.9.3.7 There are related matters. **Mr McQuail** suggests that in its attention to Peckham, and especially retailing, the UDP is unrealistic and not based upon research. I do not agree. The Southwark Retail Study is thorough and comprehensive, and it identifies particular strengths of this part of the Borough, 3 of which I regard as indisputable. They are ethnic retailing, street markets and good accessibility to the centre. I conclude elsewhere that the fourth, the tram, would improve access to and from Peckham and so might not attract as many people to the town centre as the number of existing shoppers who might be tempted to go elsewhere.
- 1.9.3.8 **Mr Dillon** queries *quality*, saying that the word *needs to be defined if it is to have any meaning and force in the planning assessment process*. In principle, I agree with him although there is a limit to the extent of guidance that a UDP can give in the determination of particular planning applications. It does, however, have relevant policies on such matters as design, whilst later documents like an Action Area Plan or SPG/SPS will focus on particular sites and localities and so should give more detailed advice. Pre-application discussions with prospective developers will also be important. I think that the Southwark Plan 18th July 2005 goes as far as it can on this matter, but the Council will note the valid point that the Objector makes.
- 1.9.3.9 **Mr Dillon** suggests changes to the text about shopping and related matters. There is no need to refer to S106 Agreements. The Southwark Plan 18th July 2005 already does so, and the adopted UDP should be read as a whole. Duplication is unnecessary, and the Council will be able to seek to enter into planning obligations to secure environmental and street improvements where they would

meet the policy tests set out in Circular 05/2005. Suitable matters might include those listed by the **Peckham Town Centre Management Group**. The Vision for Peckham and the objectives of development schemes already incorporate the Council’s intention to support proposals that would improve the image of Rye Lane and its surroundings. The same applies to proposals that would *build on the niche and speciality nature of the existing market offer*. The objectives now include better access and improved car parking. There is no need for further elaboration of these points, worthy though they are.

1.9.3.10 Several Objectors suggest the deletion of references to BME businesses. **Mr Dillon**, for example, prefers something along the lines of *specialist, niche, small to medium retail outlets*. To me, both convey much the same impression, although I think that the Council’s words perhaps better bring to mind such goods as tropical fruits and vegetables and an amazing variety of fish that I can’t buy in my local shops. The character of Rye Lane relies much on these attributes, and the character of a locality is a land use matter. No modification is needed on this point.

1.9.3.11 In summary, the basis of the Council’s strategy is to ensure that the area around the northern part of Rye Lane and its junction with Peckham High Street will continue to accommodate mainly the existing multiple retailers, that Bellenden Road will continue to offer what it calls *village-like* retailing with a strong arts character whilst a more specialised ethnic retail experience will be encouraged and improved along the southern end of Rye Lane. The Council will bid for funds to improve shopfronts and buildings, repaving and various other initiatives, especially along Rye Lane. This balanced, complementary approach should result in an attractive and linked combination of wider choice and specialisms. I support it.

*

1.9.3.12 On the third issue, I am doubtful about *vibrant* which, in this context, does not sit comfortably with the definition of the word in my OED. To some, it too readily conjures up undue noise and vibration. This is a small point, but *full of vitality* would better accord with national policy in PPS 6.

1.9.3.13 Peckham is the largest centre in the Borough and provides a wide range of services and shopping opportunities. Its retail floorspace, 63,370 sq m, is broadly similar in amount to that of other centres such as Wimbledon and Lewisham which the London Plan also defines as major shopping centres. Its scale and function is comparable with those other centres, and there is no good reason to depart from the designation. I note **Mr McQuail**’s points on the matter, but the designation should acknowledge not only existing retail floorspace, but what the role for Peckham should be in the future. On both counts, the designation is correct.

1.9.3.14 *Active frontages* accord with vitality; they should not result in obstructions on the footway, as is acknowledged. *Limited* is correct, in that there are few department stores in Peckham, but I think that *not as wide as it could be* would be more positive. Otherwise, the terminology is fine.

*

1.9.3.15 The fourth issue concerns a link between Rye Lane and Bellenden. Although it is possible to walk from one to the other, the route is less than obvious to the visitor. A better link between them would enable each to benefit from the other, attracting more trade. As the Council says, one route might be through an improved Choumert Market, with better signposting, street furniture and other *public realm treatment*. This objective should be retained in the UDP, if only to assist the Council in seeking to enter into planning obligations to secure such improvements.

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1.9.3.16 On the fifth issue, I consider that the Southwark Plan 18th July 2005 suitably reflects national policy in generally encouraging higher densities around good public transport services. At and near Peckham Rye railway station there are frequent train services to, for example, London Bridge and Victoria, and buses to various parts of London including Oxford Circus. A tram depot in some form nearby and frequent trams to Elephant and Castle and central London would further increase accessibility to and from this part of Peckham. The PTAZ designation correctly reflects these advantages.

1.9.3.17 Good public transport and higher densities should, in principle, go hand in hand and that should apply in principle here. That is not to say that the density of every site hereabouts should be redeveloped at a high, or higher, density than at present. Other considerations like conservation, visual impact and amenity may be important. Location of a site in a PTAZ is an important consideration, but it is unlikely to be the only one and may not be the determining factor. The Southwark Plan 18th July duly acknowledges as much, and gives suitable guidance on the matter both here and elsewhere as in Policy 3.2 Tall Buildings. Essentially, densities in a PTAZ should be assessed on a case-by-case basis, as the Council proposes. Thus **Councillor Mr Simmons**’ reasonable concern about the prospect of skyscrapers in Peckham is met.

1.9.3.18 **Mrs Conn** considers that the Council’s method of calculating density standards for mixed use development, as shown in Appendix 3, is difficult to understand. Certainly it is not as straightforward as a simple calculation of residential density because it seeks to take account of non-residential space. Such space is divided by 27.5, the average area in square metres of a habitable room together with an allowance for circulation space and non-habitable rooms. The calculation is a somewhat blunt tool, but I think that it is as simple

as it can be and it is a reasonable basis upon which to assess likely activity arising from a development scheme. The greater the proportion of non-residential space in a scheme, however, the less it will equate with the same amount of residential space. A critical eye is needed in using the calculation, but the UDP should keep the method.

1.9.3.19 On a related matter, Appendix 4 gives useful information about the number of dwellings likely to be secured on the various development sites, as **Mrs Conn** and others request. Paragraph 9.3.3 i sets out the expected tenure mix of affordable housing. The Council’s document CD/1.25.1 provides further helpful information. Significantly, the number of new homes, 913 or about 4.5% of the new homes expected in the Borough during 2004-2016, is much the same as those lost as a result of the regeneration of the north Peckham estates. This suggests that current infrastructure should be able to support newcomers at least as well as previously.

1.9.3.20 That, however, may be insufficient. The Council should therefore attach conditions to planning permissions and/or seek to enter into planning obligations in line with the relevant tests to secure the reasonable provision of services and amenities, like open space. In view of the urgent need for more housing in the Borough, any perceived deficiencies in school places, open spaces and parking areas etc should not thwart the intended residential developments. Nor should the noise from building them.

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1.9.3.21 The sixth issue concerns car parks. The Council accepts that the need for them in Peckham has yet to be assessed and that this will be undertaken in the preparation of the Action Area Plan. I agree that in the meantime no surface car park should be redeveloped in such a way as to lose spaces. Hence, rightly, the Southwark Plan 18th July 2005 deletes the designation of the Choumert Grove car park for Class C3 Uses. It also prevents the redevelopment of Site 64P, the Copeland Road car park, for Class C3 Uses until provision is made for car parking elsewhere.

1.9.3.22 Surface car parking provision is not an efficient use of space, especially in a town centre and it can too often result in an unattractive, featureless expanse of land. In the longer term, better use should be made of surface parking areas where possible. Underground or multi-storey cars parks are a more efficient use of urban land, although the latter are not always the most attractive buildings in a town centre. Possibly some parking space could be provided above a tram depot. These are matters yet to be considered. In the meantime, the Council’s approach and strategy is realistic.

1.9.3.23 I agree with **Councillor Mr Simmons** that car parking provision should be safe and secure. I am confident that the Council will continue to take this point into account.

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- 1.9.3.24 On the seventh issue, Site 59P is a derelict builders’ yard with little residential development close to it. It is near Peckham Square and does not experience the often high noise levels along Rye Lane which could increase as a result of a tram depot. A cinema on this site, together with other uses that promoted activity during the evenings without resulting in anti-social behaviour, would be of benefit. The Council puts it forward as an acceptable possibility, not a requirement. Other acceptable uses would complement additional community and leisure facilities at the Square, increasing pedestrian activity in this part of the town centre. Indeed, **Mr Wilmshurst** thinks the site might be suitable for a second cinema. These additional facilities could be expected to reduce crime and the fear or perception of crime. I would have had reservations about the suitability of a casino here, but I note that this is one of the Uses Not Allowed.
- 1.9.3.25 The Council states that the existing cinema on Site 61P may not be viable, but with no information on the matter I cannot comment. Planning permission would not be required for its ceasing to trade. If its future is in doubt, however, the allocation of the land for a replacement cinema could lead to blight in that the retention of the present use would serve to prevent redevelopment or change to a suitable use or uses.
- 1.9.3.26 Owing to the location of Site 61P in the town centre and the need for further regeneration, the land should be allocated for uses which would bring acceptable activity in the evenings. That might include retention of the existing cinema, redevelopment for a replacement cinema and/or other suitable Class D Uses for assembly and leisure. That is now what the Council intends, and I support it. I can see little wrong with a cinema being where it is at present. Presumably any change within Class D from a suitable to an unsuitable use could be prevented by condition, thereby meeting **Mr McQuail’s** helpful point.
- 1.9.3.27 Several objectors say that Site 63P could be suitable for a relocated cinema. That would depend upon the assessed requirements of some form of tram depot and the need to retain the bus garage and a significant amount of the existing employment floorspace on the land. For these reasons, I am not convinced that there would be enough space for a cinema and so, as there are more practicable possibilities, it would be better not to include it as an Other Acceptable Use. Similarly, it would be premature to sub-divide Site 63P for the uses considered acceptable, even for those that are known at this stage. A 2-form entry school is not now required on the land.

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- 1.9.3.28 The eighth issue is about community uses. Proposals for Sites 56P, 57P, 58P, 59P and 63P are drafted sufficiently flexibly to allow for a

more detailed assessment of local community needs, and the redevelopment of some or all of these sites could include leisure and/or community uses. Indeed, community uses are Required Uses on Sites 56P and 57P. Bearing in mind their size and town centre location, these sites should provide for the reasonable expectations of local residents. Presumably one or more public toilets could be included.

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1.9.3.29 On the ninth issue, I see no reason why Sites 57P (Sumner House) and 58P (Flaxyards) should not be redeveloped comprehensively as one scheme and at the same time. They lie opposite each other with a footway between them, but despite this closeness they differ in character and surroundings. The Proposals Map rightly distinguishes between them. Site 57P is at a significant distance from the rear of Peckham High Street and its surroundings are mainly residential and educational. Redevelopment for housing would be the most suitable use, together with community use(s) that did not result in undue noise or other disturbance. On the Proposals Map, Site 58P has an access from Peckham High Street, but the Southwark Plan 18th July 2005 Figure 24 changes its boundary to include the shop terrace fronting Peckham High Street. This makes it even more suitable for town centre uses.

1.9.3.30 The frontage along this part of Peckham High Street includes a number of small shops, and I accept the Council’s point that they provide important employment and enterprise opportunities. Any redevelopment of this frontage should be required to retain the small-scale, traditional character that these small units give to this part of the Town Centre. The rest of Site 58P, to the rear, has the potential for a larger store, although care would be required to ensure the protection of residential amenity on and close to Site 57P. The Southwark Plan 18th July 2005 provides the basis for this approach which is in line with **Mr Whitehead**’s comments, and I support it.

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1.9.3.31 On the tenth issue, the **Southwark Green Party** considers that the residential redevelopment of Site 60P (Tuke School and 2 Woods Road) should *make provision for a retention of a net amount of open space*. I agree that open space and children’s play areas should normally be part of any scheme, in line with policies for its provision. That should apply to all residential schemes, and I see no need to distinguish this one. The land is near existing open space, and this advantage may be a material consideration in assessing the amount needed on site. The Council’s proposals are reasonable.

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1.9.3.32 The eleventh issue concerns the tram. I comment in some detail below upon the Cross River Transit (CRT) proposal in my

consideration of Site 63P. As I say there, it is impossible to be certain about the consequences of better access to and from Peckham that the tram would provide. I agree with **Mr McQuail** that it is very hard to make a realistic comment upon the possible benefits, and with **Mrs Conn** on the impact of the proposal on commerce and employment. Understandably, information on the precise effect of the tram on retailing is lacking, but the effect of the scheme as currently proposed would seriously harm local employment. It would contradict the Council’s worthy objective of continuing to improve employment prospects and develop local skills.

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- 1.9.3.33 On other matters, I deal in more detail with affordable housing elsewhere in my Report. Suffice it to say here that, given the urgent need for this type of accommodation in the Borough as a whole, it would be wrong to seek to restrict it in Peckham. The Council’s intention to secure 35% of new housing here as affordable is reasonable. It is the same as in other parts of the Borough excepting the Central Areas Zone where, apart from Elephant and Castle, it is 40%. There is no evidence to suggest that a different percentage would better reflect practicalities and the needs of local people.
- 1.9.3.34 I applaud the emphasis on intermediate housing, intended to be 70% of the total amount of affordable housing in Peckham. This should eventually result in more home ownership, serve to establish a more balanced community and stimulate more local investment.
- 1.9.3.35 Policy 5.2 deals with the **Bellenden Residents’ Group’s** point about the servicing of shops. I agree that *footfall* is a rather inelegant term, although much loved by planners. I suggest *pedestrian flow*.
- 1.9.3.36 Various other matters to which Objectors refer, particularly the monitoring and enforcement of aspects of environmental health and hygiene and street cleaning, are more to do with health and safety legislation. I note the Council’s view that “rat-running” is a matter for it as a highways authority, by way of its Borough Spending Plan.
- 1.9.3.37 I have taken account of the 193 Objections from **96 signatories**. The 3 main points are that the present number of car parking spaces in the Town Centre should be retained, the importance of Peckham Rye rail station in the economic life of Peckham and the need to bring back empty floorspace above ground floors into residential use. These are good points, and I consider that the Southwark Plan July 18th 2005 includes them.
- 1.9.3.38 I welcome the reference to historic features and Conservation Areas. Peckham Rye rail station is a particularly attractive building and visually should contribute a good deal more to the locality.

1.9.3.39 I agree with the Council that the Town Centre is not an area of local park deficiency, and that there is good access to local parks and the district park. There is no need for modification on this count.

1.9.3.40 *Mobility impaired* includes people who find getting about or travelling difficult. That should be made clear.

RECOMMENDATION

1.9.3.41 I recommend that the UDP be modified in accordance with the Southwark Plan 18th July 2005 apart from:

viii Improved accessibility throughout the Action Area for cyclists, pedestrians and those who find it difficult to travel or get about; this includes keeping footways free of obstruction and increasing pedestrian flows during the evenings and at night within the town centre without encouraging anti-social behaviour.

ie Improve provision of safe, secure and accessible car parks.....

Appendix 4 – Site 63P

Main Issues

- 1) Whether the Cross River Transit (CRT) project has a sufficiently reasonable degree of certainty of proceeding within the plan period to justify the allocation of suitable land for a tram depot;
- 2) Whether, on the basis of operational and technical requirements and other criteria, Site 63P is the only feasible option for a depot;
- 3) Whether the depot proposal could be amended to accommodate in a satisfactory manner a mixed use development on the site;
- 4) Whether the advantages of using part of Site 63P for a mixed use scheme, including affordable housing and commercial development providing employment outweigh the advantages of using the site for a tram depot;
- 5) Whether the loss of existing employment and other uses and consequent disruption is justified;
- 6) Whether a tram depot would leave enough land to provide for a satisfactory development fronting Rye Lane, thereby protecting and enhancing the viability of the town centre.

Inspector’s Reasoning and Conclusions

- 1.9.3.42 It is estimated that CRT will cost about £575m. At the end of the Transport for London (TfL) Business Planning Round and under the 2004 national Spending Review, the Mayor asked TfL to include 3 tram schemes in the 5 year TfL Investment Plan. These include CRT. The cost of developing all 3 was included in this Investment Plan up to the completion of the Transport and Works Act Orders. For CRT this amounted to £24.1m. The substantive capital funding was not included, but I understand that schemes do not normally obtain funding for construction until after an Order has been obtained. Nevertheless, the making of an Order means that funding for construction is established in principle.
- 1.9.3.43 A good deal of discussion and detailed work has taken place since before Autumn 2002 in the investigation of possible locations and sites for a depot or depots. Many advantages are claimed for CRT, most of which are unchallenged and I accept. These include the relief of congestion on parts of the Northern and Victoria lines and the provision of a better public transport service to parts of Southwark that do not at present benefit from good bus or underground access to shopping and employment centres. To this can be added a greater availability and use of public transport in line with national policies concerning sustainability.
- 1.9.3.44 The money allocated so far is not a trifling sum. As agreed at the Inquiry, it is *a substantial commitment*. This consideration, the work undertaken, the benefits likely to arise from the project and the Project Director’s (Mr Albanese) engaging enthusiasm for CRT convince me of TfL’s commitment to it. It is in the Council’s Interim Local Implementation Plan which is its borough-wide transport strategy and, of course, it features in the UDP. Policy 3C.4 in the London Plan sets the framework for the Council’s proposal. Nothing in life is certain apart from death and taxes, but in my judgement this proposal is a firm one and the project has a reasonable degree of certainty of proceeding within the plan period to justify the allocation of suitable land for a tram depot. Whether Site 63P is suitable for it is, of course, another matter.

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- 1.9.3.45 On the second issue, I agree that Site 63P is a strong candidate for a tram depot. It is close to the centre of Peckham, the envisaged southernmost destination of the trams, and close to bus services and Peckham Rye rail station. In effect, therefore, it would be part of a public transport interchange. It is close to Rye Lane with its array of fruit, vegetable and fish shops which I find so fascinating and attractive. The site is just about large enough and of appropriate shape to accommodate a fleet of 48 trams, the optimum number for a project of the size proposed and frequency of service sought. There would be just enough space for maintenance and ancillary activities. These are undoubted advantages in terms of location and site, and I accept that the design and layout shown for this number of trams is *the outcome of much thought*.

- 1.9.3.46 There are, however, important matters in the selection of this site that greatly trouble me. Surprisingly, the Depot Study (February 2004) says that *the site is currently largely occupied by derelict uses*, it refers to *the levels of dereliction on site, the existing derelict status of the site and derelict uses on site. Derelict warehouses occupy a considerable area of the larger part of the site.* There is a reference to *derelict and vacant sites.* The Study advises that *no significant negative effects anticipated.* My detailed inspection of buildings and other land on the Peckham site convinces me that these descriptions are simply not true, and that the Study’s findings in this respect are wide of the mark.
- 1.9.3.47 Certainly the intensity of use of the buildings varies greatly. Some parts of the largest building, which is of 4-6 storeys, appear to be well used. Activities include the manufacture of clothes and the preparation of Chinese food. Some parts are used as workshops, apparently on a shift or part-time basis. From the equipment and materials that can be seen, however, it is clear that some good use is made of much of this floorspace. I also saw office floorspace, storage and distributive uses, as well as car valeting and, I think, vehicle repair work in several more enclosed and less publicly accessible spaces. The lack of an accurate assessment in the Study of the number of jobs on this land contrasts markedly with the caution of a prospective loss of 140 jobs at St Pancras Way should land there have been identified for a tram depot.
- 1.9.3.48 Some parts of various buildings are used as churches, of which there could be 6-7. It is difficult to judge the size of congregations at main services and other meetings, but it is suggested that there may be a total up to 700 worshippers. The care given to these parts of the buildings suggests a goodly number. Open areas are used mainly, and usefully as it would appear, for access and circulation space. Again, I have no doubt that more efficient use could be made of some of this space, but Site 63P as a whole is far from derelict and the majority of its buildings are far from vacant. I suspect that, besides the actual number of jobs on it, the land provides good opportunities for new and small businesses, perhaps because the rent for such units are, in my experience, generally lower than for more modern and purpose-built accommodation.
- 1.9.3.49 The erroneous description of Site 63P is unfortunate, to put it mildly. I believe that there is a serious risk that misinformation has resulted in the premature discarding of alternative sites and the doubtful selection of Site 63P for a tram depot. The comparative evaluation and the site selection process have been defective. Maybe a proper analysis would have shown that this land is indeed the best or the only feasible option for a tram depot, but I do wonder. On this matter alone, I do not endorse the Council’s proposals for the land. And there are other matters that point to the same conclusion. I am not convinced that Site 63P is the only feasible option for a single or principal tram depot.

1.9.3.50 I turn now to the third issue concerning any possible amendment of the depot proposal. I agree with the Council that, if CRT is to have just one depot, it must be of a suitable shape and size to take 48 trams. **MacNiven and Cameron (London) Limited (M&C)** suggests various ways in which tracks, equipment and buildings could be re-arranged so as to accommodate all that is reasonably required. This approach would be assisted with the incorporation of additional space, and attention is turned to Peckham Bus Garage and other neighbouring land. Buses play an important role in local and London-wide public transport, and suitable land for their garages is in short supply. Their numbers in London has increased by 30% during the last 5 years. No reduction in the 85 based at the Garage is envisaged as a result of CRT, as generally bus routes would be diverted to areas less well served by them.

1.9.3.51 To that extent, trams would provide an additional and complementary, rather than a replacement, service. Although a new bus garage is proposed north of Old Kent Road, the evidence is that it will not materially reduce pressure on existing garages. TfL’s Bus Services has asked that Peckham Bus Garage be retained. I agree that it should be and that the UDP should make this clear. Unless some re-organisation of the Garage would allow it, perhaps when the lease is renewed as seems probable, a tram depot should not encroach into it.

1.9.3.52 Land to the north of Site 63P, including railway embankment land where development might encounter engineering difficulties, could be incorporated into the depot. I recommend accordingly. The main problem, however, arises from the length of track needed to accommodate trams, and this means that the depot would have to extend westwards, up to or almost up to Rye Lane. This has serious consequences for land fronting Rye Lane, and particularly for the residential (Wandle) scheme which is under construction at the time of writing. Additional land north of the site would therefore be of limited assistance. This is indicated on the Council’s Annex 4 which I take to be included in the Southwark Plan 18th July 2005. It would allow for some re-arrangement of layout and thereby ease some pressure on the site, but it would not provide an acceptable single-site solution. For the Council, Mr Sowerby’s evidence on this and related points is convincing and I rely a great deal upon his experience and technical knowledge. I do not consider, therefore, that a single-site depot proposal could be amended to accommodate in a satisfactory manner a mixed-use development on Site 63P. This raises the prospect of a split-site solution.

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1.9.3.53 On the fourth issue, I am concerned mainly with affordable housing schemes and the prospects of additional employment arising from the **M&C** proposals for its land at 143-147 Rye Lane and 1-15 Bournemouth Road. At the time of writing, the Wandle scheme, is up to fourth floor level and appears to be proceeding apace towards

completion. The planning application was for 38 affordable homes, but permission was granted for 40 dwellings on 26 July 2004 and that is the number displayed on the site information board. Planning permission for the **M&C** scheme was sought for 62 dwellings but, owing to the stated requirement for the tram depot and its implications, was refused permission on 19 January 2005. Of these dwellings, presumably about 35% (22) would have been affordable.

- 1.9.3.54 The demolition of the Wandle scheme and resistance to the **M&C** scheme would result in a potential loss of just over 100 dwellings, of which $40 + 22 = 62$ would be affordable. This is not a large proportion of the total number of affordable homes in the Borough, of the 1900 needed annually or of the 50% of affordable homes of the 29,000 or so dwellings to be provided by 2016. But there is a pressing need for housing in London and the Council accepts that it will not be able to meet the need for affordable homes during the plan period. That makes the loss of these 62/100 or so even more serious, and to this should be added the clearance of *some sheltered housing*. The impetus that these 2 schemes are likely to have for the regeneration of this part of Peckham, though difficult to quantify, is another benefit that would not be realised.
- 1.9.3.55 As indicated above, I have looked at the possibility of retaining the Wandle scheme and the **M&C** proposal or similar in a mixed use development that included a single-site tram depot. I see little prospect of a satisfactory solution. The evidence convinces me that the retention of these 2 sites would incur the loss of 8-10 stabling positions. As I accept, the depot would need to extend up to the Rye Lane frontage, and that implies taking much, if not all, of the land required for these 2 schemes. Moreover, the Wandle scheme appears to have main living rooms, possibly bedrooms, at its rear and overlooking the main part of Site 63P. Planning permission was granted before the tram depot proposal was made known, so understandably a sufficiently high standard of noise attenuation measures to compensate for unknown circumstances was not included in the design. Such measures, together with a re-arranged layout of rooms and accesses, could be incorporated in a revised scheme for the **M&C** site, but a tram depot so close to the building would make its immediate surroundings noisy, especially at night when ambient levels tend to be lower. Housing in these circumstances would be possible, but not desirable.
- 1.9.3.56 Both schemes include uses at ground floor level other than residential. This should provide shops and a useful addition to those jobs already present on Site 63P. The **M&C** proposal could provide about 27. I conclude on this issue that the advantages of using part of Site 63P for a mixed use scheme, including affordable housing and commercial development providing employment, also serve to outweigh the advantages of using the site for a single-site tram depot. The possibility that compulsory acquisition of land might be speedy, or not necessary, does not invalidate the substantial planning advantages of these 2 schemes.

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- 1.9.3.57 The fifth issue concerns employment and businesses. The multiple ownerships and premises not open to view are some of the factors that make it difficult to estimate the number of jobs on Site 63P. Estimates for May 2005 vary from *a total of around 285 people are employed by the 27 businesses from which information was directly available* to over 600, the latter excluding the Bus Garage, the builders merchants and the joinery/building company but including the 150 between the railway lines and the 200 or so Council employees. Whichever is correct, and I suspect that the 600 is somewhat on the high side, the evidence at the Inquiry and gleaned at my inspection points to a significant amount of employment. The fact that some may be part-time and others may be by way of shift work does not necessarily reduce their value either to the local economy or to the people concerned. As mentioned, there appears to be opportunities for new businesses. It is not always easy to find suitable alternative premises for such activities as vehicle repairs and car valeting, and as far as I can see they seem to cause no great problem in this locality. The loss of all or most of these jobs would be a very serious matter.
- 1.9.3.58 The loss of the churches would, at the least, be unfortunate. At another session of the Inquiry, I was told about the contribution that churches make to the local communities and of their especial value to newly-arrived people of various backgrounds, countries and cultures. It would not surprise me to learn that similar circumstances apply here. Some members of the Tram Board and TfL would have been aware of the multiple ownerships and that there was employment and other uses on the site, but the lack of more detailed written evidence at the stage when decisions were made does not fill me with confidence that the full picture was before them.
- 1.9.3.59 Maybe suitable alternative accommodation could be found for most or all of these uses, and I have no doubt that the Council would assist in any reasonable way that it could. Nevertheless, with employment at the scale estimated, there would be bound to be substantial disruption during a considerable period. Not all the relocation might be to premises in the locality, and that could cause hardship to some employees. It is not always easy to find suitable alternative accommodation, either for businesses or churches. Bearing in mind also the defective analysis and what might have been discussed at the various meetings in the past, I consider that the loss of existing jobs and the disruption of businesses and other uses is a serious matter now. I would put it a good deal stronger than does the Council with its *there will be some loss of employment*, and I attach substantial importance to it.
- 1.9.3.60 The tram depot would generate employment, wherever it might be eventually located. The Study estimates 131 directly generated jobs which, like those already on site, would support further

employment in the local economy. This estimate is as good as can reasonably be expected at this stage, and is significantly less than the present level of employment. A vitally important difference, however, is that the employment and other uses on site already exist, and it is not just a matter of loss, temporary or otherwise, but of disruption. A further 220 or so jobs would be taken up by drivers and inspectors who would not be directly employed on the depot site, but that would presumably apply wherever the depot was located. On this issue, the loss of existing jobs and the disruption of businesses and other uses is not justified. I realise, of course, that a split-site solution would also result in loss of existing jobs and attendant disruption, albeit less so. The extent of this harm would no doubt depend upon the size of the depot and its arrangement within Site 63P. The less damage to these, and other important considerations, the better.

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- 1.9.3.61 On the sixth issue, the depth of the shops on the eastern side of Rye Lane varies considerably. Those that extend most to the rear would lose some of their floorspace, whereas the shallower ones would probably be little affected by the depot. It is difficult to make a judgement on the matter of impact and viability. The smaller shops appear to me to thrive, but the substantial reduction in the size of the larger ones could undermine the viability of Rye Lane as a shopping street, even with redevelopment. Even so, a likely prevailing depth of 12-14 m would appear to be achievable. Overall, I consider that a tram depot need have little detrimental effect in terms of floorspace upon the viability of Rye Lane in its entirety as a shopping street. There are more compelling reasons that lead to my recommendation.
- 1.9.3.62 On a related matter, the Council says that the tram would bring more people to Peckham and that the consequent greater investment would improve it as a shopping centre. Comparisons are made with Croydon Tramlink where, it is claimed, an extension to the route has resulted in retail and employment benefits to a deprived area. I am not convinced. It is difficult to isolate causes, and the same effect might not necessarily apply at Peckham where circumstances may differ. And accessibility works both ways. The tram would undoubtedly make it easier to get to Peckham, but it would also make it easier to leave it to shop elsewhere. That might include Elephant and Castle, not so far away, especially after the Council’s major regeneration proposals.
- 1.9.3.63 Travel to work in the City and other parts of London would be quicker and more convenient, but it is not impossible at present to board a train at Peckham Rye station for London Bridge or Victoria. During the morning peak period, the station is busy and that suggests that many people already do those or similar journeys. There are buses to various parts of Central London and to Canada Water. Better access to Peckham is not a strong argument in favour of the depot.

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1.9.3.64 There are other matters. A tram depot at Site 63P would require some re-arrangement of local roads and traffic routes. I see no objection in principle to this. It is not a consideration that should thwart the scheme. Other considerations militate against it more forcefully. I acknowledge the substantial problems of finding a suitable site elsewhere, for example on operational railway land at Granby Terrace and at the Bakerloo line depot. Nevertheless, I do not reject the possibility of a split-site depot in a mixed-use scheme with redevelopment providing adequate space and suitable type and layout of buildings to ensure reasonable protection of residential amenity. I accept that that implies delay and the duplication of some features, but TfL and the Council should reconsider this tram depot proposal. In doing so, they should take full account of loss and disruption, minimising it as far as possible. They might be encouraged by the advice in the Depot Study that *a spread of tram vehicle stabling facilities would enhance the system’s reliability*.

1.9.3.65 In conclusion, such advantages as the retention of a substantial number of jobs, avoidance of disruption and the realistic prospect of providing a significantly increased number of people with new homes, including affordable ones, outweighs the advantages of including a single-site tram depot on Site 63P. **M&C** requests that its land be excluded from Site 63P, but there is no need to do so. The Company’s scheme, as well as the Wandle development, would be part of the Use Class C3 Dwelling Houses which is rightly seen as an Other Acceptable Use.

1.9.3.66 My recommendation has implications for other text in the UDP. Unless a split-site approach is adopted, as I recommend, all references to the tram depot should be deleted.

Recommendation

1.9.3.67 I recommend that Section 9.3 – Peckham in Part 1 of the UDP and the identified Associated Proposals Sites in Appendix 4 of the UDP be modified in accordance with the Southwark Plan 18th July 2005 apart from:

1.124

An attractive, easily accessible and safe Major Town Centre, full of vitality and providing.....

Site 63P Uses Required:

Transportation including tram route, split-site tram depot and ancillary facilities, bus garage and car parking. Active retail frontage to Rye Lane.

