

Elephant and Castle

Background paper: Retail

December 2011

Draft Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF)



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1. INTRODUCTION

- 1.1 This background paper explains our approach to retail provision in the Elephant and Castle Opportunity Area. The paper sets out why we chose the shopping policy 1 and the markets policy 2 in the SPD, how they are in conformity with the London Plan and how the policies relate to our Core Strategy and saved Southwark Plan policies. It also provides some detail from the sustainability appraisal and the equalities impact assessment, which have informed the preparation of the document.
- 1.2 The retail background paper is split into different sections. These set out the policy background and the research and evidence that have informed our policies. It also provides a full list of all the document references. Throughout this background paper we have referenced the core documents (CD) that have informed the SPD and a full list of these documents is in section 7 of this paper.

2 POLICY BACKGROUND

National

- 2.1 The National Policy context is set out in section 2 of the Core Strategy Retail background paper (**CDB5**).
- 2.2 Since the Core Strategy was adopted, the government has recently consulted upon its draft National Planning Policy Framework. The Government wants to produce a simple national planning policy framework setting out their priorities for the planning system in England in a single, concise document covering all major forms of development proposals handled by local authorities. The NPPF will set out the Government's economic, environmental and social planning policies. The policies will apply to the preparation of local and neighbourhood plans, and to development management decisions.
- 2.3 In terms of town centres, the Government wants to support town centres and to protect local high streets. The draft Framework says that town centres are at the heart of communities. The draft Framework maintains the 'town centres first' approach, which means that new shops and leisure developments should look for sites in town centres first. Only if suitable sites are not to be had, shops and leisure developments can look for edge of centre and then out of centre sites.

Regional

- 2.4 The wider Regional Policy context is set out in section 2 of the Core Strategy retail background paper (**CDB5**).

London Plan (November 2011)

- 2.5 Policy 2.13 identifies opportunity areas and areas for intensification.
- 2.6 Table A1.1 sets out the Opportunity and Intensification Areas in London. Elephant and Castle is identified as having an indicative employment capacity for 5,000 jobs over the period leading up to 2031.
- 2.7 The London Plan states that the area is undergoing major transformation with significant investment in housing and potential for new retail provision integrated with a more efficient and attractive transport interchange. There is scope to create a series of connected public open spaces complemented by environmental and traffic management improvements. Resolution of these and rail related issues are crucial to the successful redevelopment of this southern gateway to central London.
- 2.8 Policy 2.15 represents an overarching policy framework for town centre development in general. Boroughs seeking to reclassify their lower-order centres through their own Local Development Frameworks need to satisfy the requirements of Policy 2.15. Boroughs are encouraged to relate the scale of new retail floorspace to the size and role of a centre, in addition to encouraging additional comparison goods capacity in larger town centres. The policy is supplemented by two tables in Annex 2 (London's Town Centre Network) which provides guidance on policy directions for individual town centres. It has been informed by the latest GLA Consumer Expenditure and Comparison Goods Retail Floorspace Need in London (2009), the GLA London Town Centre Health Checks (2009), and the London Office Policy Review (2009).
- 2.9 Table A2.1 provides strategic guidance on the broad future direction envisaged for the International, Metropolitan, Major and District centres including their possible potential for growth and regeneration. Elephant and Castle has been categorised as having High Growth potential which is defined as town centres likely to experience strategically significant levels of growth with strong demand and/or large scale retail, leisure or office development in the pipeline and with existing or potential public transport capacity to accommodate it (typically PTAL 5-6). It also has been given the 'Regeneration' supplementary classification which refers to those town centres where existing capacity can be utilized to achieve regeneration objectives including physical, environmental and economic renewal.
- 2.10 Table A2.2 and Map A2.1 indicate potential future changes to the classifications of town centres in the network over the Plan period including potential new centres. These centres or locations are not for immediate re-classification and will continue to be tested to take account of changes in accessibility and the implementation of planning decisions and policy. The classification status for Elephant and Castle and Walworth Road, as two separate district town centres in the 2008

London Plan, has changed to become one major town centre. Taken into consideration was the regeneration programme for the Elephant and Castle area, which when fully implemented could result in a larger, more integrated town centre, therefore functioning above a District level to become a Major centre (table A2.1, page 239 -247).

- 2.11 Policy 4.7 of the plan sets out the strategy for retail and town centre development. It advises boroughs to identify future levels of retail and other commercial floorspace, undertake regular town centre health checks and identify new capacity, bringing forward development within or on the edge of town centres (where appropriate).
- 2.12 Policy 4.8 sets out the strategy for supporting a successful and diverse retail sector, by encouraging boroughs to bring forward capacity for additional comparison goods retailing, supporting convenience retail, and to provide a policy framework for local and neighbourhood shopping and facilities. It also encourages the support of street and farmers markets.
- 2.13 Policy 4.9 encourages the development of local policies to support the provision of small shop units. The policy sets out a requirement to provide small scale affordable shop units.

Local Policy

- 2.14 The wider local policy context is set out in section 2 of the Core strategy retail background paper (**CDB5**). The Core Strategy policies that the draft SPD retail policies need to be consistent with are Policy 3: Shopping, leisure and entertainment and Policy 14: Delivery and Implementation.
- 2.15 Policy 3 sets out the strategy for retail and leisure provision in the borough. The policy defines a hierarchy of town and local centres which reflect their sizes and roles. It states that we will direct large leisure and retail developments to town and local centres.
- 2.16 Elephant and Castle/Walworth Road is defined as a major town centre with an existing quantum of retail floorspace of 69,000 sqm.
- 2.17 The policy indicates that we will enable the provision of around 45,000sqm of additional shopping space and leisure space at Elephant and Castle/Walworth Road to strengthen its role as a major town centre and create a range of retail opportunities and improve choice, particularly for non-food shopping.
- 2.18 The policy also sets out that we will protect and enhance our centres by ensuring that the scale of new development is appropriate to their role and character, that a balance of different uses, including shops, bars, restaurants and cafes is maintained, and that we support the provision of markets.

- 2.19 We will also protect small scale retail facilities ('A' class uses) outside town and local centres to help meet day-to-day needs.
- 2.20 Policy 14 sets out that the Council will work with our partners, local communities and developers to meet the targets set out in Strategic Targets Policy 2 – Improving places (which sets out the area target for Elephant and Castle)

Saved Southwark Plan Policies (July 2010)

- 2.21 The Core Strategy Policy 3 hierarchy of town and local centres supersedes those set out in Southwark Plan Policy 1.7 (Development within town and local centres) however the set of criteria to assess new development has been saved in Policy 1.7 and is continued to be used.
- 2.22 Policy 1.9 sets out the criteria for the change of use from A1 Use Class within protected shopping frontages, which are set within Appendix 5.
- 2.23 Policy 1.10 protects small scale shops and services outside of the town and local centres and protected shopping frontages. Development will only be permitted if certain criteria can be demonstrated.
- 2.24 The majority of proposals sites which were set out in the Southwark Plan, have been saved, and are carried forward into the Core Strategy. The vision and requirements for the Elephant and Castle proposal site 39P include the need to provide at least 5,300 new homes, up to 75,000sqm of retail and leisure space, 45,000sqm of business space, leisure facilities, a secondary school and a highly efficient transport hub. The Core Strategy vision for Elephant and Castle updates these land use requirements.

Elephant and Castle Development Framework Supplementary Planning Guidance (SPG) (2004)

- 2.25 In 2004 Southwark adopted the Elephant and Castle Development Framework SPG to set out guidance for the core part of the opportunity area. This document highlights the council's ambition to comprehensively redevelop the core area to create a new mixed use town centre. The core area covered the area around the northern and southern roundabouts, the Heygate Estate and part of Walworth Road.
- 2.26 This SPG is based on the 2007 Southwark Plan, aspects of which have been superseded by the Core Strategy, however most of the policies have now been saved until they are replaced by other Development Plan Documents. The floorspace targets in the Southwark Plan for Elephant and Castle do not reflect the Core Strategy or new London Plan. Since the SPG was prepared economic circumstances have changed. In addition, in preparing the Core Strategy and the new London Plan, the council and the GLA have updated much of the

evidence base which underpinned the 2004 SPG. Key pieces of recently gathered evidence include: the 2009 Southwark Retail Study, the 2010 Southwark Employment Land Review, the 2009 Southwark Open Spaces Evidence base, Southwark Housing Development Capacity Assessment 2010, the Southwark Housing Requirements Study (2009) and the Southwark Affordable Housing Viability Study (2010).

Elephant and Castle Enterprise Quarter Supplementary Planning Document (SPD) September 2008

- 2.27 The SPD provides stakeholders with detail regarding acceptable types of development within the area, and sets out specific detail on land-use and other aspects of urban form within the area which is located in the north-west of the Elephant and Castle Opportunity Area. It also provided further guidance on Policy 6.1 of the Southwark Plan, which pertains to the Enterprise Quarter, however this policy has now been superseded by the Core Strategy vision for Elephant and Castle (2010).
- 2.28 In terms of land-use, a key objective of the vision for the Enterprise Quarter centres on the bringing forward for development of vacant or underused sites, particularly around London South Bank University (LSBU), which is the main occupier and landowner in the area. Extending the concentration of town centre activity proposed for the core area northwards to provide a boost to the Enterprise Quarter forms another objective, as does the introduction of new uses to the area to enrich the variations in character between different locations within the Quarter.
- 2.29 The Enterprise Quarter SPD also sets out detailed information on public realm improvements. These have been carried forward into the draft SPD in Appendix 2 – Public Realm Strategy.

Walworth Road SPD (September 2008)

- 2.30 The SPD provides guidance on appropriate land-uses, housing density and urban form and design guidance for the northern part of Walworth Road. The area includes a variety of different public and private ownerships located to the west of the Walworth Road and bounded by Steedman Street to the north and Amelia Street to the south. Robert Dashwood Way, a private road running adjacent to the railway viaduct, forms the site's western boundary.
- 2.31 In terms of land-uses, the SPD sets out guidance for mixed-use developments to incorporate retail uses at ground level and mixed tenure housing on upper levels. Office and light-industrial employment land-use is encouraged on the lower floors, as is commercial leisure and community and civic uses. The SPD also notes the potential for the railway arch areas to accommodate A, B and D use classes.

2.32 Several of the sites identified in the SPD have now been developed. These include:

- South Central West comprises a predominantly residential development in three new buildings rising from 2 storeys on Crampton Street to 9 storeys alongside the railway line.
- South Central East comprising a predominantly residential development rising between 6 storeys at its southern end and 10 storeys at its highest point, fronting onto Robert Dashwood Way; and a 7 storey building comprising 25 flats facing onto Steedman Street.
- Print works on the corner of Amelia Street and Robert Dashwood Way – Private and Affordable Housing with commercial units on the ground floor.
- 120-138 Walworth Road - Student housing.

2.33 The Walworth Road SPD will be superseded by the draft SPD.

S106 Planning Obligations SPD (2007)

2.34 Southwark adopted a s106 Planning Obligations SPD in 2007. The SPD complements Core Strategy Policy 14 (Implementation and Delivery) and the saved Southwark Plan planning obligations policy 2.5. The SPD is designed to provide a clear set of standard charges required to mitigate the impact of major development proposals across the Borough. The SPD advises on how and when we will seek these obligations from developers. The SPD is a material consideration in deciding planning applications.

2.34 Planning obligations which can be calculated using standard charges set out in the SPD are sought to address the following areas:

- Affordable housing
- Archaeological investigation and excavations, preserving, recording and publishing the results and London Borough of Southwark monitoring of the excavations
- Children's play facilities, public open space improvements, and sport and recreation
- Community and health facilities
- Education provision and facilities
- Legal and monitoring costs
- Strategic transport projects (i.e. borough-wide transport projects included in the LIP which may be fully or partially exclusive of contributions sought by TfL)
- Training and employment initiatives.

2.35 The charges are index linked and have been raised annually in line with inflation.

2.36 The draft SPD sets out in Policy 20, the approach to S106 Tariff in the area.

Southwark Economic Development Strategy (2010-2016) (CDE13)

2.37 Southwark's Economic Development Strategy replaces the Employment Strategy (2005-2010) (CDE3) and the Enterprise Strategy (2005-2010) (CDE4). The strategy was adopted in 2010 to include important changes since the last revision in 2006 and includes revised employment and enterprise strategies accompanied by delivery plans. The core aim of the strategy is to tackle the barriers and market failures that prevent certain sections of the community from being able to achieve their potential, participate in the economy and achieve financial independence and wellbeing.

2.38 The strategy's employment and enterprise priorities are set out below. These are set out in the delivery plans with accompanying objectives, actions, timescales, targets and delivery responsibility.

- Tackle the barriers to work faced by priority groups
- Increase business and employer engagement
- Raise skills for sustained employment
- Support existing businesses
- Develop key business districts and town centres
- Increase business start ups

Draft Street Trading and Markets Strategy

2.39 The draft Street Trading and Markets Strategy went out for public consultation in 2010. Feedback collected through the market and street trading questionnaire is now being considered and will be incorporated into the final strategy.

2.40 The draft strategy sets is being prepared in order to address many of the issues facing Southwark's markets and develop street trading. The value of street markets and street trading more generally is increasingly recognised for its economic and social benefits. Well managed and supported street markets:

- Provide access to high quality affordable food and other goods.
- Have significant economic and employment benefits.
- Promote and sustain independent and small businesses and can be a fertile environment for black and minority ethnic entrepreneurs as business start-ups.
- Contribute to a vibrant public realm that people enjoy and feel safe using.
- Increase the pull to visitors and destination shoppers

3 RESEARCH AND EVIDENCE

- 3.1 Section 3 of the Core Strategy retail background paper sets out the broader research and evidence context.
- 3.2 In total there is around 69,000 sqm of existing retail floorspace in the Opportunity area. The retail element is disjointed and physically separated. The centre incorporates retail facilities on Walworth Road where the offer is more mainstream comparison and convenience shopping.
- 3.3 Elephant & Castle has an under-representation of comparison goods retailing. The imbalance in the retail composition can partially be explained by the fact that Elephant and Castle offers a large amount of sports and leisure facility floorspace, which is a benefit to the centre but offers little in the way of high-end comparison shopping as a counterbalance.
- 3.4 There is around 26,000sqm of shopping space in the shopping centre (including 9,000sqm of leisure uses). The proportion of shops which sell comparison goods (music, clothes, books etc) at Elephant and Castle is very low compared to other UK town centres and the number of units providing professional services, such as travel agents, is high. The main strength of the centre is the particular concentration of Latin-American businesses which reflects the growth of the Latin American community in Southwark. Around 38% of the retail space in the shopping centre is occupied by independent businesses.
- 3.5 The Walworth Road is designated as a 'protected shopping frontage', which requires that the proportion of A1 (retail) use class units must not fall below 50%. The retail offer along Walworth Road is far more varied and diverse and accessible than at Elephant & Castle, with around 127 comparison shopping units and 121 service units.
- 3.6 East Street Market, located off the Walworth Road, is full of fresh fruit and vegetables and local favourites such as jellied eels and African-Caribbean produce. It is a mixed street market selling a low cost range of fresh produce, clothing, footwear, jewellery, household goods and CD/DVDs. The market is open Tuesday to Sunday. It currently has 244 available pitches with approximately 120-180 occupied.
- 3.7 Public transport accessibility is high in the centre. The centre is served by Thameslink and South Eastern trains as well as numerous bus routes. The Elephant and Castle tube station (with access to the Northern and Bakerloo lines) is located near to the Shopping Centre.

Southwark Retail Study (2009)

- 3.8 The Southwark Retail Study (2009) (**CDE5**) provides details of the existing shopping provision in Southwark and also includes up to date health checks of the shopping centres, describing the vitality and viability of the borough's centres in terms of their retail performance. It also has examined different scenarios for future capacity for convenience and comparison goods floorspace in the borough.

Comparison Goods

- 3.9 The Retail Study reviewed shopping patterns in the borough and also the performance of existing comparison goods floorspace for the main comparison goods destinations (Peckham, Elephant & Castle/Walworth Road, Canada Water, Camberwell, Lordship Lane, Out-of-Centre). The study looked at the composite market shares which were derived from a household survey and calculated estimates for expenditure.
- 3.10 The comparison goods spend for the main destinations in the borough is £312.7 million. This amounts to just over 16% of the total available comparison spend from the whole survey area, of £1.9 billion. The available comparison spend for the whole borough is calculated at £850 million and the proportion of this borough spend that is retained by the borough is £245m or 29%. Southwark's centres are therefore losing trade (71%) to competing centres such as the West End and Croydon¹.

Convenience Goods

- 3.11 The borough performs much better in convenience retailing. Using the composite market shares derived from the Retail Study's household survey and baseline expenditure estimates, the convenience goods turnover of the main convenience goods provision in the borough (Peckham, Elephant & Castle/Walworth Rd, Bankside & Borough, Camberwell, Canada Water, London Bridge, Lordship Lane, Dulwich Village, Herne Hill, Nunhead, The Blue) is calculated to be £381.5 million. This is compared with the overall expected turnover based on company averages of £295m. Based upon the average there is therefore a surplus of convenience expenditure in the borough².

Floorspace capacity for additional retail development

Comparison Goods

- 3.12 On the basis of current market shares, increases in population levels and disposable income will increase the available comparison spend,

¹ Southwark Retail Study (2009) (para 9.32 page 62-63)

² Southwark Retail Study 2009 (para 9.27 page 61)

which will create capacity for additional retail floorspace. By 2018 expenditure surplus will be sufficient to support approximately 13,996 sqm net of new comparison goods floorspace, with most of this arising in the north east (Canada Water) and central east (Peckham) of the borough³.

Convenience Goods

- 3.13 With regards to convenience shopping there is evidence of a surplus of convenience expenditure in the borough. The borough's convenience goods capacity has been calculated based on current market shares and taking into account the retail commitments in the borough.
- 3.14 The borough will be able to support an additional 11,554 sqm of floorspace by 2018. Through analysing the breakdown of capacity arising in different parts of the borough, most of the convenience capacity is arising in the north east (Canada Water) and the south of the borough.

Scenario testing for developing the baseline floorspace capacity

- 3.15 The Southwark Retail Study (2009) analysed the extent to which baseline floorspace capacity would be affected in the future by different growth and development scenarios. It also assessed whether a significant increase in retail floorspace at Elephant Castle/Walworth Road to create an enlarged town centre would have implications for the vitality and viability of other centres in the borough and in neighbouring boroughs.
- 3.16 The scenario for Elephant and Castle which was tested was:
- Redevelopment which would provide 1,677 sqm net of convenience goods floorspace and 18,656 sqm net of new comparison goods floorspace.
- 3.17 The option of providing 1,677 sqm net of new convenience floorspace at Elephant and Castle could be accommodated on the basis of current market shares.
- 3.18 Overall, the Retail Study concluded that the comparison goods floorspace baseline capacity could be increased for Elephant and Castle (and Canada Water) to support new schemes if the borough's market share of available expenditure is increased by around 9% over the entire borough and trade is clawed back which is currently leaking to competing centres⁴.

³ Ibid (para 9.51 page 66)

⁴ Southwark Retail Capacity Study (2009)

- 3.19 New development will also be supported by a greater inflow of expenditure from new workers in the borough through increased employment planned for the opportunity area and by an increase in the affluence of residents in new housing.
- 3.20 The Retail Study indicated that the most significant impact of the Elephant and Castle proposals would be felt in Peckham, which would experience a trade diversion of 3.5% by 2018. This level of impact is not of concern due to Peckham's status as a viable centre. Peckham relies to a large extent on independent traders for its main retail attraction. The primary shopping area in the centre does however support a significant number of comparison goods retailers who are likely to experience some trade diversion to Elephant and Castle. Nevertheless, the core area of Peckham is performing relatively well and the retail offer in the centre should continue to improve⁵. The annual growth rate in Canada Water would remain a reasonable 2%, and the study predicts that with the advantages offered by a purpose built and accessible shopping centre, there is no reason why future investment at Canada Water would be put at risk by the Elephant and Castle proposals.
- 3.21 Elsewhere, the study estimates impacts on other major shopping centres, but only on the impact of the turnover of these centres generated from the Southwark survey area. Lewisham would experience an impact of 8%, Brixton 4%, Bluewater 6%, Bromley 4% and Central London 4% in 2018. The impacts should not be of concern as they are not on the full turnover of these centres.
- 3.22 The study concluded that given continuing growth rates, the impact of increased comparison goods floorspace in Elephant and Castle should not result in unacceptable harm to any of the centres examined. However, the study concludes that it would be essential to differentiate the retail offer from existing centres in order to minimise the impact. In any case the council will expect the hybrid planning application to include a retail impact assessment which will assess the implications of the proposed scheme.

4 THE OPTIONS

- 4.1 There is not necessarily one single way of meeting the needs of people who live and visit the area. Some of the different options may be more sustainable than others and, in order to ensure that the SPD contributes to sustainable development as far as possible, three different options were assessed.

⁵ Southwark Retail Capacity Study (2009)

Option one – Business as Usual

- 4.2 Establishing the business-as-usual scenario involved asking how current policies, practices and trends might change in the future in the absence of any active intervention through an SPD. 21 identified issues were evaluated in terms of growth already committed or planned in the Core Strategy, existing transport proposals; and the continuation of certain trends (e.g. in terms of levels of job creation).
- 4.3 In terms of retail provision we considered seeking to promote the consolidation of the town centre and provision of new retail space in line with the Core Strategy. However there would be uncertainty on the timing and delivery of new retail floorspace. It may be difficult to mitigate loss of small units or take into account issues associated with displacement of existing occupiers.

Option two – Managed growth: A major new town centre destination

- 4.4 In this option, the character of the central area of the Opportunity Area would become much more like a major town centre, because at present it is not fulfilling its role to its full potential. A critical mass of new shopping and leisure space would be provided creating a destination and new shopping option for Southwark residents. The Heygate development site would be developed for a mix of uses which include a significant amount of new retail space. The Enterprise Quarter would also become more mixed use, with the introduction of residential use.
- 4.5 In terms of retail, the shopping centre site would be the focus for the regeneration of the town centre with the aspiration that it is redeveloped or remodelled. The amount of shopping space in the centre would substantially increase. Across the centre, we would promote up to 25,000sqm of new shopping space on the Heygate site. New comparison goods shopping space would be provided drawing shoppers from a wider catchment. The option would help retain expenditure which leaks outside the borough. New retail provision would be made on the Heygate estate. Because the amount of space would increase substantially, there would be scope to require a proportion of new space to be provided for independent occupiers or tenants displaced through redevelopment of the shopping centre.

Option C: Managed growth: A district centre which meets local needs

- 4.6 In this option, the town centre would be regenerated, but with a smaller increase in shopping space. New shopping space would meet the needs of a smaller and more local catchment area. The Heygate development site would be redeveloped as a primarily residential scheme. The Enterprise Quarter would remain primarily in commercial and educational use.

- 4.7 In terms of retail provision, this option focused the regeneration of town centre uses around the shopping centre. The amount of retail development would be less than in option B and would seek to meet the needs of a much more local catchment. Because less additional space would be provided, it would be difficult to provide space for independent retailers or accommodate tenants displaced from the shopping centre. The Heygate redevelopment would focus on creating a new residential quarter.
- 4.8 The strategy is more aligned with Option B which presented more of a regenerative approach to the growth of the area. It not only promoted the protection and enhancement of existing assets and facilities, but also a higher level of growth in the area by focusing more on consolidating Elephant and Castle and the Walworth Road as a major town centre through the promotion of a diverse mix of uses within the central area.

5 THE STRATEGY

Shopping in the town centre

- 5.1 Policy 1: Shopping in the SPD sets out our aspiration to consolidate Elephant and Castle and the Walworth Road as a major town centre in the borough's retail hierarchy and to strengthen its appeal to a wider catchment. There is capacity to expand the amount of shopping space available in the central area of the Opportunity Area, which will help to improve the choice for the borough's residents and will also enable people to shop more locally rather than go elsewhere.
- 5.2 We will do this by working with the landowner to promote the redevelopment or remodelling of the shopping centre. To attract a wider catchment to Elephant and Castle, we are promoting the inclusion of larger 'anchor' retail tenants as part of a mix of sizes of retail units and sizes in the shopping centre. An anchor tenant is usually a major chain store or department store in a shopping centre whose presence attracts business to smaller shops within the centre.
- 5.3 We also want to focus new retail uses along the northern part of Walworth Road, to provide more of a continuous high street from the shopping centre, and Heygate development site. Active ground floor uses will also be promoted on the main roads into the centre: New Kent Road, Newington Causeway, London Road and Newington Butts. We have set out within Policy 25: Heygate Character area – the reinforcement of the function of Walworth Road as a shopping high street through the provision of a range of retail uses including large format stores on the frontage of Heygate site and promote New Kent Road as a secondary retail frontage in a street parallel to Walworth Road.

- 5.4 We will require large retail developments over 1,000 sqm (including refurbishments) to provide a range of shop unit sizes including affordable units suitable for small and medium sized independent operators. Our strategy is for affordable units to be made available in the first instance to existing businesses in the opportunity area who have been displaced as a result of development in the town centre, then new business start-ups, and finally other independent retailers. Suitable businesses should have 3 units or less. Rents should be discounted by not less than a total reduction of 40% below market rate averaged over a 5 year period. We will use s106 planning obligations to ensure that a proportion of new shop units are made available as affordable units.
- 5.5 We also want to maintain a balance of uses in the town centre and within the Walworth Road protected shopping frontage to ensure the centre can thrive and to maintain provision of essential local convenience services within easy walking distance of as many homes as possible. Policy 21 – central area – promotes the provision of a range of arts, cultural, leisure and entertainment uses, including food and drink uses which make a positive contribution to the evening economy. Policy 33 – Walworth Road area – sets out a restriction to the number of A5 (Hot Food takeaway) units at no more than 5%, to ensure there is a balance of uses on the road.
- 5.6 The strategy also recognises the importance of maintaining small scale shopping facilities. Policies 29, 41, 45 and 53 support retention of uses such as local pubs, small shops and community facilities should be retained or reprovided in accordance with the Core Strategy and saved Southwark Plan policies.
- 5.7 Policy 2 sets out that a new market square will be provided to the east of the railway viaduct and we will support further improvements to East Street Market. This is further supported in Policies 25 (new market square) and Policy 29 (explore opportunities to improve East Street market).

Justification

- 5.8 The area is designated as an Opportunity Area in the Core Strategy, and the opportunity to increase retailing provision in the area would provide a means to help regenerate the area.
- 5.9 The Southwark Retail Study (2009) (**CDE5**) suggests retail floorspace can be expanded in the borough without harming the vitality of centres either within Southwark or in neighbouring boroughs. Provision of additional shopping space in Elephant and Castle will therefore be enabled and supported to strengthen the role of the centre.
- 5.10 The Retail Study found that most available comparison goods expenditure leaks outside the borough. Through the Core Strategy we

promote increasing the market share of Southwark's centres, taking advantage of estimated increases of available expenditure and clawing back a proportion of the expenditure which is currently lost to neighbouring boroughs. Amongst the town centres in the borough, Elephant and Castle has significant capacity for new development and will be a focus for retain growth.

- 5.11 The Retail Study concluded that in order to achieve an increase in floorspace it would be necessary to increase market shares and the borough would need to retain 22% of available expenditure within the whole survey area rather than the current 16%. This is possible with the right type of scheme⁶.
- 5.12 The Southwark Retail Study (2009) (**CDE5**) suggests that around 18,000 sqm of new retail floorspace can be provided without harming the vitality of centres either within Southwark or in neighbouring boroughs. Provision of additional shopping space in Elephant and Castle will therefore be enabled and supported to strengthen its role as a major town centre.
- 5.13 Walworth Road provides a more mixed retail offer but is currently disconnected from the Elephant and Castle central area by the gap in the frontage between the Old Town Hall and the shopping centre. Our strategy is to integrate Walworth Road and Elephant and Castle more effectively, to boost footfall between the two and help them support one another. In addition, the provision of active uses on the main roads leading into the shopping centre will help to consolidate and support retail provision in the central area and make the area more attractive and functional as a shopping experience.
- 5.14 The requirement for the provision of affordable units in larger retail developments will help to mitigate impacts on businesses which are displaced as a result of development and to help ensure that the centre continues to reflect the character and diversity of the local population. This policy is consistent with the approach the council has taken in approved schemes, such as 50 New Kent Road and 120-138 Walworth Road and is in line with London Plan Policy 4.9 – Small Shops. It is also in line with the Elephant and Castle Traders' Charter. Provision of affordable shop units will be secured through s106 planning obligations. We will use a sequential approach in considering affordable units. Our preference is for affordable units to be provided on-site. If this is not feasible or viable, then off-site provision should be considered. Where affordable units cannot be provided, we will seek financial contributions, through planning obligations to provide the mitigation necessary to support retail diversity within the town centre or the rest of the borough.

⁶ Southwark Retail Study (2009) (paras 11.11-11.12 page 77)

- 5.15 When appropriately located, shops generate activity on the street, therefore increasing safety. We have saved Policies 1.9 and 1.10 in the Southwark Plan. Policy 1.9 is intended to ensure that at least 50% of the shopping units in the Walworth Road protected shopping frontages stay in retail (A1 Class Use) and we propose to maintain that.
- 5.16 The area is lacking in the provision of a selection of cafes and restaurants. Food and drink uses can make an important contribution to boosting the appeal of the centre and generating a vibrant evening economy. They also reduce the need to travel by providing amenities in close proximity to transport infrastructure, residential development, and employment areas. In order to ensure the strategy to maximise diversity within the town centre is achieved, we will use development opportunities to expand the choice available.
- 5.17 Currently around 4% of the units on Walworth Road are in Hot Food Takeaway (A5) use. (see Appendix 1). Hot food takeaway shops offer a popular service to local communities, support the local economy and provide employment opportunities. They are appropriate in Town, District and Neighbourhood Centres. They can, however, have a detrimental impact on the amenity of the area, particularly where they involve evening opening. In addition both the proliferation of A5 uses and their clustering together can lead to dead frontages and an overconcentration which may affect the viability and vitality of a centre, undermine the predominantly retail function of the shopping centre and collectively impact upon the amenity of the surrounding area. These problems can be compounded where there are restaurants and pubs in the vicinity. We would restrict further growth in takeaways as these cumulatively can impact on local residents and in the retail vitality of the parade.
- 5.18 The provision of markets can help enliven town centres, reinforce the identity of an area and help provide a more varied shopping experience. They can also have other benefits, such as giving more people access to fresh fruit and vegetables, supporting local producers, reducing air-freighting and creating a route into setting up small businesses.
- 5.19 A market east of the railway viaduct could help bring vitality to the central area. Markets are part of the overall retail economy of the area and we will consider how they work with other forms of retail to enhance the economy of the area rather than compete with it or detract from it. The policy will complement the Southwark Markets and Street Trading strategy 2009-2012 which the council is currently preparing.
- 5.20 The council seeks to promote and retain, where possible, small scale facilities and uses which perform an invaluable role in meeting local needs, which are outside of the main shopping areas. Such facilities can be of particular importance to the elderly and the mobility impaired, and contribute towards a reduction in the need to travel.

Consistency with London Plan and Core Strategy

- 5.21 Providing a substantial increase in the amount of shopping floorspace would consolidate Elephant and Castle/Walworth Road function as a major town centre in our hierarchy of centres in the borough. This is consistent with Policy 3 in our Core Strategy and Policy 4.8 and Table A2.2 in the London Plan.
- 5.22 It would also benefit the local economy and has the potential to provide many new jobs, making a significant contribution to the London Plan estimate that Elephant and Castle can provide around 5,000 new jobs.
- 5.23 The London Plan Policy 2.15 encourages boroughs to consider the scope for consolidating and strengthening centres by seeking to focus a wider range of services, promoting diversification, and improving environmental quality. Policy 4.7 adds further guidance by setting out that boroughs should identify future levels of retail and other commercial floorspace need in light of local assessments.
- 5.24 Making some shops available to independent small and medium sized (SME) operators is consistent with the approach the Mayor is taking in policy 4.9 (small shops) of the London Plan.
- 5.25 Policy 4.6 of the London Plan supports the planning of night time activities in appropriate locations.
- 5.26 Core Strategy Policy 3 and Policy 4.8 of the London Plan also support the provision of markets, and measures to range of London's markets to improve their management, enhance their offer and contribute to the vitality of town centres.
- 5.27 Policy 3 of the Core Strategy supports the retention and provision of small scale retail facilities.

Sustainability Appraisal

- 5.28 The sustainability appraisal found that the majority of the policies in the SPD will have a positive impact. For every policy, the positive impacts outweighed the negative impacts when assessed across the whole range of sustainability objectives. In some cases the policies have no significant impact with the sustainable objective.
- 5.27 In particular Policy 1 scored several major positive results. New shopping space will result in new job opportunities for local people and boost the local economy, having a positive impact upon addressing poverty and encouraging wealth creation. The promotion of a range of shop unit sizes and flexible space, to include affordable units will help support new business start-ups and independent retailers in the area. The town centre would also become much more distinctive with the

provision of new mixed use buildings containing shopping floorspace. The refurbish or remodelling of the shopping centre will help to enhance the look and character of the town centre, in addition to the inclusion of active uses along the main roads which will help to enhance the wider townscape and create a more attractive, and functional town centre

6 CONCLUSIONS

- 6.1 The strategy to enable the provision of additional retail floorspace in the opportunity area has been justified through the Southwark Retail Study 2009 and it will enable the Elephant and Castle and the Walworth Road major town centre to strengthen its appeal to a wider catchment.
- 6.2 Through working with the landowner of the shopping centre, we will promote the diversification of retail units, their size and type of shopping. Also, by focusing new retail uses along the northern part of Walworth Road, New Kent Road, Newington Causeway, London Road and Newington Butts, the centre will be much more attractive to a wider catchment to Elephant and Castle.
- 6.3 The strategy supports a mixed balance of uses as well as the retention of uses such as small scale shops, restaurants, cafes and local pubs within the Opportunity Area which is in accordance with the Core Strategy and saved Southwark Plan policies. These uses are important to ensure that residents have access to facilities for day to day shopping.
- 6.4 The requirement for affordable units suitable for small and medium sized independent operators to be provided in larger retail development will ensure that the impacts on businesses which may be displaced as a result of development will be mitigated, and it will help to ensure that the centre continues to reflect the character and diversity of the local population.
- 6.5 The creation of a new market square in the central area will help to enliven the area and give an added dimension to shopping.

7. DOCUMENT REFERENCES

- (CDR97) London Plan 2011
- (CDR83)GLA working paper on Economics Retail in London: small retailers (2005)
- (CDL21) Saved Southwark Plan (2010)
- (CDE5) Southwark Retail Study 2009
- (CDCS3) Adopted Core Strategy
- (CDB5) Core Strategy Retail Background Paper

Appendix 1: Retail Survey of Walworth Road (2011)

Walworth Road Retail Survey

East Side, then West Side

Road Name	Number	Current Occupant	Current Use	Class	
Newington Butts	105	William Hill	Bookmakers	A2	
Newington Butts	103	Donde Lucho	Café	A3	
Newington Butts	101	Winemasters	Convenience Store	A1	
Newington Butts	99	Premier Mini Market	Food Retail	A1	
Newington Butts	97	The Well (Chinese)	Restaurant	A3	
Newington Butts	91-95	Travel Agent/Hairdressers/Coffee shop	Mixed	A1	
Elephant and Castle	20	Beddy Buyz	Retail	A1	
Elephant and Castle	16a	Shampoo Hair	Hairdressers/Beauty	A1	
Elephant and Castle	18	My Big Fat Greek	Restaurant	A3	
Walworth Road	8	Vacant Retail Units - (Strata)	Vacant	A1/A2/A3	Assumed
Walworth Road	80	Ivory Arch (Indian)	Restaurant	A3	
Walworth Road	82	Dream Pizza	Takeaway Restaurant	A5	
Walworth Road	84	Chatkhara	Café	A3	
Walworth Road	86	Hotel	Hotel	C1	
Walworth Road	88	Vacant	Vacant	A1/A2/A3	Assumed
Walworth Road	90	Accountants/Tax Consultants	Offices	B1	
Walworth Road	92	Solomein Travel	Travel Agent	A1	
Walworth Road	94-96	Murrys Partnership	Lawyers	A2	
Walworth Road	98-100	Chinese Restaurant	Restaurant	A3	
Walworth Road	116-118	T.Clarke	Offices	B1	
Walworth Road	?	Under construction	Vacant	A1/A2/A3	Assumed
Walworth Road	120-128	Kwik Fit	Garage	A1/B2	Assumed
Walworth Road	140-174	Offices	Offices	B1	
Walworth Road	176-178	The Tankard	Public House	A4	
Walworth Road	182-184	Sales Lettings Management	Estate Agents	A2	
Walworth Road	186	Church	Place of Worship	D1	
Walworth Road	188	Afro World Superstore	Convenience Store	A1	

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Walworth Road	190	Vacant	Vacant	A1/A2/A3	Assumed
Walworth Road	192	Walworth Pharmacy	Pharmacy	A1	
Walworth Road	194	Fanta's Beauty Salon	Hairdressers/Beauty	A1	
Walworth Road	196-200	Mcdonalds	Restaurant	A3	
Walworth Road	204	William Hill	Bookmakers	A2	
Walworth Road	206	Drs Surgery	Drs Surgery	D1	
Walworth Road	208	Dry Cleaning	Dry Cleaning	A1	
Walworth Road	210	Café Time	Café	A3	
Walworth Road	212	Arifs Patisserie	Bakery	A1	
Walworth Road	216	Vashtis Nail Bar	Hairdressers/Beauty	A1	
Walworth Road	218	M & Q Enterprises	Electrical Retailer	A1	
Walworth Road	220-222	Paddy Power	Bookmakers	A2	
Walworth Road	224-226	Tesco Express	Convenience Store	A1	
Walworth Road	228	Specsavers	Opticians	A1	
Walworth Road	230	Pauls discount Store	Retail	A1	
Walworth Road	232	Champ Sports	Sports Retailer	A1	
Walworth Road	234-236	Post Office	Post Office	A1	
Walworth Road	238	Occassional Cards	Retail	A1	
Walworth Road	240	Oakham Loans		A2	
Walworth Road	242	Subway	Sandwich Bar	A1	
Walworth Road	244-248	Lynnes Electrical Superstore	Electrical Retailer	A1	
Walworth Road	250	Schwar and Co	Jewellers	A1	
Walworth Road	252	Snappy Snaps	Retail	A1	
Walworth Road	260	Barclays	Bank	A2	
Walworth Road	262	Bet Fred	Bookmakers	A2	
Walworth Road	264-276	Morrisons	Supermarket	A1	
Walworth Road	278	Chicken Cottage	Takeaway Restaurant	A5	
Walworth Road	280	Bagel King	Takeaway Restaurant	A5	
Walworth Road	282	Newsagent	Newsagent	A1	
Walworth Road	286	Temple Bar	Public House	A4	
Walworth Road	288	Georges Barbershop	Hairdressers/Beauty	A1	
Walworth Road	290	Natwest	Bank	A2	

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Walworth Road	294	The Best Kebab	Takeaway Restaurant	A5
Walworth Road	296	Albane Jewellers	Jewellers	A1
Walworth Road	298	The Italian Footwear Company	Retail	A1
Walworth Road	300	Shoe Repairs	Shoe Repairs	A1
Walworth Road	302	Eroma Sandwich bar	Takeaway Restaurant	A5
Walworth Road	304	Brazilian Food Shop	Convenience Store	A1
Walworth Road	306	Baron John	Retail	A1
Walworth Road	308	Dynamic Sounds	Electrical Retailer	A1
Walworth Road	310	Entrees Bar & Restaurant	Restaurant	A3
Walworth Road	312	Cash Converters	Pawnbrokers	A1/A2
Walworth Road	314	Ranya Café	Café	A3
Walworth Road	316	Samara Convenience Store	Convenience Store	A1
Walworth Road	318-320	CEX	Electrical Retailer	A1
Walworth Road	322	Fonehouse	Electrical Retailer	A1
Walworth Road	324	Bubbys Beauty Nails & Hair	Hairdressers/Beauty	A1
Walworth Road	326	Dixie Chicken Takeaway	Takeaway Restaurant	A5
Walworth Road	330-344	Iceland	Supermarket	A1
Walworth Road	346	Grocers	Food Retail	A1
Walworth Road	348	Peacocks	Retail	A1
Walworth Road	350	Express Money Transfer	Financial	A2
Walworth Road	352	Panafrique Travel & Tours	Travel Agent	A1
Walworth Road	354	Figaro Barbers	Hairdressers/Beauty	A1
Walworth Road	356	Nails, Hair and Beauty	Hairdressers/Beauty	A1
Walworth Road	358	Akdeniz Jewellers	Jewellers	A1
Walworth Road	360	Walworth Kebab House	Takeaway Restaurant	A5
Walworth Road	362-368	Tesco Express	Convenience Store	A1
Walworth Road	374	Banana's Bar	Public House	A4
Walworth Road	376	LBS Ownership Unit	Offices	B1
Walworth Road	378	TD Sports Shop	Retail	A1
Walworth Road	380	La Luna Pizzeria	Restaurant	A3
Walworth Road	382-384	Beds 4 u	Retail	A1
Walworth Road	386-388	William Hill	Bookmakers	A2

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Walworth Road	390	Sofisticat	Retail	A1	
Camberwell Road	2	Jenny Ping	Hairdressers/Beauty	A1	
Camberwell Road	4	Chinese Medicine	Health	A1	
Camberwell Road	6	Ruskin Private Hire	Cab Office	A1	
Camberwell Road	8	Currys/Grills	Takeaway Restaurant	A5	
Camberwell Road	10	BSM - Driving School	Retail	A1	
Camberwell Road	12	Mixed Blessings Bakery	Bakery	A1	
Camberwell Road	14	Vacant	Vacant	A1/A2/A3	Assumed
Camberwell Road	16	Hatsworld Hat Shop and Barbers	Hairdressers/Beauty	A1	
Camberwell Road	18	AG Smith	Funeral Directors	A1	
Camberwell Road	20	Back To Eden	Hairdressers/Beauty	A1	
Camberwell Road	22	Astra Convenience Store	Convenience Store	A1	
Camberwell Road	24	Southwark Retirement Agency (LBS)	Offices	B1	
Camberwell Road	26	Sunlight Express	Dry Cleaning	SG	
Camberwell Road	28	Card Shop	Retail	A1	
Camberwell Road	30	Dallas Chicken and Rins	Takeaway Restaurant	A5	
Camberwell Road	36	Electrical Shop	Electrical Retailer	A1	
Camberwell Road	38	Vacant	Vacant	A1/A2/A3	Assumed
Camberwell Road	40	Top Flooring - Carpets etc.	Retail	A1	
Camberwell Road	42	Cards and Party Planners	Retail	A1	
Camberwell Road	44	Beauty Salon	Hairdressers/Beauty	A1	
Camberwell Road	62	Solicitors	Solicitors	A2	
Camberwell Road	64	Happy Bikes	Garage/sales	A1/B2	Assumed
West side of the road					
Walworth Road	137-149	Shell	Garage	SG	
Walworth Road	151	LBS Corporate Facilities Management	Council Office	D1	
Walworth Road	153-155	Newington Library		D1	
Walworth Road	157-163	Walworth Clinic	NHS service	D1	
Walworth Road	169	A Gold & Co	Solicitors	A2	
Walworth Road	171-173	G Baldwin & Co	Retail	A1	
Walworth Road	175-179	Southwark Payments LBS	Council Office	B1	

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Walworth Road	181-183	Matucci (furniture)	Retail	A1
Walworth Road	185	Amore Restaurant	Restaurant	A3
Walworth Road	187	The Mirror	Newsagent	A1
Walworth Road	187a	Threadneedleman	Tailor	A1
Walworth Road	189	Café house	Restaurant	A3
Walworth Road	191-193	Blockbuster	Rental	A1
Walworth Road	195	Herbert Morrison House	Office	B1
Walworth Road	199	Exact Print Shop	Retail	A1
Walworth Road	201	Vacant	Vacant	A1
Walworth Road	203	London Bride	Retail	A1
Walworth Road	205	Yates Estate Agent	Estate Agent	A2
Walworth Road	207	Angel (clothing)	Retail	A1
Walworth Road	209	Jerk Chicken	Takeaway Restaurant	A5
Walworth Road	211	Walworth Surplus Store	Retail	A1
Walworth Road	213	Supermarket	Supermarket	A1
Walworth Road	215	Lillys Hair & Beauty	Hairdressers/Beauty	A1
Walworth Road	217	Electronics Repair Centre	Retail	A1
Walworth Road	219	Shades of Fashion (clothing)	Retail	A1
Walworth Road	221	Fair Collections	Retail	A1
Walworth Road	223a	Hardys Wine Store	Retail	A1
Walworth Road	225	Glitz, Hair & Beauty	Hairdressers/Beauty	A1
Walworth Road	227	Gabby Caribbean Takeaway	Takeaway Restaurant	A5
Walworth Road	229	Cash City	Amusements	A2
Walworth Road	231	The Works	Hairdressers/Beauty	A1
Walworth Road	233	Hiep Phat	Convenience Store	A1
Walworth Road	235	Mana Thai	Restaurant	A5
Walworth Road	239	Carphone Warehouse	Retail	A1
Walworth Road	241	Fish Brothers - Pawnbrokers	Pawnbrokers	A1/A2
Walworth Road	243	Risky Clothing	Retail	A1
Walworth Road	245	Sportec Sports Shop	Retail	A1
Walworth Road	247-249	KFC	Restaurant	A3
Walworth Road	251-253	Ridgeway Pharmacy	Pharmacy	A1

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Walworth Road	255	Kander - Acupuncture and Massage		A1
Walworth Road	257	Vacant - formerly Greggs the Baker	Takeaway Restaurant	A1
Walworth Road	259-261	Nationwide	Bank	A2
Walworth Road	263-265	Clothing Warehouse	Retail	A1
Walworth Road	267	The Beaten Path	Public House	A4
Walworth Road	269-271	Atlantic Clothing	Retail	A1
Walworth Road	273	Greggs The Bakers	Takeaway Restaurant	A1
Walworth Road	277-279	Clothing Club	Retail	A1
Walworth Road	281	MS London - all shuttered, likely shop	Retail	A1
Walworth Road	283	Michael Lish - Suits	Retail	A1
Walworth Road	285	Claire's Accessories	Retail	A1
Walworth Road	287	Phones 4 U	Retail	A1
Walworth Road	289-291	Boots	Retail	A1
Walworth Road	293	Blue Inc - Clothing	Retail	A1
Walworth Road	295	MK One - Clothing	Retail	A1
Walworth Road	297	D & A opticians	Opticians	A1
Walworth Road	299	Foot Locker	Retail	A1
Walworth Road	301	Albermarle Bond	Pawnbrokers	A1/A2
Walworth Road	303	Holland & Barrett	Retail	A1
Walworth Road	305	Former Butchers - currently vacant	Retail	A1
Walworth Road	307-319	Marks & Spencers	Retail	A1
Walworth Road	321-323	Peppermint	Retail	A1
Walworth Road	325-327	Super Value - Household goods	Retail	A1
Walworth Road	329	Sense - Charity Shop	Retail	A1
Walworth Road	331-333	Poundbusters and Pawnbrokers	Retail	A1/A2
Walworth Road	335	Sams Butchers	Retail	A1
Walworth Road	337	O2 - phone shop	Retail	A1
Walworth Road	339-341	Salvation Army - charity shop	Retail	A1
Walworth Road	343-345	Art + Magic - Furniture	Retail	A1
Walworth Road	347	Moyo Ma	Restaurant	A3
Walworth Road	349-351	Santander	Bank	A2
Walworth Road	353	Agora Betting Shop	Bookmakers	A2

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Walworth Road	355-357	Julia Knows Beauty	Hairdressers/Beauty	A1	
Walworth Road	359-363	BetFred	Bookmakers	A2	
Walworth Road	365	Walworth Convenience Store	Convenience Store	A1	
Walworth Road	367-369	Argos	Retail	A1	
Walworth Road	371-375	Superdrug	Retail	A1	
Walworth Road	389	Shoe Shop	Retail	A1	
Walworth Road	391	Pawnbrokers	Pawnbrokers	A1/A2	
Walworth Road	393	Trinity Hospice	Retail	A1	
Walworth Road	395	Hair and Cosmetics	Hairdressers/Beauty	A1	
Walworth Road	397	Charity Shop	Retail	A1	
Walworth Road	401	Nail Salon	Hairdressers/Beauty	A1	
Walworth Road	403	Newsagents	Convenience Store	A1	
Walworth Road	405-407	The Red Lion - Trumans Brewery	Public House	A4	
Camberwell Road	1	Vacant	Vacant	A1/A2/A3	Assumed
Camberwell Road	5	The Money Shop	Pawnbrokers	A1/A2	
Camberwell Road	7 to 11	Coral	Bookmakers	A2	
Camberwell Road	15-21	Carpet Right	Retail	A1	
Camberwell Road	23-25	Costcutter	Convenience Store	A1	
Camberwell Road	27-29	CMHT NHS Clinic	NHS service	D1	
Camberwell Road	31	Church	Place of Worship	D1	
Camberwell Road	33	Bills Café	café	A3	
Camberwell Road	37-39	Bar (Vacant)	Public House	A4	
Camberwell Road	49	Hair & Beauty Salon	Hairdressers/Beauty	A1	
Camberwell Road	51	Nivela	Restaurant	A3	
Camberwell Road	53	Hair Salon (Vacant)	Hairdressers/Beauty	A1	
Camberwell Road	55	Convenience Store (Vacant)	Convenience Store	A1	
Camberwell Road	57-61	D-Eclipse	Restaurant	A1	
Camberwell Road	63-67	Seville Furniture	Retail	A1	
Camberwell Road	73-75	Carnell Bike Shop (closed & no view inside)	Retail/Garage	A1	
Camberwell Road	77	Mens Clothing Shop	Retail	A1	
Camberwell Road	79	Beauty Salon	Hairdressers/Beauty	A1	
Camberwell Road	81	Vacant	Vacant	A1/A2/A3	Assumed

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Camberwell Road	83	Marys Café	café	A3
Camberwell Road	85	Redsea - Eritrean Restaurant	Restaurant	A3
Camberwell Road	87	Laundromat	Laundrette	SG
Camberwell Road	89	Hairdressers	Hairdressers/Beauty	A1
Camberwell Road	91	Emukay - Takeaway/Restaurant	Restaurant	A3