

MDO 58 ————— Knollys Rd Triangle ————— 2.7ha

Summary of Representations & Responses (Policy):

Objection A:

Using the area between the railway tracks as a small park will bring this facility to an area that is deficient. (Roderick D. Brown)

Response A:

The area is in private sector hands and its poor access makes it more suitable for uses other than a park.

Objection B:

Rail Track's investment of considerable sums of money in security and effective management of the site has served to upgrade the site's prospects, however the council must be realistic concerning the potential uses to which the site can be put. It will continue to appeal to B2 and B8 operations. (Richard Coburn)

Response B:

Accepted. The Knollys Road triangle site is likely to be difficult to develop due to its narrow single point of access under the railway. The poor access to the site made GVA Grimley conclude in their employment land demand study for Lambeth that it was unreasonable to insist that the site only be reserved for employment uses. However it is accepted that there will be demand for these uses in the future. The poor access prevents fire tender access, which also restricts other uses. The Council has therefore decided to delete the designation of the site as an MDO, as it is no longer seen as a major development opportunity for the reason set out above.

MDO 59

Norwood School, Gypsy Road

1.0ha

Summary of Representations & Responses (MDO):

Objection A:

Norwood College to be rebuilt as an advanced Technical College. (Mr W. O'Leary – Weston Hill Improvement Group)

Response A:

Primary School facilities are to be provided in lieu of this site at the site of the New Norwood School on Crown Lane. This school is needed as a disposal site to fund the new school. A new secondary school is to be provided to serve Norwood on the site of the Grove Special Schools. Therefore, this school will not be needed for educational use. The site will be disposed of and any use in line with the plan will be acceptable. If the site is no longer required for other community or educational uses, then it is likely that the site will be redeveloped for housing.

Objection B:

What is the school site to be used for when the school use is to be transferred to the Crown Lane Primary School site? (Sally Wadsworth)

Response B:

Primary School facilities are to be provided in lieu of this site at the site of the New Norwood School on Crown Lane. This school is needed as a disposal site to fund the new school. A new secondary school is to be provided to serve Norwood on the site of the Grove Special Schools. Therefore, this school will not be needed for educational use. The site will be disposed of and any use in line with the plan will be acceptable. If the site is no longer required for other community or educational uses, then it is likely that the site will be redeveloped for housing.

MDO 60

**Former Part of Vale Street Depot (including
land formerly in depot use) 0.6ha**

Summary of Representations & Responses:

Objection A:

In order to comply with statutory & consistory court requirements (Health & Safety/ Listed building/ Conservation area legislation), part of Vale St. should be considered for use as an cemetery extension to meet above needs. The remainder should be designated for community use. If the use of part of the site for a cemetery extension is rejected, the Council must provide alternative means whereby its obligations can be discharged. (Nicholas Long) (R. S. Flanagan – Friends of West Norwood Cemetery)

Response A:

Lambeth has 5-10 years spare cemetery capacity; hence there is no immediate requirement. But more pertinently, the change in levels and contamination makes the site unsuitable for cemetery use. In any event the site is still partly needed for waste use.

Objection B:

I object to the proposal because the Council should concentrate on providing adequate community and business resources for the current residents of West Norwood before bringing more people into an already densely populated and under-served area. (Diane Miller)

Response B:

Not accepted. The proposed MDO identifies a number of uses which are appropriate to the site and which have the support of the local community. The proposed uses include community uses.

MDO 61
0.9ha

Park Hall Trading Estate, off Park Hall Rd,

Summary of Representations & Responses:

Objection A:

The requirement for a minimum of 70% Gross Floor Area of employees is considered too restrictive, this % needs to be considered in light of an overall proposal for redevelopment. Furthermore, limiting the employment use to the central part of the site unacceptably constrains any future redevelopment proposal and is an issue that should be addressed at the detailed design stage. (Workplace Group Plc)

Response A:

The vast majority of this site is suitable for continued employment use (see responses to objections to Policy 22), non-employment use is only likely to be acceptable on the peripheral part of the site, outside the original factory building, to the west of the site. The objectors have been negotiating exactly such a scheme with the London Borough of Lambeth.

Objection B:

This site should retain its commercial status and be developed as such. If the council wants to pursue some sort of mixed-use, then perhaps it could seek to create artist's studios. The site would be inhospitable for housing. (Diane Miller)

Response B:

Not accepted – a small part of the site on its western flank would be hospitable for housing.

MDO 62 ————— **Norwood Hall** ————— **0.2ha**

Summary of Representations & Responses (Policy):

Objection A:

I strongly oppose development of Norwood Hall site for housing. Also strongly, oppose housing development or other building on adjoining open space. (Jane Pickard)

Response A:

It is now proposed to retain the building for community use and to retain the open space and so the MDO has been deleted.

Objection B:

I object to the current plan because I believe that Norwood Hall and its grounds should be used for community purposes only. There's a shortage of quality schools and nursery day-care in the area. The site would be ideal for a nursery day-care or school or some other community purpose because of its central location. Moreover, current community resources in the area are dire. (Diane Miller)

Response B:

It is now proposed to retain the building for community use and to retain the open space and so the MDO has been deleted.

Objection C:

To cover the area with bricks and mortar would contradict Policy 45 on preserving green space. We submit that the field next to Norwood Hall, and the Hall itself, should continue to be exclusively and rigorously earmarked for such use. (J.H. Ward)

Response C:

It is now proposed to retain the building for community use and to retain the open space and so the MDO has been deleted.

Objection D:

Retain for exclusive community use. Keep all the open space, 'limited development' needs clarification and remove MDO status. (NIT/NDM – Ricky Renalls)

Response D:

It is now proposed to retain the building for community use and to retain the open space and so the MDO has been deleted.

~~MDO 63~~ — ~~Old Norwood Library~~ — ~~0.1ha~~

Summary of Representations & Responses:

Objection A:

Retain for community use. (Sally Wadsworth)

Response A:

This is exactly what is proposed. The site has now been developed for community use with ancillary offices, and therefore the MDO designation is to be deleted.

Summary of Representations & Responses:

Objection A:

The statement contained in the last sentence is vague and not specific. What does the last sentence mean, just in case plans for further development come forward, or SCCC fail to implement the current planning permission. The UDP must offer clear and unequivocal guidance to officers and members in their consideration of planning applications. (Marilyn Evers)

Response A:

Not accepted – the specifics how sporting benefits are to be spread to the surrounding area is a matter of detail at application stage.

It is proposed that MDO 64 is deleted from the plan and replaced with new Policy 45a.

Objection B:

We object to the current form of wording, it fails to reflect the status of the ground as a national and internationally important sporting venue or the opportunities, economic and regenerative benefits that this creates. We consider the requirements of the policy as drafted to be unnecessary and unreasonable. We are of the opinion that an additional paragraph should be inserted at the start of the policy to reflect the unique and historic nature of the Cricket Ground. In particular, we request that the reference to on-street parking should be deleted. (Surrey County Cricket Club)

Response B:

Not accepted – the specifics as to how sporting benefits are to be spread to the surrounding area is a matter of detail at application stage. A reference to the setting of the Cricket Ground has been added.

It is proposed that MDO 64 is deleted from the plan and replaced with new Policy 45a.

Objection C:

Approve of shared use community facility, however would like inclusion of Vauxhall School as a school and community facility use. (Jon Davies, Governor – Vauxhall Primary School)

Response C:

This is really an objection to MDO 111. It is proposed that MDO 64 is deleted from the plan and replaced with new Policy 45a.

Objection D:

Should include the whole of ground. (Surrey County Cricket Club)

Response D:

Accepted – it is proposed that MDO 64 is deleted from the plan and replaced with new Policy 45a which covers the whole ground.

**MDO 65 ——— The Oval Tube Station, 312–316 Kennington
Park Rd Rothesay Court, (Harleyford Rd),
Oval Club House ——— 0.5ha**

Summary of Representations & Responses:

Objection A:

It should refer to the need for any new development to have regard to the presence and importance of the Ground ensuring that any development does not have a detrimental impact on the operation, function or setting of the Ground. Accordingly, we object to the policy as drafted. (Surrey County Cricket Club)

Response A:

It is highly unlikely that a development on a site of this size would have this impact. Nevertheless this is an important matter. However the plan need only say this once and in the MDO for the Cricket ground itself. In any event the MDO is proposed for deletion as there is little prospect of it coming forward for development.

MDO 66
0.4ha

Offley Works, Offley Rd & 44, 46 Offley Rd

Summary of Representations & Responses:

Objection A:

Our proposal is that Lambeth should consider redeveloping the site, including the building recently vacated by Parkstone Pottery as a mixed use site with secure low-cost studio and storage space (desperately needed in the area); sculpture and other workshops; artists could show their work and possibly a teaching studio. Organizations, such as Acme, which have experience and expertise in these developments, should be approached for their views before any other plans are considered. (Miranda Hyslop, Gordon Mc Dougall – Kennington Association)

Response A:

This building is being sold for workshop use and this involves no planning change of use. This will include small workshop space suitable for artists use.

Objection B:

We object to the plan to develop Offley Works if this means any reduction in studio space in the area, or the relocation away from the Oval of the artists currently renting space from Lambeth. These artists, of national and international repute, have been there for many years. They are small businesses in their own right, attract galleries (including the Tate), critics and collectors to view their work, and exhibit regularly. (G. J. Wragg and Howard Copping)

Response B:

This building is being sold for workshop use and this involves no planning change of use. This will include small workshop space suitable for artist's use.

MDO 67

43-55 Clapham Rd (Otis)

0.2ha

Summary of Representations & Responses:

Objection A:

This site would be suited to housing - this is not clear in the policy as written. (Springfield Action Group)

Response A:

The Part B MDO's do not generally allocate land uses. This is because a variety of land uses may be acceptable; especially in mixed-use schemes boroughwide policies still should be followed e.g. on protecting employment buildings but allowing residential in a range of circumstances.

MDO 68

Freemans - 135 Clapham Road

1.6ha

Summary of Representations & Responses:

Objection A:

Façade retention is generally unacceptable (English Heritage)

Response A:

Accepted – façade retention is somewhat of a misnomer here as it is the frontage original whole building which is of merit.

Objection B:

Object to mixed-use employment area. (Stockwell Park Conservation Society)

Response B:

Not accepted – the site is currently in employment use, providing employment levels are maintained and amenity is not harmed there is no reason why the site should not be suitable for a mixed use development, located as it is in an inner urban area with good public transport links.

Objection C:

Object to secondary access and through pedestrian links to Liberty Street, as this would cause an undesirable increase in traffic in a side road and lack of security to those dwelling houses in Durand Gardens backing on to the site. (Stockwell Park Conservation Society, Stockwell Partnership, Mrs Barbara Evans)

Response C:

Accepted in part – it is intended to clarify that this is to be a pedestrian and cycle only link, which would otherwise mean that these would have to pass all around the site which would be a considerable diversion. It has also been clarified that safety of rear gardens along Durand Gardens need to be maintained.

Objection D:

Would like to see a development brief included for this site in the UDP. (Springfield Action Group, Durand Gardens Residents Association, The Albert Square and St Stephens Association)

Response D:

Development briefs are prepared separately from the UDP. It is not possible to prepare them for all sites. Ideally this site should have one but resources for preparing them are very limited.

Objection E:

Materials and façade treatment should complement the style and character of the Stockwell Park Conservation Area architecture and the Print Works. This does not mean it cannot be modern, but a modern style of development must have a rigorously thought through design agenda that can be justified down to a high degree of detail (Durand Gardens Residents Association, Vivian Aylmer, The Albert Square and St Stephens Association)

Response E:

Accepted in part – however there is considered to be more scope for a contemporary design treatment on the rear Liberty Street frontage.

Objection F:

Repair damage done to Stockwell Park Conservation Area by sensitive development of the premises now owned by Freeman's. (Durand Gardens Residents Association, The Albert Square and St Stephens Association, Mrs Barbara Evans)

Response F:

Accepted – change made.

Objection G:

The scale of the surrounding streets and the SPCA do not exceed 3-storeys and this height should not be exceeded on the perimeter of the site other than along Clapham Road. (Durand

Gardens Residents Association, The Albert Square and St Stephens Association, Vivian Aylmer, Mrs Barbara Evans)

Response G:

Accepted in part – the changes make it clear that development on the Liberty Street frontage should be of a complementary height. On a large site like this however an artificial 3-storey height limit would be wrong given the existing building heights.

Objection H:

Locating private gardens and houses opposite these properties should protect privacy and security of neighbouring back gardens. (Durand Gardens Residents Association, The Albert Square and St Stephens Association, Vivian Aylmer)

Response H:

Agreed - what is important is that the security of these rear gardens is not compromised. They are open now.

Objection I:

Daylight loss, loss of privacy and overlooking on all sides of the site should be avoided. (Durand Gardens Residents Association, The Albert Square and St Stephens Association, Vivian Aylmer, Mrs Barbara Evans)

Response I:

It is proposed to mention amenity however specific aspects of amenity are covered in boroughwide policies such as Policy 32.

Objection J:

The residential development density of the site should not exceed the lowest desirable density of this type of Urban Regeneration Site, which would also reflect the highest existing densities in the neighbourhood, as defined in the draft UDP 2002 -2016 i.e. 450 HRH. Any additional non-residential development should be considered to be the equivalent of residential for the purposes of calculating this overall site density, e.g. 900 m² of offices = 10 flats @ 90m² = 30 habitable rooms in the equation. (Durand Gardens Residents Association, The Albert Square and St Stephens Association, Vivian Aylmer, Mrs Barbara Evans)

Response J:

The new UDP adopts a design-led approach to density and so does not attempt to impose densities in advance – least of all in the UDP irrespective of design. There is scope on this site for reasonably high densities.

Objection K:

The proposed plot ratio of the site should not exceed the existing plot ratio of the site. An environmental impact assessment should be included as a requirement of any planning application. (Durand Gardens Residents Association, The Albert Square and St Stephens Association, Vivian Aylmer, Mrs Barbara Evans)

Response K:

The plan does not use plot ratio as a design tool. It is crude and neither protects amenity or secures good design. Whether or not a scheme requires EIA is determined by the regulations. It is not up to the UDP.

Objection L:

Reveal old buildings and complement their form from all directions for integration. Create settings for old buildings and on site listed building so all complements the elevation and context of Clapham Rd. (Mrs Barbara Evans)

Response L:

Accepted – changes made.

Objection M:

Create a new west side to Liberty Street thus completing it as a street. (Mrs Barbara Evans)

Response M:

Accepted – changes made.

Objection N:

Enhance the setting of the listed buildings north side Durand Gardens and remove unsightly bulk of existing factory. (Mrs Barbara Evans)

Response N:

Accepted in part – wording protects listed buildings on site and setting of adjacent listed buildings, and allows for the removal of the later rear additions from the print-works building. However, it would be difficult in planning terms to resist a development building out to the existing building line, therefore the proposed wording does not go that far.

Objection O:

Create a new community identifying with the old buildings and linking the Clapham Rd, listed building, integrate open space and parking in a sympathetic and controlled manner that benefits the whole neighbourhood. (Mrs Barbara Evans)

Response O:

Accepted – changes made.

Objection P:

The Freeman's site at 135 Clapham Road should not be designated as a mixed-use employment area. This is an important site and the land use ought to be determined by the borough-wide policies and government policy on matters such as housing, mixed uses, protection of existing uses, community facilities etc. It does not accord with Government policy to limit the range of uses on the particular site and restrict the potential for re-using previously developed land and converting existing buildings. (Ridale Developments Limited)

Response P:

Not accepted – see response to objections to Policy 22.

MDO 69

**St Agnes Place (Area to East of Kennington Park),
3.1ha**

Summary of Representations & Responses:

Objection A:

Delete sentence: " Some small loss of Kennington Park Extension (Parks Regeneration Area) may be permitted where it benefits park overall and leads to better enclosure of park". (Friends of Kennington Park)

Response A:

Accepted – change made.

Objection B:

Objection -to the unspecified development of the former scrap yard. The planning aim to unite the park and park extension is to be the main driver. Any buildings on scrap yard site to be less than 10% site area. Lambeth has already built housing on public open space of the park extension. This was acceptable to local residents on the basis that the scrap yard would be decontaminated. This has not been done. (Kennington Association)

Response B:

This scrap-yard is an eyesore. It needs to be decontaminated before it can be used as a park extension. This could not previously happen because of the squatter. There is no current funding for this due to the cost of the community cricket ground now completed. This is a Brownfield site suitable for some redevelopment.

MDO 70

**Stannary Street (Various Commercial Sites
between Milverton Street and Stannary Street)**

1.5ha

Summary of Representations & Responses:

Objection A:

This should be a key worker priority site – current TV building. (Peabody Unite)

Response A:

Not accepted -This is an important employment site, currently home to a TV studios where Richard and Judy is filmed. It is a mixed-use employment area in the plan allowing some housing, however given the strategy of the plan of protecting key employment sites, and of allowing mixed use providing they intensify employments sites, no case has been presented as to why this should not prevail. No reason given why it should be key worker housing over and above other forms of housing and affordable housing.

Objection B:

There should be no height restriction as this aspect can be determined at the detailed planning stage. (Peabody Unite)

Response B:

Not accepted – the street is in a conservation area and a strong design principle in this particular location with respect to the conservation area is the retention of a uniform building height. Individual proposals will of course be assessed on their own design merits.

**MDO 71 Tesco Supermarket – 263-275 Kennington
Lane**

1.4ha

Summary of Representations & Responses:

Objection A:

It does not state the reasons for redevelopment or the consequences for the existing retail provision. The policy is also silent on the procedure by which these development aspirations will be progressed. (Tesco Stores)

Response A:

The reason is the pressing need for housing in London. The Government Office for London has recently published a report on the more intensive redevelopment of such sites including housing. Tesco's itself is pursuing a national study on such development in conjunction with the Housing Corporation. The proposal is clear that development would be above store and in car park. Hence a rebuilt store could remain. It would be for the private sector to pursue such a scheme, as Tesco's is doing on a similar store in Brixton.

Objection B:

Further development would be against the interest of the locality and residents living nearby. The store is supported as a local store but any move to turn this into a superstore would be resisted (Rita Fitzgerald)

Response B:

Noted – please see reasons given under response to Objection A. Generally, MDOs do not state a preferred use for sites. The Council can not categorically state in the MDO that no further retail development can take place on the site. Any expansion of the existing retail use on the site would be judged on its merits against UDP policy on the location of new or expanded existing retail development (Policy 5). These policies direct major new or expanded retail developments to follow a sequential approach in respect of where they can locate.

Objection C:

Need to ensure that any development on the MDO71 site does not have a detrimental impact on the operation, function or setting of the Ground. (Surrey County Cricket Club)

Response C:

The site is too remote for there to be much chance of this. This issue is now addressed in the MDO for the ground itself.

MDO 72

**Beefeater Distillery, 20 Montford Place &
Other Sites to the East of Montford Place
0.9ha**

Summary of Representations & Responses:

None received

MDO 73
2.1ha

Oval Gasometers, Kennington Oval

Summary of Representations & Responses:

Objection A:

It should refer to the need for any new development to have regard to the presence and importance of the Ground ensuring that any development does not have a detrimental impact on the operation, function or setting of the Ground. Accordingly, we object to the policy as drafted. (Surrey County Cricket Club)

Response A:

It is highly unlikely that a development on a site of this size would have this impact. However, this is an important matter. Nonetheless, the plan need only say this once and within the policy for the Cricket ground itself.

MDO 74 ~~Former Lambeth Depot, 323 - 329 Kennington Lane/ Various Sites in Oval Way & Kennington Grove Area~~
~~1.4ha~~

Summary of Representations & Responses:

Objection A:

It should refer to the need for any new development to have regard to the presence and importance of the Ground ensuring that any development does not have a detrimental impact on the operation, function or setting of the Ground. Accordingly, we object to the policy as drafted. (Surrey County Cricket Club)

Response A:

It is highly unlikely that a development on a site of this size would have this impact. However, this is an important matter. Nevertheless, the plan need only say this once and in the MDO for the Cricket ground itself.

Because work has now started on the new Lilian Baylis School, this MDO is now to be deleted.

MDO 75

**238 Kennington Lane/ 2 - 124 Dolland St. & 1-
3 Loughborough St. 0.5ha**

Summary of Representations (to paragraph 5.11.1):

Objection A:

The area is not dominated by the cricket ground which turns its back on the area. What Oval neighbourhood housing estate does the text refer to? There are several housing estates, none of which goes by that name. (Marilyn Evers)

Response A:

Accepted – Proposed to amend wording to state that the Cricket ground is the largest physical presence in the area. Reference to council estates proposed to be corrected.

Objection B:

No mention of Oval Mansions (Rita Fitzgerald)

Response B:

Noted – However it is not considered necessary to mention all buildings and sites which may come forward for development in the future. Furthermore, the site has recently been sold and is no longer in Council ownership.

MDO 76

**Land to the rear of White Swan Public House,
Westow Hill and 10–20 Crystal Palace Parade**

0.4ha

Summary of Representations & Responses:

None received

**MDO 77 3–5 Cawnpore Street / 99–107 Woodland
Road, 0.2ha**

Summary of Representations & Responses:

None received

MDO 78

**Stockwell Station, Stockwell Rd & Richardson
Court, Studley Rd**

0.5ha

Summary of Representations & Responses:

Objection A:

Concern over traffic through proposed creation of public open space and closure of Binfield Road. (Victor M. Glaser)

Response A:

Accepted – although this had been widely consulted on by the Stockwell Partnership as part of the Stockwell master plan and was considered achievable in traffic terms it has met with considerable concern and unpopularity through uncertainty of the impact of road closure on the surrounding traffic.

MDO 79

**Lingham House Court, 10, 12, 16 & 18
Lingham St. / 275-277 Clapham Road
0.3ha**

Summary of Representations & Responses:

Objection A:

All the description after and including "...and recreates street frontages..." should be deleted and replaced by "...with housing above and behind". Without this change, the UDP places an unnecessary restriction on the development of this site. (Metropolitan Housing Trust)

Response A:

Accepted in part – currently the development on-site is hostile to the street. It is to be expected that new development should address these streets in accordance with basic urban design principles, although this can be in the form of open space. The trees along these boundaries are no hindrance – indeed, it is an advantage to creating attractive streets.

Objection B:

It is proposed that the existing vacant old people's home is replaced by a new home with 20-30 flats for the frail and elderly together with housing for sale and a retail unit. The proposal arranges all the residential accommodation around a southwest-facing garden on Grantham Road providing an asset to the scheme and enhancing the street environment. Therefore, the policy to 'recreate street frontages' is not appropriate. The town centre uses should be limited to the ground floor of the Clapham Road (Pollard Thompson Edwards).

Response B:

Accepted – it is appropriate however that on Lingham Road the development does not create a hostile wall enclosure. Railings to an open garden would be acceptable.

Summary of Representations & Responses:**Objection A:**

Concern over loss of employment. (Vivian Aylmer, The Albert Square and St Stephens Association, Stockwell Partnership)

Response A:

Accepted on loss of employment - the site is not currently vacant but is likely to become so over the next few years. The designation as an affordable housing priority site has therefore been deleted. However it is considered important here to provide certainty over the nature of a scheme given that, firstly, it is desirable to retain a significant element of employment floorspace as part of any redeveloped scheme (as for other sites) and, secondly, as it is a large site solely affordable housing would be inappropriate and unsuitable.

Objection B:

Object to the site being allocated as an affordable housing priority site, add reference to mix of uses to complement / main housing use. (Hays PLC)

Response B:

Accepted on loss of employment - the site is not currently vacant but is likely to become so over the next few years. The designation as an affordable housing priority site has therefore been deleted. However it is considered important here to provide certainty over the nature of a scheme given that, firstly, it is desirable to retain a significant element of employment floorspace as part of any redeveloped scheme (as for other sites) and, secondly, as it is a large site solely affordable housing would be inappropriate and unsuitable.

Objection C:

An element of employment floor space must be retained. (Brixton Society)

Response C:

Accepted on loss of employment - the site is not currently vacant but is likely to become so over the next few years. The designation as an affordable housing priority site has therefore been deleted. However it is considered important here to provide certainty over the nature of a scheme given that, firstly, it is desirable to retain a significant element of employment floorspace as part of any redeveloped scheme (as for other sites) and, secondly, as it is a large site solely affordable housing would be inappropriate and unsuitable.

Objection D:

A development brief should be prepared. (Stockwell Partnership)

Response D:

Decisions on priorities for development briefs are taken outside the plan process depending on staff time and workload priorities.

MDO 81

**Land to the rear of West Stockwell
Neighbourhood Office, land to the rear of
Union Grove plus Coronation Hall, Union Rd
& open area fronting Smedley St.**

0.4ha

Summary of Representations & Responses:

None received

~~MDO 82 Savoy Laundry/Union Mews Area: 0.7 Ha~~

~~MDO 83 Clapham North Industrial Estate Area: 0.2 Ha~~

MDO 84 18 Union Road, 340a-344 Clapham Road
Area: 0.5 Ha

MDO 85 9 Jeffrey's Road, 330-340 Clapham Road
Area: 0.6 Ha

MDO 86 Former Annie McCall Hospital/Stockwell Studios
Area:
0.3 Ha

Summary of Representations & Responses:

Objection A:

It is considered that the text for site MDO 82-86 is out of date and pre-dates the recent planning appeal decision in respect of the Savoy Laundry. (Weald Properties Limited)

Response A:

Accepted – it is now proposed to delete this MDO (82) – see map amendments.

Objection B

MDO 84 should not be promoted for employment. There is no need to develop sites comprehensively. Delete requirement for active frontage uses on Clapham Road from MDO 84. Delete Victorian Shops at 4-12 Union Road from list of features worthy of retention/enhancement. (Rialto Homes)

Response B:

Accepted in part – the site is part for a wider employment area north of Union Road, which has good road access and considerable employment potential. It has run down buildings and some residential use. However this is precisely the reason why it is proposed for designation as a mixed-use employment area, to secure improvements. The fact that it is not suitable for B2 or B8 is irrelevant as it is suitable for B1. The site currently is not wholly vacant and includes one important small black business providing employment and a service to the local community. It may be difficult for the business in question to find alternative premises should they have to move.

Objection C:

The Stockwell studios and workshops should be set at affordable rents. (Diane Sullock)

Response C:

This is not a land use planning issue. It is Lambeth's regeneration objective however to retain this building for artist studios use.

Objection D:

The frontage should be retained and not obscured by additional buildings. (Diane Sullock)

Response D:

The building is noted as a feature worthy of protection in the policy. This implies no new buildings to front.

Objection E:

Add to list of features worthy of retention "Former Annie McCall Hospital - Stockwell Studios and garden." (Diane Sullock)

Response E:

It is already.

Objection F:

Add educational use alongside arts and culture (Clapham and Stockwell Town Centre Board)

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Response F:

Accepted – change made (see change recorded under MDO 84).

**MDO 87 South Bank University/Lambeth College
Wandsworth Road
1.7ha**

Summary of Representations & Responses (MDO):

Objection A:

It should stipulate that the site must be used for education and employment (i.e. incubator units) rather than be ear marked for housing as the area is already high in housing density and needs employment opportunities (Springfield Action Group)

Response A:

The site is poorly designed for educational purposes. Although this would be the first preference under Policy 26, there has been no interest in the year that the site has been marketed. The site is suitable for employment purposes and an element of this would be secured under Policy 20. However, the density of the existing site and the pressing need for housing mean that a scheme with a large housing component would also be suitable.

Objection B:

Would like to see a development brief for this site undertaken with the local community (Stockwell Partnership, Clapham and Stockwell Town Centre Board)

Response B:

This is accepted as desirable however development briefs are pursued outside the development plan and subject to workload and resources.

Objection C:

Contrary to Policies 26 and 30 (Mr E Mirzanli)

Response C:

Not accepted – Policy 30 does not apply. Policy 26 does apply and will be used to test any application.

MDO 88

**Courland Road Grove (Plot North of Euro
Towers) 0.2ha**

Summary of Representations & Responses:

None received

MDO 89

Wilcox Road

0.4ha

Summary of Representations & Responses (Policy):

Objection A:

Suggest the following form of words: "Revitalize the unique character of Wilcox Road by enhancing the streetscape and commercial activity. Potential for redevelopment of single story shops to north of site. Improve the route between Wandsworth and south Lambeth Roads. Creation of public space on road." (Stockwell Partnership)

Response A:

Accepted. Change made

MDO 90 Clyston Street / Wandsworth Road 1.1ha

Summary of Representations & Responses:

Objection A:

The MDO allocation together with the KIBA designation is unrealistic and will prejudice future redevelopment of these areas. Should encourage scrap-yard relocation. The plan refers to a requirement for compensation for loss of the temporary children's play use. It is not clear how this requirement is expected to be dealt with in any redevelopment proposals. The plan should clarify how non-employment sites within KIBA's and MDO's are to be treated. Clearly, these areas incorporate a number of different land ownerships and it will not always be possible to achieve comprehensive redevelopment. It is unclear, for example, how wholly residential sites (e.g. the front part of Nos. 364-368 Wandsworth Road) will be treated if these come forward in isolation from more comprehensive development proposals involving various land ownerships. (Metropolis)

Response A:

Lambeth has been in extensive discussion with the various landowners for the site. In response to the objection, the MDO does not insist on comprehensive development other than inclusion of the scrap-yard. It is proposed to amend the proposal to clarify the position on the scrap-yard and further work on the development of the site.

Objection B:

Object to Stewarts Road Adventure playground being sold off, as this will increase youth vandalism on the estates. Should include a youth centre (May Garvey, Vilma Read, Gwendoline Crossley, Susan Peake, Eugene McNabb, Violet Connolly, Bert Hewitt, Bridget Toope)

Response B:

Accepted – although the site has not been in use as an adventure playground for a number of years it is the lawful use of the site and active use may be restored at a later date. The adventure playground will be removed from the area of the MDO. The retention of the site as open space in the form of an adventure playground is also in line with PPG17, which states that the quality of the site is not a precondition for its value/loss as open space. The adventure playground was granted permanent planning permission in 1995. Nearby there are also several other facilities provided by Oasis, and there is the Thesseley Youth Centre 200m away, which provides services for Lambeth Youth. The area is therefore not one that is deficient in play areas.

Objection C:

Object to the unnecessarily restrictive nature and the unclear wording of Policy MDO90. We object to the requirement to incorporate a scrap yard into the site and consider that the policy does not provide sufficiently for maximum opportunities for mixed-use development (Eaton Square Garages Limited)

Response C:

Not accepted – It is proposed to amend and clarify the wording. However, inclusion of the scrap-yard is essential as residential development next to it would be wholly unacceptable. The site is part of a much wider employment area of strategic importance identified in Strategic Guidance RPG3 (see response to objections to Policy 22).

MDO 91 Destination Streatham (Ice Rink/Streatham Station) 4.7ha

Summary of Representations & Responses (MDO):

Objection A:

After "of regional importance" insert the words: "including a full size (60m x 30m) ice surface" (Streatham Ice Skating Action Group, Nicola Hale, S Boothroyd, Streatham Youth Ice Hockey Club)

Response A:

Accepted – change made.

Objection B:

Plans need improvement with improved station, more car parking etc. (James Bennet)

Response B:

The creation of a strategic transport hub would necessitate the improvement of the existing station. Any development of Streatham Station and the area around it would include an element of off street parking provision in line with the Council's parking standards.

Objection C:

Funding and viability must be tested by involving interested commercial developers, prior to developing a comprehensive planning guide. (Stanthorpe Triangle Residents Association)

Response C:

The consultants, Donaldson's, have looked at this in an independent report for Lambeth, and the matter is also being carefully considered in the negotiations with Tesco's concerning the submitted planning application on the site.

Objection D:

Makes various comments of detail, mainly in support of the proposals (Jean Coleman)

Response D:

Noted.

Objection E:

Add I) Provide arts and community facilities. (J Clyne)

Response E:

Accepted – change made.

Objection F:

Oppose the development of a supermarket on the ice rink site. (Jon and Jayne Parke, Paula Hanna)

Response F:

This is more of a commentary on the planning application than it is on the development plan.

Objection G:

The policy should be further strengthened by identifying studies that demonstrate the impact, over a period of time, that major retail developments have on the surrounding area's small businesses. The general term "retail development" also covers far too wide a range of options from, shall we say, major supermarkets to a small multi purpose shopping centre (Streatham Partnership Board)

Response G:

Two specific studies have already been carried out identifying the impact of a new supermarket for this site on the wider Streatham area. Both a major supermarket and a small shopping centre would be classified as being in the A1 Use Class; they would not generally be distinguished in planning policy terms.

Objection H:

Reference to "housing" in Para 5.14.16 is removed as this could be read as implying that there were limited housing development opportunities within the Partnership Board and Council's vision and approach. In fact, housing is a central and crucial part of the vision. Similarly, the Partnership Board/council proposals also have the potential for job creation. (Streatham Partnership Board)

Response H:

Not accepted as there is no such implication – the reference to housing refers to the potential of any potential scheme to provide housing. Its deletion could lead to justified counter-objection.

Objection I:

Reword existing policy to make a stronger and clearer commitment to integrated transport, sports and community facilities plus other elements such as affordable housing. (Lower Streatham Neighbourhood Watch & Residents Association)

Response I:

This is exactly what the policy proposes.

Objection J:

The policy has been expressed in too vague and non-specific a fashion. It should be more positive about the objectives for the area and more definite about rejecting the current likely alternatives. (Lower Streatham Neighbourhood Watch & Residents Association)

Response J:

It is important that the policy should set out broad objectives rather than being over-specific, which could hinder investment. The policy must not be framed around being for or against any specific scheme. It needs to set down the general tests to be applied to any scheme.

Objection K:

The Policy should state the outcomes that are required from a successful re-development of the Streatham Station area, rather than requiring particular design solutions based on earlier indicative masterplans (Tesco's).

Response K:

This is exactly what the MDO does – it does not dictate any particular design solution. No suggested re-wording is given.

**MDO 92 ————— Streatham Odeon Cinema/ Astoria Mansions/
2-8 Gracefield Rd**

Summary of Representations & Responses (Policy):

Objection A:

Additional retail development could be accommodated on the Astoria Mansions site if this becomes available but it is too small and quite unsuitable for a major food store, of which there are sufficient already (Stanthorpe Triangle Residents Association).

Response A:

It is now accepted that this site may not come forward for development for many years. The cinema is an asset to the town centre and in any event would have to be retained or suitably replaced. It is therefore proposed to delete this proposal. Elgar House is physically separated by a road in active use, and is in separate ownership. The Lambeth retail and leisure capacity study indicated that it was not an attractive site for redevelopment.

Objection B:

Protect Cinema (Jean Coleman, Sheila Freeman, Mr E Mirzanli).

Response B:

The cinema is an asset to the town centre and in any event would have to be retained or suitably replaced – with the loss of the ABC it is even more crucial to retain the Odeon. It is therefore proposed to delete this proposal.

Objection C:

The site in question should include Elgar House to expand the area available for development. This will enable a much more viable retail development (Cllr David Malley).

Response C:

Elgar House is physically separated by a road, and in separate ownership. The Lambeth retail and leisure capacity study indicated that it was not an attractive site for redevelopment. It is proposed to delete this proposal.

Objection D:

While supporting the allocation of the Odeon site to a possible mixed development site, we would wish to emphasize the need for alternative, equivalent, well located cinema facilities to be identified and developed before the current Odeon was lost to Streatham. Ideally the location should include car parking and also some more art house provision (Streatham Partnership Board, The Streatham Society).

Response D:

The cinema is an asset to the town centre and in any event would have to be retained or suitably replaced. It is therefore proposed to delete this proposal.

MDO 93 — ABC Cinema/Norwich House/Cromer Court
0.9ha

Summary of Representations & Responses:

Objection A:

Every effort should be made to reopen it as a cinema or a theatre (Sheila Freeman, Mr E Mirzanli)

Response A:

Not accepted - Planning permission is not needed to retain this in D2 use, which is the current proposal. The site was closed following the merger of the ABC and the Odeon and sold with a covenant that it not be used for cinema use. The former ABC buildings is a listed building at risk, and Government policy (in PPG15) is that for such buildings the use, which secures the best future for the building, should be permitted, even if this is not the original use. A large part of the site (including the ABC cinema) is being redeveloped for a mixed-use scheme, whilst the remainder of the site, Norwich House, appears to be actively occupied as offices. Therefore it is proposed that the MDO be deleted.

Objection B:

Unless these community facilities are at the heart of the development, with access from the High Road, it is likely that they will not be well used. The Streatham Community Forum has considered this at some length and considers that it would be preferable to use the equivalent amount of money to develop an alternative site. (Streatham Partnership Board)

Response B:

Accepted in principle- though MDO is now being deleted.

Objection C:

Should be for a supermarket. (Streatham Partnership Board, Streatham Society)

Response C:

Not accepted - The Lambeth retail and leisure capacity study considered that this would not be a good site for a supermarket as it was outside the cores of the centres, had little pedestrian flow in this location, and could attract demand away from better located sites in the town centre.

MDO 94 ————— Streatham Hill Station, ————— 1ha

Summary of Representations & Responses (MDO):

Objection A:

I notice that the current plans do not make any use of the air space above the railway tracks. This is a major shortcoming, as it could be used as a very convenient multi-storey car park, which is a major drawback to shopping in this part of Streatham. It would also make Streatham Hill more attractive to rail passengers as it would provide protection from the weather whilst waiting for trains. If passenger volumes are to be significantly increased, the whole station layout needs to be reviewed, to provide more platforms to allow more trains to use the line. The rail layout is not something that can be changed later; it has to be part of the initial plan. The restriction of the width under the road bridge could be overcome by building the new platforms in the other direction, using the railway sidings. (Streatham Society, James Bennett)

Response A:

A multi-storey car park would encourage congestion on a key arterial road hindering bus use. There has been disagreement about the boundary of this MDO, and concern that the development of air rights could leave the station platforms in darkness and have implications on perceptions of safety. Streatham Hill Station is located within the Streatham High Road and Streatham Hill Conservation Area (CA54), and therefore is protected from demolition. Given the above, and the fact that although this MDO has been a longstanding aspiration of the Council, there has been no interest from developers, it is considered that it be deleted.

Objection B:

We believe that the MDO at Streatham Hill Station should not include the area over the tracks west of the bridge that spans the station. This would place the entire station platforms into darkness reliant on artificial lighting at all times, and would not assist perceptions of safety. Development above the tracks on this scale would also have an adverse impact on Drewstead Road, which the society considers is a potential conservation area. However, we consider that there is scope for redevelopment of the current single storey shops on the east side of Streatham Hill and north side of Leigham Court Road - and possibly also incorporating a high quality replacement of the public conveniences. This could be a major landmark development at a key gateway to Streatham. Design should be to a very high standard to complement the adjacent parades of the Leigham Court Estate Conservation Area. (Streatham Society)

Response B:

Accepted in part- the development of air rights could have implications on perceptions of safety on the station platforms. Streatham Hill Station is located within the Streatham High Road and Streatham Hill Conservation Area (CA54), and therefore is protected from demolition. Given the above, and the fact that although this MDO has been a longstanding aspiration of the Council, there has been no interest from developers, it is considered that it be deleted.

~~MDO 95 10, 10A, B, C, 12 Leigham Court Road~~
~~0.6ha~~

Summary of Representations & Responses:

None received

Officer Note:

The site has been redeveloped for housing, and therefore the MDO designation is being deleted.

MDO 96

Unigate Depot 129 Valley Road

0.7ha

Summary of Representations & Responses (MDO):

Objection A:

The site should be allocated for housing purposes, as the proposal as drafted implies that it is to be restricted to social housing provision. Current national planning guidelines PPG3 advocates the promotion of mixed and balanced communities which conflicts with the approach being pursued by the council for the site. (Dairy Crest Group PLC)

Response A:

It would be inappropriate to make a blanket allocation for housing use as this is an operational employment site and any housing proposal would have to meet the tests of Policy 23. The site was identified as an affordable housing priority site in the deposit draft UDP to allow a priority exemption to the retention of employment policy, solely if the site was developed for affordable housing. However, on reflection, the large social housing site adjoining means that application of this policy to secure predominantly affordable housing is considered inappropriate, as it would not create the mixed and balanced community that both the Government and the Council are seeking. The unsuitability of the site for employment purposes/mixed uses would have to be demonstrated first at application stage.

MDO 97

**Valley Road Yard (Rear of 25-41 Valley Rd,
Access off Curtis Field Rd)**

0.4ha

Summary of Representations & Responses:

Objection A:

The overly prescriptive references to a broader mix of types of houses and the requirement to contribute to the open space should be deleted. (London Electricity)

Response A:

Partly accepted, reference to a broader mix of types of housing has been taken out. However, the proposal will add to the use of a very poor park and so mentioning of improvements to the park is considered essential. It is proposed to amend the policy to give urban design principles as for other MDO's.

Summary of Representations & Responses:**Objection A:**

The reference to a "cluster of high buildings" is overly permissive.
Revised trial sentence –

"Development may form the apex of the interchange of Vauxhall Cross but should not be significantly higher than surrounding buildings and should be in accordance with the intent of Policy 37 (English Heritage)

Response A:

Accepted in part - it is no longer proposed to refer explicitly to Vauxhall as being a site suitable for a cluster of tall buildings. Instead, the issue of 'over-height' buildings is dealt with under the new Policy 37 (Location and Design of Tall Buildings and Views). Each case will be dealt with on its own merits and assessed in relation to specific criteria pertaining to location, aesthetic quality, urban design quality, impact on traffic and impact on views.

Objection B:

Retain first sentence; delete third sentence; replace second sentence with 'The whole of the island site should be acquired for public use and developed as public open space, providing a 'green lung' for the surrounding high buildings and adding amenity to the new transport interchange.' (Chris Cossey)

Response B:

Not accepted – whilst the need and benefit of new public open space is recognized in the MDO description, it would be impractical for the Council to acquire the whole site and lay it out as such. Because of the location, it is likely that such a large open space this would create a windswept and noise ridden environment. This is a Brownfield site capable of high-density use next to a public transport interchange, the development of which could lead to considerable improvements to that interchange.

Objection C:

There appears to be a presumption in favour of the development of high buildings near the river. The residents of Vauxhall and Waterloo do not favour this approach. High buildings create a barrier between the local residential population and the river. They create exclusivity, form local wind tunnels, and give rise to a hostile environment. (Marylyn Evers)

Response C:

Accepted in part – see response to Objection A. The Development Framework for the area will consider the issue of microclimate effects.

Summary of Representations & Responses:**Objection A:**

Add third paragraph: 'Development above the station will include a significant amount of retail space, making this a main hub of new shopping provision in the Vauxhall Cross area. To improve amenity and safety, both the railway access archway (by relocating the ticket barriers) and the adjacent pedestrian archway (by introducing retail units) should be developed as public thoroughfares with active frontages. (Chris Cossey)

Response A:

Not accepted - it would be wrong to dictate the exact range of uses for a development site that is very much opportunity driven. In any event retail space should ideally be at grade, especially if it is to be the main hub of provision in the area. It may not be practical to have active frontage along the whole length of viaduct tunnels.

Objection B:

The concept of air-rights development over the existing station (and presumably viaduct) is not acceptable. If the air rights development comprises nothing above viaduct/platform height, this would be acceptable. (Westminster Society, Vauxhall Neighbourhood Housing Forum)

Response B:

Not accepted – no justification is given for this. At this location, it is unlikely to have a significant visual impact.

MDO 100

Bondway East (1-55 Bondway plus 56 Parry St. and Hilden House, Parry St.)

0.6ha

Summary of Representations & Responses:

Objection A:

While the relocation of hostels may be appropriate, sites for relocation should be identified in the policy. (Michael Ball, Vauxhall Neighbourhood Housing Forum)

Response A:

Upon further consideration of this issue, the Council considers that it is important to recognise the need for hostel provision in this MDO as they play a vital role as accommodation for people who are in various forms of housing need. This clause has been deleted from the MDO.

MDO 101

Effra Site, Wandsworth Road

2.5ha

Summary of Representations & Responses:

Objection A:

The text of MDO 101 should be amended to delete the statement that only one permission at anyone time will be permitted. (St George)

Response A:

Accepted – This is a development control management issue, and not the realm of a Unitary Development Plan.

Objection B:

This policy should be stronger in that no further development on the site should be higher/taller than the "butterfly" blocks of St. George's, and no further intensification of the existing site. (Louise Peachy - Secretary, Stockwell Park Conservation Society)

Response B:

Accepted in part – to be so definitive about the future use of the site would prejudice the assessment of future planning applications on the basis of their merits. Setting arbitrary restrictions on buildings heights is also considered to be contrary to good urban design principles – rather, all new development will be subject to an assessment under Policy 37. However it is proposed to amend the MDO to reflect the objector's concern about over-intensification.

Objection C:

Add 'Provision of retail units, restaurants and other community facilities should be located in one concentrated area, not dispersed.' (Chris Cossey)

Response C:

Noted – however, due to recent development on the site, there is no longer the opportunity to concentrate such facilities in one area.

Objection D:

Object – but supportive if following sentence is added: Development must provide connections through to the river and encourage desire lines between the river and hinterland. (Michael Ball – Vice Chair, Vauxhall Neighbourhood Housing Forum)

Response D:

Accepted – change proposed.

Objection E:

Suggest adding the following words: "No further intensification of development on site (e.g. 47 story tower block!)" (Stockwell Partnership)

Response E:

Accepted in part – see response to objection B above.

MDO 102	<u>Parry Street West (72 Bondway, 96 Wandsworth Rd, 18-22 Parry Street)</u>	1ha
MDO 103	Parry Street East	0.3ha
MDO 104	<u>5 & 21 Miles Street (Wendle Court & 131-137 Wandsworth Road)</u>	0.5ha
MDO 105	<u>Keybridge House South Lambeth Road and Various Properties in Wyvil Road</u>	2ha

Summary of Representations & Responses:

Objection A:

These areas (MDO's 102-105) are important and guidance needs to be provided on the usage. (Mrs J Gavin, Springfield Action Group)

Response A:

MDO's generally do not dictate uses. This is because a wide range of possible uses exists, particularly on accessible sites such as this one. In any event, policies on mixed use and requiring a certain percentage of floorspace uses apply. Mentioning specific uses in the MDO would therefore cause confusion.

Objection B:

Replace at least 1/3rd of floor space should be employment use with at least 1/2 of floor space should be employment use. (Vauxhall Neighbourhood Housing Forum)

Response B:

Not accepted – parts of this area are in low employment density. Redevelopment is likely to provide a significant increase in the number of jobs on-site with the 1/3rd requirement. It is also important to retain some degree of flexibility as demand for office space in Vauxhall Cross may not in the medium term be as high as it is now.

MDO 106
2.4ha

Nine Elms Sainsburys (Wandsworth Rd)

Summary of Representations & Responses:

Objection A:

I object to the word "intensive" as this area of the Wandsworth Road already has a high population density but only limited public transport capacity. There needs to be a limit as the height to which the developers can build. There needs to be an appreciation of the impact on traffic congestion that this development could create. (Mrs J. Gavin, Springfield Action Group)

Response A:

Not accepted – the area has very good public transport accessibility, and plans for improved capacity, being so close to Vauxhall Cross. The development would have very limited car parking, in line with Boroughwide policy, and so would not cause traffic congestion.

Objection B:

We support the identification of the existing Sainsbury's supermarket and car park in the Plan as having potential for development that is more intensive. We object however to prescribing details in advance of any scheme being considered. (J Sainsbury's Plc.)

Response B:

Not accepted – the MDO is framed in very general terms. The objector is effectively saying that MDO's should have no policy content, which is unreasonable. The requirements for the development of the site in terms of public space and active frontage are those suggested by CABE following design review of the site.

Objection C:

Suggest adding following form of words: "No further intensification of development on site (e.g. 47 storey tower block!). (Stockwell Partnership)

Response C:

Not accepted – the site is ideally suited for intensification. The current supermarket makes very poor use of the site. Government specifically encourages intensive use of sites such as this for housing. Tall building applications will be assessed against Policy 37.

MDO 107

**39-59 South Lambeth Road (Timber Yard)
1.2ha**

Summary of Representations & Responses:

Objection A:

The site is in very active commercial use, providing a useful local service and a substantial number of manual and other jobs within walking distance of local people. We do not think the loss of all this employment should be allowed. (Vivian Aylmer, Neil Saunders, Albert Square & St Stephens Residents Assoc., George Wright – Director, Stockwell Partnership)

Response A:

Accepted - it is acknowledged that the site does offer some local employment, though it also detracts from the visual amenity of the area which contains a number of listed and historic buildings. It is therefore proposed to amend the MDO to require the retention of the employment on site and to encourage improvements to the South Lambeth Road frontage to the site.

MDO 108

**Former Lawn Lane Primary School (Now
Lawn Lane Centre, Lawn Lane)**

0.4ha

Summary of Representations & Responses:

None received

MDO 109

1-3 Glyn Street

0.4ha

Summary of Representations & Responses:

Objection A:

Removal of roads has implications for local business owners to parking places; development should avoid overshadowing. Buildings should be 5 storeys or lower in keeping with local grade II listed buildings. (Diane Sullock)

Response A:

Not accepted – businesses should not consider they have a right to park on this road, especially given modern policies on traffic restraint. Avoiding unacceptable overshadowing is a factor that is considered, according to boroughwide policies as it applies to all significant development. It is inappropriate for individual MDO's to set height limits, as this will be considered on a case-by-case basis against boroughwide and local design policies.

Objection B:

Map and text do not match. (Michael Ball, Vice Chair – Vauxhall Neighbourhood Housing Forum)

Response B:

Noted.

MDO 110 Lambeth Walk/Ethelred Estate

Summary of Representations & Responses (MDO):

Objection A:

There should be a reference in (e) to working with TfL to improve access to public transport. (Mayor of London)

Response A:

Accepted – amendment proposed.

Objection B:

Object to in principle; support for demolition of listed school, subject to amended wording (English Heritage, Ambo Architects, and Various Local Residents)

Response B:

Accepted that the wording is flawed and so it is proposed to be amended to meet the statutory tests. However, the Council and many in the local community do not think that the building is worthy of listing. After all, its listing was sought as a blocking measure to Project Vauxhall, it has now been blocked, and the listing of the school poses severe constraints for the future regeneration of the estate.

Objection C:

Should retain and not relocate Lambeth Walk Shopping Area, it has not failed and it is an essential local amenity (Former Cllr Boodram, Vauxhall Neighbourhood Housing Forum, Waterloo Town Centre Board, Many local residents and shopkeepers)

Response C:

Accepted – this will be designated a local parade, and will be shown as such on the Proposals Map.

Objection D:

Should recognise planning mistakes of the past (Chris Cossey)

Response D:

The MDO seeks to recognise and undo planning mistakes of the past, and ensure that new development addresses and meets the needs of the local community.

Objection E:

Protect Black Prince Road shops. (Chris Cossey)

Response E:

Accepted – this will be designated a local parade, and will be shown as such on the proposals map.

Objection F:

Development at Kerrin Point should be at a lower density. (Chris Cossey)

Response F:

Not accepted. Kerrin Point was high-rise, but like many developments of the period its open setting meant that it was not of higher density than the housing it replaced.

Objection G:

Lilian Baylis School (or site) should be for community facilities and open space and not housing. (Chris Cossey, Vauxhall Neighbourhood Housing Forum)

Response G:

Noted- however, if not suitable and/ or viable for educational/ community use for which there is local demand, then redevelopment for a mix of uses including housing would be expected.

Objection H:

This site on Kennington Road including the Ethelred Youth Club is public open space. It was created as part of Lambeth Walk Open Space in 1972 within the Lambeth Walk Comprehensive redevelopment. The Youth Club was granted various permissions in the 1970's and 1980's on the basis that this use was commensurate with public open space use.

The site was transferred from the GLC to LBL in 1983 on this basis. It is therefore inappropriate to allow development of the site, other than for uses commensurate with public open space use, such as for sports or youth activities. (Friends of Lambeth Walk Open Space, Kennington, Oval & Vauxhall Town Centre Partnership Board, Waterloo Town Centre Board, Ambo Architects, Vauxhall Neighbourhood Housing Forum, Manor of Kennington Residents Association and a number of local residents)

Response H:

Partly accepted – in the past the land has not been recognised as public open space by Lambeth. The adopted Unitary Development Plan (Fig 10.1) shows that the Kennington Road frontage as outside the boundary of the Lambeth Walk public open space. This was upheld in a Judicial Review of the case of Glosby V London Borough of Lambeth. However the Council accepts that the site can form a useful extension to the adjoining Lambeth Walk Public Open Space, enabling it to better fulfil its function as a local park, in an otherwise dense urban area, and to give it a more prominent frontage along Kennington Road. Accordingly it is proposed to designate the area as Public Open Space in its new Unitary Development Plan.

Objection I:

Do not support the redesigning and or partially relocation of Lambeth Walk Open Space. We challenge the suggestion and question the evidence that Lambeth Walk Open Space is unsafe and a policy would achieve safety or even the perception of safety. More so, housing currently overlooks the site (Friends of Archbishops Park, Friends of Lambeth Walk, Kennington, Oval & Vauxhall Town Centre Partnership Board, Waterloo Town Centre, Board Manor of Kennington Residents Association, Former Cllr Boodram and a number of local residents)

Response I:

Accepted in part – It is now proposed that there would be no loss of public open space at Lambeth Walk Open Space. The Friends of Lambeth Walk Open Space were awarded significant funding for the creation of a Lambeth Walk Doorstep Green at the end of 2003. Lambeth have signed a contract stating the site is designated as a Doorstep Green for 25 years, which means that the authority guarantee that the site is protected for that period. Between 2004 and 2006, the regeneration works planned for the open space include community safety measures, amenity and accessibility improvements relating to paths, signage perimeter treatments, planting, dealing with dog mess and litter, and the re-introduction of permanent seating.

Objection J:

Lambeth Walk Open Space should be designated as a Park. (former Cllr Boodram, Vauxhall Neighbourhood Housing Forum)

Response J:

Accepted - it will be designated as public open space and shown as such on the Proposals Map.

Objection K:

Kerrin Point should be public open space. (Ambo Architects)

Response K:

Not accepted – it is previously developed urban land previously in housing use. Government policy prioritises such sites for housing. Lambeth and London face a critical shortage of housing. As part of a wider development site, it offers the opportunity to create a gateway that would be part of a wider regeneration of the area. This would be lost if this was accepted.

Objection L:

Delete 'Development in' and replace with 'improvements to'. Replace 'area development scheme' with 'area improvement scheme'. (Vauxhall Neighbourhood Housing Forum)

Response L:

Accepted in part – it is unrealistic to pose one as an alternative to the other, both will be necessary.

Objection M:

Add after 'a new heart for Lambeth Walk' 'through partnership with local community groups and a community master planning exercise'. (Vauxhall Neighbourhood Housing Forum)

Response M:

Accepted in part- any development or improvement of Lambeth Walk/Ethelred Estate would involve community groups and seek to address the needs of the local community. However this MDO should highlight the aspirations/ objectives for this site by the Council, rather specify the process by which they are achieved.

Objection N:

Replace (g) with 'increasing the population of the area only where sympathetic interventions identified through a master planning exercise involving the whole community make this possible.' (Vauxhall Neighbourhood Housing Forum)

Response N:

Accepted in part – In particular the Mayor of London has set challenging housing targets for this site (2,000 units). It is proposed that in the revised deposit plan this be reduced to 1,000 in the light of the more pragmatic approach, however a lower figure is unlikely to be acceptable to the Mayor, and so it is necessary to stress in the MDO that significant new housing is necessary.

Objection O:

No demolition, no private housing. (Various local residents)

Response O:

Not accepted - private housing may be necessary to help pay for redevelopment/improvements and in line with government policy to help provide a more mixed and balanced community.

Objection P:

Add 'refurbishment and improvements to the Lambeth Walk shopping parade and market commensurate with designation as a local centre'. (Vauxhall Neighbourhood Housing Forum)

Response P:

Accepted – amended accordingly.

Objection Q:

We need a swimming pool. (Mrs Jane McCarthy)

Response Q:

Noted - Sporting facilities for the area will be determined as part of the redevelopment of the site, however the areas poor public transport accessibility make it unsuitable for a large sports centre.

Objection R:

The millions used for regeneration could be used for making repairs instead. (Various Local residents)

Response R:

Noted - however this is not the situation. Funding would come from the private sector, which would fund redevelopment, but could also fund some refurbished blocks. Redevelopment would only be chosen over refurbishment as part of an options appraisal within a community-led master plan if it were the economic option.

Objection S:

Introduce CCTV in Lambeth Walk. (Various local residents and shopkeepers)

Response S:

Accepted – subject to funding. CCTV would be part of a package of measures to improve security in the area.

Objection T:

Why is Lambeth proposing demolition – we want to stay (Various local residents)

Response T:

Not accepted - Lambeth is not proposing substantial demolition. Any amendment to the MDO has been included to this effect.

Objection U:

What of the youth club? The long outstanding question of the Club's future needs to be resolved and guaranteed. (Ethelred Youth Club)

Response U:

Accepted – amendment made. The youth club should remain unless it wishes to move.

MDO 111 — Former Vauxhall Primary School, — 0.9ha

Summary of Representations & Responses:

Objection A:

It is likely that there will be a real shortage of school places either in the near future, or when performance problems in Vauxhall School have been overcome. Unless the UDP is clearly able to point to the potential for increased provision elsewhere in the immediate area, the school should be retained as an educational establishment. (Sarah O'Connell, Chair- Friends of Archbishops Park)

Response A:

Accepted – As a result of a recent review of its education accommodation, the Council now considers Vauxhall School as necessary accommodation, primarily for its strategic value as an overspill site. The school will remain on the site. Any future proposal to release the site from education use will be assessed against the UDP policies on loss of community facilities. In light of this decision, it is not considered necessary to use the opportunity of the UDP to stake out the potential future use of the site in part or completely for other uses. Consequently it is proposed to delete this MDO.

Objection B:

The school is in use and there are no plans to close. (Michael Ball - Vice Chair, Vauxhall Neighbourhood Housing Forum)

Response B:

Accepted – As a result of a recent review of its education accommodation, the Council now considers Vauxhall School as necessary accommodation, primarily for its strategic value as an overspill site. The school will remain on the site. Any future proposal to release the site from education use will be assessed against the UDP policies on loss of community facilities. In light of this decision, it is not considered necessary to use the opportunity of the UDP to stake out the potential future use of the site in part or completely for other uses. Consequently it is proposed to delete this MDO.

MDO 112

**Former Beaufoy Institute (Lilian Baylis
Annexe, 39 Black Prince Rd)**

0.4ha

Summary of Representations & Responses:

Objection A:

There is a vibrant arts and crafts community in North Lambeth. There is a shortage of studio space. I am objecting to the suggestion that the Beaufoy car park should be developed for housing and that the arts/education use might move elsewhere in the Borough/Vauxhall. (Celia Stothard)

Response A:

This is a misreading of the policy. There is no suggestion that education use moves from the site and an amendment is proposed to make this clear. The original school building must stay in education use due to the covenant. However, it would be going too far to insist that educational use stay on the whole of the site if this were not required. The site offers the potential for a variety of mixed-use schemes, meeting the pressing demands of Lambeth, subject to other Plan policies, should Education no longer require it.

Objection B:

The clause accompanying this MDO refers to 'complementary development'. This is coupled with the 'potential relocation of uses elsewhere..' Taken together this policy would seem to conflict with the Borough's responsibility to protect one of its listed buildings, and one with a use that is protected by covenant. (Paul Baker, Amo Architects)

Response B:

Please see response to A. The listed building is fully protected in the MDO description, as is the covenanted use. The second sentence is proposed to be removed. The Education Department currently retain an interest in the site. When or if this is relinquished, any number of uses may be acceptable.

Objection C:

It is not clear what the second sentence of the policy means. The building would be an ideal asset base for a community-managed organisation, which would be the focus for delivery of community development and neighbourhood renewal. Riverside SRB have established a Community Development Trust and have proposed use of the Beaufoy for this purpose, and are committed to engaging the whole community in a master planning exercise during 2002. Replace second Para with "Refurbishment of building for community use to facilitate the regeneration of Vauxhall". (Vauxhall Neighbourhood Housing Forum).

Response C:

The second sentence is to be deleted. The covenant protects the use of the listed building for education use. Education currently retain their interest in the site but if this is relinquished, any number of uses may be acceptable, including the uses proposed. Whilst the Community Development Trust may be a suitable use for the site, the UDP can not safeguard a site for a use which does not equate with its lawful planning status.

Objection D:

Beaufoy Institute is protected and needs a facility of its own, car park/adjacent land. (Julia Wright)

Response D:

The site offers the potential for a variety of schemes and uses, subject to the covenant and the interest of Education in the site. Potentially a facility for the Beaufoy Institute could be created under the description of intended uses and continuation of existing uses already provided. See proposed changes.

MDO 113

Waterloo Station (Land under Waterloo Station)

9.2ha

Summary of Representations & Responses (to Policy):

Objection A:

Add increased emphasis on bus interchange. (Mayor of London)

Response A:

Accepted – change made.

Objection B:

Replacement of Cornwall Road Bus Garage without an alternative suitable facility being provided elsewhere in the Waterloo area is unacceptable to TFL. (Mayor of London)

Response B:

Accepted in part – however the wording proposed by TfL would be weak and provide no lever as part of the Waterloo Station planning application to require Railtrack to find an alternative location – hence a tougher form of wording is proposed.

Objection C:

Concerns about the references to "air-rights development" and "development above the station." These references should be omitted in the absence of firm proposals for these forms of development. Reference should be included to the character of the historic London Railway terminus and the desirability of retaining its present form and function. (English Heritage)

Response C:

Not accepted – it is important to set a firm policy framework as a basis for the detailed appraisal work that has now commenced on the future of Waterloo Station. It is clear that significant air-rights development, as at Charring Cross and Liverpool Street, will be necessary to pay for the remodelling of what is Europe's largest railway terminus that is now close to capacity. This may require radical remodelling of its form and function – subject to conservation constraints. The Secretary of State has now considered this matter, and has only decided to list the Waterloo Victory Arch. As such, there is no statutory conservation designation, which would prohibit air-rights development or the remodelling of the station.

Objection D:

Railtrack support the above policy but consider that reference should be made to the suitability of the location for appropriate high density/high rise development. Reference should also be made to the requirement for central developers' fund. (Richard Coburn, Railtrack)

Response D:

Not accepted – a central developers fund is referred to under Policy 74 (as proposed to be amended) however it is to be expected that this will not significantly cover works to the main terminus as it is to be expected that this will be mainly funded from development. General policies (e.g. 37 and 12) cover the issues of high density and high-rise development and it would be inappropriate to repeat them here.

Objection E:

We are concerned that any proposals to develop the station will absorb the additional transport capacity. It should not in any way impinge on or overwhelm residential amenities within the conservation area. (Roger Woodley, Chair – Lambeth Estate Residents Assoc.)

Response E:

Accepted – changes proposed.

Objection F:

Waterloo Station is the main transport hub in the area; the 'at grade' pedestrian route implied by this policy is inadequate. The policy should also recognise the importance of providing level access from the north bank of the Thames via Hungerford Bridge to Waterloo Station

and support should be given for an upper level pedestrian route that achieves equality of access. (Mike Mc Cart, the South Bank Centre)

Response F:

Accepted – changes proposed.

Objection G:

Policy does not adequately address the historic blight of Waterloo Station on Waterloo as a whole. It is the single most important barrier to the regeneration of the hinterland to the east side of the station. (CC Smith)

Response G:

This is covered in clause (f) of the policy.

Objection H:

Although re-development of Waterloo is necessary, an integrated master plan that deals with the entire Waterloo area is required so that phased development, community aspirations and corporate interest are better balanced. (Edith Fekarurhobo, Waterloo Community Development)

Response H:

Noted – The Council is working with the GLA on the initial stages of the Waterloo Development Framework, which will look at the area comprehensively. Once completed and adopted – as intended – as Supplementary Planning Guidance to the UDP, it will help guide development to ensure it is appropriate and balanced in the way the objector has pointed out.

Objection I:

However, a shopping centre on the South Bank, in the Conservation Area? NO. The brief for redeveloping Waterloo Station once again demonstrates a naive expectation that planning can mean you have it all - clause (h), and possibly this clause needs rephrasing to prevent it becoming a holy grail for the architectural profession. (Anne Burke & Marina Thaine, County Hall Residents Assoc.)

Response I:

Accepted – see proposed changes to Policy 77 and MDO 115 which, along with the revised definition of the edge-of-centre boundary around the Lower Marsh District Centre, remove the former aspiration for the creation of a new Waterloo District Centre from the emerging UDP.

Summary of Representations & Responses (to paragraph 5.16.46):

Objection A:

The policy as worded omits reference to TfL's interim bus station in Tennyson Way, giving an incomplete picture (Mayor of London)

Response A:

Accepted – change made.

MDO 114

Elizabeth House – York Road

0.4ha

Summary of Representations & Responses:

Objection A:

This is incongruous: take the barriers down on one side of York Road, and allow them to go up on the other side, in the Conservation Area. This does not string together sensibly as a coherent plan for the area, and smacks of one-off site speculation. (Anne Burke & Marina Thaine, County Hall Residents Assoc.)

Response A:

The objection gives no indication as to how the MDO should be changed.

MDO 115

**Shell Centre Upstream, Building and Offices,
2-8 York Road
2.4ha**

Summary of Representations & Responses:

Objection A:

Add to the end of the last sentence: "being displaced from Jubilee Gardens, as well as some parking provision for people with disabilities and some parking for tourist coaches." (Mayor of London)

Response A:

Accepted – amendment proposed.

Objection B:

Building on this site will cause severe loss of amenity, aspect and light to many residential units within County Hall, which has always had the benefit of open space between Chicheley Street and The Shell Centre. Indeed the proposed policy virtually guarantees 'intensive' office and leisure development in this mixed use, now a highly residential, conservation area; not to mention that it conflicts with seven other policies. (Anne & Mike Burke County Hall Owners and Residents Association, Ms Esther Wang & Mdm Chwee Keng Wong, Graham Brown, P. Cariiss, Dr Nicholas M. Luscombe, Dr P.J. Nicholson, Karen Cruttenden, Phillip Burley, Dr M.D. O'Brien, Marina & Peter Thaine and Robert Allison)

Response B:

Accepted: The Council now accepts that the podium space is public open space. Shell's recent application for a mixed use development on the podium site was refused, with insufficient justification in relation to the need for such a retail facility in this location, and loss of public open space being cited as the key reasons for refusal. Amendments are proposed to this MDO so as to reflect the Council's decision that the site should constitute public open space and its desire – and that of the majority of objectors to this MDO – to retain the openness afforded to the immediate area by this open space.

The issue of loss of light is a detailed matter that will be dealt with in considering a detailed planning application for the site. The day lighting and sun lighting study submitted with any application will have to show that the impact is within acceptable limits.

Objection C:

Objection is raised to the final sentence of this policy which states that there will be 'Utilisation of basement car/parking servicing to house operational parking for South Bank Centre being displaced from Jubilee Gardens. The car park has two roles, an operational role and the provision of a visitor car park. Its operational role serves the artists and performers, the large numbers of stewards, many of whom are retirement age, needed to staff the building in line with the Entertainment Licensing laws and key employees working unsociable hours at venues operational for 18 hours a day, 364 days a year. (Mike Mc Cart, the South Bank Centre, Shell International Petroleum Co. & Lend Lease Euro)

Response C:

It is fully accepted that there are operational needs of the South Bank Centre. Policy 76 (see responses to objections) deals with these matters in more detail. The South Bank Parking Study found that only around 75 of the spaces at the South Bank Centre arose from operational requirements (although this may rise with the redevelopment of the centre), which means the majority of these are commercial. The profit gained from this car park is not a material planning consideration. Given current policies of traffic restraint it is to be expected that where opportunities arise these, and large private car parks such as at Shell, should be removed. The moving of operational parking to the Shell basement will free up the Hungerford Car Park to be laid out, along with Jubilee Gardens, as a world class public park.

Objection D:

There are strong concerns that these policies will fail to adequately protect Lower Marsh District Shopping Centre, and will fail to prevent Waterloo making the mistakes of an area like Victoria Street. 'Cross-River High Street': it is not clear why an extension of the West End will be of benefit to Waterloo. Whether Waterloo has the features and characteristics (including infrastructure and space) to act as a continuation of the West End; how it will complement Lower Marsh as well as the numerous other activities proposed for the area. There is a strong view that a supermarket for the area would be better placed at Upper Marsh/ Westminster Bridge road, near, or at Lower Marsh, serving as an anchor store for Lower Marsh, rather than at the Shell Centre or York Road. (Michael Ball, Waterloo Community Development Group)

Response D:

Accepted in part – In its recent refusal of Shell's application for a mixed use development, the Council was not convinced of the need for a retail facility of the proposed size in this particular location, away from other centres or agglomerations of retail activity. But the Council considered that the proposed store did not have an unacceptable impact on Lower Marsh shopping centre. Proposed amendments to the MDO description to prevent development of the podium site may partly satisfy this objection, but the Council can not completely rule out the possibility of some retail development on the greater Shell site at some point in the future, if a satisfactory demonstration of need can be made.

Objection E:

Object to the requirement to provide 'public' open space on part of the podium. The podium is not and should not be designated a public open space. Current proposals, which are the subject of planning applications before your Council, provide open space that is accessible to the public and it is considered that this meets any aspiration in this respect. (Shell International Petroleum Co. & Lend Lease Euro)

Response E:

Not accepted – The Council considers that the Shell Centre Podium constitutes public open space of significant benefit to both local residential communities and visitors to the area, by virtue of its allowing full and unrestricted visual and pedestrian access to the River. It is proposed to amend the MDO description to reflect this Council position.

MDO 116

**The South Bank Centre Arts Complex -
includes National Theatre, Royal Festival Hall,
Queen Elizabeth Hall, Hayward Gallery**

5.3ha

Summary of Representations & Responses:

Objection A:

Objection is raised to the extent of the MDO boundary that covers the Hungerford Car Park, which is designated as Metropolitan Open Land. The inclusion of Hungerford car park within this boundary and the resultant simultaneous designations of the same land, as both Metropolitan Open Land and a Major Development Site are contradictory and create uncertainty in the plan. The boundary should be redrawn to exclude Hungerford car park (Mayor of London, Marilyn Evers, Mr M. Forwood, Peter Harris and J. & C. Finamore)

Response A:

Accepted – A consultant's study (BDP) commissioned by the Council to assess the issues surrounding the potential planning conflict between these two designations of Hungerford Car Park in the light of objections to the initial Deposit Draft UDP, has recently been completed. The report concluded that the designations are generally in conflict with each other and that in this instance, the only reason to entertain the dual designation would be for the benefit of the expansion of the South Bank Centre. The South Bank Centre's aspirations to develop the Hungerford car park site have to be balanced against the case to improve the existing adjacent open space and extend over this site. The Council has now more fully considered the relative merits of allowing SBC to expand on to this site versus extending Jubilee Gardens onto the Hungerford Car Park site and creating a world class public open space on the MOL land, and considers that the latter is the prudent way to proceed. In the light of the substantial development pressures and the priority given to open space protection and enhancement, the Council concludes that there is a stronger case for the car park to be used as open space than to extend the South Bank Centre over all or part of the Hungerford car park site. Following on from a recommendation in the consultants study, it is now proposed to put together a planning brief for the existing South Bank Centre site in order to maximise development options for their future aspirations. The MDO designation for the South Bank Centre on the Proposals Map will therefore be redrawn to exclude the Hungerford Car Park site. The car park site itself will be re-designated with a Parks notation (in addition to its current MOL designation) signifying the Council's intention that the site should become part of Jubilee Gardens public open space.

Objection B:

In (C) add "Waterloo Bridge - Grade II*" after RfH and "RNT in line one. (English Heritage)

Response B:

Accepted – amendment made.

Objection C:

English Heritage generally supports the proposal to improve the Arts Centre and adjoining areas within the framework of an agreed master plan. However, there should be safeguards for the character and appearance of the buildings and their settings and the wider area. Amendments suggested below. The demolition of key Arts buildings should not be pre-empted by the policy, which should be more flexibly worded. (English Heritage)

Response C:

Accepted – amendment made.

Objection D:

This is Britain's main arts complex and the world's largest concentration of cultural facilities. It would be a tragedy if the centre were to be marred with large-scale commercial development on the pretext of providing funding. (Martin York, Stanthorpe Triangle residents Assoc.)

Response D:

The MDO contains strict controls to ensure that this does not happen.

Objection E:

Objection is raised to Part (i) of MDO116 which refers to 'no increase in car parking with Hungerford Car Park relocated.' The existing operational use of the Hungerford Car Park is essential to functioning of the SBC and the income from the car park generated supports the revenue cost of keeping the arts and performance facilities functioning. Financial constraints do not allow their re-provision elsewhere on the estate. (Mike Mc Cart, South Bank Centre)

Response E:

See responses to Policy 76.

Objection F:

I would like to argue that this unique site which is important to London as a whole, as well as to local residents, should be made available to the public as soon as possible and that the ownership should be safeguarded by a body the equivalent of the National Trust. (Max Nasatyr RIBA)

Response F:

Noted – however site ownership is not a material planning consideration. The site is nationally owned.

Objection G:

It should not be designated as a Parks Regeneration Area. (Marilyn Evers)

Response G:

Accepted – this designation has been deleted from the plan.

Objection H:

Paragraph (a) refers to an 'informally' agreed plan, which does not refer to the involvement of residents. Consultation with and the support of the local community are fundamental to the future of this area. (Marilyn Evers, Mrs Nulifer York)

Response H:

Accepted in part – Amendments have been made to the MDO to refer to a need for conformity in the South Bank master-planning process with the forthcoming Waterloo Development Framework, which will be jointly prepared by the GLA and Lambeth. Effective community consultation will be part of the preparation of the Framework. However, the South Bank Centre may wish to pursue its own master-planning exercise and it is the obligation of the local authority to consider any application submitted. The Council would hope that SBC would involve the local community through all stages of its master-planning exercise. There would of course be public consultation carried out by the Council as part of any application submitted for the redevelopment of the arts complex.

Objection I:

Paragraph (e) states that higher buildings 'must have a positive architectural relationship with the existing buildings. This is a vague and superficial statement, which will not give clear guidance to members or officers in making decisions on planning applications. The criteria must be more detailed, clearer and tighter. (Marilyn Evers)

Response I:

Accepted in part – it is proposed to add criteria to the policy and in any event normal boroughwide and Waterloo design policies apply.

Objection J:

The Shell Podium site should be designated as public open space. (Leslie Boodram, Francis Forest, Waterloo Town Centre Board, Ms Esther Wang & Mdm Chwee Keng Wong)

Response J:

This appears to be an objection to the wrong policy. Please see responses to MDO 115.

Objection K:

In, sub-paragraph (c) delete "the Secretary of State.... towards St Paul's". (Michael Ball, Waterloo Community Development Group)

Response K:

Not accepted – see changes made at the request of English Heritage, no justification given for this objection.

Objection L:

In (a) add after 'and with demonstrable public and local community support' (Michael Ball, Waterloo Community Development Group)

Response L:

Accepted in part – Amendments have been made to the MDO to refer to a need for conformity in the South Bank master-planning process with the forthcoming Waterloo Development Framework, which will be jointly prepared by the GLA and Lambeth. Effective community consultation will be part of the preparation of the Framework. However, the South Bank Centre may wish to pursue its own master-planning exercise and it is the obligation of the local authority to consider any application submitted. The Council would hope that SBC would involve the local community through all stages of its master-planning exercise. There would of course be public consultation carried out by the Council as part of any application submitted for the redevelopment of the arts complex. The wording suggested cannot be accepted as costs can be awarded against local authorities which determine planning applications solely on the basis of public opposition.

Objection M:

(b) after 'proposed' add "which is integral to a strategic London-wide arts and culture strategy and demonstrates viability. And after 'overall' add 'particular' (Michael Ball, Waterloo Community Development Group)

Response M:

Accepted – change made.

Objection N:

In (e) add to end "Proposals to build above the line of the RFH will not be acceptable". (Michael Ball, Waterloo Community Development Group)

Response N:

Not accepted – as stated in responses to objections on building height the general horizontal emphasis of the South Bank is punctuated by occasional taller buildings such as Oxo Tower, the London Eye, and the Shell Centre, there is the potential to do this at the South Bank Centre. Such a building may also be necessary to ensure financial viability.

Objection O:

In (f) replace 'the amount of any' with 'minimal' and after 'enabling development' add 'only provided it has no impact on the public perception of the quarter as an arts centre, and must be supported by a publicly scrutinised...' (Michael Ball, Waterloo Community Development Group)

Response O:

This is already covered by the other clauses (as proposed to be amended) and would create repetition.

Objection P:

The overall character of the area as an 'arts space' is in conflict with the proposed development as a commercial work area. Office block and high-rise residential blocks should not be included on this site. (Mrs Nulifer York)

Response P:

The MDO contains strict controls to ensure the right balance and to protect this character.

Objection Q:

The de-designation of the strip of land alongside the viaduct is inappropriate when viewed against the criteria of RPG3 and PPG2. The MOL should extend up to Hungerford Bridge. Past use of the strip of land beside the bridge for access to the Royal Festival Hall is

insufficient reason to de-designate this zone. (Donald Weighton, Friends of Jubilee Gardens, Jeremy Cross)

Response Q:

Accepted – For the reasons set out in the response to Objection A above, the Council considers it appropriate to designate the whole of the Hungerford Car Park site, including the access strip, as MOL.

Objection R:

Include recognition that the removal of the unlisted buildings in the conservation area will require justification in terms of the tests set out in PPG 15. (Mike McCart, South Bank Centre)

Response R:

Accepted – Amendment made in response to the objection from English Heritage.

Objection S:

Add a new part. (i) individual sites being developed within the following principles and framework of the agreed Urban Design Strategy for the South Bank Centre which has regard to:

- Clearer pedestrian movement
- Active street frontages
- The separation of pedestrians from service lanes and delivery yards - New public squares and open spaces. Access for people with disabilities. (Mike Mc Cart, South Bank Centre)

Response S:

Accepted – changes made.

**MDO 117 Former County Hall (Riverside), Belvedere
Rd,**

2.2ha

Summary of Representations & Responses:

Objection A:

The wording 'Restriction of use for Queen' Walk for sitting out areas/kiosks to preserve unrestricted public access', is NOT SUFFICIENTLY EXPLICIT. " 'Pavement café' use must not be allowed and kiosks, street trading etc must be prohibited as a public, open, pedestrian area. (Marilyn Evers)

Response A:

The pavement café immediately outside the main entrance has permission, and it is not this but the multiples of other stalls and installations blocking the Queens Walk which cause problems.

MDO 118

**One Westminster Bridge (County Hall Island
Block/~~Ellington~~ Addington Street) 2.4ha**

Summary of Representations & Responses:

Objection A:

Add "and views from the Palace of Westminster/Westminster Abbey World Heritage Site" at end of sentence (English Heritage)

Response A:

Accepted – change made.

Objection B:

The proposal is far too restrictive in its approach to the design of the new building and is accordingly preventive, the imaginative re-development of the County Hall Island site, itself, an ugly and menfleur feature of a principle access to the city of Westminster. (MP R. Handley, Westminster Society)

Response B:

Not accepted – the wording derives from the called-in decision and the constraints set down by the Secretary of State which led him to judge that the 'bridging over' the street was unacceptable.

Objection C:

The ongoing operability of the Trust's General Lying-in Hospital is of critical importance to the Trust. We would re-iterate our concerns about off-street vehicular access being maintained in the long term. (Dr Jonathon Michael, Guy's & St Thomas's Hospital Trust)

Response C:

Accepted – change made.

Objection D:

Object to the wording of MDO 118 and request that it is rewritten to amend inaccuracies and provide greater clarity on the appropriate form of development. It should state "Development must preserve the setting of the listed County Hall Riverside Building and General Lying-In Hospital. The site's incorporation within the Waterloo Office Regeneration Area and proximity to a strategic transport hub make it suitable for high density, large scale office development which could take the form of high buildings. The development should avoid a bridge link between the two sites. Creation of a new open space on part of the former roundabout closed to traffic in the peninsulation scheme. Improvements to cyclists, bus, pedestrian and viaduct routes." (Frogmore Investments Ltd)

Response D:

The suggested wording omits the County Hall North and South blocks which make a positive contribution to the character and appearance of the South Bank conservation area. As with all MDO sites it is not necessary to indicate uses as policies permitting a variety of uses and requiring mixed uses apply. Listing certain uses would imply that policies on mixed uses do not apply. Similarly it is not necessary to indicate the likely scale of development, as this would be inappropriate given the constraints on height following the Secretary of State's decision, given that the site is allocated as part of a Transport Development Area by policy 12. Other transport amendments made.

Objection E:

It's a pity it took the expense, in terms of time and money, to determine a reasonable outline proposal for these sites. The traffic system remains a nightmare. (Anne Burke & Marina Thaine, County Hall Residents Assoc.)

Response E:

It is unclear what the basis of the objection is.

Objection F:

We object to the second line of this policy, where it refers to the "site to north". It is unclear as to whether this relates to the land to the north that is still contained within the defined

boundary of MDO 118 or whether it relates to land to the north, that lies just outside the defined MOO 118 boundary. (Prospect)

Response F:

Accepted – change made.

Objection G:

Correct site boundary (Frogmore)

Response G:

Accepted – change made to the Proposals Map.

MDO 119
7.1ha

St Thomas Hospital, Lambeth Palace Rd

Summary of Representations & Responses:

Objection A:

The central pedestrian spine through the hospital site should be opened up (Mayor of London)

Response A:

Accepted – however it is necessary to emphasise the importance of security here, this is also a grave and genuine concern of the hospital. However examples such as Guys illustrate that modern hospitals can still operate without them being grave and hostile enclosed enclaves.

Objection B:

The overall emphasis of this policy is seeking to enhance the built environment of Waterloo; we have serious concerns about the pedestrian link proposed on the river frontage of St. Thomas' Hospital. Such an access may have an adverse impact on our patient and staff security. (NHS Executive)

Response B:

Not accepted – the open space next to Westminster Bridge is open to the public but is inaccessible from the riverside walk, this is unacceptable on a riverside location in Central London. The Hospital buildings form a quadrangle behind this and security can properly be exercised at this point.

Objection C:

Although we support much of this section, including street frontage on Lambeth Palace rd: -

- The policy is unclear on the council's view towards alterations in the MID. Victorian ward blocks. The Trust would wish in the longer term to replace present sectional in fill buildings between the ward wings with more appropriate infill.
- The Trust continues to object to opening up the river walk into the Hospital grounds.

(Dr Jonathon Michael, Guy's & St Thomas' Hospital Trust)

Response C:

Accepted – amendment made.

MDO 120

**York House, 199 Westminster Bridge Rd and
Beckett House, Lambeth Palace Rd 0.9ha**

Summary of Representations & Responses:

None received

MDO 121

**Royal Street/Upper Marsh (Founders Place)
(Various Addresses)**

1.8ha

Summary of Representations & Responses:

Objection A:

The Foundation is broadly supportive of the policy and welcomes the explicit recognition of the development potential of this important site. However, the Foundation considers that the policy should not be prescriptive on the creation of a new entrance to Archbishops Park. (Guy's & St Thomas's Charitable Foundation)

Response A:

Not accepted – It is intended to improve the existing park entrance by extending it and improving it around Carlisle Road rather than creating a new entrance. The extension of the existing line of Plane Trees across the site is the logical landscape design solution across the site. This land was originally allocated in the Waterloo District Plan for wholly park extension use (south of Royal Street) this was amended in the original UDP to 'park extension across part of the site'. This is considered a reasonable compromise, which in any event will involve a small part of the site south of Royal Street.

Objection B:

The third paragraph should read: Extension of Archbishops Park on part of the site, and contributions towards improving it. Delete the rest of the sentence. (Friends of Archbishops Park)

Response B:

Accepted in part – it is intended to improve the park entrance around Carlisle Lane and the proposed re-wording reflects this.

Objection C:

The request that the 'roof-scape' enhancing the character of the park is ambiguous. It could be taken as calling for an imposing dramatic roofline. Given that the buildings visible from the park are mainly historic and one of the key features of the park is that it is barely overlooked and therefore provides a welcome break from the urban landscape, this would be inappropriate. The fifth paragraph should ask that the roof-scape slope down towards the park, to ensure that there is minimal visual impact from the park. (Sarah O'Connell – Chair, Friends of Archbishops Park)

Response C:

Accepted – changes made.

Objection D:

Area as drawn appears to include both land designated in the last UDP as expansion for Archbishops Park, and a former Victorian school building, now used as a Buddhist Temple. Both areas should be withdrawn from the MDO 121. It also includes a small area of public open space on the corner of Carlisle Lane to the south of Royal Street. This should be separately identified on the map (Sarah O'Connell – Chair, Friends of Archbishops Park)

Response D:

Accepted in part - the MDO now includes wording stating the Council's position regarding the positive contribution of the Holy Trinity Centre and building at No. 10 Royal Street to the conservation area. The land at Carlisle Lane is highway verge not public open space, although the MDO proposes to incorporate it as part of the park.

Objection E:

After 'Extension of Archbishops Park on part of site' delete 'or.' and replace with 'and contributions towards improving it and creating new park entrance to north. (Michael Ball, Waterloo Community Development Group)

Response E:

Not accepted – this would be too onerous. The land is not in Council ownership.

Objection F:

Following detailed discussions with planning officers to agree a draft statement of development principles we propose the following words should be added to the final sentence. "Building height is likely to be restricted in the southern part of the site due to its location within the conservation area, with building heights progressively increasing on the northern boundary, where high rise development is likely to be considered more appropriate."
(Guys and St Thomas's Charitable Trust)

Response F:

Accepted – change made.

Objection G:

In the UDP before the last one, it was proposed that the park be extended right up to Royal Street. This was abandoned in the last UDP but the need for more green space still exists.
(Mr R. Lynn)

Response G:

Accepted in part – at the last UDP inquiry it was accepted that partial development of the land was appropriate given the pressing healthcare needs and as the site was in private hands there was no means to implement the previous policy. This is the position of the plan now as amended.

MDO 122

**Lambeth North Station, 10 Westminster
Bridge Road
0.2ha**

Summary of Representations & Responses:

Objection A:

Add after 'Air-rights development' 'must not overshadow, overlook or harm adjacent affordable housing amenity space'. (Michael Ball, Waterloo Community Development Group)

Response A:

This is an issue on most development sites and is covered by boroughwide policy.

MDO 123

**2-6 Hercules Road/123-79-101 Westminster
Bridge Road 0.5ha**

Summary of Representations & Responses:

Objection A:

We object to the unnecessarily restrictive nature of MDO123. We consider that unreasonable emphasis is placed on the preservation of buildings, which, in the case of our site, it is irrelevant because it is a vacant plot. (Level Properties Ltd)

Response A:

Not accepted as the MDO area covers a broader area than the objector's land and includes intact Victorian buildings within the proposed Lambeth North conservation area.

Objection B:

Add 'Not suitable for small hotels'. (Michael Ball, Waterloo Community Development Group)

Response B:

Not accepted for reasons given under responses to Policy 28 objections.

MDO 124 111/141 Westminster Bridge Road
1.1ha

Summary of Representations & Responses:

Objection A:

Add to end "Preferred development as supermarket with improved connections to Lower Marsh". (Michael Ball, Waterloo Community Development Group)

Response A:

Not accepted as the Lambeth retail and leisure capacity study found that the poor pedestrian flow and weak links to Lower Marsh and the riverside meant that it was a poor location for a supermarket.

MDO 125

**Doon Street (Car Park bounded by Doon St.,
Cornwall Rd and Upper Ground) 0.7ha**

Summary of Representations & Responses:

Objection A:

It would be appropriate to achieve a Town Centre-wide consensus on the best site for this facility. We suggest Kennington, as there are various sites available, should remain a site of affordable housing. (Diana Braithwaite, Friends of Lambeth Walk Open Space and Chris Cossey- Chair, Kennington, Oval & Vauxhall town Centre Partnership Board, Anne Burke & Marina Thaine – County Hall Residents Association, Canon Richard Tuss, Parish of Waterloo – St John with St Andrew and Graham Brown, and Michael Ball – Chair, Waterloo Community Development Group, Ray Puckey, Munro House Tenants & Residents Assoc. and Rita Fitzgerald, Marilyn Evers - Waterloo Community Charity, Ray Puckey, J Mc Elvogue – Briant Estate T. & R. Assoc., Julie Nunn, Julie Nunn – Tanwell Estate T &R Assoc., Councillor Leslie Broodram, Nicola Howey, Derek James: – Chair, Stamford Aquinas & Climsland House R. A., Sarah O’Connell – Chair, Friends of Archbishops Park, Pauline Anderson, Paul Baker, Mr R Lyn, Francis Forrest – Waterloo town Centre Board, and Ambo Architects)

Response A:

Not accepted – firstly the issue of the alternative site that has been suggested on Kennington Road. This is outside any established centre; it is not as well located for public transport as the Doon Street Site. It has planning permission for housing and is not available for development. All major leisure developments such as this are governed by the government’s ‘sequential approach’ (Policy 5) as such it would militate against an out-of-centre site such as the one suggested.

In Croydon and Brent, the Mayor of London and/or GOL has objected to such sites on this basis. In addition, there is no funding for such a location. The Doon Street site has been intended for community use as the last phase of the Coin Street project for 20 years. Opinion surveys for Coin Street Community Builders and the South Bank Employers Group indicate that sporting facilities are those most demanded by both residents and workers/visitors to the area. This proposal has been subject to extensive public consultation by these groups and by the Borough in the UDP key issues paper when this site was the most favoured.

Most critically, however, it is the only site that is capable of attracting private sector, planning obligation and national lottery funding. It may not be ideal in serving Vauxhall, however it is much better located than a Vauxhall location for the vast majority of the objectors, and it can serve North Southwark.

Objection B:

A public swimming pool is strongly desired. We strongly suggest public consultation on location of such an expensive project, request easy access to be taken into account for all persons within the community. (Mrs P. Anderson, Jenny Stiles, Assoc. of Waterloo Groups)

Response B:

Accepted in part - Access is taken to account under Policy 31 and new Policy 31B.

MDO 126

Hothouse – Stamford Street

0.2ha

Summary of Representations & Responses:

None received

MDO 127
0.7ha

Gabriel's Wharf, Upper Ground

Summary of Representations & Responses:

Objection A:

The development, which will be allowed, is not specified. This is unsatisfactory. The Coin Street sites were given to the community for affordable housing and live/work provision. (Marilyn Evers)

Response A:

Accepted – change made.

Objection B:

Add after 'When redeveloped' ' with mixed use but mainly affordable housing'. (Michael Ball-Waterloo Community Development Group)

Response B:

Accepted – change made.

Objection C:

When redeveloped should include public piazza of present size to include affordable arts and crafts outlets and cafes which contribute to a lively area for tourists and Londoners alike (more successful than Oxo tower). (Diane Sullock)

Response C:

Accepted in part – however, the exact tenant mix and the affordability of the business rents is a matter for Coin Street Community Builders.

MDO 128
0.8ha

Prince's Wharf, 58 Upper Ground

Summary of Representations & Responses:

Objection A:

Add after 'Mixed use riverside development' 'but mainly affordable housing ' (Michael Ball – Waterloo Community Development Group)

Response A:

Accepted – change made.

MDO 129
0.2ha

London Nautical School, 61 Stamford St.

Summary of Representations & Responses:

Objection A:

Greater clarity is needed in the wording of this section. (English Heritage)

Response A:

Accepted – change made.

Objection B:

There should be no loss of open space. (Ray Puckey, Munroe House Tenants & Residents Assoc., Ray Puckey - Waterloo & Kennington Housing Forum, Nicola Howey, Edith Fekarurhobo – Waterloo Community Charity and Michael Ball – Waterloo Community Development Group)

Response B:

Noted - The recent Council approval for the redevelopment of open space on the Hatfields site for active sports playing purposes has necessitated the revision of this MDO. It now no longer includes the Hatfields site to which the objectors are referring, and pertains only the Nautical School site, setting out broad planning, design and conservation principles to be applied to any redevelopment of the school land within its own site. The school has received Sports College status. As part of the permission for the redevelopment of Hatfields, the school will be able to use the new sports facilities at lunchtimes and in certain instances throughout the day.

Objection C:

The plans supplied with the UDP Draft were insufficient to properly evaluate the proposals outlined. Detailed maps should be supplied for all MDO's. (Paul Baker – Ambo Architects)

Response C:

Detailed maps can be supplied on request.

~~MDO 130 — 3i Waterloo Road Waterloo Rd (91 Waterloo Rd. Union Jack Club)~~
0.3ha

~~MDO 131 — Mercury House (99-119 Waterloo Rd & 124-126 Cornwall Rd)~~
0.3ha

Summary of Representations & Responses:

Objection A:

The principle of allocating these sites for redevelopment is supported. However, the Council is aware that both sites comprise the 'Waterloo Triangle' and that there may be an opportunity to link the two sites for redevelopment. (3i Plc)

Response A:

Accepted – both sites have now been incorporated into a single site.

Objection B:

It is highly unsatisfactory that there is no policy or proposals with reference to this location. If the site became available for redevelopment, there should be a planning brief alongside public consultation. Included, should be a Section 106 to provide affordable housing as well as other community benefits. (Marilyn Evers)

Response B:

The policy for MDO 130 and MDO131 was the same for both sites i.e. 'Potential for redevelopment of both sites'. However given the formation of the Waterloo Triangle Development Consortium both sites have been combined into a single MDO. See D) for building heights.

Objection C:

What is the policy? (Anne Burke & Marina Thaine – County Hall Residents Assoc., Canon Richard Truss – St Johns Parish with St Andrews, Councillor Leslie Broodram, Francis Forrest – Waterloo town Centre Board and Julie Nunn)

Response C:

See Response B, both sites now incorporated into a single MDO.

Objection D:

Add to end 'Heights in redevelopment must not exceed current height of 3is at the riverside end of the site, with lower heights approaching the Old Vic end of the site.' (Michael Ball, Waterloo Community Development Group)

Response D:

It is accepted that the heights should be lower at the Old Vic end and this is now incorporated in the policy, however MDO's do not specify specific building heights. This is because this needs to be assessed in detail against boroughwide design and building heights policies at application stage. This is already the site of a high building so is in principle acceptable as a site for a high building. It is not possible to both argue that the area is overdeveloped and that the area has a lower density than the rest of central London and so should not be further developed. Finally it is possible for a replacement building, slightly higher than 3is, to have a lower impact, through being set back from Roupell Street so it is less visible, which would also open up a blocked potential strategic view of St Pauls form Lambeth Bridge/Millbank. This is now reflected in the MDO.

MDO 132

**Cornwall Rd / The Cut, Bus Garage at 3
Cornwall Rd & 88-124 (even) The Cut**
0.6ha

Summary of Representations & Responses:

Objection A:

Objection is raised to the redevelopment of Cornwall Road Bus Garage without an alternative suitable facility being provided elsewhere in the Waterloo area. (Mayor of London)

Response A:

Accepted – however ‘could be considered’ is too uncertain and not suitable wording for inclusion in a development plan.

Objection B:

Concern that new affordable housing included in the MDO area. (Michael Ball – Waterloo Community Development Group)

Response B:

Noted – the affordable housing has been included within the MDO area so as to give the maximum level of flexibility to any future developer. The MDO does require that the affordable housing be replaced should any approved scheme require the use of the site of the existing affordable units. It may be that a future developer may wish to keep the affordable housing fronting the Cut and develop only the land to the rear. This would also satisfy the MDO. This housing was built in the early 1980s and although attractive internally, externally is poor quality and under-uses the site. The existing houses are not in a conservation area and not worthy of protection in character or design terms.

Objection C:

We are profoundly concerned by this entry, which seems to suggest that, when the Bus Garage site becomes available for re-development then the recently built, affordable housing along The Cut should also become available. (Jenny Stiles – Association of Waterloo Groups)

Response C:

This housing was built in the early 1980s and although attractive internally externally is poor quality and under-uses the site. Without this site the Cornwall Bus Garage site would not be attractive to a supermarket developer (Lambeth retail and leisure capacity study). This would mean that Lower Marsh/The Cut would not attract a supermarket and the bus garage would not be moved, both of which are strongly desired by the local community. The MDO requires that the affordable housing be replaced therefore, there can be no policy objection. The existing houses are not in a conservation area and not worthy of protection.

MDO133

Young Vic, 66 The Cut

0.2ha

Summary of Representations & Responses:

None received

