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31st January 2012

BDP.

Mr Tim Cutts

Acting Head of Planning Policy
Planning Policy
Regeneration and Neighbourhoods
FREEPOST SE1919/14
London
SE1P 5LX

Dear Tim

RESPONSE TO DRAFT ELEPHANT & CASTLE SPD

We would like to thank you and Barbara-Ann for the meeting last week. Both we and our client found the session extremely useful in gaining further insight into the proposals and process and having positive conversations about potential changes. As promised we have been through the Draft Elephant and Castle SPD in some detail with suggestions of a number of text changes and additions to assist with the amendment process. As there is so little time for you to consider the consultation responses before finalising and adopting the report, we hope the detailed amendments will assist you in making the changes and would be very happy to discuss any of the points further or provide additional information.

As this is the formal (and final) consultation on the Draft SPD, we are writing with a formal representation on behalf of London South Bank University. As you know London South Bank University has a vested interest in the long term future of the Elephant and Castle area and wishes to work in partnership with London Borough of Southwark to ensure that the SPD becomes a robust tool for delivering high quality and sustainable future regeneration. The Draft SPD is comprehensive and is developing into a good quality document, but we would like to suggest a number of changes to refine the principles and policies to accurately reflect the university's campus vision.

To that end we hereby submit formal comments and suggested amendments to the Draft SPD diagrams and text. For clarity the comments have been broadly prioritised in order of importance and we attach mark ups where appropriate to illustrate the points raised. Our comments are structured under the following sections:

1. The role of London South Bank University;
2. London South Bank University Estate Vision;
3. Enterprise Quarter principles;
4. Student accommodation and other land uses;
5. Heritage and conservation;
6. Central area principles;
7. Section 106 contributions.

1. The role of London South Bank University

1.1 As a major land owner, employer and stakeholder, London South Bank University has a very important role to play in the regeneration of the Elephant and Castle area. The university is committed to working in partnership with London Borough of Southwark and would like this to be fully reflected in the Draft SPD. *Requested amendment: Specifically name London South Bank University in the following locations:*

- a) *As a major employer – p.21, para 2.2.9.*
- b) *As major social infrastructure – p.23, para 2.2.14.*
- c) *As a key partner – p.28 (vision) and p.31, para 3.2.11.*
- d) *Please can there also be consistent reference throughout the document to London South Bank University – p.29 (core strategy diagram), p.120, para 5.8.7, and p.139.*

2. London South Bank University Estate Vision

2.1 Since the Enterprise Quarter SPD was adopted in 2008 the university has developed a clear vision for the future growth and improvement of the Southwark campus. This vision seeks to provide an enhanced central campus focusing on the existing area of university accommodation and providing a high quality environment with a diverse mixture of uses. This vision will contribute substantially to the regeneration of the area, with spin off benefits by way of educational attainment, employment, vibrancy and physical environment improvements. While the SPD is supportive of the growth of the university, a number of important components of the vision are not yet fully reflected in the draft SPD with several proposals in the SPD being in conflict with the core objectives. The comments below seek to support those elements that align with the vision and identify those that conflict to ensure the SPD facilitates the regeneration of this important site:

- a) An overarching objective of the university's vision is to create a compact 24 hour campus, where activity is created through a diverse mix of uses including introduction of student accommodation, leisure and cultural uses, as well as university accommodation and town centre uses. In this way the campus will become vibrant with natural surveillance, improved safety and a reduction in the fear of crime particularly in the evenings. The vision seeks to make better use of the existing accommodation and take opportunities for physical improvements wherever possible. The aspiration for the growth of London South Bank University is supported in the SPD, but the importance of improving the existing stock and environment should also be recognised.

Requested amendment: Change text at p.30, para 3.2.7 as follows: 'Support the growth and improvement of London South Bank University and the London College of Communication' (suggested amendment underlined).

- b) We are supportive of the SPD where it promotes the growth the provision of space for higher education – p.43 (SPD8) and p.121 (SPD49). The SPD should also support the refurbishment of higher education space.

Requested amendment: Amend SPD8 (p.43) as follows: 'Proposals for provision of new and refurbished space for higher education will be supported' (suggested amendment underlined).

- c) A number of sites have been identified for future development to facilitate the growth and improvement of the campus, but not all are indicated in the draft SPD as potential development sites. These are identified and explained below, and for clarity please find enclosed (at Appendix A) mark ups showing the exact extent of the sites for inclusion as potential development opportunities.
- d) The Technopark site bounded by London Road, Ontario Street and Keyworth Street is a future development site that is crucial to delivering the university's campus vision (referred to as 'Anchor 3'). It is located at a key arrival point to the university from the town centre and by various modes of public transport, but currently fails to perform that crucial gateway role. The future aspiration is therefore to redevelop this site and the surrounding public realm so that it marks arrival into the Enterprise Quarter and

provides pedestrian friendly connections into the university campus. It should therefore be identified in the SPD as a development opportunity.

Requested amendment: Identify the Technopark site as a potential development opportunity in the SPD at p.20 (figure 6) and p.124 (figure 40).

- e) The university owns sites at Caxton House, Dante Place and 83 New Kent Road. As part of the vision for a more compact campus, and to enable more efficient use of the existing university accommodation, these sites are likely to be redeveloped in the future and should therefore be identified as potential development opportunities.

Requested amendment: Identify the following as development opportunities as indicated in Appendix A – Caxton House at p.20 (figure 6) and p.124 (figure 40), Dante Place at p.20 (figure 6) and p.112 (figure 34), and 83 New Kent Road at p.20 (figure 6) and p.129 (figure 43).

- f) Arts, culture, leisure and entertainment uses are important in improving activity, vibrancy and achieving a 24 hour campus. We therefore support the positive view of proposals for arts, culture, leisure and entertainment uses (p.42, SPD6).
- g) We support the planned improvements to public transport, walking and cycling – p.45 (SPD10), p.47 (SPD11).

3. Enterprise Quarter Principles

3.1 The vision for the future of London South Bank University is for an active, vibrant and high quality community campus in the heart of Elephant and Castle. This will be a significant contributor to and catalyst for regeneration in the area with many spin off benefits for the local economy and communities. While many of the principles in the SPD will help to achieve the campus objective, there are some areas that should be strengthened to present and promote this as a clear directional strategy.

- a) The character description of the Enterprise Quarter should recognise the variations in the quality and style of built form, with some areas of poor quality built form in the university area along London Road, Newington Causeway and Borough Road with an inward looking nature of the university and lack of active ground floor frontage. *Requested amendment: Add new paragraph after 5.8.7 (p.122) to state 'The built form in the Enterprise Quarter is of variable ages and qualities, with some poor quality buildings in particular along London Road, Borough Road and Newington Causeway that lack active ground floor frontage and fail to contribute positively to the streetscene.'*
- b) The corner of London Road and Ontario Street is a key gateway arrival point to the university from the Central Area and via various modes of travel. This area however lacks a sense of arrival and fails to perform the role of a gateway. In particular, the public realm is of poor quality and lacks definition, and the Technopark building (on the corner of London Road and Ontario Street) is a major barrier to movement failing to announce the entrance to the university. Creating a gateway in this location will not only mark the entrance to the university campus area but will better connect the Enterprise Quarter to the central area and promote pedestrian movement to the north along the key strategic route of London Road.

Requested amendments: Add new bullet under paragraph 5.8.7 (p.120) – 'Promote the creation of a gateway at the south of the Enterprise Quarter on London Road, connecting and encouraging movement from the central area and announcing arrival into the university area.'

Add new bullet under SPD51 (p.123) – 'Development should:

- *Contribute towards creating and strengthening gateways into the area and improving legibility, including from the south at the junction of London Road / Ontario Street.' (suggested addition underlined)*

Amend figure 40 (p.124) to indicate a gateway public space at the junction of London Road / Ontario Street (see Appendix B for mark up).

- c) We are generally supportive of the building heights strategy in the draft SPD, but it would benefit from additional clarity and refinement in relation to townscape legibility and the role of gateways. In particular we would like to see greater emphasis on using building heights to emphasise the southern gateway to the Enterprise Quarter and enhance the role of this area in drawing pedestrians to and from the central area. The Enterprise Quarter SPD (2008) included a very clear indication of the appropriate locations for tall buildings but this is not well reflected in the Draft SPD. In line with the previous approach, the Technopark site (on the London Road / Ontario Street junction) is considered an appropriate location for a taller building of landmark quality to mark the gateway and entrance to the university campus.

Requested amendments: Add new bullet under SPD17 (p.56) – ‘Tall buildings should:

- *Help reinforce way-finding and the legibility of the area, including by announcing key pedestrian activity nodes and arrival points and reinforcing gateways.’ (suggested addition underlined)*

The tall buildings strategy is not clearly represented on figures 14 and 15 (p. 58). While we acknowledge the importance of flexibility in the SPD, a plan diagram would be beneficial to help identify those locations that the Council deems appropriate for taller buildings and demonstrate the interconnections with other aspects of the SPD strategy.

Amend paragraph 5.8.4 (p.119) – ‘There is an opportunity for taller buildings to be developed on Newington Causeway and London Road which will help to define the gateway into the central area.’

Amend text under SPD51 (p.123) – ‘Tall buildings should:

- *Help define gateways into the central area and Enterprise Quarter, especially to the south of the viaduct, shown on figures 14 and 15. They should diminish in height moving north along Newington Causeway and London Road to manage the transition to surrounding building development.’ (suggested additions underlined)*

- d) We generally support the principles for enhancing the quality of the public realm in the draft SPD, particularly the improvement of the public realm (p.52, SPD15) and the creation of a finer grain of development (p.53, SPD16). We are pleased to see that many of the key public realm principles from the Enterprise Quarter SPD (2008) have largely been taken forward in the draft SPD. The intended role of Appendix A is however unclear and the proposals are notably more detailed than for any other area. Since the Enterprise Quarter SPD was adopted in 2008, the university has advanced its strategy for the future of the campus and many of the highly detailed public realm proposals in Appendix A no longer align with the development opportunities. There are also now further opportunities for improvements to the public realm and permeability of the area which we consider should be promoted in the SPD.

Requested amendments: Remove Appendix 2 from the SPD.

Amend SPD51 (p.122) – ‘Public realm improvements should focus on:

- *Providing public spaces to act as focal points and gateways within the area:*
 - *At the junction of London Road / Ontario Street.’ (suggested additions underlined)*

Amend figure 12 (p.49) and figure 40 (p.124) as per the annotations at Appendix B and summarised as follows:

- *Promote a new and more direct pedestrian route from the junction of London Road / Ontario Street to Keyworth Street to increase permeability between the Central Area and the Enterprise Quarter.*
 - *Create a gateway space at the junction of London Road / Ontario Street to announce arrival and improve the legibility of the area.*
- e) There activation of frontages throughout the Enterprise Quarter will help to provide natural surveillance and to create a 24 hour community campus while also improving integration with the surrounding areas.

We therefore support the strategy text promoting active uses at ground floor (p.120, para 5.8.7 and p.121, SPD49).

Requested amendments: Amend wording of SPD49 to state 'development should provide active ground floor uses along all routes and spaces.' (p.122, SPD51). (suggested additions underlined)

Amend figure 40 (p.124) as per the annotations at Appendix B and summarised as follows:

- *Promote the activation of ground floor frontages throughout the area.*
- f) We recognise the value of tree planting and support the proposals for the creation of green linkages, including in the West area linking to the Enterprise Quarter. It should however be recognised within the SPD that tree planting is subject to feasibility in relation to the utilities in particular.

Requested amendments: Amend SPD51 (p.122) to state – 'Reinforcing the formal 'boulevard' character of streets leading to St George's Circus, supplementing existing mature street trees on Lambeth Road and Borough Road where necessary and feasible, and introducing new tree planting on London Road where possible.' (suggested additions underlined)

4. Student accommodation

4.1 Providing high quality and affordable student accommodation in the right locations is a key priority for the university to create a sense of community in the university area. Student accommodation will make a vital contribution to the objective for a '24 hour' central campus by creating activity and eyes on the street during day and night. Any new accommodation will be linked directly with the university providing for students who attend the university and will therefore contribute directly to the local economy and vibrancy.

- a) We support the objective to help address needs for student accommodation (p.30, para 3.2.6). We also support the favourable view of proposals for student housing (p.43, SPD8).
- b) Where it is considered essential to creating a community and a more vibrant mix of uses, student accommodation, in direct association with London South Bank University, should be promoted in the Enterprise Quarter. It should also be recognised that the area lacks activity and natural surveillance during the evening, and the SPD should strongly promote a more diverse mixture of uses. We are generally supportive of the land use principles under SPD49, but consider that further additions would strengthen this guidance.

Requested amendments: Add new bullet under paragraph 5.8.7 (p.122) – 'Promote a 24 hour community campus in the heart of the Enterprise Quarter.' Add student accommodation as a use promoted under SPD49 – 'Residential use, including student accommodation associated with the university, can be introduced...' (suggested amendment underlined).

- c) Student accommodation is a vital component of the university's long term vision for the central campus. Student accommodation in the Enterprise Quarter directly linked to London South Bank University should therefore be a priority over other providers to ensure that other developments do not prejudice the delivery of the campus vision.
- d) As set out in point 2(e) above, there may be opportunities in future to release land for development in order to rationalise the university's land ownership and provide a more compact campus. We have identified the sites in the Pullens (Dante Place) and Rockingham (83 New Kent Road) areas, and consider that both of these sites could be deemed appropriate for an alternative private residential use.

Requested amendments: Identify opportunities for conversion or redevelopment of student accommodation sites for housing, including in the Pullens and Rockingham character areas.

Add new bullet under SPD5 (p.36) to state: 'Proposals for the conversion or redevelopment of student accommodation to private residential will be supported.'

Amend SPD41 (p.110) to state: 'Additional residential use will be supported, including the conversion and redevelopment of student accommodation'. (suggested addition underlined)

Amend SPD52 (p.127) to state: 'Additional residential use will be supported, including the conversion and redevelopment of student accommodation'. (suggested addition underlined)

- e) In the Pullens character area, the area to the north of Newington Butts is very different character to the south by way of the urban grain, appearance, scale and form of development. The text should give greater recognition to the different style and form of buildings north of Newington Butts, and recognise that some areas may be appropriate for larger scales subject to the context and relationship to conservation areas.

Requested amendments: Amend text on to recognise the variations in the character of built form particularly between the north and south of Newington Butts – p.108 (paras 5.6.1 – 5.6.3), p.110 (SPD43).

5. Heritage and Conservation

- 5.1 We recognise that heritage assets need to be preserved and respected, but there is an imbalance in the SPD currently with a disproportionate emphasis on conservation than promoting physical improvement and a more attractive, better quality environment in many areas. In order to address that balance we suggest the following amendments.

- a) SPD16 provides the overarching principles for built form. The principles primarily relate to protecting the existing character, built form and heritage and fail to recognise the need for improving poor quality built form.

Requested amendments: Add new bullets under SPD16 (p.53) to state:

- Improve the quality of the environment and townscape in areas of deficiency.
- Enhance the townscape through the design and architectural quality.

- b) We understand that there will be consultation later this year on buildings proposed for local listing through the council's heritage SPD. We support this as a robust approach to designating locally listed buildings with an opportunity for the public and stakeholders to comment and ensure accuracy. However, as the Elephant and Castle SPD will be adopted in advance of that SPD, we do not consider it appropriate for buildings proposed for local listing to be included in that SPD at this stage. Should buildings not be designated as locally listed, there will be undue confusion and conflict between the SPDs. We therefore strongly object to the inclusion of any reference to buildings proposed for local listing.

Requested amendments: Remove all references to buildings proposed for local listing, including figure 18 (p.76), figure 21 (p.87), figure 24 (p.93), figure 27 (p.99), figure 30 (p.106), figure 33 (p.111), figure 36 (p.117), figure 40 (p.124), figure 42 (p.129).

Remove Appendix 3 from the SPD.

- c) We are concerned about a number of buildings proposed for local listing where we consider that these are inadequately justified both within the SPD (and background evidence documents) and in terms of their historic and townscape qualities. In particular, the justification is unclear for the proposed local listing of 103 Borough Road, Caxton House at 13-16 Borough Road, and 83 New Kent Road. As an example, only part of the 103 Borough Road building is included and it has been the subject of much physical change with few original features intact. We therefore feel that further more detailed interrogation and consultation is required before any local listing goes forward and we strongly object to these proposed local listings on p.124 (figure 39), p.129 (figure 42) and in Appendix 3.

Requested amendments: Amend figure 39 (p.124) to remove proposed local listings, particularly of 103 Borough Road and Caxton House on Borough Road.

Amend figure 42 (p.129) to remove proposed local listing of 83 New Kent Road.

Remove references to 103 Borough Road, Caxton House and 83 New Kent Road from Appendix 3.

- d) As a general point, the colours between current and proposed conservation areas are difficult to distinguish on figures throughout the report (p.55, fig 13).

6. Central character area

6.1 First impressions are crucial to London South Bank University where there is a need to fill student places in an ever more competitive higher education environment. Students and visitors to London South Bank University arrive by various modes of transport, including the tube and train lines, and the quality and appearance of the central area of Elephant and Castle is therefore paramount to the university.

- a) There is little mention of the need to improve the appearance and sense of arrival in the central area, despite Elephant and Castle being identified as the 'southern gateway to Central London' by the London Plan. The quality of the environment in this area is currently very poor and hostile for pedestrian and greater emphasis should be placed on this in the SPD. There is a lack of emphasis on future design and architectural quality as a key principle, and particularly in relation to the central area, and this should be addressed to secure effective future regeneration.

Requested amendments: Add new bullet under paragraph 3.2.9 (theme 5) as follows:

- 'Promote the highest design and architectural quality in new and refurbished buildings commensurate with the role of the area as a southern gateway to Central London.'

Amend SPD1 (p.32) to state:

- 'Work with the landowner to transform the shopping centre through the highest quality redevelopment or remodelling, supporting the introduction of new large 'anchor tenants' and promoting a wider and mix of retail uses to strengthen the appeal of the town centre to a wider catchment'. (suggested addition underlined)

Add new bullet under paragraph 5.1.7 (p.71) as follows:

- 'Ensure all development and public realm enhancements are of the highest quality to provide a positive perception of this strategic gateway.'

Add new bullet under SPD23 (p.74) as follows:

- 'All development on the shopping centre should be of the highest design and architectural quality.'

Add new bullet under SPD23 (p.75) as follows:

- 'Taller landmark buildings should be elegant and of exceptional architectural quality in order to create an appropriate identity for this strategic gateway.'

- b) The quality of the public realm in the central area will be vital to improving perceptions of the area and turning it into a high quality gateway. Further opportunities should be taken to improve the public realm in the central area, particularly around the northern roundabout and at future entrances to the shopping centre.

Requested amendments: Amend figure 19 (p.77) to expand the areas of opportunity for public realm improvement around the edges of the northern roundabout and to show an additional opportunity for a new civic space to the northern entrance of the shopping entrance. See mark up at Appendix C.

7. Section 106 Contributions

7.1 London South Bank University recognise the council's policy for Section 106 contributions but seek greater clarification on the changes to the Section 106 charging that are proposed within this SPD.

- a) The SPD proposes Section 106 contributions for developments over 100m² or 1 additional dwelling. This is not evidenced specifically in the S106 viability study which tests contributions only in relation to far larger scale developments. It is a substantial change from the SPD, which sets out 10 units or 1,000m² as the threshold and without evidence to suggest the small scale developments could cope with the change in viability terms we object to this proposal and the substantial burden of open book financial appraisals for such small scale development applications.
- b) It is not possible to easily compare the S106 tariffs for strategic transport (proposed to supersede tariffs in S106 SPD) due to different charging units. The S106 SPD charges at a rate of £210 per person, whereas the proposal in the draft SPD is for charges of £104 per square metre (for residential developments).

We hope these comments are all clear and look forward to seeing the revised SPD which we trust will reflect the suggestions. Just to reiterate, as there is very little time for consideration of the consultation responses before adoption we would be happy to discuss or provide additional clarification so please do not hesitate to contact us.

Finally, we would be grateful for any information at the earliest possible stage on future consultations on matters of interest to London South Bank University.

Yours sincerely



Becky Cocker
Town Planning Associate

BDP

cc Stephen Wells (London South Bank University, Director of Estates)
Anna Sinnott (BDP)

APPENDIX A – ADDITIONAL DEVELOPMENT OPPORTUNITY SITES

Figure 6: Potential development sites in the opportunity area - SUGGESTED AMENDMENTS

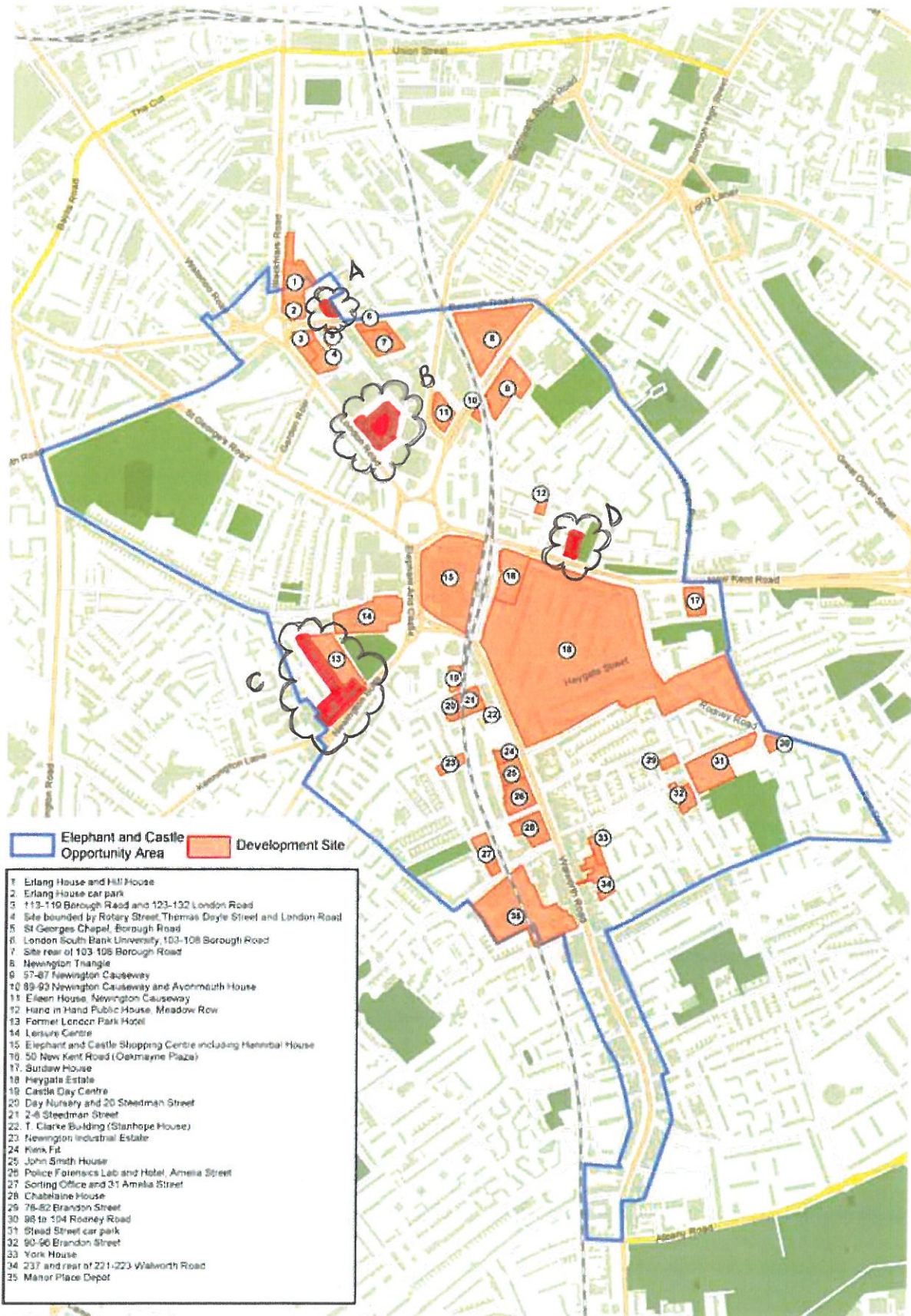


Figure 34: Indicative proposals for the Pullens character area - SUGGESTED AMENDMENT

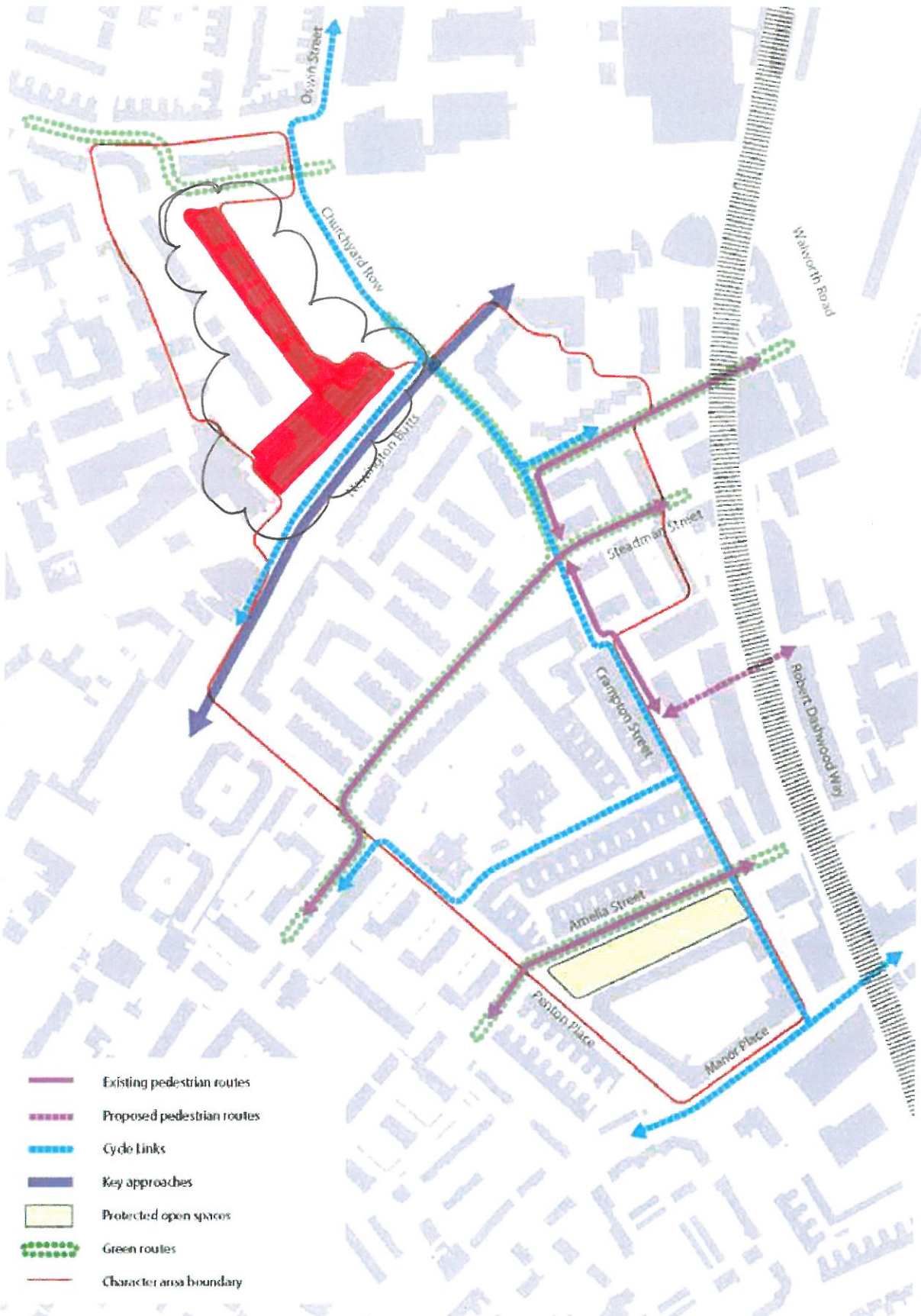


Figure 42: Heritage assets in the Rockingham character area

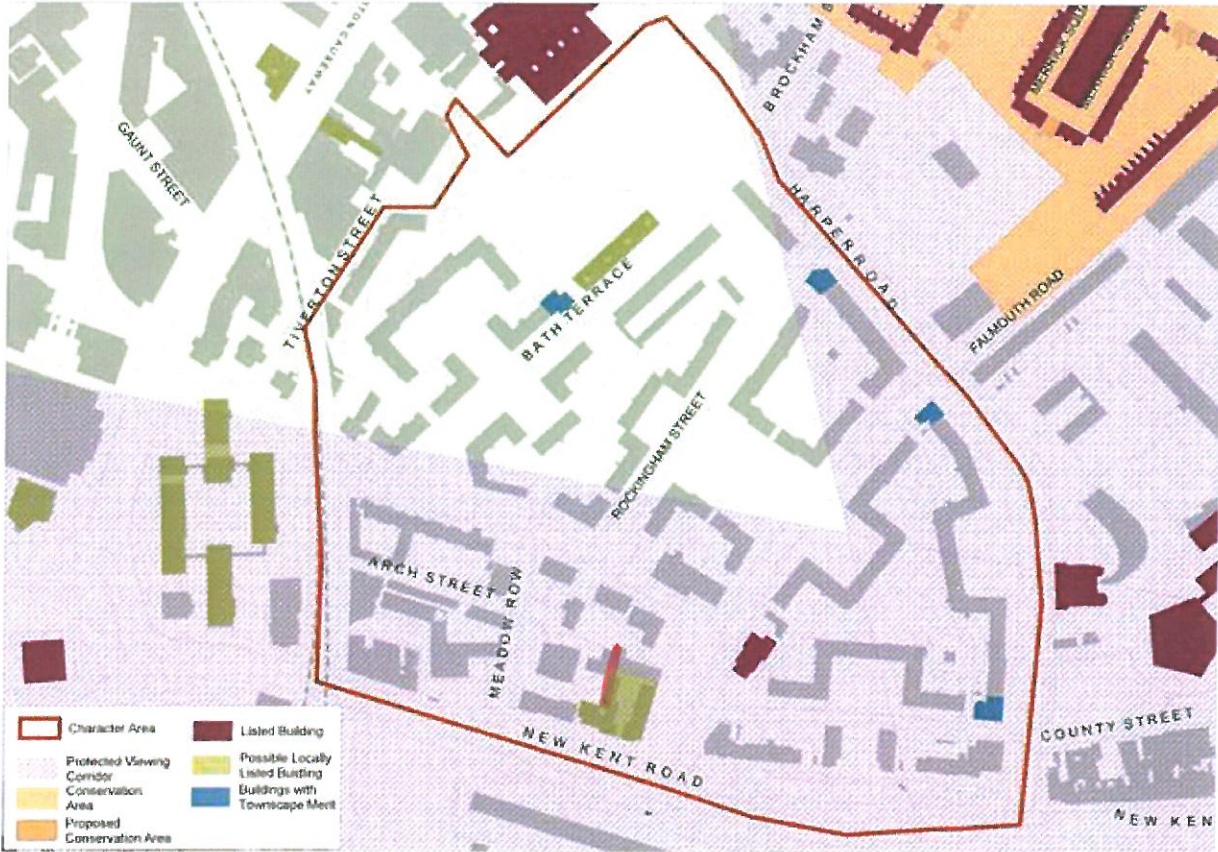
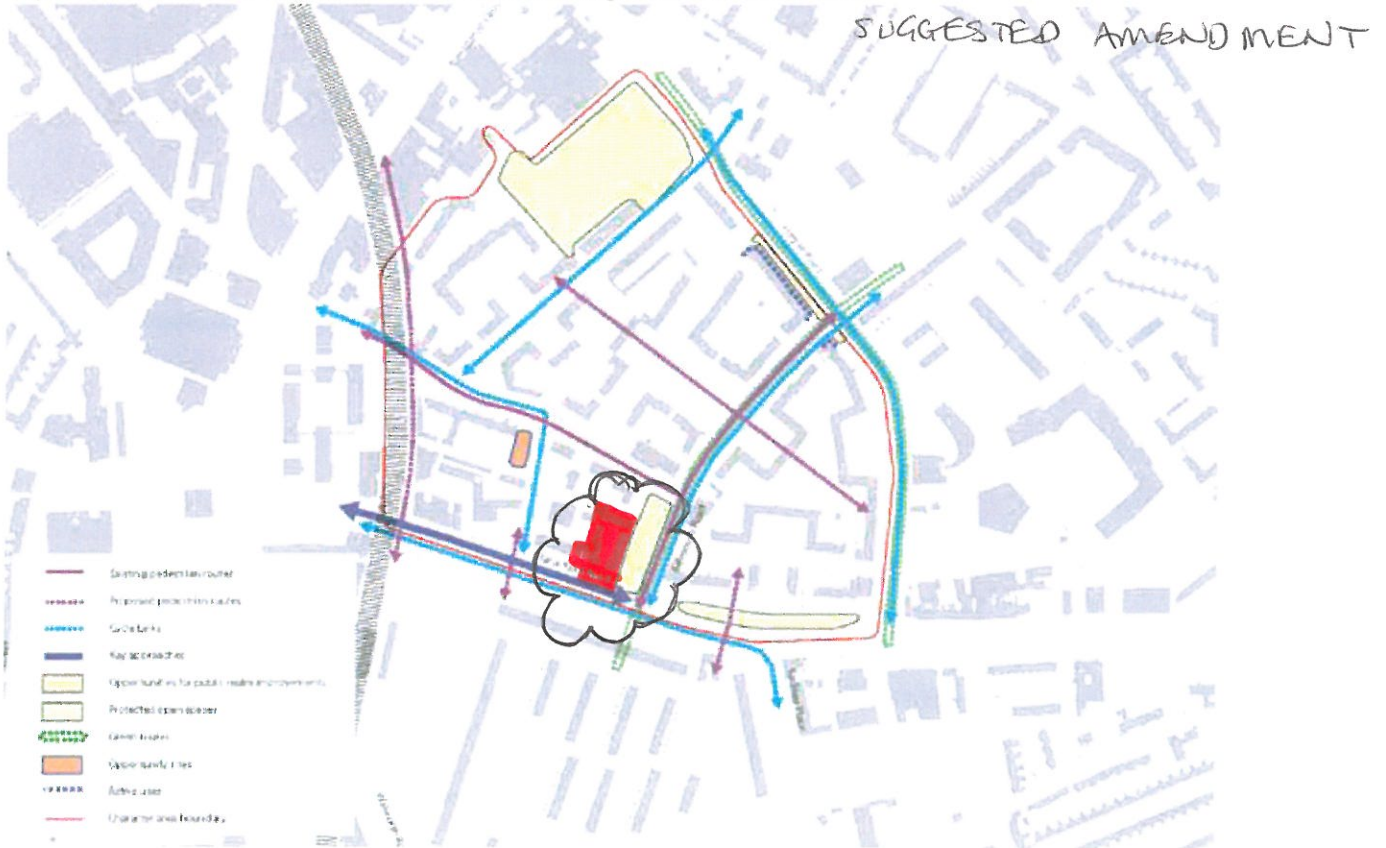


Figure 43: Indicative proposals for the Rockingham character area



APPENDIX B – AMENDMENTS TO ENTERPRISE QUARTER AND MOVEMENT PRINCIPLES

Figure 12: Existing and proposed pedestrian routes — SUGGESTED AMENDMENT

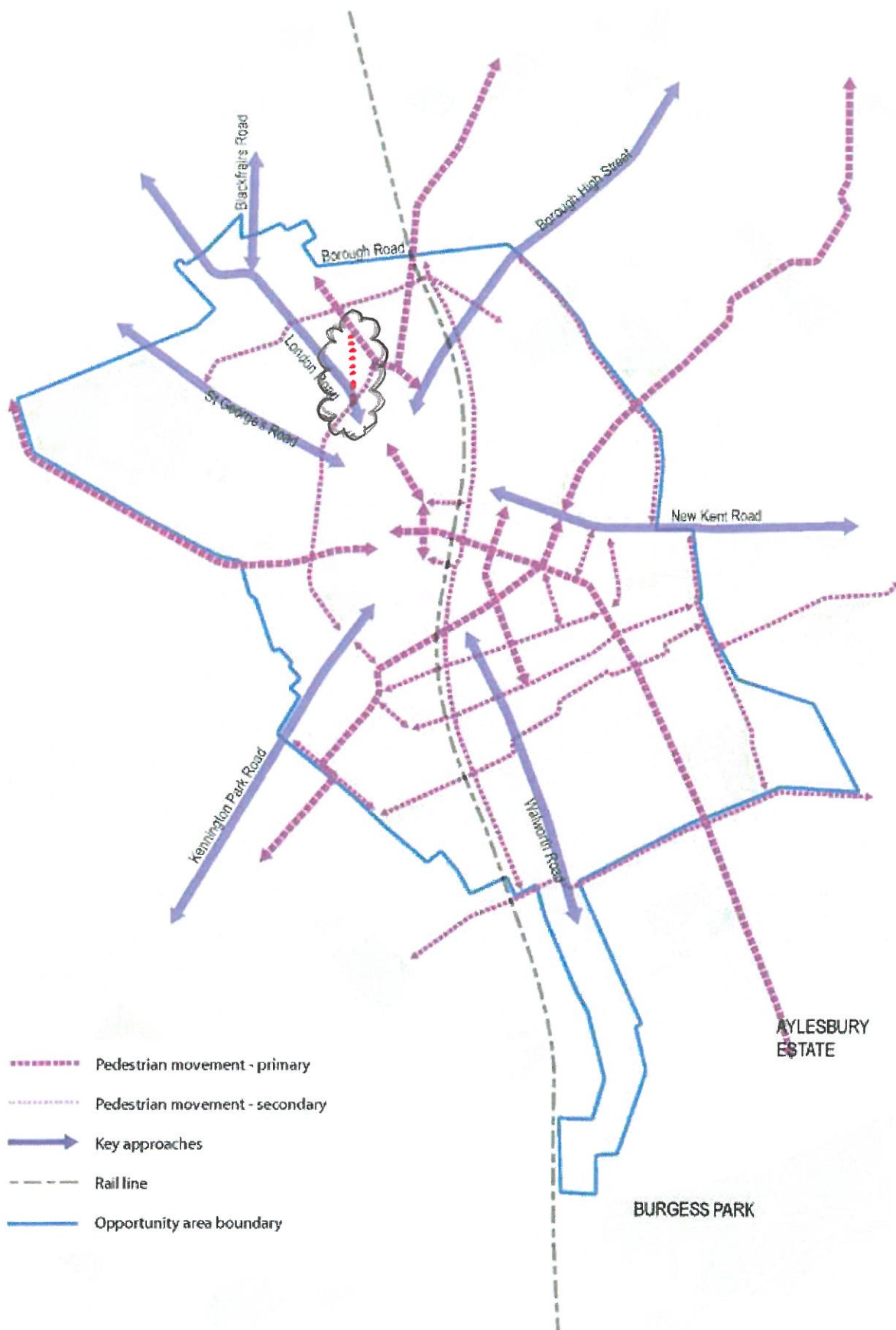


Figure 39: Heritage assets in the Enterprise Quarter character area

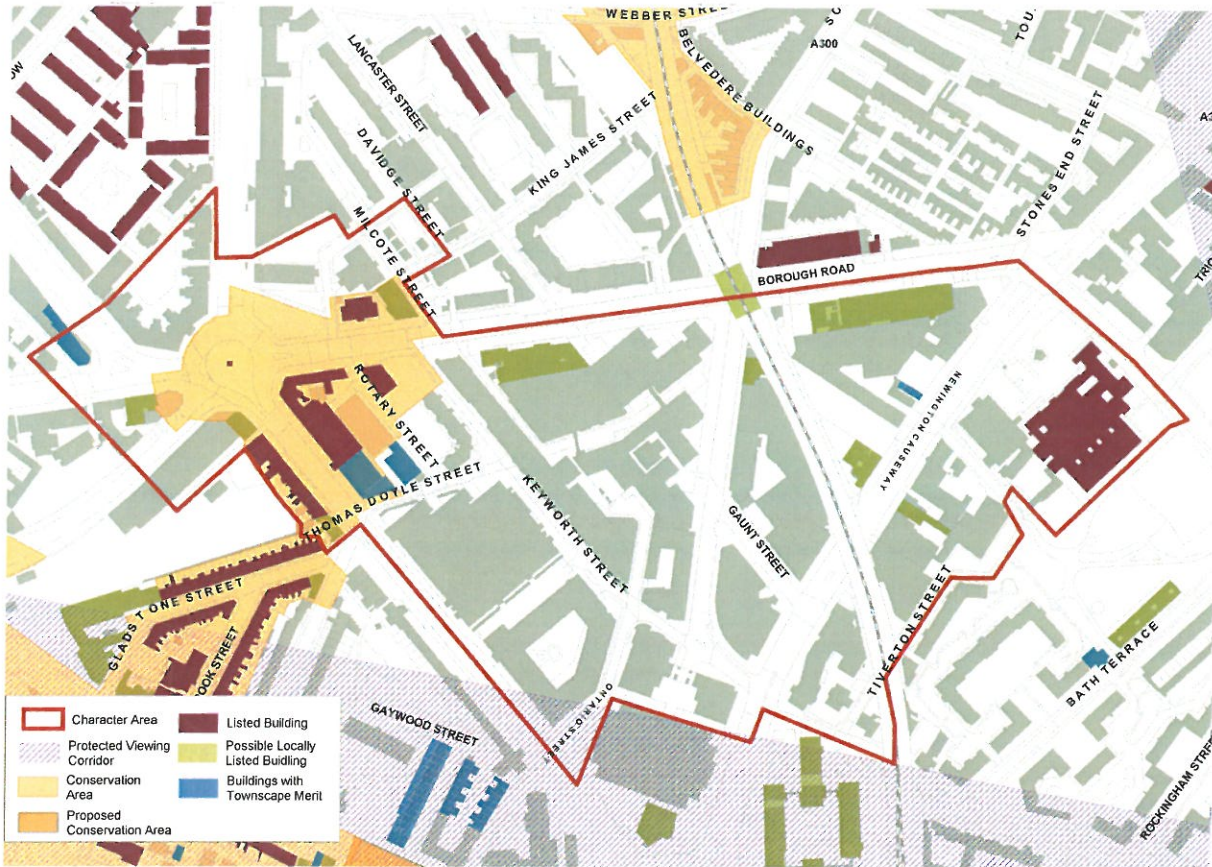
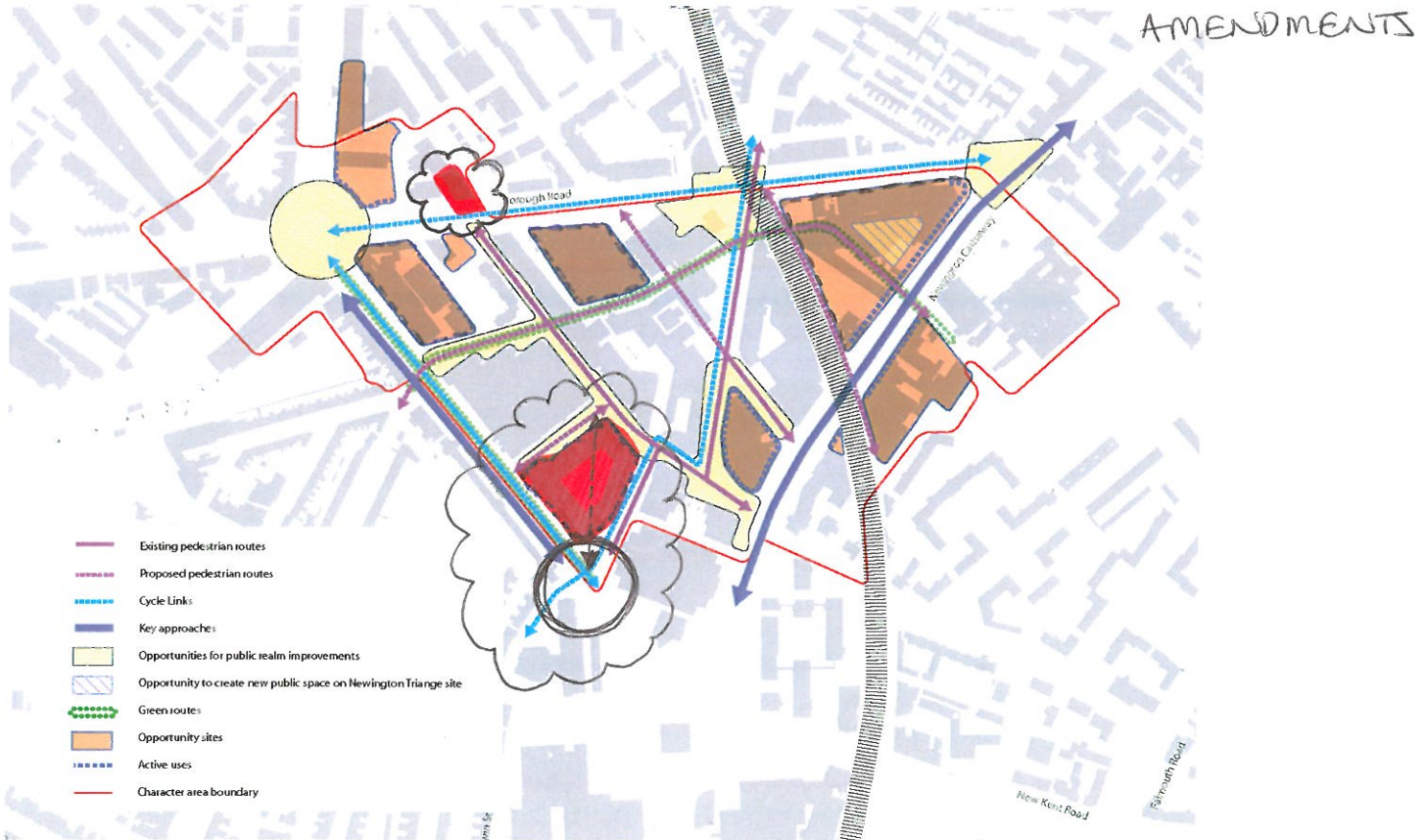


Figure 40: Indicative proposals for the Enterprise Quarter character area - SUGGESTED AMENDMENTS



APPENDIX C – AMENDMENTS TO CENTRAL AREA PRINCIPLES

Figure 19: Indicative proposals for the central character area

SUGGESTED AMENDMENTS

