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## 1.0 INTRODUCTION

- 1.1 This statement is submitted on behalf of Eadon Limited in support of a revised planning application for Elephant Road ('the Site'), for a mixed used development comprising residential, student accommodation, retail, cinema and restaurant uses ('the Development'). A full description of the Development is set out in the planning application. The scheme is designed by Paskin Kyriakides Sands ('PKS'), an architectural practice with a track record for producing schemes of significant architectural merit.
- 1.2 The statement sets out the planning case in support of the Development. It assesses the Development in the context of national, regional, local and other relevant planning guidance.
- 1.3 The planning application is accompanied by an Environmental Statement ('ES') produced by URS Corporation which incorporates technical assessments on matters including transport, townscape and archaeology. The ES together with a Design and Access Statement produced by PKS should all be read in conjunction with this Planning Statement.
- 1.4 A separate revised planning application is being submitted which will allow completion of the proposed Market Square and associated basement service area that adjoins the Site to the south. Architectural and landscape plans submitted as part of both planning applications highlight the relationship between the two planning applications.

## 2.0 PLANNING HISTORY

- 2.1 The site was previously used as a Volvo car dealership, although it is not clear when the London Borough of Southwark (LBS) granted planning permission for this use.
- 2.2 Planning permission was granted in December 2006 (LBS reference: 05-AP-1693) for a mixed use scheme comprising three buildings linked together by a two-storey podium incorporating retail, restaurant and cinema uses. The 15 storey south building (53.8 metres (m) high) provides residential accommodation, the 18-storey north building (66.7m) incorporates a hotel and the 24 storey west building (80m) provides office and residential accommodation.
- 2.3 The consented scheme includes a basement car park and servicing area including 44 car parking spaces and 339 bicycle parking spaces. The basement has been specifically designed to facilitate below ground access to the adjacent Elephant and Castle Shopping Centre site as per the requirements set out in the Adopted Elephant and Castle Development Framework.
- 2.4 A central area of green open space is located directly above the podium in between the 3 buildings. Planning permission for a new Market Square on land adjoining the above mentioned site was also granted in December 2006 (LBS reference: 05-AP-1694). The Market Square is linked to the aforementioned application through the shared basement servicing area providing servicing and storage facilities for market traders.

### 3.0 SITE DESCRIPTION

- 3.1 The Site is located in the London Borough of Southwark and forms part of a wider area at Elephant and Castle that has been identified for major redevelopment. The Site is well located for public transport, being situated close to underground and mainline rail services at Elephant and Castle and a number a key bus routes.
- 3.2 The Site comprises 0.50 hectares and is bounded to the north by New Kent Road, to the east by the Heygate Estate, to the south by a playground area fronting onto Walworth Road and the west by Elephant Road and a railway viaduct.
- 3.3 The site formally comprised a Volvo car dealership fronting New Kent Road and a cluster of small industrial units to the rear known as the Castle Industrial Estate. The Site was recently cleared of all existing buildings. Vehicular access to the Site is currently via Elephant Road.
- 3.4 Neighbouring uses to the Site comprise high density residential development to the north and east, commercial uses to the west and an area of public open space to the south. Raised railway tracks are located to the immediate west of the Site on the opposite side of Elephant Road.
- 3.5 The Site is not located within a Conservation Area and does not contain any listed buildings. The Site is not located within any Strategic Viewing Corridors, however is located in the background to the proposed Townscape View of Westminster from Serpentine Bridge.
- 3.6 The Site forms part of a wider area identified for major regeneration by the GLA and LBS. Specifically the Elephant and Castle area has been identified as an Opportunity Area by both authorities. Supplementary Planning Guidance associated with the Opportunity Area was adopted in 2004 and is known as the Elephant and Castle Development Framework. The Development Framework identifies the preferred structure, form and setting out of new development at Elephant and Castle.

#### **4.0 CONSULTATION**

- 4.1 The submission of the revised planning application for the Development follows discussions with the London Borough of Southwark ('LBS') together with relevant statutory and non-statutory bodies including the Greater London Authority ('GLA').
- 4.2 Consultation with the LBS and the GLA on the original redevelopment proposals began in December 2004. The comments and suggestions made by these bodies influenced the design process for the consented scheme.
- 4.3 Following the grant of planning permission in December 2006, the design team have held further consultation meetings with the LBS and the GLA to discuss a number of revisions to the scheme.

## 5.0 DEVELOPMENT PROPOSALS

5.1 The Development proposes a mixed use scheme providing a total of 49,620sq m Gross External Area (GEA). The GEA comprises the following:

- 26,415sq m of Class C3 residential;
- 9,236sq m of Class C2 student accommodation;
- 2,321sq m of Class A1 retail;
- 2,047sq m of Class D2 cinema;
- 694sq m of Class A3 restaurant;
- 7,160sq m of basement parking & plant; and
- 1,745sq m of above ground ancillary areas.

5.2 The Development is described in detail in the following paragraphs and in the accompanying ES. In summary, it comprises a group of 3 buildings arranged on a 2 storey podium structure.

5.3 The south building is located on the southern boundary to the site and is the smallest of the 3 buildings. The building has a GEA of 7,294sq m and a height of 59.85m AOD. The building will incorporate a range of private residential studios, 1, 2 and 3 bedroom units.

5.4 The north building is located on New Kent Road and will house the student accommodation element of the scheme. The building and has a GEA of 9,236sq m and a height of 68.3 m AOD. The lower half of the building comprises standard sized en-suite bedrooms with two shared kitchen/dining/living areas on each floor. The upper floors of the building comprise slightly larger units with ensuite facilities and a kitchenette. The building includes a total of 233 bedrooms.

5.5 The west building is located along the Elephant Road frontage to the site and is the tallest of the 3 buildings at 87.5 m AOD. The building will incorporate a range of 1, 2 and 3 bedroom residential units with a GEA of 19,123sq m.

5.6 The podium element of the scheme incorporates a servicing area and parking at basement level with a GEA of 7,160sq m. The ground floor level incorporates a foodstore, additional retail space and restaurants with a total GEA of 2,949sq m. The first floor level incorporates the cinema, together with additional retail and restaurant space with a combined GEA of 3,044sq m.

5.7 The central space located between the 3 proposed buildings at podium level will provide the main open space associated with the scheme in the form of a landscaped area. In addition, a separate planning application deals with the implementation of the Market Place located to the immediate south of the Site. Architectural Plans associated with this planning application show how the development will interact with the Market Place.

- 5.8 The basement car park and service area has been reconfigured to provide 44 car parking spaces, 494 cycle parking spaces and 9 motorcycle parking spaces. The revised layout is still capable of providing below ground access to the adjacent Elephant and Castle Shopping Centre site.
- 5.9 Vehicular access to the basement servicing area and car parking is provided via New Kent Road.

## 6.0 PLANNING POLICY ASSESSMENT

6.1 The planning policy context for the Development comprises policy and guidance at the national, regional and local levels. At the national level, planning policy is contained within a series of Circulars and Planning Policy Guidance Notes ('PPGs'), which are being replaced by Planning Policy Statements ('PPSs') introduced by the amendments to the planning system which came into operation in 2005.

6.2 The Development Plan for the site comprises the London Plan, adopted in February 2004, and the Southwark Unitary Development Plan ('UDP'), which was adopted in 1995 and will soon be superseded by the Emerging UDP. A Public Inquiry was held in April 2005 into the policies set out in the Emerging UDP (incorporating changes to the Revised Deposit UDP), which was published in 2005. Following the publication of the Inspector's Report in January 2006, the Council published a series of Proposed Modifications in June 2006, which were consulted on in October 2006. In January 2007, Cabinet resolved to adopt the Emerging UDP and notified the Secretary of State of their intention to adopt.

6.3 On 22 February 2007, the Secretary of State issued a letter making the following three directions to the Emerging UDP before it could be adopted:

- Policy 4.2 does not make specific reference to Lifetime Homes standards; and
- Policy 4.4 does not include specific reference to a payment in lieu for affordable housing for developments of 10 to 14 units; and
- The Suburban North Zones as shown on the Key Diagram and Proposals Map become Urban Zone.

6.4 However, as the Emerging UDP is a significant way through the statutory process in relation to plan preparation and review, and its provisions are consistent with the policies in the London Plan and national planning policy and guidance, greater weight should be attached to the policies as a material consideration in determining the application. It is noted that from the date of adoption (likely to be July 2007), it will be saved as the Development Plan for the purposes of Section 38 of the Planning and Compulsory Purchase Act 2004 for a period of three years. As such, the 1995 UDP is not referred to in this chapter.

6.5 Supplementing national policy and the Development Plan is further guidance, provided in the form of the Council's and Mayor's Supplementary Planning Guidance ('SPG') or Supplementary Planning Documents ('SPD') and miscellaneous other documents such as 'Guidance on Tall Buildings', published jointly by CABE and EH in 2003 (and revised for consultation purposes in January 2007). The Council's SPGs which are relevant to an assessment of the Development include those which were published in relation to the policies set out in the Adopted UDP and draft SPG/SPDs which have been published pursuant to the



draft provisions of the Emerging UDP and have been subject to extensive consultation and discussion during the public inquiry into the Emerging UDP.

6.6 In line with the recent amendments to the planning system, a Local Development Scheme ('LDS') was adopted by the Council in October 2005. As the policies of the Emerging UDP are considered to be up to date, work on further documents forming part of the Local Development Framework ('LDF') will be published in due course.

6.7 The following paragraphs provide an assessment of the Development in the context of national, regional and local planning policy.

### **6.8 Site Suitability**

#### *Planning Policy Designations*

6.9 In the London Plan, the site lies within the Central London Sub-Region, and is located within Opportunity Area 8 – Elephant and Castle and an Area for Regeneration. At the local level, the site lies within Proposals Site 43 – the Elephant and Castle Core Area. It is also located within the Central Activities Zone (CAZ), the Elephant and Castle Opportunity Area and a Transport Development Area.

6.10 An SPG has been adopted for the Elephant and Castle Opportunity Area, known as the Elephant and Castle Development Framework SPG (the Development Framework) (Ref. 6-4). Within the Development Framework, the site is designated as being suitable for a predominantly residential building with active uses at ground level. It also falls within an area designated as a Local Cluster, where tall buildings may be appropriate subject to detailed testing.

### **6.11 Land Use**

6.12 The proposed mixed-use development incorporates residential, student residential, retail, restaurant and cinema uses. National guidance promotes mixed-use schemes as a way of achieving sustainable development. Planning Policy Statement 1 (PPS1): Delivering Sustainable Development (Ref. 6-5) promotes the more efficient use of land through higher density, mixed use development and the re-use of suitably located previously developed land and buildings (Paragraph 27). PPS1 states that mixed-use developments should be promoted in locations that allow the creation of linkages between different uses and can thereby create more vibrant places. PPS6: Planning for Town Centres (Ref. 6-6) also recognises the

importance of mixed-use development to town centres and the role it can play in the realisation of sustainability objectives.

- 6.13 The London Plan supports mixed-use schemes as an effective means of bringing employment and residential uses closer together, thereby reducing the need to travel.
- 6.14 Paragraph 3.21 notes that large-scale residential *developments 'will be capable of generating a mix of uses and a variety of activities, including commercial development, such as offices, workspaces, restaurants, leisure facilities and local shops and services'*. Furthermore, Paragraph 3.52 notes that *'mixed-use development creates greater use of buildings and areas throughout the day and night, promotes more sustainable forms of development and reduces the need to travel'*.
- 6.15 The Emerging UDP identifies a range of uses that should be provided within the Opportunity Area within Policy 6.1. These include residential, retail, office, leisure, educational, cultural and community uses. Whilst the policy identifies a minimum floorspace or unit requirement for various uses including residential, retail and office, the requirement applies to the Opportunity Area as a whole and is not attributable to individual development sites.
- 6.16 A mixed-use development on this site, combining housing and student accommodation with active ground level retail and leisure and community uses, will make a significant contribution towards creating a sustainable community at Elephant and Castle, particularly when seen in the context of the commercial-led Masterplan for the wider area. An assessment of the relevant policy and guidance for each component use is provided in the following sections.

#### *Residential*

- 6.17 National housing policy is contained within PPS3: 'Housing' (Ref. 6-7), which was published in 2006. PPS3 considers that the planning system should deliver:
- High quality housing that is well-designed and built to a high standard;
  - A mix of housing, both market and affordable, particularly in terms of tenure and price, to support a wide variety of households in all areas, both urban and rural;
  - A sufficient quantity of housing taking into account need and demand and seeking to improve choice;
  - Housing developments in suitable locations, which offer a good range of community facilities and with good access to jobs, key services and infrastructure; and
  - A flexible, responsive supply of land – managed in a way that makes efficient and effective use of land, including re-use of previously developed land (Brownfield), where appropriate.

6.18 The London Plan seeks to increase the quantum of housing within London, particularly in mixed-use schemes located in sustainable locations. Paragraph 3.6 states that *'in line with the concept of a sustainable and compact city, future residential development needs to be located so as to maximise the use of scarce land, to conserve energy and to be within easy reach of jobs, schools, shops and public transport'*. The Plan also seeks new housing development which helps to support economic growth and offer a range of housing choices, including the provision of affordable housing (discussed below).

6.19 The Emerging UDP states that it will be necessary to 'make the most of development opportunities and to find innovative solutions to provide high quality living environments while increasing the intensity of development'. The suitability of any particular site for residential uses depends on:

- Whether it would be possible to provide a satisfactory standard of accommodation;
- Whether there is adequate infrastructure to support the proposed development; and
- Whether other uses are specifically protected or promoted by other policies and/or designations in the Plan.

6.20 A number of objectives for new housing development in the Core Area of Opportunity are set out on Page 38 of the Development Framework, which states that new housing will be expected to:

- Embrace, as appropriate, the concept of Lifetime Homes, which can adapt to personal needs and circumstances;
- Deliver a broad range and mix of housing types, size and tenure, including an element of affordable housing;
- Demonstrate exemplar standards in terms of energy efficient building design;
- Take on board the Council's ambitions in terms of waste minimisation and water conservation;
- Use sustainable and durable construction materials;
- Promote travel by modes other than the car;
- Deliver the highest quality of both architectural and urban design;
- Deliver a safe, high quality and diverse public realm;
- Ensure high standards of residential amenity in terms of sunlight/daylight penetration, provision of outdoor amenity space, appropriate mitigation against adverse environmental/pollution effects;
- Contribute towards the delivery of the social and community infrastructure required to support new and existing population; and
- On appropriate sites allow for mixed-use development.

6.21 The following considerations support the suitability of the site for residential use and the quality of the residential accommodation proposed:

- The site is not designated for other uses by the UDP, and is promoted as being suitable for residential use in the Development Framework;
- The site is well-located in terms of access to infrastructure, with a Public Transport Accessibility Level (PTAL) rating of 6 (discussed in *Chapter 8: Traffic and Transportation*);
- The proposed development would provide a high standard of design and construction to provide a high standard of accommodation in terms of residential amenity, with all units built to Lifetime Homes standards;
- The proposed development would deliver a broad mix of market residential units, comprising 1, 2 and 3-bed units, together with a financial contribution to provide off site affordable housing;
- Sustainability and energy efficiency are key tenets of the proposed Development, which will employ sustainable construction methods, plug into the Council's aspirations within the renewable energy strategy and employ best practice in the minimisation of waste and water usage;
- The proposed development is in a highly accessible location, being within walking distance of various modes of public transport. The extensive provision of cycle parking on-site further helps to reduce the use of the private car; and
- The innovative design of the residential units and form of the building ensure high standards of daylight and sunlight and the provision of both communal and private amenity space for residents.

#### *Affordable Housing*

6.22 London Plan policy 3A.6 requires that UDP affordable housing targets ensure that the full spectrum of housing need is met. It divides housing into three categories – social housing, intermediate housing and market housing. The Plan also sets a strategic target of 50% affordable housing provision for all housing developments within London. The Plan acknowledges, however, that this target takes into account higher levels of provision in social housing-only schemes, with lower levels of provision in market-led developments. The affordable housing provision within development schemes is subject to viability assessments where the Plan targets cannot be met.

6.23 In addition to the quantum of affordable housing, the London Plan also seeks a tenure split of 70% social rented and 30% intermediate, and promotes mixed and balanced communities.

- 6.24 London Plan policy 3A.6 provides a definition of affordable housing and requires that UDP affordable housing provision meets the full spectrum of housing need. It divides housing into three categories – social housing, intermediate housing and market housing. The proposed development provides all three forms of housing. The Plan also sets a strategic target of 50% affordable housing provision for all housing developments within London. The Plan acknowledges, however, that this target takes into account higher levels of provision in social housing-only schemes, with lower levels of provision in market-led developments.
- 6.25 The GLA's strategic targets for affordable housing provision are subject to viability assessments where the Plan targets cannot be met. Local affordable housing requirements are contained within Policy 4.4 of the Emerging UDP and Section 3 of the Adopted Elephant and Castle Development Framework. Both refer to a strategic target of 50%, but recognise that there is currently a considerable imbalance in favour of social housing at Elephant and Castle. In this regard, Policy 4.4 includes a lower requirement for 35% of all new housing in the Elephant and Castle Opportunity Area to be affordable.
- 6.26 Policy 6.1 relates specifically to the Elephant & Castle Opportunity Area. The policy identifies a minimum of 5,300 new dwellings of mixed tenure to be provided during the plan period, although the requirement applies to the Opportunity Area as a whole and is not attributable to individual development sites.
- 6.27 The Development Framework also acknowledges that the large infrastructure investment required at Elephant and Castle may necessitate the redirection of Section 106 contributions away from housing and into transport and other public realm works, and that precise levels of affordable housing should be considered on a site by site basis.
- 6.28 A number of exceptional circumstances apply at the Elephant & Castle and to this site in particular. These circumstances were accepted by the Council as part of the original planning permission for redevelopment of the site dated December 2006.
- 6.29 The exceptional circumstances on the site include: (a) accommodating the vehicular service ramp to provide future vehicle service links through the enlarged basement service yard to the shopping centre redevelopment and as necessary to other commercial premises to comprise the Elephant & Castle Regeneration Area; (c) the potential for the use of the service yard by vehicles servicing the redeveloped Shopping Centre; (c) accommodating pedestrian access ways which preserve the safeguarding route of the Cross River Tram route as well as strengthening the ground structure to accommodate the Tram; (d) providing a range of commercial uses required to render the scheme both viable and vibrant whilst minimising the number of cores that are brought to ground floor level; and (e) provision of a large public square to accommodate a market space with the potential for multi functional activity.

- 6.30 The consented scheme incorporates only 5 shared ownership units out of a total of 219 residential units. A Toolkit Appraisal based on the revised scheme suggests that approximately 22 shared ownership units could be provided, including the 5 units from the consented scheme (i.e. a further 17 shared ownership units). It is considered more appropriate to provide a commuted payment sum in lieu of onsite affordable provision as part of the Section 106 obligations for the revised scheme.
- 6.31 A Draft Supplementary Planning Document (SPD) on Section 106 Planning Obligations was published by the Council in December 2006 and states that in certain circumstances, an in lieu payment may be made to the Council to provide affordable housing off site.
- 6.32 A commuted payment in lieu of on site affordable housing could be used to bring forward the Council's Early Housing Sites which in turn will assist in the decanting provision for the Heygate Estate. The construction period for the revised scheme would be circa 3 years from commencement whereas using the commuted payment sum could assist the provision of the Council's Early Housing Sites within a much shorter time period.
- 6.33 It has been the case to date that new affordable housing generated through private development within the Elephant & Castle Opportunity Area have been made available in the first instance to tenants of the Heygate estate. This practice enables developments to directly contribute to the wider regeneration objectives by providing new homes for Heygate residents and thereby accelerating the timetable for the rehousing of the estate. In turn this assists the Council to bring forward the release of land for development in line with the objectives established in the adopted planning framework for the area. To date affordable homes have been made available to Heygate residents through this mechanism at Steedman Street and Crampton Street. The detailed rehousing work undertaken by LB Southwark's Housing Department has concluded that there is very little if any demand for shared ownership units from Heygate tenants. As a consequence the 22 shared ownership units which could be generated through the revised scheme for 50 New Kent Road are unlikely to be occupied by Heygate tenants and therefore this early development would not contribute to the wider plan objectives described above.

6.34 In order to ensure these wider housing and plan benefits are realised it is proposed that the affordable contribution for the revised scheme is made in the form of an in lieu contribution to the Elephant and Castle Early Housing Programme. The in lieu payment will have the affect of increasing the amount of affordable [rented] floor space within the programme. This will ensure that Heygate residents are able to directly benefit from the redevelopment of the Elephant Road site and that the scheme contributes to wider regeneration objectives outlined above. The Early Housing Programme which is managed by LBS in partnership with two consortium of Housing Associations will be able to provide the LPA with evidence to demonstrate that the in lieu contribution from the revised generates an increase in rented floor space over and above that which would otherwise have been built.

6.35 For the reasons mentioned in the preceding paragraphs, it is considered that the Elephant Road site provides an exceptional set of circumstances that justify the provision of a commuted payment in lieu of on site affordable housing.

#### *Residential Mix*

6.36 Policy 4.3 of the Emerging UDP requires the provision of an appropriate mix of dwelling sizes within residential developments. The policy requires that:

- The majority of units should have two or more bedrooms, and developments of 15 or more dwellings will be expected to provide at least 10% of the units with three or more bedrooms with direct access to private outdoor space; and
- The number of studio flats must not exceed 5% of the total number of dwelling units within a development. Studio flats are not suitable for meeting affordable housing need; and
- At least 10% of all major new residential developments should be suitable for wheelchair users, except where this is not possible due to the physical constraints of the site.

6.37 The Development proposes a mix of units which is largely in accordance with Policy 4.3. Of the 312 units, 155 (50%) have two or more bedrooms, while approximately 10% (31 units) have three or more bedrooms, The provision of 10% of units with three or more bedrooms is considered to address the identified need for larger units within the Borough, and represents an appropriate response for the site.

6.38 The Development includes 15 studio flats, which equates to 5% of the total residential mix and 10% of units will be capable of meeting Wheelchair Accessible Housing standards.

### *Residential Space Standards*

- 6.39 Space standards for residential units are addressed by LBS's Residential Design Standards SPG, which was adopted in 1997. The SPG sets out guidelines for minimum unit and room sizes for new residential development.
- 6.40 All units meet and exceed the minimum unit floor areas required by the SPG, with all studios achieving a minimum of 36 sq m, 1 person units ranging from 45 to 72 sq m, 2 person units ranging from 60 to 101 sq m and 3 person units ranging from 84 to 124 sq m.
- 6.41 Further information on the quality and configuration of the residential units is provided within the accompanying Design and Access Statement.

### *Student Residential*

- 6.42 The London Plan seeks to ensure that new developments offer a full range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups including students (Policy 3A. 4).
- 6.43 Policy 4.7 in the Emerging UDP relates to non self-contained housing for identified user groups. New schemes will normally be permitted where:
- The need for, and suitability of, the accommodation can be demonstrated by the applicant;
  - Its provision does not result in a significant loss of amenity to neighbouring occupiers;
  - There is adequate infrastructure in the area to support any increase in residents; and
  - The development provides a satisfactory standard of accommodation, including shared facilities.
- 6.44 There is unprecedented demand for student accommodation in the wider London area and specifically in Southwark. London has the largest student population in the UK with approximately 228,000 full time students<sup>1</sup>. Student numbers are expected to increase significantly in the short to medium term.
- 6.45 London Southbank University and Kings College are both located in Southwark as well as colleges affiliated to the University of the Arts. Approximately 40,000 students currently attend the three above mentioned institutions, of which 28,000 are full-time<sup>2</sup>. First year and international students living away from home represent the core demand for purpose built

<sup>1</sup> Times Guide 2007

<sup>2</sup> Times Guide 2007, UCAS, HESA, London Southbank University, Kings College London, University of the Arts



accommodation. This is estimated at 105,000 out of the 228,000 full time students in London and approximately 12,000 in Southwark<sup>2</sup>. When combined with the additional likely demand from second and third year undergraduates and the non-international post graduate market, the total demand for purpose built student accommodation in London is 159,000, of which 20,000 is Southwark based demand<sup>2</sup>.

6.46 There are currently approximately 4,200 purpose built student bed spaces in Southwark, provided by London Southbank University, Kings College and the University of the Arts<sup>3</sup>. These include the schemes listed below:

Institution	Hall of Residence	Location	No. of Bed Spaces
London South Bank	David Bomberg House	SE1	289
	Dante Road	SE11	414
	McLaren House	SE1	600
	New Kent Road	SE1	81
University of the Arts	Manna Ash House	SE1	253
	Julian Markham House	SE17	225
	Brooke Hall	SE5	102
	Bernard Myers House	SE5	123
Kings College London	Kings College Hall	SE5	472
	Brian Creamer House	SE1	69
	The Rectory	SE1	28
	Wolfson House	SE1	268
	Stamford Street	SE1	552
	Great Dover Street	SE1	769
	<b>TOTAL</b>		<b>4,245</b>

6.47 Planning policy officers at LBS have also provided the following schedule of planning permissions granted for student accommodation since 2000. Although our understanding is that none of the schemes are directly linked to a Southwark based University or college.

<sup>3</sup> London Southbank University, Kings College London, University of the Arts

LPA Ref:	Address	Date of Consent	No. of Bed Spaces
0100419	67-77 Marlborough Grove	23/03/2002	203
0000932	43 Old Jamaica Road	24/10/2001	40
9901455	1-7 Old Jamaica Road	30/03/2000	28
0001264	110 Peckham Road	07/02/2001	93
05-AP-0069	Harris Street	28/06/2005	123
<b>TOTAL</b>			<b>487</b>

6.48 In summary, the total demand for purpose built student accommodation in Southwark is approximately 20,000 bed spaces. When comparing this with the existing supply of University affiliated accommodation (4,245) plus all student accommodation schemes consented in Southwark since 2000 (487), there is currently a shortfall of approximately 15,000 spaces. These figures demonstrate a clear need for additional student accommodation and therefore compliance with the relevant clause in Policy 4.7 of the Emerging UDP.

6.49 The design and internal layouts associated with the student accommodation have been developed in close consultation with experienced operators of student accommodation facilities. The proposed accommodation will meet the needs of the modern student and create an environment that is conducive to further education learning in an urban environment. The chosen operator will also seek to ensure that the proposed student accommodation is affordable to both undergraduate and postgraduate students.

6.50 The siting of student accommodation at Elephant and Castle will contribute towards the vitality and viability of the area by increasing pedestrian activity and generally bringing life into the area. The student use will also complement the other proposed uses in the scheme, namely the retail element and cinema.

6.51 The site is located in close proximity to the major Elephant and Castle transport interchange and therefore will provide easy access for students, residents, shoppers and cinema goers alike. The Adopted Development Framework for Elephant and Castle will ensure that the local infrastructure is capable of servicing the overall quantum of proposed development in the area. Further information on the transport accessibility of the site, including a Transport Assessment (TA) of the proposed development, is provided within *Chapter 8: Traffic and Transportation*.

*Retail, Cinema and Restaurants*

6.52 In addition to the residential and student uses, the proposed development incorporates other uses including retail, restaurants and a cinema. PPS6: 'Planning for Town Centres' lends

support to high-density, multi-storey mixed-use developments within town centres. It states in Paragraph 2.22 that '*a diversity of uses in centres makes an important contribution to their vitality and viability. Different but complementary uses... can reinforce each other, making town centres more attractive to local residents, shoppers and visitors*'. Specific support is given to ground level retail within housing schemes.

- 6.53 The London Plan, at Policy 3D.3, recognises the important role that retail plays in mixed-use development, but also recognises the need for a coordinated approach to the distribution of retail activity.
- 6.54 The Elephant and Castle Opportunity Area is identified as a Major Town Centre in the context of the Southwark retail hierarchy. PPS6 (Paragraph 1.8) and the Emerging UDP (Policy 1.8) stipulate that new retail development should be located in existing centres and as such the site is suitable for the proposed retail component of the scheme.
- 6.55 The retail component of the proposed scheme has been designed to create active frontages and encourage street level vitality along New Kent Road and Elephant Road as advocated in the *Elephant and Castle Development Framework*. Smaller kiosk style retail units are proposed along the east and west building elevation at ground level and will contribute to the diversity of retail choice for shoppers. There are also a number of restaurants provided both at ground level and first floor level. Therefore, the area is considered an acceptable location for retail development.
- 6.56 In terms of the proposed cinema element of the scheme, Policy SD.4 of the London Plan recognises that evening and night time entertainment activities should be encouraged in town centres should be easily accessible by public transport and accessible to all members of the local community. In addition, the Emerging UDP includes an objective for Elephant and Castle to promote a range of high quality recreation, entertainment and leisure facilities (part 8.2.3). It is therefore considered that the site constitutes an appropriate location for a cinema because of its accessibility by public transport but also its contribution to the mixed-use nature of the scheme.
- 6.57 Design**
- 6.58 The importance of good design in new development is a key principle within PPS1, which considers design one of the pillars of delivering sustainable communities. PPS1 states at Paragraph 33 that '*good design is indivisible from good planning*'. PPS1 supports the creation of good quality building and spaces that contribute towards the creation of usable, durable and adaptable places.

6.59 The London Plan carries through the emphasis on design, which it recognises as a key tool in achieving a compact and sustainable London. Paragraph 4.35 states that *'good urban design gives order to space and beauty to buildings'*. Policy 4B.1 requires that developments should:

- Maximise the potential of sites;
- Create or enhance the public realm;
- Provide or enhance a mix of uses;
- *Be accessible, usable and permeable for all users;*
- Be sustainable, durable and adaptable;
- Be safe for occupants and passers-by;
- Respect local context, character and communities;
- *Be practical and legible;*
- Be attractive to look at and, where appropriate, inspire, excite and delight;
- Respect the natural environment; and
- Respect London's built heritage.

6.60 The proposed Development has been designed to high architectural standards and will set a quality design benchmark for the future regeneration of Elephant and Castle. The scheme has been designed to reflect planning policy, but has also evolved as a result of consultation with key stakeholders in the decision making process. *It embodies the principles of good design and therefore is deemed to comply with Policy 4B.1.*

6.61 High quality design and the efficient use of land are also important considerations in relation to the Emerging UDP. Policy 3.10 seeks to ensure that all new development maximises the use of land while protecting against over-development. The proposed Development is considered to be an appropriate response to the site and the aspirations for the Elephant and Castle area, taking into account public transport accessibility and the site's location within Central London. Policy 3.11 of the UDP notes that *"high quality design will help make Southwark a more attractive place in which to live and work, contributing to the success of regeneration projects"*. The design of the proposed development has been carefully considered so as to maximise amenity for both existing and future residents and users, both in terms of internal conditions and the external environment. It aims to contribute towards the ongoing regeneration of Elephant and Castle, by providing a development that is appropriate to the site and its context and is therefore not considered to constitute over-development or inappropriate intensification.

#### *Design and Access Statement*

6.62 In line with Policy 3.12 of the Emerging UDP and current national guidance contained within Circular 01/2006 (Ref. 6-9), a Design and Access Statement has been submitted to accompany the revised planning application.

### *Designing out Crime*

- 6.63 Policy 3.14 of the Emerging UDP sets out a number of principles which new development is expected to incorporate in order to improve community safety and crime prevention. The principles include natural surveillance, the basic design of pedestrian routes and spaces, clear and uniform signage, effective street lighting and the clear definition of boundaries between public and private spaces. The proposed development has taken on board these principles with the aim of creating a development that is not only safe within itself, but also contributes towards the *safety and security of the wider area*.

### *Density*

- 6.64 As mentioned above in relation to design and the efficient use of land, higher density residential development is promoted at all policy levels as part of the drive for sustainable development. National guidance contained within PPS3 promotes *“designs and layouts which make efficient and effective use of land, including encouraging innovative approaches to help deliver high quality outcomes”*. Density standards for residential accommodation are contained within both the London Plan, at policy 4B.3 (table 4B.1), and the Emerging UDP, at Policy 4.1 and Appendix 3.
- 6.65 The Emerging UDP states that residential development schemes of mainly flats in the CAZ should achieve densities of between 650 and 1,100 habitable rooms per hectare (hrph), with development of typically six to eight storeys tall. Using the UDP density calculation standard to take account of non-residential floor area, the density of the proposed development is 2,068 hrph. Although in excess of the guideline density range, the site is designated as being appropriate for a tall building and is located in an area of high public transport accessibility.
- 6.66 Therefore, it is appropriate to optimise the intensity of development on this site. Consent has recently been granted at Castle House for a residential tall building with a density of 3,553hrp. The proposed development represents a lower level of density, which reflects the generous levels of open space provided within the scheme.
- 6.67 London Plan policy 4B.3 seeks to *“ensure that development proposals achieve the highest possible intensity of use compatible with local context, the design principles in policy 4B.1 and with public transport capacity”*. The UDP considers that development achieving a density range of 650 - 1,100hrph will normally be six to eight storeys tall, but acknowledges *“there will be sites where taller buildings are appropriate”*. The proposed development delivers the policy objectives in relation to density whilst optimising the use of a site, which meets the criteria of an acceptable location for a tall building (see below).

## *Tall Buildings*

- 6.68 Policy 4B.8 of the London Plan promotes the development of tall buildings where they: create attractive landmarks which enhance London's character; support economic clusters of activity; act as a catalyst for regeneration; and are acceptable in terms of design and impact on their surroundings. Paragraph 4.56 states that tall buildings can *'make an important contribution to creating an exemplary, sustainable world city'* and *'support the strategy of creating the highest levels of activity at locations with the greatest transport capacity'*. The Plan therefore supports the creation of well-designed tall buildings in appropriate locations, particularly where there are good transport links, economic benefits and where the scheme would promote London's role as a World City.
- 6.69 National advice on the principal considerations for tall buildings are provided in 'Guidance on Tall Buildings' produced by CABI and EH, published in March 2003. The guidance recognises that, in the right place, tall buildings can make positive contributions to city life, being first-rate works of architecture and acting as beacons of regeneration (Paragraph 4.1). Tall building proposals should be subject to close scrutiny and assessed against the following criteria:
- The relationship to context, including topography and other tall buildings;
  - The effect on the whole existing environment;
  - The relationship to transport infrastructure, aviation constraints and public transport capacity;
  - The architectural quality of the building;
  - The contribution that the building will make to public spaces and facilities in the area;
  - The effect on the local environment;
  - The contribution made to the permeability of the site and wider area;
  - Function and fitness for purpose; and
  - Sustainability.
- 6.70 A full assessment of the proposed development against these criteria is provided within the Townscape and Visual Assessment, Volume II of the ES.
- 6.71 The EH/CABI guidance is summarised at Paragraph 4.9 of the document, which states that *"to be acceptable, any new tall building should be in an appropriate location, should be of first-class design quality in its own right and should enhance the qualities of its immediate location and setting. It should produce more benefits than costs to the lives of those affected by it"*.
- 6.72 Local guidance on the siting and design of tall buildings is provided within policy 3.20 of the Emerging UDP, which considers that tall buildings may be appropriate in Opportunity Areas provided that they are not located within viewing corridors and benefit from excellent public

transport accessibility. The UDP states that "*tall buildings, if designed thoughtfully, can be an important component in raising population density around transport nodes, avoiding urban sprawl and contributing to an area's regeneration*".

- 6.73 The Development Framework for Elephant and Castle identifies a Core and Secondary Cluster where the tallest buildings (up to 135 metres (m)) are encouraged to be located. The Site is located on the periphery of the Secondary Cluster. The Framework also identifies notional building heights and for the Site suggests that building heights should step up from south to north ranging from 14 to 29m. The consented building heights have been assessed and are considered to be an acceptable built form for this particular location. The amended scheme proposes only minor increases in building height and; therefore, it is considered that the proposed development will continue to constitute an appropriate transition in the built form from the Core Cluster to the outlying areas of Elephant and Castle. The scale of development on the site continues to reflect the principle of stepping the development up to its frontage onto New Kent Road.
- 6.74 Supplementary guidance on tall buildings within Southwark is provided within a draft SPG, which was published in November 2002 (Ref. 6-10). The SPG states that each proposal for a tall building will be considered on its own merits, but considers at Paragraph 4.2 that a location will generally be acceptable for tall buildings if it is: within an existing town centre; has excellent public transport facilities; is within an existing cluster of tall buildings or is an appropriate focal point for a landmark building, and; does not detrimentally affect strategic or important views, conservation areas, listed buildings or World Heritage Sites.
- 6.75 The provision of a more up to date SPD on tall buildings is in progress, with an initial draft document being prepared for consultation purposes in November 2005 (Ref. 6-11). The consultation draft provided firm support for tall buildings in the Elephant and Castle Opportunity Area, reinforcing the policies of the London Plan and Emerging UDP. The draft document was reported to Executive, but members did not agree the document for consultation due to the approach taken towards tall buildings on Blackfriars Road. The SPD is therefore undergoing further revision prior to publication.

#### *Public Realm*

- 6.76 The importance of good design, as described above, extends to the quality of space and pedestrian experience within the public realm. Policy 4B.1 of the London Plan encourages publicly accessible space that is built and managed to a high standard, is accessible and usable for all and forms a coherent public realm with neighbouring spaces and areas.

6.77 Policy 3.13 of the Emerging UDP sets out the urban design criteria to be considered in the design of new developments, which states "*proposals should have regard to the existing urban grain, development patterns and density in the layout of development sites*". The proposed development aims to create a public realm that works in relation to both the existing and future urban environments, taking into account potential developments on neighbouring sites.

6.78 The provision of children's play space has been formulated with careful regard to the Mayor's Draft SPG Providing for Children and Young People's Play and Informal Recreation, October 2006 (Ref. 6-12). The assessment of the proposal against this guidance is explained in more detail in the submitted Design and Access Statement prepared by PKS Architects. Applying the guidance of 10 square metres (m<sup>2</sup>) of play area per child within the development the proposed playspace exceeds the standard requirement for children aged 0-4. It is not considered appropriate to provide active play spaces for older children aged 5-16 within the relaxed garden environment and the Design & Access Statement identifies the off-site provision within the area which accommodates these needs.

#### *Impact on Strategic Views*

6.79 A number of views towards St. Paul's Cathedral and the Palace of Westminster are protected by the London Plan and Regional Planning Guidance Note 3, Annex A ('RPG3A') (Ref. 6-13). Protection of these views is designed to ensure that London's key landmarks can continue to be enjoyed from important viewing locations around the city, and assessment of the impact that tall buildings have on these views is an important consideration during the planning process. The site does not lie within any Strategic Viewing Corridors or Background Consultation Areas, however a comprehensive visual assessment of the building's impact on strategic and local views has been provided within Volume II: Townscape and Visual Assessment.

6.80 Following the introduction of the London Plan in February 2004, the GLA have produced a draft London View Management Framework (Ref. 6-14) which is proposed to replace RPG3A. A draft document was published for consultation in April 2005, containing a proposed methodology for the assessment of impact on views, and management plans for 26 views in and around Central London. A revised draft document was subsequently published in February 2007 (Ref. 6-16). Although the View Framework has not yet been finalised, it has been considered as part of the Townscape and Visual Assessment volume.

6.81 Within the draft SPG, the Site is located in the background area to Townscape View No. 23 – Serpentine Bridge to Westminster. The visual management guidance for this view states "*Development in the background in Lambeth and Southwark should respond to the ability to see the towers of the Palace of Westminster, whilst noting that these can only be seen in the*



winter months. It should be noted that new clusters of tall buildings may emerge within the Elephant and Castle opportunity area."

- 6.82 A comprehensive Townscape & Visual assessment of the impact of this proposal on strategic and local views has been provided within Volume 2 of the ES. The visual assessment demonstrates that the proposed development will not cause a harmful impact to the view of Westminster Cathedral from Serpentine Bridge.

*Impact on other Townscape Views*

- 6.83 The impact of the proposed development has been assessed in relation to a number of other townscape views, including river prospects and local views. The assessment concludes that the proposed development will have an overwhelmingly positive impact.

**6.84 Energy and Sustainability**

*Sustainability*

- 6.85 PPS1: Delivering Sustainable Development is the key national policy document in relation to sustainability. The government recognises that, in order to achieve sustainable communities, new development must aim to achieve sustainability objectives in respect of physical, social and economic issues. Paragraph 3 states that "*at the heart of sustainable development is the simple idea of ensuring a better quality of life for everyone, now and for future generations*". This holistic approach to development is carried through into the London Plan (Policy 4B.6), which seeks to ensure sustainable design and construction by, amongst other things, re-using land and buildings, conserving energy and other resources, ensuring that development makes the most of natural systems both within and around the building and by promoting sustainable waste behaviour.

- 6.86 Policy 3.3 of the Emerging Southwark UDP requires the submission of a Sustainability Assessment for planning applications for major developments (as does Policy 3.20 for tall building applications). An assessment is provided at *Chapter 7: Sustainability*.

*Energy*

- 6.87 The minimisation of carbon dioxide emissions through improved energy efficiency and the increasing use of renewable energy sources is a key objective of the London Plan, and an integral component of the national drive towards more sustainable forms of development.

Policy 4A.8 of the London Plan requires that major development schemes should provide an assessment of their energy demands, and demonstrate how they have taken steps to apply the Mayor's energy hierarchy. Paragraph 4.20 seeks the reduction of energy consumption through appropriate design, orientation, layout and construction, and supports the use of natural heating, lighting and cooling systems as well as on-site generation of heat or electricity from renewable resources.

6.88 Emerging UDP Policies 3.4 and 3.5 continue the theme of energy efficiency, encouraging the use of renewable energy sources and maximising the use of natural daylight and ventilation.

6.89 The Development Framework stresses the specific importance of reducing energy consumption within Elephant and Castle in light of the potential additional carbon emissions that would be generated if all of the forecast growth in jobs and homes were realised. Section 7.1 of the framework outlines a number of Council objectives for achieving this goal, including supplying 10% of the total forecast energy demand through building mounted renewable technologies.

6.90 In line with policies contained within the London Plan, the UDP and the London Renewables Toolkit: 'Integrating renewable energy into new developments' (Ref. 6-16), an Energy Statement has been prepared and submitted in support of the planning application. The results of the energy assessment are summarised in *Chapter 7: Sustainability*.

6.91 In accordance with policy, the proposed development minimises carbon emissions through a variety of measures, which seeks to reduce the demand for energy, provide energy efficiently and utilise renewable energy technologies where feasible. The proposed development takes a strategic approach to energy by connecting into the MUSCO Network, a biomass district heating system planned for the Elephant and Castle area. This will be augmented by site-specific measures, including a ground source geothermal heat pump system.

#### **6.92 Access and Inclusion**

6.93 Policy 4B.5 of the London Plan states that the Mayor will require all future development to meet the highest standards of accessibility and inclusion. The principles of inclusive design include ensuring that as many people can easily use a proposed Development without undue effort, separation or special treatment. In line with Policy 4B.5, an assessment of the proposed development in terms of access and inclusion has been submitted as part of the Design and Access Statement. The statement complies with the guidance provided within Circular 01/2006, which was published in June 2006.

## 6.94 Transport Accessibility

6.95 National planning policy and guidance promotes the location of uses generating a high demand for travel in close proximity to major public transport interchanges and corridors. PPS1 (Paragraph 27) and Planning Policy Guidance Note 13: Transport ('PPG13') (Ref. 6-17) (Paragraphs 3 and 20) advocate the importance of integrating land use and transport planning as a means of achieving sustainable development. The London Plan continues this theme at the regional level. Policy 3C.1 promotes the integration of transport and development by "*supporting high trip generating development only at locations with both high levels of public transport accessibility and capacity, sufficient to meet the transport requirements of the development*".

6.96 In accordance with PPS1 and PPG13, the Emerging UDP requires that the location of new development is appropriate to the size and trip-generating characteristics of the development proposed. Policy 5.1 states that "*large developments generating a significant number of trips should be located near transport nodes*". The site is located in close proximity to a range of transport services, including mainline rail and London Underground services at Elephant and Castle station and numerous bus services, which run along Newington Butts and Elephant and Castle. Furthermore, the site is located within a Transport Development Area as designated within both the London Plan and Emerging UDP. Policy 5.5 of the Emerging UDP requires that development within Transport Development Areas should:

- Maximise the efficient use of land around major transport sites;
- Strengthen and enhance links to existing public transport nodes;
- Strengthen and enhance walking and cycling infrastructure;
- Improve the legibility of the public transport network; and
- Be of exemplary design quality.

6.97 The high level of public transport accessibility enjoyed by the site is expressed by the PTAL rating, which is contained within Appendix 17 of the UDP. The site has a PTAL rating of 6, which means that it is in one of the most accessible categories of locations and is therefore ideal for high-density mixed-use development. Further information on the transport accessibility of the site, including a Transport Assessment of the proposed development, is provided within *Chapter 8: Traffic and Transportation* in compliance with Policy 5.2 of the Emerging UDP.

### *Car Parking*

6.98 Policy 3C.1 of the London Plan states that car parking provision should reflect levels of public transport accessibility, while national policy promotes the minimisation of car parking

provision. The London Plan considers that large mixed-use developments need to have appropriate levels of car parking provision, determined through an analysis of the particular travel generation characteristics of the proposed uses.

- 6.99 The Emerging UDP's car parking standards are contained within Appendix 16. Policy 5.6 states that developments should seek to minimise the provision of car parking, with levels of provision justified against the PTAL rating, the impact on overspill parking and the demand for parking within Controlled Parking Zones (CPZ). The site is located within a CPZ and lies within both the Central Activity Zone (CAZ) and the Elephant and Castle Opportunity Area.
- 6.100 The UDP permits a maximum of 0.4 spaces per residential unit within the CAZ; however, within a CPZ it is expected that new residential development will be car free. The proposed development provides 44 car parking spaces, representing a provision of approximately 0.14 spaces per unit. Of the 44 car parking spaces, 34 spaces will be designated as Blue Badge spaces for disabled users in accordance with Policy 5.7 of the Emerging UDP.

#### *Cycle Parking*

- 6.101 Appendix 16 of the UDP requires the provision of one cycle parking space per residential unit, plus one visitor space per 10 units (equating to a per unit provision of 1.1 spaces) and one cycle parking space per 250 square metres of retail floorspace. The proposed development provides 494 cycle parking spaces in line with this policy, as well as 9 motorcycle spaces.

#### *Servicing, Vehicular Access and Waste*

- 6.102 Servicing and vehicular access to the underground car parking is via New Kent Road. The servicing and refuse collection would be undertaken in a dedicated underground servicing area at the lower basement level. The servicing area would incorporate four bays capable of accommodating large rigid or articulated vehicles and an additional three bays capable of accommodating transit vans or similar.
- 6.103 The proposed development also has the potential to facilitate underground service access to the Elephant and Castle Shopping Centre should it be required by LBS in the future. Further information on the servicing and waste strategies is provided within *Chapter 8: Traffic and Transportation*, and the accompanying TA Update.

#### 6.104 Microclimate

- 6.105 Policy 4B.9 of the London Plan requires all large scale buildings, including tall buildings, to be sensitive to their impact on the microclimate in terms of wind, sunlight, reflection and overshadowing. In this regard, *Chapter 15: Sunlight, Daylight and Overshadowing* and *Chapter 16: Wind* sets out an assessment of the likely effects of the on wind conditions.
- 6.106 The policy context for the consideration of daylight and sunlight issues is contained within London Plan Policy 4B.9, which requires that tall buildings be sensitive to their impact on the microclimate in terms of sunlight, reflection and overshadowing. At the local level, Policy 3.2 of the Emerging UDP protects the general amenity and environmental quality of an area. *Chapter 15: Daylight, Sunlight and Overshadowing* sets out an assessment of the effects of the proposed development in this regard.

## 7.0 CONCLUSION

7.1 In conclusion, the revised scheme is in accordance with the proposed Development Plan and other material considerations. In particular, it will deliver the following policy objectives:

- The proposed development complies with planning policies at national, regional and local levels in terms of design, land use, density, sustainability, tall buildings and regeneration;
- The proposed development is designed to a high architectural quality and will act as a quality benchmark for the future regeneration of Elephant and Castle;
- The proposed development optimises the regeneration opportunities of a previously developed urban site in a town centre that is earmarked for major physical regeneration;
- The proposed development would bring a considerable mix of activity and benefits to the Site and local area, including retail, leisure and residential uses;
- The proposed development is located in close proximity to a range of public transport opportunities and can be expected to contribute towards a reduction in the need to travel by private transport;
- The proposed development will act as an appropriate transition in built form between the proposed high density development area and the existing outlying areas in Elephant and Castle; and
- The proposed development will generate a range of employment opportunities both during the construction and operational phases of the development.

## REFERENCES

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- Ref. 6-2 London Borough of Southwark, (2007); 'Emerging Unitary Development Plan'.
- Ref. 6-3 CABE/English Heritage, (2003); 'Guidance on Tall Buildings'.
- Ref. 6-4 Elephant and Castle Regeneration Team, (2004); 'Elephant and Castle Development Framework'.
- Ref. 6-5 Office of the Deputy Prime Minister, (2005); 'Planning Policy Statement 1: Delivering Sustainable Development'.
- Ref. 6-6 Office of the Deputy Prime Minister, (2005); 'Planning Policy Statement 6: Planning for Town Centres'.
- Ref. 6-7 Office of the Deputy Prime Minister, (2006); 'Planning Policy Statement 3: Housing'.
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- Ref. 6-9 Office of the Deputy Prime Minister, (2006); 'Circular 01/2006 (Communities and Local Government): Guidance on Changes to the Development Control System'.
- Ref. 6-10 London Borough of Southwark, (2002); 'Draft Supplementary Planning Guidance on Tall Buildings'.
- Ref. 6-11 London Borough of Southwark, (2005); 'Draft Supplementary Planning Document on Tall Buildings'.
- Ref. 6-12 GLA, (2006); 'Providing for Children and Young People's Play and Informal Recreation'.
- Ref. 6-13 Department of the Environment, (1992); 'Regional Planning Guidance 3 Annex A: Supplementary Planning Guidance for London on the Protection of Strategic Views'.
- Ref. 6-14 London View Management Framework Draft Supplementary Planning Guidance, (2005).
- Ref. 6-15 London View Management Framework Draft Supplementary Planning Guidance, (2007).
- Ref. 6-16 GLA, (2005); 'Integrating renewable energy into new developments: Toolkit for planners, developers and consultants'.
- Ref. 6-17 Department of Transport, Local Government and the Regions, (1994); 'Planning Policy Guidance Note 13: Transport'.