

Briefing for Planning Committee members – Plot H1, Elephant Park – 21/AP/1819

We refer to the above application being considered at Planning Committee on 4 October 2022.

We raise the following material objections:

Housing

1. This application is the final plot of Elephant Park, on the site of the demolished Heygate Estate. The Applicant holds an Outline Planning Permission (OPP) to build homes on Plot H1. The proposal to build an office block instead of housing is a radical change of direction. **The loss of housing that could be secured under the OPP, or could otherwise be built on the plot should be considered by the committee in determining the application.**
2. The Applicant says that it has delivered all the housing required by the OPP. However, it has only delivered 25% affordable housing and only 100 social rented homes (out of 2,689 homes in total). H1 is also a brownfield site that should be optimised for housing, according to London Plan policy (also called H1). **A fresh viability assessment should be conducted to establish whether the maximum amount of affordable housing has been delivered under the OPP.**

Health hub

3. The Applicant offers a health hub as a preferred alternative to 10% affordable workspace, justifying this by 'exceptional circumstances'. However, the Applicant then gives a range of options, with no guarantee that a health hub will be the option delivered. **The Application should not be approved until this is settled.**
4. A second matter of concern is the short 30-year length of a health hub lease. This compares to the 250-year lease granted by the Applicant to Southwark for the Walworth Library. **Should a health hub be built, the length of the lease should at least match that given for the Library.**
5. A third concern is the probable loss of the Princess St and Manor Place surgeries, should the hub be built. While it will no doubt provide more up-to-date facilities than the surgeries, the impact for future local health provision and the impact on users of those existing facilities (eg in terms of potentially longer journey distances), beyond the development site, **demands a comprehensive public consultation before, not after, the determination of this application.**

Community space

6. The community space provided by the Applicant is largely taken up by amenities (library, nursery). There is little available for the local community to let at affordable cost, for civic, social and other events. The terms for the community space supposedly made available for rent which has been long promised (the Trunk) have not been concluded. **The Application should not be approved unless the community space is improved and leasing and letting arrangements are finalised.**

Design and massing

7. The Applicant proposes a building higher and twice the mass of the building consented under the OPP, which was designed with extensive local consultation which has been almost entirely absent in relation to this application. The proposed B1 office floorspace doubles that consented in the OPP. **The proposed building will dominate views and reduce sunlight in Elephant Park and have severe negative impacts on neighbouring buildings.**
8. The Design Review Panel said that the proposed building had an *'overly bulky character and deep plan of design'* and as far as we are aware the proposal has not been returned to the Design Review Panel (DRP) for comment. **The Application should not be approved until a referral back to the DRP has been made.**

Affordable retail

9. A large number of local businesses, from black and ethnic minority backgrounds, have been displaced by the Elephant's regeneration and the demolition of the shopping centre. **The Applicant has obligations under the OPP to help relocate some of these traders by providing affordable retail and workspace.**
10. The Applicant has not yet met that obligation, supplying only 902sqm, against a requirement of 960sqm. While this is a relatively small amount, the requirement is a minimum and still leaves many traders without premises, including La Bodeguita, one of the Elephant's largest independent traders. Arch 7 traders also face relocation. H1 should be used to help as many remaining displaced traders as possible. **The Application should not be approved until the minimum 960sqm of affordable retail space is in occupation.**

Carbon reduction

11. This proposal is not compliant with the energy policy requirement to reduce CO2 by 40%, achieving only 38%. While this may only appear to be a relatively small deficit, if Southwark is to reach its target of being carbon neutral by 2030 it should be met on-site in full. It is also a long way short of the pledge made for the Elephant regeneration by the then Lendlease Europe Chief Executive, as a founding project, under the Bill Clinton Climate Initiative, to be a Climate Positive Development and to strive to reduce the amount of on-site CO2 emissions to below zero. **The Application should not be approved without a full 40% on-site CO2 reduction and further detailed commitments to investment in non-carbon energy sources.**

Social rent enforcement action

12. The Council has an outstanding enforcement action for a social rent property on Elephant Park, to establish whether or not the home is being properly let at a social rent. This raises a question about whether or not social rents are being charged for the hundred Elephant Park social rented units, in accordance with the OPP's s106 agreement. **The Application should not be approved until the enforcement action is resolved.**