Objection to Heygate Outline Planning Application, Elephant and Castle 12/AP/1092

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Early Objection
This is my initial objection, made within the public consultation period. Due to the size of the application, I have not been able to read all documents and may well be submitting further detail and further grounds for objection. The changes that are being proposed by myself and others are substantial and should require a revised planning application and at least a further round of consultation before the application is determined.

I object to the application for the following reasons:-

Consultation
I attended and submitted comments at each of the 3 masterplan exhibitions held by Lend Lease. I also attended several of the Lend Lease liaison groups and workshops held on housing, sustainability and interim uses. I have to say this has not been a transparent and engaging process. Key documents have been withheld, meetings have been more about explaining the Lend Lease masterplan than any kind of genuine dialogue, most of the comments made by the community were never responded to. To give a few examples:-

Misleading information has been provided. We were told throughout there would be 25% affordable housing, but the applicant has withdrawn this commitment. The exhibitions conveyed a strong policy in favour of tree retention, yet it now emerges that at least 75% of the total trees will be felled, and quite possibly a much higher proportion than this.

The Design Code required by the Regeneration Agreement has remained a secret throughout.

There was a strong bias throughout the pre-application consultation preventing any dialogue on housing issues. For example, the 1st exhibition Feedback Form question 1 Your priorities managed to list 17 themes in which housing was not one of them. It is interesting to note that when the South London Press reporter interviewed visitors to the exhibition the most important issue raised was affordable housing (see South London Press, 19 July 2011). This is confirmed by the high prominence given to affordable housing at surgeries held by local councillors.

It was difficult to use the Feedback Forms at the Lend Lease exhibitions, as some important key principles were never covered, for example, there were
no questions on doubling density, on height and massing working well with established character, or on pedestrians and cyclists having priority over vehicles, or on interim uses being embedded throughout the masterplan.

I also found it hard to comment on some issues as key terms were not defined. For example, what height is a tall building, a medium building and a small building? What is meant by affordable retail? A glossary would have been very helpful; I requested this on the opening day of the 1st exhibition in July 2011, but nothing materialised.

Floorspace
For the existing floorspace to either double or treble amounts to overdevelopment, and I am concerned at the impact on local residents, the local character and the identity of place at the Elephant and Castle. The application fails to balance what exists now with what the developer is bringing to the area and as such is not delivering a successful place (Lend Lease design principle) nor responding sensitively to the existing context and existing heritage assets (Lend Lease design principle).

The basement floorspace applied for is very high and if an amount towards the upper end was sought (188,000 sq m out of a maximum proposed floorspace of 330,741 sq m) this would distort the development. Basement floorspace should be excluded from the total floorspace sought and applied for separately. The Development Specification also needs to be explicit about what it includes.

I object to the applicant proposing a net loss of community floorspace. The minimum community floorspace offered by the applicant of 1,000 square metres is considerably less than the community floorspace that is being lost.

Lifetime neighbourhood and sustainable development
The application fails to comply with London Plan policy 7.1 and the emerging SPG on lifetime neighbourhoods. The concept that brings everything together should be the lifetime neighbourhood and a commitment that the facilities and services provided are accessible and affordable and relevant to all. The Master-plan design principles make no reference to what makes for an active and supportive local community – issues of empowerment, ownership and democratic accountability are incredibly important.

There is no information on the provision of new social infrastructure, as if the needs of an additional 5,000 residents can simply be absorbed into the existing facilities, with no impact on health, education and open space facilities.

Housing
The low or zero level of affordable housing is not Southwark policy compliant (35% is required), the very low level of family housing (only 10%) and the
The size of the homes (the policy aim should be to exceed minimum standards) are not compliant with the London Plan or HCA requirements.

I object to the failure to provide a diversity of housing choice including self-build, co-housing, multi-generational housing, supported housing for older people (to replace the 2 sheltered housing schemes that have been lost), co-operative housing and Community Land Trusts. This is non-compliant with London Plan Policy 3.8 and NPPF policy “choice of quality homes”.

There is no supporting study of housing needs and conditions within the Elephant & Castle OA and the applicant seems to ignore addressing these needs and contributing to the sustainability of the wider area.

**Open Space and public realm**

I object to the loss of open space. The new park is very small, and there are no green fingers to break up the monolithic feel.

In policy terms, public realm should be “inclusive and accessible” and “a series of connected spaces …..allowing people to meet, congregate and socialise” (London Plan Policy 7.5). The application does not at present respond to this policy.

**Tall Buildings**

The tall buildings definition of 12 floors + does not comply with the Core Strategy definition of tall buildings as 10 floors + and “any building that is significantly higher than surrounding buildings will be regarded as a tall building. I object to the failure to apply London Plan policies on tall buildings to the non-classified tall buildings that front the park.

It is appreciated that to achieve 2,500 housing units much of the development will be high density, but high density does not have to mean very tall buildings and repetitive massing. Justifications are not given as to why 14-18-18-23-23-24-25-25-30 storey buildings are required. At no point during the pre-application consultation were other options to this large and isolated block structure presented, despite strong representations made by the community.

The tall buildings principles and studies do not appear to have been undertaken in accordance with London Plan Policy 7.7 which requires sensitive locations where there are conservation areas or listed buildings. A large number of Grade II listed buildings and 2 proposed conservation areas are in close proximity to the site.
**Elephant Road**
I object to the inclusion of Elephant Road Park within both the Oakmayne and Lend Lease applications. This needs to be corrected. If Elephant Road Park is within this application then the playground and sports field should be reinstated by Lend Lease.

**Play**
The Play Strategy breaches the London Plan by the non-provision of youth space on site. A lack of detail on the distance of play space from homes, supervised and non-supervised play, teenage play makes it difficult to determine policy compliance.

**Employment**
I object to the lack of reference to jobs for local people. Jobs for local residents (with a minimum local jobs target of 30%), and not just opportunities in the construction industry, should be a key principle, as should a commitment to the London Living Wage and procurement policies that support local providers.

There should be a condition in the section 106 to work with local schools, training colleges and training agencies across all sectors (public, private and voluntary/community) on an employment and training strategy.

**Retail**
There has been a failure to support existing retail, at the Shopping Centre, East Street market and local shopping parades as part of a retail offer that integrates new retail development with existing activity. This should be a key principle.

New retail development at the top end of Walworth Road will impact upon existing traders, but there is no mention of how this will be managed and whether the new retail development will provide opportunities for existing traders. The retail impact assessment has not considered the impact on the 70 Latin American businesses on Elephant Road, Eagle’s Yard and the Shopping Centre.

A key principle must be economic diversification. So I would expect to see encouragement for cultural and creative enterprises and micro businesses, including provision of business incubator units and workspace.

**Energy and sustainability**
The Development Specification fails to describe renewable energy and drainage, district heating / CHP and environmental sustainability. Whilst these are covered in the supporting documents, there should be an explicit and transparent commitment in the documents for approval.
The Clinton designation was partly based on the innovative Multi Utility Services Company (MUSCo) supplying low carbon energy, non-potable water and data connectivity. This is required by the Core Strategy and developments in the area have wiring in place (a significant s 106 requirement) yet Lend Lease has deleted this model.

Sustainability refers to social impact as well as environmental and economic, and there has been no study to value in social terms what has been lost and is being provided. There should be either a social impact assessment or a Strategic Environmental Assessment to cover this.

**Demolition and interim use**

I object to the proposed demolition of Crossway Church, the ex-Heygate shopping units on Rodney Road and the meeting space provided by the 2 Heygate clubrooms.

There are no proposals for any retained buildings. There should be reference to the use of some existing buildings as community managed space and business workspace and the potential to meet the need for temporary housing should not be dismissed. Given the years of uncertainty ahead, we certainly do not want to see most of the site as a wasteland. Interim uses should be blossoming throughout the development site.

Demolition and construction plans must include public access arrangements to all sites, so that the potential for interim use can be realised.