

Policy 63 Upper Norwood

Summary of Representations & Responses (Policy):

Objection A:

Better transport - No. 2 bus etc. to Upper Norwood; Transport to Kings College Hospital, Dulwich Hospital directly. We are a high-density area with no amenities for the young, middle aged or old. (Wally O'Leary - Westow Hill Improvement Group)

Response A:

It is proposed to add reference to improved public transport to the policy, although the frequency and adequacy of the Number 2 Bus is principally the responsibility of the Mayor of London, and the Borough will continue to press for improvements.

Objection B:

Change Policy 63 with particular reference to Lambeth Transport hierarchy Policy 11 (Lambeth Cyclists)

Response B:

As with other similar objections it is unreasonable to make developments only accessible to public transport.

Objection C:

This continued marginalization of a peripheral area by Lambeth and the four other boroughs could only serve to exacerbate the feeling of living in a deprived area within a borough whose council cannot see further south than Norwood. I suspect more money and attention would be paid to Gypsy Hill if its position were more central or even bordered on the Thames. (Robert Mc Arthur)

Response C:

Noted – the area has an excellent local police station, primary school and library and proposals for a new secondary school in Norwood.

Officer Comment: The final sentence of the supporting text has been updated in light of changed circumstances with LB Bromley UDP. (Metropolitan Open Land on 'top site', Major Development Site for National Sports Centre.)

Policy 64 Regeneration of Stockwell

Summary of Representations & Responses (Policy):

Objection A:

Include form of words proposed by Stockwell Partnership (George Wright – Director, Stockwell Partnership).

Response A:

Accepted – the change proposed by the Stockwell Partnership (to the supporting text in paragraph 5.13.1) has been added. All of the main Stockwell Master Plan proposals have been included in the plan.

Objection B:

As above, to indicate that regeneration is being under taken by Hyde Housing and not Stockwell Partnership. Reference to Stockwell Masterplan to be included.

Response B:

Accepted – changes embodied in Response A (Para. 5.13.1).

Summary of Representations & Responses (Paragraph 5.13.1):

Objection A:

This statement is factually inaccurate. Suggest replacement wording. (George Wright - Director, Stockwell Partnership)

Response A:

Accepted – change made.

Policy 65

Regeneration of Vauxhall/Battersea Area, including Wandsworth Road

Summary of Representations & Responses:

Objection A:

It is unclear what is proposed by this policy including the references to links under the railway lines. (London Borough of Wandsworth)

Response A:

Agreed- this part of the policy has now been deleted as Nine Elms (New Covent Garden) and the railway lines are within LB Wandsworth. The policy has now been updated to reflect recent discussions and regeneration activity between the two boroughs, and it is hoped that the new policy wording is clearer in its intent.

Policy 66 Regeneration of Streatham Town Centre

Summary of Representations & Responses (Policy):

Objection A:

Objection is raised to the wording of the second sentence; If the carriageway of the A23 is to be narrowed, then surplus space should be used to allow for improved continuous bus lanes (or possibly tram lanes). This should also be extended to include the area around Streatham Library, north of Mitcham Junction. (Mayor of London)

Response A:

Accepted-change made.

Objection B:

Avoid traffic diverting onto side roads (James Bennett, J Clyne, Lambeth Liberal Democrat Group)

Response B:

Accepted-change made.

Objection C:

Object to any proposal to narrow any part of the dual carriageway to single lanes as that will not have the effect of reducing the impact of through traffic but will slow it down and therefore increase the impact, increase pollution etc. (Streatham Vale Property Occupiers Association)

Response C:

Not accepted - In Streatham, the road goes from single to dual to single carriageway. This simply has the effect of increasing traffic speeds for a short section increasing the noise and severance effect of traffic. Slowing traffic will also have some restraining effect.

Objection D:

Object to your definition of Streatham Village - the traditional definition of Streatham Village is the area of Sunnyhill and Wellfield Roads and stretching up hill across the Valley Road Estate towards Valley field Road. (Streatham Vale Property Occupiers Association)

Response D:

Accepted - The policy refers to the part of the original village within the town centres – clarification proposed.

Objection E:

Proposals to be introduced for development of a Streatham bypass. (Simon Hooberman)

Response E:

Not accepted-A Streatham bypass was considered in the 1980s but firmly rejected following considerable public concern. It would no longer accord with policies on road building and traffic restraint.

Objection F:

The Policy should acknowledge the role of convenience and comparison retailing in enhancing the various areas of Streatham, and the town centre as a whole. (Tesco's)

Response F:

Accepted – change made.

Objection G:

In 2nd paragraph after 'single lanes' add 'improve conditions for cyclists in this key desire line'. (Lambeth Cyclists)

Response G:

Accepted – change made.

Objection H:

We need a mix of shops, restaurants, pubs, evening entertainment, sport and of course transport all along the road -especially if we are going to encourage people to shop and

spend their leisure time locally. Too great a specialisation would be bad for the area. (Sheila Freeman)

Response H:

Accepted – change made.

Objection I:

Give priority to arts and cultural facilities. (J Clyne)

Response I:

Accepted – change made.

Objection J:

Should improve public transport to Brixton. (J Clyne)

Response J:

Accepted – change made.

Objection K:

We strongly oppose the proposal of building another supermarket on the ice rink site. We do not need another supermarket. (Mr and Mrs Ross, Anthony Butler, Mr B. Fabunm, J. MacKelvie)

Response K:

Not accepted-any supermarket application will be assessed against Policy 5 and MDO91. The evidence of the independent retail and leisure capacity study was that in commercial terms another supermarket could be sustained.

Objection L:

We would like to see the ABC Canons cinema site developed as a cultural/community centre. (Mr and Mrs Ross, Anthony Butler, J. MacKelvie, Pathfield Road Residents Association)

Response L:

This site has been given planning permission for a mixed use scheme, which is being implemented.

Objection M:

Streatham is a sufficiently important area for the UDP to include a policy on urban design and/or a character statement. (The Streatham Society)

Response M:

Accepted in part – it is proposed to give additional emphasis in the policy to urban design issues, however as a long linear centre it would be artificial to separate out regeneration from urban design issues. The two are intrinsically linked and so are best dealt with through a single integrated policy.

Objection N:

Reword policy to promote better community facilities. (Lower Streatham Neighbourhood Watch & Residents Association)

Response N:

Accepted – change made.

Objection O:

Reword policy to make specific commitments on the A23 through Streatham Town Centre including traffic calming, more pedestrian crossings, cycle lanes, cycle parking and better street lighting. (Lower Streatham Neighbourhood Watch & Residents Association)

Response O:

Not accepted - All of these are accepted as worthy aims, however this is an excessive level of detail for the policy as the exact nature of the changes needed has not yet been determined.

Objection P:

The narrative of the policy, which describes the character of four areas, does not correspond to the two cores (Streatham Society).

Response P:

Accepted – wording changed.

Objection Q:

We are concerned that premises under mansion blocks between the cores could become a preferred location for A3 uses. The UDP needs to ensure that residential amenity is adequately protected in these areas (Streatham Society)

Response Q:

This is not the case. Any application for an A3 use would have to comply with Policies 4 and 29 of the deposit UDP. Policy 29, in particular, aims to ensure that there is no significant impact on amenity.

Objection R:

Use of the phrase "Streatham Village" will confuse. This term has traditionally been the name for residents' groups covering Sunnyhill Road and Wellfield Road east of the High Road. (Streatham Society)

Response R:

Accepted – change made to use the local term.

Objection S:

We would not object to one additional medium sized supermarket within the town centre if this were the price to pay for defending the town centre from further out of town retailing. Of the potential sites identified in the UDP as MDO's and/or discussed at the 5 February seminar on the UDP, we consider that the former ABC site and adjacent offices at Norwich House (MDO93) would be the least bad option, as it would serve the Streatham Hill core which currently has very limited choice. This would be conditional on ensuring: -that the façade and foyer of the listed cinema is retained, that there is some continuing leisure use within the site, and - that the neighbouring 1960s pub, which detracts from the conservation area, is redeveloped as part of an integrated scheme. We also consider that an additional MDO should be identified at Elgar House, and /or added to MDO 92. This 1960s office building, with a tyre fitter below, is a major eyesore, and could provide a site for ground floor retailing and redevelopment above. We suggest that Elgar House should be included within the Streatham Core Area. (Streatham Society)

Response S:

These matters and the suitability of these sites are covered in detail in responses to similar objections to MDO's 92 and 93. The high vacancy etc. of Elgar House shops means that it cannot be considered as part of the core.

Objection T:

The UDP should mention the need to relocate the tollpike milestone to a sympathetic location (it has already been moved once following 1930s development). (Streatham Society)

Response T:

Not accepted - this is too detailed for the UDP, can be considered as part of an improvement strategy outside of the UDP itself.

Objection U:

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. 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. (Streatham Society)

Response U:

Accepted – MDO94 (Streatham Hill Station, Corner of Streatham Hill and Drewstead Road) has been deleted.

Summary of Representations and Responses (Paragraph 5.14)**Objection A**

The plan contains no provisions for the development of the area between Streatham Hill and West Norwood in vicinity of Palace Road. The plan organizes development around town centres; however, while town centres may form the basis for co-ordination provisions within areas, development should not, and cannot be confined to the town centres. (Richard Nobles, Chair, Streatham Wells Primary School.)

Response A

Not accepted – it is not possible for the plan to go into detail for every single area. This can be done for some areas is supplementary planning guidance issued outside the plan itself. The problems of Streatham Wells are however less concentrated and pressing than many other parts of the borough.

Objection B

We object to the omission of the existing Sainsburys store from the local centre boundary, on the Proposals Map. We submit that the store plays an important anchor role in the functioning of the local centre. (J Sainsburys PLC)

Objection B

Not accepted – Sainsburys is physically disconnected from the local centre to the north and serves a different function. It is very much an out-of-centre store.

Summary of Representations and Responses (Paragraph 5.14.2)

Objection A

Either end fine -well I don't know about line dancing at Streatham Hill why not get rid of the centre bit of Streatham. (Jean Coleman)

Response A

Not accepted- the Council wishes to revitalise and improve Streatham town centre. It is not clear what the respondent is seeking to achieve.

Policy 67 — Food and Drink Uses in Streatham Town Centre

Summary of Representations & Responses (Policy):

Representation A

We broadly support this policy, but in order for this to work, a proactive approach is needed to ensure that when properties or leases are up for sale, these wider needs are considered. Alternative users need to be identified before property becomes available otherwise there will be no way for this Policy to work. (Leah Levane, Streatham Partnership Board)

Response A

It is proposed to delete this policy. This issue will be addressed by more general Borough wide policies (Policy 4 and 29).

Representation B

We broadly support this policy. (Leah Levane, Streatham Partnership Board)

Response B

It is proposed to delete this policy. This issue will be addressed by more general Borough wide policies (Policy 4 and 29).

Representation C

We support this policy because of the need to protect the retail viability of Streatham Town Centre, to protect residential amenity and to increase public safety. We have made additional comments in our response to policy 29 on the need for co-ordination with the night café and entertainment licensing regimes. (Robert Doyle, The Streatham Society)

Response C

It is proposed to delete this policy. This issue will be addressed by more general Borough wide policies (Policy 4 and 29).

Policy 68 Streatham Vale and Lower Streatham

Summary of Representations & Responses (Policy):

Objection A:

Recommend additional development to include: The regeneration of Streatham Common Station including: re-opening 2nd entrance/exit at Eardley Rd and improved commuter parking and/or transport to station; Considerable improvement to alleviate severe traffic congestion particularly along Greyhound Lane; traffic lights near Streatham Common Station; immediate action to deal with closed down row of shops on bridge. (Arlene Barr and Jane Park)

Response A:

These are all matters covered in general terms in the policy, however the suggested wording is too detailed for inclusion in the plan itself.

Objection B:

Would add, because of need to maintain family housing: " Adding extensions must not be a back door to conversion. These uniform houses will be treated as if in original condition (i.e. 3/4 bedroom) (Cllr David Malley).

Response B:

This matter is covered by Policy 17 in any event as conversions are based on original (un-extended) floor area.

Objection C:

We would like to see far more attention given to development of the area and to likely approaches to tackle the problems that are summarised within the draft UDP (5.14.17). For example, in recognising the lack of community facilities, it would be helpful to identify some potential sites for such development. (See also the Board's response to Policy 66) (Streatham Partnership Board)

Response C:

Noted – these are all matters covered in the policy. The policy can only be so detailed however. It is proposed to identify a site for community facilities.

Objection D:

Rename this Policy Lower Streatham AND Streatham Vale (Lower Streatham Neighbourhood Watch & Residents Association)

Response D:

Accepted – change made.

Objection E:

Include proposals for environmental improvements and improvements to station etc. (Lower Streatham Neighbourhood Watch & Residents Association)

Response E:

These are all matters covered in general terms in the policy, however the suggested wording is too detailed for inclusion in the plan itself.

Policy 69

Vauxhall Cross Transport Hub

Summary of Representations & Responses:

Objection A:

The Council should clarify which scheme this policy is referring to. TfL's long-term aim is to see the removal of all gyratories when traffic conditions permit and provided safety is not impaired. The current scheme proposed by TfL and in agreement with the Council does not involve the removal of the gyratory. (Mayor of London)

Response A:

Like any policy in the plan the policy will be used to assess any scheme that comes forward. Many schemes have been proposed in the area and the bus interchange proposal has now been given Council approval because it does not prejudice the long-term aspiration to end the gyratory. All other schemes will also be subject to this test and the policy will be amended to make this clearer.

Objection B:

The policy should recognize the need to ensure that any proposal does not result in adverse traffic and environmental effects in Wandsworth due to the removal of capacity (London Borough of Wandsworth)

Response B:

The scheme has been thoroughly tested by Transport for London and together with congestion charging results in less traffic on Wandsworth Road and Nine Elms Lane.

Objection C:

Replace 3rd sentence 'the scheme should either remove. ...crossings at grade.' with 'The scheme should incorporate removal of the gyratory road system, reintroduce two-way working and remove all footbridges, so that all pedestrian road crossings are at grade.' (Chris Cossey)

Response C:

This is not practical and is not part of the initial scheme being implemented by Transport for London. The scheme however is designed to enable these as additional improvements later if they prove practical following further traffic reduction measures.

Objection D:

Support subject to: -Schemes being operationally, technically and commercially acceptable and viable; and have the support of the relevant Train Operating Company (ies). -Establishing an agreed platform strategy for platform capacity and public safety at Vauxhall Cross, before proposals for major development are progressed. A central fund is established (by way of developer contributions) to fund infrastructure and station improvements (including safety and capacity requirements) (Railtrack)

Response D:

Accepted – changes made. It is not necessary to mention one party (the TOCs) having an effective veto however as these operate under the regulatory regime of the Mayor of London and the Strategic Rail Authority.

Objection E:

Delete both policies and re-think Vauxhall radically. (Manor of Kennington Residents Association)

Response E:

The objector does not state what is objectionable about this particular policy as opposed to the type of development that it might facilitate.

Policy 70 Vauxhall – Urban Design & Public Realm Improvements

Summary of Representations & Responses (Policy):

Objection A:

This policy may be interpreted as giving a green light to unfettered tall building development in the locality. It should be tightened up. Replace "cluster of high buildings" with "high density and high quality buildings" and cross-reference to high buildings criteria in Policy 37 (as amended). (English Heritage)

Response A:

It is important to unambiguously state the vision and regeneration context for Vauxhall Cross – which is based around the creation of a new world class urban quarter. It is considered that in terms of visual sensitivity, transport accessibility and potential capacity, and site availability, Vauxhall provides a unique opportunity within the borough for significant regeneration gains. This should be made clear in this policy. The word 'unfettered' is however unwarranted. The revised policy will now have the explicit reference to a 'cluster of tall buildings' removed and proposed additional wording cross-refers to policy 37 and the Vauxhall/Battersea Development Framework that is now in preparation – see also changes to supporting text, which clarify the role of the framework in terms of assessing the cumulative impact of high density development.

Objection B:

Opposed to high buildings (Stockwell Park Conservation Society, Westminster Society, Chris Cossey, Manor of Kennington Residents Association)

Response B:

Noted – The issue of 'over-height' buildings is dealt with under the new Policy 37 (Location and Design of Tall Buildings and Views). New tall buildings, or tall extensions to existing buildings, will generally not be appropriate. However, each case will be dealt with on its own merits and assessed in relation to specific criteria pertaining to matters such as location, aesthetic quality, urban design quality, impact on traffic and impact on views.

Objection C:

Replace 'centred on the new public transport interchange. (Piazza). (Lines 3-4) with 'around a new large green public open space and piazza in front of the new public transport interchange.' (Chris Cossey)

Response C:

Accepted in part - The proposed wording is very similar to that in the plan, the only difference being the stipulation that it is a 'green' open space. It is unlikely to be of this character given the density of the area, the high number of people using it and the hostility of the surrounding area, but a reference to this aspiration will be placed in the revised policy.

Objection D:

More emphasis should be given to the implementation of the historic proposals to improve the links from the east of the railway to the river, generally referred to as 'Crossing the Line'. (Walford Maritime Limited, Pension and Life Assurance Plan)

Response D:

The policy gives very strong emphasis to this. The objector has proposed no alternative wording.

Objection E:

The policy is too 'flabby' and ill defined. It is unclear what sites are included in "around Vauxhall Cross". It should not include any part of Spring Gardens. The 'new high-density urban quarter' concept is supported provided that the area is tightly limited and clearly defined (in the same way as office development in Waterloo). (Vauxhall Neighbourhood Housing Forum)

Response E:

All major development opportunities that form part of the transport development area are shown on the proposals map. The situation in the area is however very fluid. The objectives towards breaking the barrier effect of the railway may prove successful, as may the Mayor of London's proposals to link regeneration activity between Vauxhall and Battersea. To reflect this fluid situation, and the comparative lack of physical constraints in Vauxhall compared to Waterloo, GVA Grimley recommended to Lambeth that policy in Vauxhall was not specific to a strictly identified area.

Objection F:

If Vauxhall Cross is to be promoted as a district centre then the nature and amount of floor space should be indicated in the "proposals" so that likely impact can be assessed. There should be larger scale inset maps showing detail of proposals associated with the development proposals being promoted. (London Borough of Wandsworth)

Response F:

Accepted – floorspace to be defined. Development sites will be set down in more detail in the forthcoming Vauxhall/Battersea Development Framework. An inset map here would serve no purpose, as the proposals map is clear in this area.

Objection G:

The current plan, which involves building on most of Vauxhall Park and the demolition of the Vauxhall Tavern Pub, would be extremely detrimental to the people living in the area (Helen Lindsay)

Response G:

Presumably, the objector is referring to Spring Gardens not Vauxhall Park. The plans for Spring Gardens have been dropped some time ago and form no part of the current plan.

Objection H:

We support the concept of a high density development around the transport interchange; PROVIDED it is designed within a green framework and fully incorporates principles of environmental sustainability (Lambeth Environment Forum)

Response H:

Noted – this is very much the intention.

Summary of Representations & Responses (Para 5.15.4):**Objection A:**

Delete in last sentence (line 1, page 154) the words: 'through creating a gyratory'. In next line delete '(the Pod)'.(Chris Cossey)

Response A:

Accepted – amended accordingly

Summary of Representations & Responses (Para 5.15.5):**Objection A:**

Suggests replacement wording highlighting negative and positive impacts of Tesco's and shortage of sporting provision.

Response B:

Accepted in Part – Tesco's has both positive (more shopping provision) and negative (impact on centres) and so it is best not to mention it. Sports provision will be reflected in the paragraph.

Policy 71 Use of Arches in Vauxhall

Summary of Representations & Responses:

Objection A:

Railtrack suggests the deletion of the area specific arch policies and the introduction of a borough-wide policy for railway arches that covers all scenarios. The basis of this policy should be to recognize the adaptability of arch premises to accommodate a range of uses. Please refer to our suggested policy, which is attached. (Richard Coburn – Railtrack)

Response A:

Accepted in part – It is proposed to create a single borough-wide arches policy. Active frontage uses are defined under policy. It refers both to land-use and design aspects. The purpose of the reference is to allow an exception to the normal employment uses in certain defined locations. This is made clear in the revised policy.

Objection B:

We support and encourage movement through the viaduct between Salamanca Street and Black Prince Road. However, we would like you to add the following: -

5.15.6 "Lambeth will seek the opening up and/or use of arches to encourage movement through the viaduct between Salamanca Street and Black Prince Road. As well as the removal of Salamanca Street east of the railway viaduct in order to link up open space north of Salamanca Street to Pedlars Park." (Michael Ball – Vauxhall Neighbourhood Housing Forum)

Response B:

This is an excessive amount of detail. It should be noted that following other objections it is proposed to replace this policy with a borough-wide policy covering arches. Hence mentioning of specific arches would be inappropriate. Finally these arches would not actually lead anywhere and so it would be inappropriate to open them up.

Policy 72 Spring Gardens

Summary of Representations & Responses (Policy):

Objection A:

Add after pursued "in partnership with local community groups as part of a community master planning exercise". Delete "through the removal of mounding, and"

In paragraph 5.15.8, delete "and if they contribute towards enhancing it", add after this "in partnership with local community groups as part of a community master planning exercise". Delete Spring Gardens is designated as a 'Parks Regeneration Area'. (Michael Ball – Vauxhall Neighbourhood Housing Forum)

Response A:

Accepted in part – 'removal of mounding' removed. The designs for Spring Gardens will be taken forward through the Vauxhall/Battersea Development Framework process. This process will have strong community involvement but it is not a community led master-plan.

Objection B:

Whilst warmly welcoming the Council's commitment to pursue the improvement and extension of Spring Gardens, as detailed in Policy 72, statement, FOVSG do not see this as solely limited 'through road removal'. Moreover, any policy of road removal should entail that space created by removed roads should be incorporated into the extension of Spring Gardens and should not be used for built development.

FOVSG feel most strongly that if any part of the mounding were to be removed there would need to be ample budget to re-landscape sympathetically in relation to extra tree planting. (Mr Nik Greaves – Friends of Vauxhall Spring Gardens)

Response B:

Accepted in part – see response A. The process of road removal will primarily be towards open space extension.

Objection C:

Objections to proposals to remove mounding on which the local friends group are planning to plant a wild flower environment with a non-mowing management of grass area. Nearby developments should be of 5 stories or less in keeping with nearby conservation area.

In paragraph 5.15.8, add after 'There are development sites around Spring Gardens' a restriction on height being desirable to prevent overshadowing of Spring Gardens and surrounding residential areas. (Dianne Sullock)

Response C:

Not accepted – height restriction will vary greatly between different parts of the surroundings. For example to the north there is little potential for overshadowing. These are all matters adequately dealt with through boroughwide policies on building heights.

Summary of Representations & Responses (Paras 5.15.7 and 5.15.8):

Objection A:

Support. HOWEVER, to describe the gardens as bleak and uninteresting is quite inaccurate and unfair. The assurance of no more exclusivity agreements is welcome; but it is to be hoped that the designation as a Parks Regeneration Area has no implications for built development and the site. (I.D. Adams, Chair, Manor of Kennington Residents Assoc.)

Response A:

Accepted – changes made.

Policy 73 — Regeneration of Waterloo

Summary of Representations & Responses:

Objection A:

Waterloo will add most to London if its unique qualities are emphasized. A city benefits by having areas of distinct character. We welcome all efforts by Lambeth, including support of Waterloo Community Development, to ensure that the needs of the local residential community are recognized and met. We welcome the intent in this plan to enhance this, as there are problems at present e.g. lack of shops for essential needs insufficient affordable housing, sports facilities. (We enormously welcome the progress Lambeth seems currently to be making on a new Library).

Yet, to succeed with a clear vision it is essential to rule things out. In respect of major shopping (other than for day to day items) it might be helpful to recognize (Para 5.16.1) that Waterloo is also very well connected by public transport to Oxford St, Bond St and Piccadilly). It is strategically important to consider if London benefits from distinctive shopping areas and if so to concentrate on the character of those. Major shopping cannot be an addition to Waterloo without increasing density and thus undermining the potential for other uses. (Jenny Stiles – Association of Waterloo Groups)

Response A:

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Objection B:

Policy 73 is superfluous in that it provides little restriction on development. It is unachievable, denoting a conflicting wish list. There simply is not the room to stuff so much development dedicated to so many different conflicting uses into Waterloo, there seems little merit in doing so. It is unlikely, having unleashed such expectations coupled with so few restrictive powers, that the local authority would have the capacity to effectively control development. Moreover, it is simply inconceivable that Waterloo's community could survive such an onslaught, or that its character would not be swept away.

Amend Policy 73, The Central London Policy Area Para (B) by more closely defining the proviso e.g. 'protecting the character', 'local resident character' etc. (Michael Ball – Waterloo Community Development Group)

Response B:

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Objection C:

There is a clear conflict between the different classifications that Proposals Map and relevant proposed policies say regarding the podium site. As a MDO (implying that development on this open space is acceptable), a site for office regeneration, (when there are currently no offices on the site), an area suitable for 'cluster location' of high buildings, a Conservation area, a Parks Regeneration Area, a Visitor Management area in addition to being next to a significant residential area. The ambiguity of the disputed policy/MDO/Proposals Map might lead to justification of development on the podium site, which would be contrary to the other, policies contained in the draft.

The space should be shown as open to the public, - which it has been since the Shell centre was built. The podium site should be removed from Office Regeneration, MDO and high building's classification. There should be a more specific commitment to conservation of the South Bank Area in its present shape and form, together with an embargo on development of any currently open space.

(Anne Burke & Marina Thaine, Anne Burke & Marina Thaine – County Hall Owners & Residents Assoc., Dr M. D. O'Brien, Peter Carsis and Robert Alison)

Response C:

Accepted in part – The Shell podium site is now considered by the Council to be public open space and MDO 115 has been amended to reflect this.

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Objection D:

In relation to proposals for the South Bank Centre, which falls within the Waterloo Visitor Management Area, the policy fails to recognize that enabling development including offices, may in future be the key to funding enhanced arts and cultural facilities at the centre and associated public realm around the buildings. Such development would not be permitted under the terms of Policy 73. Delete word 'accordingly' from the end of the second sentence.

(Mike Mc Cart – The South Bank Centre)

Response D:

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Objection E:

We support the aims to regenerate the Waterloo area. However, we object to Policy 73, as we consider that it should promote a mix of land uses in the area to ensure urban diversity and sustainable development, which in turn will help promote the regenerative aims of the Policy.

(Level Properties Ltd.)

Response E:

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Objection F:

No mention is made of the circle initiative SRB area of lower Marsh and the Cut Business improvement District, which Lambeth is a stakeholder in. No reference is made to the emergence of a "Business improvement District" model of regeneration, though two pilots are being considered.

The existence of the circle initiative bids pilot should be acknowledged, the potential for establishing bids type management should be mentioned, particularly as Lambeth has indicated whole hearted support for the scheme elsewhere.

(Circle Initiative – Lower Marsh & The Cut Business Improvement Partnership)

Response F:

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Objection G:

No definition of 'appropriate sites', there is no clear community benefit through increased development. There is also a danger of the area becoming 'overdeveloped' in the guise of 'regeneration enhancement'. 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 Charity)

Response G:

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Objection H:

We do not consider that development within the area needs to be managed and co-ordinated in detail, as each will have a different period. We do, however support the view that developments should be assembled with regard being had to other schemes coming forward for the area. Individual proposals can bring forward the regeneration of the area in a timely and deliverable way and so should be equally promoted.

We propose the draft policy is reworded to take into account. (Shell International Petroleum Co. & Lend Lease Europe Ltd)

Response H:

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Objection I:

We object to the final paragraph relating to affordable housing in that it does not provide clarity regarding the definition and determination of when a site is "appropriate". (Prospect)

Response I:

Having re-considered the objectives of this policy, the Council is of a view that it is primarily aspirational and does not contain any policy or objectives that are not covered by other Waterloo policies or boroughwide policies. The policy is therefore proposed for deletion. The objections received do not raise any matters warranting the retention of this type of policy.

Policy 74 Transport in Waterloo

Summary of Representations & Responses (to Policy):

Objection A:

Objection is raised to the wording of (A) in that this point should also include a reference to the scale and impact of development taking account of Waterloo's role as a major interchange, which means that it serves the wider London area (Mayor of London)

Response A:

Accepted – change made.

Objection B:

In (C) After pedestrian add 'cycle' (Lambeth Cyclists)

Response B:

Accepted – change made.

Objection C:

Generally, no policy is stated towards Baylis Road Westminster Bridge Road or Waterloo Road and policy relating to enhancement of the Environment for shopping or traffic reduction measures around the core shopping area (Circle Initiative)

Response C:

Accepted – change made.

Objection D:

Recommend that the policy is amended to include an explicit requirement for central developers' funds to be created for the funding infrastructure and station improvements at Waterloo. (Railtrack)

Response D:

Accepted – change made.

Objection E:

Clause (C) (vii), Clause (E) In our opinion creates a vicious circle of development putting pressure on transport capacity, leading to more development to pay for Increased transport capacity (County Hall Owners and Residents Association)

Response E:

Not accepted - the scale of development will be restricted by the available transport infrastructure.

Summary of Representations & Responses (to Paragraph 5.16.15):

Objection A:

Amend to show Mayors chosen route of Cross-River Transit and delete this para.(Mayor of London)

Response A:

Accepted – amend accordingly. The Mayor has chosen the route and the time for lobbying is over.

Summary of Representations & Responses (to Paragraph 5.16.17):

Objection A:

Amend second sentence to reflect bus priority improvements on York Road (Mayor of London)

Response A:

Accepted – change proposed to be made.

Objection B:

The National Theatre would expect to be consulted on servicing and access issues arising out of any progressive pedestrianisation of York Road. Only the South Bank Centre is referred to in the UDP. (John Langley, Royal National Theatre)

Response B:

Accepted – The title of MDO 116 has been amended from the 'South Bank Centre' to the 'South Bank Arts Complex - includes National Theatre, Royal Festival Hall, Queen Elizabeth Hall, Hayward Gallery.' This indicates the Council's intention to view the whole complex as one in matters such as this.

Objection C:

Removal of the reference to York Road as a 'high street' (Lower Marsh Business Improvement Partnership)

Response C:

Accepted – change made.

Policy 75 Urban Design & the Character of Waterloo

Summary of Representations & Responses (Policy):

Objection A:

We have serious concerns about the pedestrian link proposed on the river frontage of St. Thomas' Hospital. There is a need to protect the security of the patients on this site who are often in a vulnerable state. (Inventures)

Response A:

This is not included within this policy (see MDO119).

Objection B:

Should be amended to include reference to the suitability of appropriate high density and high rise schemes in Waterloo. (Railtrack)

Response B:

There are parts of Waterloo, which may be suitable for high-density schemes and/or high buildings, and parts, which are not. This is specifically covered in the policy on high buildings and policies on different uses within the Waterloo area. There is no need to repeat this here.

Objection C:

Insert after item (h) at end of line "...and not anywhere in the magnitude of 40,000sq.m. (several local residents and several local tenants groups, former Councillor Boodram, Waterloo Town Centre Board)

Response C:

There is no item (h) in the policy. The UDP does not attempt to predict or prejudge the amount or scale of development that may be acceptable in Waterloo. This would be most unwise in advance of any major studies on the capacity of the station and the capacity for development and the visual impact of such development. As such, there would be no planning basis for such a cap. The proposed wording would be vague and unclear, what scale of development would be suitable, would it all be suitable on one site? Rather the UDP sets down criteria and tests for development that comes forward.

Objection D:

It does not sufficiently provide for individual or imaginative design solutions for a site, which may in their own right, offer development of the highest architectural quality, design and layout. (Level Properties Limited)

Response D:

The policy in no way prevents this – no evidence as to how the policy would inhibit this.

Objection E:

Refer to South Bank Streetscape Design Guide and projects in the 'Transforming the South Bank' document. (South Bank Employers Group)

Response E:

Not accepted – UDP policy is not the appropriate place to refer to such design guides. Although many of the projects in the 'Transforming South Bank' document are considered worthwhile and may be supported in principle by the Council, it is not considered necessary to include them in either the policy or the supporting text of the UDP. Such documents are more suitable as SPG but the decision of whether or not to adopt them as SPG has not yet been made.

Objection F:

There is an absolute need for an integrated master plan that deals with the entire Waterloo area so that phased development, community aspirations and corporate interest are better balanced. (Waterloo Community Charity)

Response F:

Not accepted – experience in Waterloo has shown that master-planning exercises will not work unless there is clear agreement on the areas available for development and on the presuppositions that underlie them. In Waterloo where many key issues, (e.g. the technical issues surrounding the development of Waterloo Station) have yet to be resolved; this has and now as much as ever required a pragmatic approach. Whereby sites under a variety of ownership can each come forward at different times but in a complementary manner, agreeing key principles in the UDP is a fundamental part of this. The Council is committed to working with the GLA to produce a Waterloo Development Framework, which will contain objectives relating to the spatial development of the area.

Objection G:

Section (A) of this policy should include a sixth 'vision' for the area relating to its significance as a potential area of world recognition. (Prospect)

Response G:

Accepted – amendment made.

Objection H:

We object to section (B) of this policy, in that it is unclear as to where the four zones begin and end. More precise information should be included as to what the 'problems' are that need to be solved, as well as some indication of what opportunities exist to enable them to be solved. (Prospect)

Response H:

Accepted – now includes more precise geographical boundaries and description of opportunities.

Objection I:

Identify that Riverside Zone is a conservation area. (County Hall Owners and Residents Association)

Response I:

Accepted – change made.

Objection J:

(D) Should include a commitment to not losing public open space. (County Hall Owners and Residents Association)

Response J:

Not accepted – there is no suggestion of loss of open space from street furniture improvements etc. Loss of public open space is fully covered by other policies.

Objection K:

The note 5.16.18 strikes a too pro-development chord; Broadgate is not in a conservation area. (County Hall Owners and Residents Association)

Response K:

Accepted in part- wording proposed to be amended. However it is considered that new development in Waterloo is essential if the area is to attain the Council's objective of making it a world class place. Waterloo station is not in a conservation area either.

Summary of Representations & Responses (Paragraph 5.16.20):

Objection A:

Given the pressures on land usage in Waterloo it is important not to let unnecessary developments occur. It is very surprising to find it suggested that we are short of either restaurants or health clubs in Waterloo. (Jenny Stiles, assoc. of Waterloo Groups)

Response A:

Surveys by the South Bank Employers Groups have shown that visitors and workers in the area perceive there to be a shortage of such facilities. There certainly is to other areas on the fringes of central London.

Summary of Representations & Responses (Paragraph 5.16.21):

Objection A:

Refer back to 75(C) to resolve the levels issue.

Response A:

Accepted – amendment proposed.

Summary of Representations & Responses (Paragraph 5.16.23):

Objection A:

The 'steady increase' is misleading; any improvements are minor in the overall scale of development potential in the Waterloo area. (Edith Fekarurhobo, Waterloo Community Charity)

Response A:

Not accepted – the creation of Forum Magnum Square, Bernie Spain Gardens and the Millennium Green are all very significant achievements.

Summary of Representations & Responses (Paragraph 5.16.24):

Objection A:

There is no mention here of the possible 'cross-river transit' which proposes to come along Waterloo Rd. Small piazzas and public squares are fine in low density areas, however in areas such as Waterloo the open space requirements for both the local residential community and the corporate sector is much greater. (Edith Fekarurhobo, Waterloo Community Charity)

Response A:

Larger open space proposals and cross-river transit are both covered elsewhere in the Waterloo section.

Summary of Representations & Responses (Paragraph 5.16.25):

Objection A:

Emma Cons does not have a playground. Again, no mention of the 'cross-river transit' so any narrowing of road will be minimal. No mention of open space within existing social housing provision. (Edith Fekarurhobo, Waterloo Community Charity)

Response A:

Accepted in part – cross river transit is mentioned elsewhere in the Waterloo section.

Policy 76 Off Street Parking & Coach Parking in Waterloo

Summary of Representations & Responses (Policy):

Objection A:

The South Bank Centre objects to the omission of any reference to existing off-street parking at the Hayward Gallery and Hungerford Car Park and disabled parking both off street and on street. The second sentence of the policy states that coach parking will not be permitted other than as part of the Waterloo Station development, and only short term stopping at pre-booked designated places will be permitted. The concept of coach parking being secured as part of the Waterloo Station development is welcomed. Amend the first sentence of policy and paragraph 5.16.27. (Mike Mc Cart – the South Bank Centre)

Response A:

Accepted in part – The South Bank Parking Strategy, prepared for Lambeth by consultants following extensive research, found that the current operational needs of the South Bank Centre could be met via the National Theatre Car Park. There is no operational need therefore for the Hayward and Hungerford Car parks. In line with national policy on traffic restraint therefore places should be restricted on redevelopment. It is accepted however that these operational needs may change upon redevelopment and the policy has been changed to reflect this. The commercial gain that the South Bank Centre gains from these spaces is not a material planning consideration. The argument could be used too often and conflicts with government and Mayoral policies of traffic restraint. Clarifications are proposed to the policy.

Objection B:

Will the coach ban be extended to the County Hall residential area? Can this policy be strung together with those reinforcing the preservation of all open space, and create a pedestrian square between Waterloo Station (where the coaches are to be parked) and the river. No mention is made here of the Shell Centre car park replacing Hungerford car park, even though the South Bank's other car parks are mentioned and exclude proposals in Policy 44. (Anne Burke & Marina Thaine – County Hall Owners & Residents Association)

Response B:

As the County Hall has two hotels it is not possible to extend a coach ban to this area. The Plan is to be read as a whole therefore there is no intention to string together the number of policies and MDOs that deal with land between Waterloo Station and the river.

Objection C:

Until public transport links (particularly in the late evening to places such as SW London/NE Surrey) have been improved sufficiently, consideration is given to ensuring enough parking provision is retained for patrons and staff for performances at the venues on the South Bank, so that the viability of the venues is not jeopardised. (Mark Balaam – London Tourist Board & Convention Bureau)

Response C:

Not accepted – public transport links to these areas – via Waterloo – are excellent. The policy is proposed to be amended to allow some operational parking as part of the South Bank Centre redevelopment.

Objection D:

Restricting off street parking as proposed in this policy is too inflexible and does not allow for the possibility of replacement car parks becoming available. (National Car Parks Ltd)

Response D:

Not accepted – this conflicts with national and regional policies of traffic restraint.

Objection E:

Generally supported providing environmental design principles are followed. (Judy Bartlett & Roger Evans – Lambeth Environment Forum)

Response E:

Noted.

Summary of Representations & Responses (Para 5.16.26):

Objection A:

Are the car parks at Doon Street and Coin Street going to be discontinued? The text should set out clearly what is intended. If proposals are not finalised then the text should be deleted.
(National Car Parks)

Response A:

Policy 76, for which this para is supporting text, clearly set out what public car parks are to stay and which are to go.

Policy 77 — Retail & Leisure Development In Waterloo

Summary of Representations & Responses:

Objection A:

The term 'Major District Centre' is confusing in the context of RPG3's definition of types of London town centre. Replace 'Major' with 'Main' (Mayor of London)

Response A:

Noted – Having further considered the main priorities for retailing and town centre activities in the north of the borough, it is now proposed to make amendments to the 'edge-of-centre' boundary around the core of the Lower Marsh District Centre on the Proposals Map. The idea of the 'Cross River High Street' and expanded Waterloo Major Centre has been abandoned, in favour of a more traditional town centre and edge-of-centre approach. Consequently, the need for a specific retail policy for Lower Marsh is removed, and proposals for town centre uses in this area will be controlled under Policies 4, 5, and 29 of the Unitary Development Plan, as with all other centres within Lambeth. The revised approach will protect and consolidate Lower Marsh District Centre by default.

Objection B:

Rail Track considers that Waterloo Station (including areas within the Station) should be highlighted as an appropriate location for accommodating quality retail facilities. This will improve and enhance Waterloo Station's international status (Richard Coburn of Railtrack).

Response B:

The station is within the edge of centre of the Waterloo District Centre on the Proposal Map. Hence there is no need to specifically mention this in the policy. Mentioning it in the policy would mean that national policy tests about need and connections with the core of the centre – Policy 5 – would not apply and this is inappropriate.

Objection C:

Policy 77 should include the Waterloo Visitor Management Area in its reference to expansion of Waterloo District Centre as a major retail location because of the "cultural retailing" it provides. The importance of this activity in meeting the needs demands of audiences and visitors as well as to viability of the centre, which is likely to increase in the future. (Mike McCart of South Bank Centre)

Response C:

Not accepted – in policy terms, the district centre and the visitor management area are treated as distinct entities. In any event, it is not proposed to continue with the idea of an enlarged Waterloo District Centre (see Response A).

Objection D:

Paragraph 5.16.31 indicates that analysis of the cinema market indicates that there is development capacity for a large multiplex, commercial cinema in the Waterloo area, however the study undertaken for LBL in November/December 2001 made it quite clear that there was no further capacity for cinemas in Lambeth (Marilyn Evers, Michael Ball of the Waterloo Community Development Group).

Response D:

Noted – however it is now proposed to delete this policy and instead rely on borough-wide Policies 4 and 5 to govern the siting of leisure facilities attracting large numbers of people, such as cinemas, according to the sequential approach set out in government guidance.

Objection E:

Policy 77 paragraph (B)(i) assumes the Cross River High Street. The proposed Cross River High Street is inappropriate cutting through the arts and cultural centre. There has been no discussion or consultation with residents of the borough about the desirability of it (Marilyn Evers).

Response E:

Noted – All references to the 'Cross River High Street' are proposed to be removed from the Plan, coinciding with the revised edge-of-centre boundary which is pulled back to the southern side of York Road and no longer includes the area between Belvedere and York Roads or the sites along Belvedere Road up to Waterloo Bridge.

Objection F:

B (iv) The document does not detail how any development is to be controlled so as not to harm the "core of the centre at Lower Marsh" (CC Smith, Michael Ball of Waterloo Community Development Group, Circle Initiative)

Response F:

Accepted – Because this policy is proposed to be deleted, applications instead to be assessed in accordance with Policies 4, 5, and 29 in the same way as for all other centres in the borough, the core of the centre at Lower Marsh will receive the maximum protection possible through the sequential approach set out in PPG6.

Objection G:

The expansion of the Waterloo District Centre to eventually become a Major District Centre stretching right up to the river is the wrong strategy for the area, and will reduce its unique selling point for visitors and residents alike.(Anne Burke and Marina Thaine of County Hall Owners and Residents Association).

Response G:

Accepted – see Responses A and E.

Objection H:

New Supermarket should be in or as close to Lower Marsh as possible, or placed at Upper Marsh/Westminster Bridge Road, not in the Shell Centre or York Road.(Michael Ball of Waterloo Community Development Group, Anne Burke and Marina Thaine of the County Hall Owners and Residents Association, Jenny Stiles of the Association of Waterloo Groups)

Response H:

Accepted in part – In line with the sequential approach to retail developments attracting a large number of people under PPG6, and Policy 5 of the UDP, any application for a new supermarket in the area would need to be supported by an analysis of the suitability of core of centre sites before consideration could be given for sites further down the sequential order. It is not proposed to identify a specific site within the core of the Lower Marsh centre or anywhere else for a new supermarket but rather assess applications for such developments on their merits. There are no obvious sites available on Lower Marsh.

Objection I:

'Cross-River High Street': it is not clear why the 'Cross River High Street' 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, or how it will complement Lower Marsh as well as the numerous other activities proposed for the area. (Michael Ball of Waterloo Community Development Group)

Response I:

Noted - see response to Objection E.

Objection J:

C. "Loss of shops to other uses will be restricted on Lower Marsh". The restrictions need to be specified. (CC Smith)

Response J:

See Response A. Shops within Lower Marsh District Centre will receive the same level of protection as for all shops in all District Centres.

Objection K:

It is not completely clear from the Proposals Map how far the 'edge of centre' allocation extends in all directions. If it does not already do so, we consider that the land allocated under Policy MDO123 should appropriately be included within the 'edge of centre' boundary of the Waterloo District Centre, so as to encourage an appropriate mix of uses on the site. (Level Properties Ltd)

Response K:

Accepted – the Proposals Map will be made clearer.

Objection L:

The policy should be broadened to accommodate 'commercial' development in general to allow the appropriate expansion of existing office development in this area, as offices already exist within the area and contribute to the mix of uses. (Christian Aid)

Response L:

Not accepted as office development in this area is permitted by policy 21.

Objection M:

Any retail development outside Lower Marsh should demonstrate how it will strengthen links to Lower Marsh. Immediately, not eventually (B) (Circle Initiative)

Response M:

Accepted in part– it is proposed to pull back the edge-of-centre boundary for the district centre to more closely represent the existing pattern of retail activity in the area, along with Waterloo Station. It is therefore expected that the vast majority of new retail development will fall within either the core or the edge of the centre. Any retail development that does not fall within these boundaries will be assessed against the sequential test in Policy 5 which will, by default, protect retail activity in the core of the centre at Lower Marsh. The Waterloo Station development will not take place for several years hence an 'immediate' demonstration of impact on Lower Marsh will not be possible.

Objection N:

Object to omission of Waterloo Road as part of Cross River High Street though there is currently substantial retail use. (Circle Initiative)

Response N:

Noted – the removal of all references to the concept of a 'Cross River High Street' should satisfy this objection.

Objection O:

Loss of shops on the Cut, Kennington and Westminster Bridge Roads should not be permitted as these form part of and strengthen the existing core of Lower Marsh. As a 'specialist' shopping area, as well as a neighbourhood shopping centre. (Circle Initiative)

Response O:

Accepted - Local shops on the Cut, Kennington and Westminster Bridge Roads will be afforded the same level of protection as local shops elsewhere in the borough, via Policies 4 and 29. It is proposed to delete this policy (see Response A). The clause referred to did nothing to add to the policy presumption against loss of shops on these streets.

Objection P:

Insufficient detail regarding future of the street market vis-a-vis 'World Class' aspiration for Waterloo. (Circle Initiative)

Response P:

Accepted – the protection and promotion of the Street Market is now covered in new wording added to Policy 75.

Objection Q:

Shell Centre Upstream site should be included within the designation 'District Centre - Edge'. (Shell International Petroleum Company Limited and Lend Lease Europe Ltd)

Response Q:

Not accepted – it is considered that the Shell Centre is too far removed from the existing pattern of retail development. Amendments are proposed to the proposals map to bring the western edge of the edge-of-centre boundary back to York Road. Applications for retail use outside the boundary will be assessed against Policy 5 and PPG6 on a case by case basis, including the Shell Centre.

Policy 78 — Uses of the Arches in Waterloo

Summary of Representations & Responses:

Objection A:

The UDP fails to acknowledge the important contribution that arch properties provide and to effectively plan for this. (Richard Coburn of Railtrack)

Response A:

The contributions that arches make will be made clear in the proposed new boroughwide policy.

Objection B:

Two specific policies have been introduced to the UDP that deal with arches in Vauxhall and Waterloo. This ignores arch properties elsewhere within the borough such as Brixton and Streatham etc. (Richard Coburn of Railtrack)

Response B:

It is proposed to replace this policy – and that for Vauxhall – with a boroughwide policy.

Objection C:

Arches are suitable for a wider range of uses that may not be interpreted as an 'active frontage use' this aspect of the policy should be amended to refer to particularly suitable uses to which arches in Waterloo could be put including: Retail in Class A1, A2, A3, Business B1, Light Industry B1, Storage B8, Leisure D2. (Richard Coburn of Railtrack)

Response C:

Accepted in part – active frontage uses are defined under policy. It refers both to land-use and design aspects. The purpose of the reference, is to allow an exception to the normal employment uses in certain defined locations. This is made clear in the revised policy.

Objection D:

Railtrack object strongly to the introduction of a condition stating 'that every effort should be made to re-house small businesses locally' where conversion is proposed. This is not a matter for land use planning and is ultra vires in terms of the scope of Unitary Development Plan Policies. (Richard Coburn of Railtrack)

Response D:

Not accepted – change of use of an arch in employment use to non-employment use would be contrary to policies on employment protection, unless appropriate replacement employment space can be provided. Hence it is considered that the aspiration to relocate existing businesses is a reasonable one.

Objection E:

Add after 'is permitted' 'and will be actively encouraged in Hercules Road as part of improvements to the public realm of this route' and at end, 'changes to parking use will be resisted'. (Michael Ball – Waterloo Community Development Group)

Response E:

Accepted in part – the suggested wording with respect to Hercules Road is too detailed for a borough side policy. However the proposed replacement policy will incorporate the suggestion reiterating the unacceptability in using arches for parking purposes.

Objection F:

Whilst the South Bank Centre supports the concept of the conversion of arches to active frontages, it wishes to object to the lack of recognition of their required use of the arches for operational activities, such as storage, servicing and essential plant. Amend Policy 78 to read as follows: 'In Waterloo (north of Lambeth Road) railway arches provide a variety of small business premises as well as operational storage, servicing and other essential uses for the South Bank Centre. Whilst these are acceptable uses of the railway arches, conversion of arches to active frontages uses is permitted providing every effort is made to re-house small

businesses locally. Loss from parking use is permitted. (Mike Mc Cart – The South Bank Centre)

Response F:

Accepted in part – some of the suggested wording has been included in the proposed replacement policy but it is not considered necessary to include detailed wording concerning what should be authorised storage, operational plant and servicing uses of arches associated with the SBC. The proposed replacement policy would not necessarily preclude such uses.

Objection G:

In addition to the statements made within this policy, we believe that it is important to note that not all arches are appropriate for the type of development mentioned. There are arches which span across thoroughfares, which we feel should be treated, as if part of the overall urban design criteria or more specifically that the installation of high quality integrated public art should be promoted. (Howard Simmons – South Bank Employers Group)

Response G:

The policy does not apply to arches that form public highways. This is made clear in the supporting text to the replacement policy.

Policy 79 Permanent Retention of ~~t~~The London Eye

Summary of Representations & Responses:

Objection A:

The Mayor supports the permanent retention of the London Eye, however, it should make significant contributions to the delivery of a world class park given the severe impact the attraction has on the area in terms of visitor numbers and circulation. (Mayor of London)

Response A:

Accepted – this has already been achieved via a Section 106 agreement.

Objection B:

Policy pre-empts decision on current planning application. EH supports renewal of temporary permission, albeit for an extended period, to allow future consideration of retention of the structure in its sensitive location. (English Heritage)

Response B:

Noted – The London Eye has recently gained temporary planning permission for a period of 25 years. It has been roundly agreed (including the Government Office for London) that the London Eye is a unique and one-off structure and that it would be prudent for a temporary permission to be granted even though circular 11/95 states that temporary permission can only be granted for short-term or trial runs. Lambeth is very much committed to the long term retention of the London Eye.

Objection C:

Remove the sentence presuming the retention of the Eye. Change 79(a) to make it more explicit and rigorous in terms of Visitor Management, imposing very strict conditions. Change 79(c) to ensure that unauthorised stalls/stands are not permitted. (Marylyn Evers)

Response C:

Not accepted – This is the only objection questioning the retention of the London Eye. In both the UDP and the recent planning application there has been overwhelming support for the principle of permanent retention of the London Eye. For the reasons stated in the UDP it has become a world famous icon and symbol of London and it would be sorely missed. The policy is strict on visitor management measures, however specific details have been dealt with in the planning application. As the London Eye Company do not own Queens Walk they cannot be forced to remove unauthorised stalls. Hence the need to dedicate this as public highway.

Objection D:

The permanent retention of the London Eye should be tied to British Airways paying all the expense (i.e., traffic, parking, illegal traders) which the London Eye creates (Robin Dahlberg).

Response D:

Noted - these are management matters, which have been negotiated through the application and approval process.

Objection E:

In (c) With regard to the dedication of Queen's Walk as a public highway, we do not consider that this is necessary prerequisite for the permanent retention of the London Eye. Therefore object to this aspect of the policy although TLEC does not object in principle to the notion to dedication. (The London Eye Company)

Response E:

Not accepted – for reasons given under (C) above. The owners of the land will in any event need to be co-signatories of the planning application for the Eye.

Policy 80 Jubilee Gardens / and the Hungerford Car Park Site

Summary of Representations & Responses:

Objection A:

Suggests alternative wording emphasising world class nature of Jubilee Gardens. (Mayor of London)

Response A:

Accepted - as it emphasises the link to planning obligations, the second proposed amendment is ambiguous and wording more clearly stating the same end is proposed.

Objection B:

The aspiration appears to be to make Jubilee Gardens a proper setting for the Eye. Jubilee Gardens does not exist to create hub for the tourist attraction. It exists in its own right and must be redesigned and refurbished as such. It is not here to create a route to a hard to manage tourist attraction. It does not exist to create a visual link between Waterloo station and the wheel (Marilyn Evers).

Response B:

Accepted - It is proposed to amend the policy so that it has broader objectives than the setting of the London Eye, yet it is important to retain this element of the policy to emphasise the views of the Eye across the Shell Podium as being a critical element of the character of the South Bank. The amended policy will also reflect the objectors concern that the whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge be designated as MOL.

Objection C:

All of Jubilee Gardens and the area known as the Hungerford Bridge car park, must remain designated as Metropolitan open land. This is the current designation of the whole site from County Hall to the Hungerford Bridge and there is no justification for changing that designation. Paragraph 5.16.39 implies that the part of the site currently used, as a service road by the RFH is not designated as Metropolitan Open Land. This is not accurate. It is designated as Metropolitan Open Land it was not omitted from the designation open land. All Metropolitan open land must be protected from development. It must be sacrosanct. (Marilyn Evers – Waterloo Community Charity)

Response C:

Accepted - It is proposed to amend the policy to reflect the objectors concern. The whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge (including the access road) will be designated as MOL.

Objection D:

There is considerable local wish to see the potential of this open space maximised. We object strongly to the de-designation of any of it (Judy Bartlett of Lambeth Friends of the Earth and Lambeth Environment Forum).

Response D:

Accepted - It is proposed to amend the policy to reflect the objectors concern. The whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge (including the access road) will be designated as MOL.

Objection E:

We are concerned that Policy 80 implies that Jubilee Gardens may be restructured around the needs of the Eye. Jubilee Gardens was a valued open space before the Eye came. The Park is at a magnificent location on the Thames. It is important locally, where we have little open space and nationally. Retain the MOL status of the whole area, (including where anything else becomes available), extend it. (Jenny Stiles – Association of Waterloo Groups)

Response E:

Accepted - It is proposed to amend the policy so that it has broader objectives than the setting of the London Eye, yet it is important to retain this element of the policy to

emphasise the views of the Eye across the Shell Podium as being a critical element of the character of the south bank. The amended policy will also reflect the objectors concern that the whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge (including the access road) be designated as MOL.

Objection F:

In principle, we support this policy. Nevertheless, we suggest several small changes to the wording we would like to suggest. (Please see full Rep for details.) (Michael Ball – Waterloo Community Development Group)

Response F:

Accepted in part – a number of changes have been proposed which respond to the objector's concerns. Most notably, changes have been made to reflect the intention to retain the entirety of Jubilee Gardens and the Hungerford Car Park site up to the viaduct as MOL (including the access road), and to emphasise this site as a setting for the London Eye.

However, legally the UDP must set out policy. It may not delegate matters to specific groups. The local planning authority must make planning decisions on planning grounds, costs can be awarded against it on appeal if it solely decides applications on the results of public consultation. Government guidance states that plans are not appropriate places for setting out consultation mechanisms.

Objection G:

Any future plans to upgrade and extend the South Bank Centre will be put at risk and the regeneration of the entire area will be undermined. Irrespective of whether there is development on or under an extended Jubilee Gardens, SBC believes that some form of significant topography is required in the landscaping to achieve a world-class riverside park, maximising the amount of open space, providing views of the river, separation from the Eye, integration with cultural development on the Hungerford site and the high level walk from Hungerford Bridge to Waterloo Station. It would also make it easier to achieve softer green landscaping and improve the quality of the gardens itself. Keeping the gardens flat will condemn the park to becoming a rat-run for visitors to the Eye. Please consider our suggested amendments to the language of this policy. (Mike Mc Cart - The South Bank Centre)

Response G:

Not accepted - A consultant's study (BDP) commissioned by the Council to assess the issues surrounding the potential planning conflict between the two designations of Hungerford Car Park as an MDO and Metropolitan Open Land 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.

The policy does not rule out a limited element of landscaped topography, but it does require that access from Belvedere Road be 'predominantly at grade'. The reference to improvements to the surrounding area now refer to 'links' rather than to 'extensions' to Jubilee Gardens.

Objection H:

We are concerned that the Plan does not rule out the erosion of Jubilee Gardens. My committee opposes policy 80 on the grounds that its opposition to the development of Jubilee

Gardens (as elaborated in 5.16.39) is not sufficiently strong - especially the wording "raising levels to create an extended area of Jubilee Gardens could still be inappropriate development by harming the character of the MOL." We believe that any such development should be ruled out. Our recommendation is that there is no change or erosion of the MOL status! (Simon Allison of Whitehouse Residents Association)

Response H:

The objector is referring to paragraph 5.16.40. It is proposed to amend the policy to reflect the objectors concern. The whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge will be designated as MOL (including the access road). It is considered that the explanatory text is sufficiently strong to convey the Council's aspiration for this to occur, and to deter inappropriate development.

Objection I:

Jubilee Gardens should be grassed over, up to the existing railway viaduct, as per current UDP. There should be no loss of any open space whatsoever. This debate must first be had with both the Waterloo & Kennington Housing Forum and Friends of Jubilee Gardens. We have also made suggestions for amendments to the policy. (Ray Puckey – Waterloo & Kennington Housing Forum, Nicola Howey, Jez Feenay, Ray Puckey, Jez Feeney, - Matheson Lang Tenants & Residents Association, Cllr Leslie Boodram, Julie Nunn, Francis Forrest – Waterloo Town Centre Board, Julie Nunn – Tanwell Estate Tenants & Residents Association and Ray Puckey – Munroe Tenants Association)

Response I:

Accepted - It is proposed to amend the policy to reflect the objectors concern. The whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge will be designated as MOL (including the access road).

Objection J:

Add, "Any changes and improvement should be referred to Waterloo Town Centre Management Board and the friends of Jubilee Gardens". (Canon Richard Truss – Parish of Waterloo, St John with St Andrew)

Response J:

Legally the UDP must set out policy. It may not delegate matters to specific groups. The local planning authority must make planning decisions on planning grounds, costs can be awarded against it on appeal if it solely decides applications on the results of public consultation. Government guidance states that plans are not appropriate places for setting out consultation mechanisms.

Objection K:

We do not consider an extension is necessary to form a proper setting for the London Eye. We support improvements to Jubilee Gardens and we agree that a car park is not an appropriate use of MOL but we object to the extension of the gardens across the Shell Centre (podium) site. We agree that access to Jubilee Gardens and the Gardens themselves should remain substantially at ground level. We therefore propose this 'requirement' is deleted and the policy redrafted as " The Gardens should form a proper setting for the London Eye and developments between the Eye and Waterloo Station should provide convenient public access and glimpsing views of the Eye." (Shell International Company & Lend Lease Europe Ltd)

Response K:

The objector appears to be referring to the issue of views. Views of the Eye across the podium from York Road are an important positive feature of the South Bank Conservation Area. In its recent decision on Shell's application to develop the podium site, the Council established its position that the podium site is public open space. It is unlikely that any form of development – excepting open space improvements – would be acceptable on this site. The idea of 'glimpsed views' is therefore not one that the Council would entertain. The policy has been changed to refer to links to Jubilee Gardens rather than an extension to it across the Podium. The existing Parks Regeneration Area designation over the podium site will be removed in the Revised Deposit version of the emerging UDP. The concept of Parks Regeneration Areas is proposed to be removed from the Revised Deposit UDP entirely.

Objection L:

We support the principle that the improvement of Jubilee Gardens with world-class landscape design and public improvements should be secured. However as previously outlined the Hungerford Car Park is critical to any proposals for future improvements, regeneration and upgrading of the South Bank. To seek use of the Hungerford Car Park site as open space under Policy 80 would in practice create a formidable policy obstacle for future development and this will result in a lost opportunity for the BFI and the SBC particularly and the area in general. Any future-plans to upgrade and extend the South Bank will be put at risk and the regeneration of the entire area will be undermined. (Jon Telkman – British Film Institute)

Response L:

Not 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 dual designations as an MDO and MOL 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. This same argument applies to the BFI.

Objection M:

We have already made our views clear regarding Policy 44, Metropolitan Open Land, which includes both the sites covered by this policy. The rationale of this policy, however, is neither clear nor consistent. How does the 'extension' of Jubilee Gardens across the, Hungerford Car Park form a proper setting for the Eye, which can only be viewed side on from that vantage point'. While the Shell podium viewing point, which affords the most complete view of anywhere in Lambeth, is to become a corridor cutting through a development site (perhaps accommodating one of that cluster of high rise buildings suggested in Policy 37 for 'Shell Centre?'). (Anne Burke & Marina Thaine – County Hall Tenants & Residents Association)

Response M:

Noted – The aim of this policy is to establish Jubilee Gardens and the Hungerford Car Park site as a world class contiguous public open space in its own right. However it is the Council's view that the presence of the London Eye is an opportunity in terms of the creation of this exemplary public open space, not a hindrance. If the Hungerford Car Park site is to be developed along with Jubilee Gardens into a park, then it most certainly has the potential to capitalise on the visual contribution that the London can make to this part of Waterloo. It is nevertheless proposed to amend the policy so that it has broader objectives than the setting of the London Eye, yet it is important to retain this element of the policy to emphasise the views of the Eye across the Shell Podium as being a critical element of the character of the South Bank. The amended policy will also reflect the objectors concern that the whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge be designated as MOL.

The existing Parks Regeneration Area designation over the podium site will be removed in the Revised Deposit version of the emerging UDP. The concept of Parks Regeneration Areas is proposed to be removed from the Revised Deposit UDP entirely.

Objection N:

The Waterloo residential and working communities have for years supported a public park to Hungerford Bridge and would be betrayed by any de-designation of the Metropolitan Open

Land. Strong objection to any exemption or extension of service road from the plan to create a park worthy of the neighbourhood and of London as a whole. The existing service road should form part of the Metropolitan Open Land and of the Jubilee Gardens public open space as a ground level park. (Michael Wolfers)

Response N:

Accepted - The amended policy will also reflect the objectors concern that the whole open space, including Jubilee Gardens and the Hungerford Car Park site up to Hungerford Bridge be designated as MOL (including the access road).

Objection O:

Any development of this area should comprise buildings of no greater height than those in the area. The policy is well balanced but could benefit from a cross-reference to development of the new Hungerford footbridge. (MP R Handley – Westminster Society)

Response O:

The issue of 'over-height' buildings is dealt with under the new Policy 37 (Location and Design of Tall Buildings and Views). However, each case will be dealt with on its own merits and assessed in relation to specific criteria pertaining to matters such as location, aesthetic quality, urban design quality, impact on traffic and impact on views.

MDO 2 Texaco Garage & Glasshouse Walk, 1.4ha

Summary of Representations & Responses:

Objection A:

Each MDO should stress that replacement structures with newer frontages or visible from across the river should require no development higher than existing. (Mr R. Handley – the Westminster Society)

Response A:

Not accepted - The issue of 'over-height' buildings is dealt with under the new policy 37 (Location and Design of Tall Buildings and Views). New tall buildings, or tall extensions to existing buildings, will generally not be appropriate. However, each case will be dealt with on its own merits and assessed in relation to specific criteria pertaining to matters such as location, aesthetic quality, urban design quality, impact on traffic and impact on views.

Objection B:

We welcome the statement that development will go ahead only if supported by the local community, and the implication that if the local community does not support it, then development will not go ahead. However, the current wording of policy number MDO 2 is not clear on the requirements in the respect that:

1/ if adjacent sites are developed then money raised will be used to improve our present building and/or the facilities we offer.

2/ should the community decide in favour of an enhanced and improved replacement to the centre that:

(a) the current mixed use is kept and enhanced;

(b) it is at least 'like for like' in the immediate neighbourhood; There is no overall loss to the floor area of the centre and the nature of the equal (or hopefully larger) space provided is such that it would be adequate for the kind of activities that we currently organise. We hope for more space because of the constant demand for cheap studio units by crafts people in the area and to better meet the needs of the large Portuguese community.

(c) The timescale is kept strictly short (i.e. does not threaten the viability of our membership) and that during any changeover period, adequate alternate facilities in the immediate neighbourhood are provided. (This is of particular concern to those senior citizens that depend on the Centre as their principal and, in many cases, only focal point for community involvement and the craft people working in our studios who depend upon it for their livelihood.)

(d) That design of a replacement centre is in consultation with the local community and the Centre. (Tim Boxall – Secretary – Vauxhall Gardens Community Centre)

Response B:

Accepted – changes made.

Objection C:

Inappropriate use proposed. Community facility should be enhanced in partnership with community groups. Redraft or delete 1st Para. (Michael Ball – Chair, Vauxhall Neighbourhood Housing Society)

Response C:

Accepted - See above.

Objection D:

Do not destroy the site and tradition of 18th Century Vauxhall Gardens. Preserve the city Farm, a late 20th Century amenity in both educational and social terms. (G. Lang Tree)

Response D:

Noted - However, Spring Gardens and the City farm are not part of this site and are in no way threatened.

Objection E:

The paragraph is poorly written and vague in concept. The statement should identify that the site to the east of the arches has the potential to make a significant contribution to the regeneration of that part of Vauxhall to the east of the railway viaduct. The text should make it clear that development may occur in a phased manner, provided that schemes for the constituent parts of the site demonstrate that they would not prejudice the satisfactory development of the site as a whole. As this site lies within Vauxhall, close to Vauxhall Cross, it would be more appropriately moved to that section of the UDP dealing with Vauxhall (5.15), (CLS Holdings Plc)

Response E:

Accepted in part – it is proposed to move the Glasshouse Walk site to the Vauxhall part of the plan and rewrite parts of the policy. It is important to include design advice within the policy and indeed the developers have now accepted these principles. Comprehensiveness, as far as possible, is necessary to ensure that development preserves and enhances the Vauxhall Gardens Conservation Area.

Objection F:

As currently drafted, the MDO is very vague, and does not refer to the protection of residential amenity of existing properties within and adjoining the development site. (Peninsula Heights Management Company c/o Kenleigh Folkhard & Hayward)

Response F:

Accepted – change made.

MDO 3 ————— Queensborough House, ————— 0.3ha

Summary of Representations & Responses:

Objection A:

The proposals do not do enough to protect against over-height buildings. (M.P. R. Handley – Westminster Society)

Response A:

The issue of 'over-height' buildings is dealt with under the new policy 37 (Location and Design of Tall Buildings and Views). New tall buildings, or tall extensions to existing buildings, will generally not be appropriate. However, each case will be dealt with on its own merits and assessed in relation to specific criteria pertaining to matters such as location, aesthetic quality, urban design quality, impact on traffic and impact on views. An arbitrary height limit would have no planning justification.

However, as works have now commenced on the Queensborough House site, this MDO is proposed for deletion.

**MDO 4 ~~9 Albert Embankment/5 Salamanca Street,~~
~~0.2ha~~**

Summary of Representations & Responses:

Objection A:

The proposals do not do enough to protect against over-height buildings. Each item should suggest that, replacement structures with newer frontages visible from across the river should require no development higher than existing. (M.P. R Handley – Westminster Society)

Response A:

The issue of 'over-height' buildings is dealt with under the revised policy 37 (Location and Design of Tall Buildings and Views). New tall buildings, or tall extensions to existing buildings, will generally not be appropriate. However, each case will be dealt with on its own merits and assessed in relation to specific criteria pertaining to matters such as location, aesthetic quality, urban design quality, impact on traffic and impact on views. An arbitrary height limit would have no planning justification.

Objection B:

Inappropriate use proposed. Amenity space required. South Bank House opened up. (Michael Ball)

Response B:

Development has now commenced so it is proposed to delete this MDO. South Bank House is not part of the site.

MDO 5 London Fire Brigade HQ Headquarters, 8
Albert Embankment
1ha

Summary of Representations & Responses:

Objection A:

The proposals do not do enough to protect against over height buildings. Each item should stress that replacement structures with newer frontages or visible from across the river should require no development higher than existing. (MR R. Peter Handley, Westminster Society)

Response A:

The issue of 'over-height' buildings is dealt with under the new Policy 37 (Location and Design of Tall Buildings and Views). New tall buildings, or tall extensions to existing buildings, will generally not be appropriate. However, each case will be dealt with on its own merits and assessed in relation to specific criteria pertaining to matters such as location, aesthetic quality, urban design quality, impact on traffic and impact on views.

Objection B:

Inappropriate use proposed. Concern about South Bank House. Redraft to reflect concern. (Michael Ball)

Response B:

The proposal does not cover South Bank House, and like all MDO's does not specify an end use providing this complies with the general and area specific policies of the plan.

Objection C:

LFEPa welcomes the identification of this site as a Major Development Opportunity. However, in light of the possibility of the site becoming vacant, as identified above, we request that the policy be re-drafted to reflect our joint understanding as set out in correspondence and meetings. (London Fire & Emergency Planning Authority)

Response C:

Accepted – changes made.

MDO 6

East Brixton Regeneration Arc

Summary of Representations & Responses (Policy):

Objection A:

The development of Popes Road Car Park is supported providing that it is recognised that the existing section of Popes Road from Canterbury Crescent to Station Road is reserved for the Cross River Transit terminus. (Mayor of London)

Response A:

Part accepted – a provision for the Cross River Transit facility within the MDO has been provided for but as this has changed and may be subject to further change it is not prudent to specify the exact location.

Objection B:

We very strongly object to this policy as it stands now. Whilst we agree with some aspects of the policy as laid out in the UDP, the area of the MDO is as large as that which is designated as the core area of Brixton Town Centre. As such, we suggest that it needs a much larger, more inclusive consultation programme. The redevelopment would radically alter the geographical shape of the town centre, and affect many residents and local businesses. The current level of information about the project among those affected is insufficient to justify the inclusion of the project in a 15-year plan. If a project as big as this is to succeed as a regeneration driver, it has to be based on comprehensive understanding and agreement between those planning and those who the regeneration is supposed to help. This project is too big to be slipped through as part of the UDP process. We feel that these plans are very wide-ranging and will have a major impact on the character of central Brixton. The objections listed above stem from the fact that Lambeth has not consulted adequately on the major proposals contained in MDO6. It may well be that there is community support for aspects of what is proposed in the UDP and the Arups EBRA report. Other aspects will doubtless provoke concern. Nevertheless, there has been no meaningful opportunity to date to identify either support or concern. (We do not believe a brief presentation at a Forum meeting represents such a meaningful opportunity). Before the next draft of the UDP is published, there needs to be a proper consultation around the EBRA. While we encourage the plans to improve some derelict areas on the designated sites, we have not been consulted sufficiently to allow us to formulate a response. (Brixton Area Forum Board)

Response B:

Accepted in part – the UDP itself is fairly general about this site. However more detail is provided in a consultants report entitled the 'East Brixton Development Framework'. Lambeth officers have been working with the town centre board to extend and widen the consultation on this study and have consequently altered the MDO to address town centre concerns. These concerns expressed so far, including those after the deposit period, are reflected in the revised policy – see also remaining responses.

Objection C:

Object to the strong focus in the plans on large retail developments. The support of small, independent, local business is vital to retaining the character of Brixton, and retaining its attraction when competing with other, blander retail centres, such as Croydon. Any redevelopment would have to maintain a practical balance between various sizes of retail units, and would have to be in sympathy with the current character of the town centre. (Brixton Area Forum Board)

Response C:

Accepted – changes made.

Objection D:

Object to the lack of community facilities and of space for Voluntary Sector and Social Enterprise. These are essential to retain the vitality of the centre of Brixton. (Brixton Area Forum Board)

Response D:

Accepted – promoted by Policy 54 but it is right to also mention it here.

Objection E:

Object to the lack of clarity as to how the plan would deliver any of the environmental and social outcomes listed in the introduction to the Arup Report on the East Brixton Regeneration Arc. It is unclear, for example, how the recommended plan would have any positive effect on crime levels in the Arc, in the town centre, or in the surrounding streets. (Brixton Area Forum Board)

Response E:

Accepted in part – a new supplementary paragraph is proposed to be added.

Objection F:

Object to the proposals to relocate facilities from Brixton Recreation Centre to Ferndale Sports Centre. (Brixton Area Forum Board)

Response F:

Accepted – Ferndale Sports Centre has now been developed and the relevant MDO will be deleted. The uses of this centre are complementary to the Brixton Recreation Centre and, of course, are exterior.

Objection G:

Do not think a 'Landmark Development' (i.e. supermarket or similar) is right for the area. Planners have the fetish attitude that a large supermarket etc. will solve Brixton's problems. I would prefer it if they concentrated on attracting more and varied retailers/businesses into the area. (Geoffrey Thurley)

Response G:

Accepted – it is proposed to amend the MDO to avoid a second and competing centre of attraction being created, as recommended in the East Brixton Urban Design Framework report. New retail development will not solve Brixton problems, however appropriate retail development will generate many of the community and transport improvements the area needs that would be unlikely to be funded otherwise. The Lambeth Retail and Leisure Capacity Study has shown that there is a shortage of retail facilities in Brixton which forces people to spend elsewhere, to the disbenefit of all of Brixton's businesses – it has also identified the capacity for a supermarket in the borough, which could be centrally located at Brixton although need would have to be demonstrated for this to be feasible.

Objection H:

I would not support large supermarkets in Brixton Town Centre as it would kill the internationally recognised cultural flavour of Brixton and make it the same as many South London Centres that are dead in non-shopping hours. (Sue Bell)

Response H:

See response under G above, amendment proposed.

Objection I:

We are slowly losing all our space. The only development should be a high quality playground. We object to any housing in front of Southwyck House as we have a dense enough population here already. (Mrs R. Spearing)

Response I:

See response to G above. There will be no loss of existing open space to accommodate new developments in Brixton, however there may be the creation of new open space to complement new development and cater for an increased residential population and town centre usage.

Objection J:

Several proposals appear excessive in terms of their impact on the local environment, and considerable investment of resources would be required for only marginal improvements in quality or efficiency. The viability of some proposals appears to be achieved only at the expense of neighbouring properties or the public realm. (Alan Piper – the Brixton Society)

Response J:

Part accepted – this is nonetheless a sweeping statement, which has been applied to several sites with no specific justification here. The policy contains many

requirements in terms of the scale and nature of development and the quality of the public realm to ensure that this will not occur. Most of the objection relates to the timing and scope of the East Brixton Urban Design Framework rather than the plan itself (see response under b).

Objection K:

East Brixton Regeneration Arc is an unclear policy that fails to provide developers with adequate guidance of what the Council is seeking to achieve, and what type of development will be permissible where. The Policy is premature given the urban Design Framework for East Brixton, the consultation process for which has not yet finished. (Mount Anvil Construction)

Response K:

Accepted – change have been proposed as a result.

MDO 7

**Bon Marché Yard (between Nursery Rd,
Ferndale Rd & at rear of 442-444 Brixton Rd)
0.3ha**

Summary of Representations & Responses:

Objection A:

Allow small-scale manufacturing (Mr Alan Piper of The Brixton Society).

Response A:

Accepted. Change made

MDO 8

Brixton “Phase II” Site

0.14ha

Summary of Representations & Responses:

No objections received.

MDO 9 ~~**Brixton Underground Station, 435-439 Brixton Rd**~~ **0.12ha**

Summary of representations and responses:

Objection A:

Several proposals appear excessive in terms of their impact on the local environment, and considerable investment of resources would be required for only marginal improvements in quality or efficiency. The viability of some proposals appears to be achieved only at the expense of neighbouring properties or the public realm. (Brixton Society)

Response A:

Not accepted – no justification has been given to this sweeping statement which has been applied to several sites. In any event, the development is substantially complete and MDO is proposed to be deleted.

MDO 10 — Ferndale Sports Centre, Nursery Rd — 0.7ha

Summary of Representations & Responses:

Objection A:

Clarify Site Proposals: Proposals for individual sites are generally in the form of very brief notes, which do not clearly distinguish between site history, current developments and new proposals. These should be identified separately. (Alan Piper, the Brixton Society)

Response A:

Not accepted – each MDO refers to the full scope of proposals, which the plan could support. This might include current proposals, but these may fall by the wayside so it rather identifies the broad objectives, which should be met. Site history is only (and rarely) introduced where it is relevant to consideration of future proposals. Hence there is no need to identify these matters separately. In any event, the development of the sports centre is now complete and MDO10 is proposed to be deleted.

Objection B:

Any assertions regarding the possible relocation of facilities from Brixton Recreation Centre are contingent on MDO6 being adopted, which we believe is premature for reasons outlined above. We also object to the weak protection given to "as much of the surrounding open spaces as possible". There is a chronic shortage of public open space in this part of Brixton and any development on this site should safeguard and enhance the public open space. (Brixton Area Forum Board)

Response B:

Accepted. In any event, the development of the sports centre is now complete and MDO10 is proposed to be deleted.

Objection C:

Object to separating Ferndale Road frontage. Prefer if main vehicle access is via Ferndale Road to minimise traffic in western part of Nursery Road (Brixton Society)

Response C:

The development of the sports centre is now complete and MDO10 is proposed to be deleted.

