

Appendix 1

Consultation undertaken in relation to **Outline application for redevelopment of the site ref: 10-AP-1092**

Consultation undertaken

Site notice date:

11-05-2012

Press notice date:

10-05-2012

Case officer site visit date:

Numerous.

Neighbour consultation letters sent:

10-05-2012

Internal services consulted:

10-05-2012

Planning Policy
Transport Group
Design and Conservation Team
Archaeology Officer
Economic Development
Urban Forester (Arboricultural Officer)
Ecology Officer
Environmental Protection Officer
Housing Regeneration Initiatives
Elephant and Castle Regeneration – Property
Waste Management
Public Realm (Highways)
Southwark Primary Care Trust (NHS)

Statutory and non-statutory organisations consulted:

10-05-2012
Greater London Authority
London Fire & Emergency Planning
City of Westminster
London Borough of Lewisham

London Borough of Bromley
City of London
London Borough of Lambeth
London Borough of Haringey
London Borough of Islington
English Heritage
Natural England
Environment Agency
Metropolitan Police
London Underground
Network Rail
Thames Water
Transport for London
Department for Communities and Local Government
Aquiva
The Royal Parks
EDF Energy

Neighbours and local groups consulted:

Neighbour notification letters sent to 2716 properties within circa 100m radius of the application site.

Re-consultation:

09-10-2012 Notification to all statutory and internal consultees.
08-10-2012 Letters sent to all original addresses plus and additional respondents.
11-10-2012 Press Notice.

Consultation undertaken in relation planning application for **Demolition of existing buildings on structures on the site ref:12-AP-3203**

Consultation undertaken

Site notice date:

11-10-2012

Press notice date:

11-10-2012

Case officer site visit date:

Numerous

Neighbour consultation letters sent:

09-10-2012

Internal services consulted:

Design and Conservation Team
Ecology Officer
Elephant and Castle Regeneration - Property
Environmental Protection Team
Archaeology Officer
Transport Planning Team
Urban Forester (Arboricultural Officer)

Statutory and non-statutory organisations consulted:

Environment Agency
Department for Communities and Local Government
Greater London Authority
London Fire & Emergency Planning
Natural England
Transport for London

Neighbours and local groups consulted:

Neighbour notification letters sent to 2716 properties within circa 100m radius of the application site.

Re-consultation:

n/a

APPENDIX 2

Consultation responses received relating to Outline application 10-AP-1092

Internal services

1 Planning Policy

No key objections to the proposal.

- The provision of additional homes on the masterplan site will significantly contribute towards the target in policy 5 of the Core Strategy, for 4,000 new homes in the Opportunity Area;
- Further clarification will be needed at the reserved matters stage to ensure that the policy regarding provision of affordable housing in developments is considered alongside viability. Suggest mechanisms to be put in place through the section 106 agreements for each phase to include a review mechanism to ensure that the maximum amount of affordable housing is delivered throughout the process;
- Policy requires 35% affordable housing and 35% private housing, the housing statement does not set out how much of either type of housing is being proposed, only that viability tests will be needed at the reserved matters application stage. This clarification will be required at reserved matters stage;
- The council's preference is that larger 4 and 5 bedroom units are also included in the scheme, the application only refers to 3 bedroom units;
- All new units will need to meet the minimum standards in the adopted Residential Design Standards SPD 2011;
- A minimum of 2,000sqm and maximum of 5,000sqm of business floorspace is proposed. The saved Southwark Plan proposal site 39P requirement is for a minimum of 45,000sqm of B1 space, including incubator space, managed workspace and accommodation. A greater quantum of business floorspace is therefore encouraged within the development site, which can be supported by an underlying demand in the 'local office market' for suitable high quality office premises.

2 Transport Group

- Pedestrians and Cyclists

The indicative layout to streets is permeable to both pedestrians and cyclists;

Where estate roads are shared with vehicles, they will be for local access by a small number of vehicles;

New pedestrian crossings are proposed for Walworth Road (near Elephant Road) and Heygate Street;

Significant works are proposed to the Elephant & Castle northern roundabout to remove the pedestrian subways and provide 'at-grade' (i.e. surface-level) crossings. This will involve the signalling the remaining three unsignalised junctions within the roundabout which, together with a thorough improvement to road markings, will improve safety for all traffic. TfL is currently reviewing the design with the intention of maximising pedestrian and cyclist safety benefits;

All routes on the estate will be available for use by cyclists, and there will be two signed routes;

TfL has proposed a Cycle Superhighway (CSH6) on Walworth Road connecting with the existing CSH7 in the Elephant & Castle area. Details of this route have not yet been

determined by TfL, specifically the point at which the two CSH routes would join. Evidence shows that the majority of cyclists travelling on north-south journeys in this area choose to use the Elephant and Castle northern roundabout rather than the existing CSH7 'western bypass' on Churchyard Row and Elliot Row. The significant works proposed to the northern roundabout will help to address cycle safety problems there and so make the 'main road' route more attractive; Provision of one or two cycle hire docking stations has been secured, with details to be agreed at reserved matters stage.

- Car Parking

It is proposed that parking for disabled residents is provided at a rate of one space for every ten residential units, which is our normal requirement and therefore welcomed. Details will be considered at the reserved matters stage to ensure that disabled parking for each plot is convenient to building cores serving wheelchair-accessible units. A parking management plan will be required to demonstrate that, among other things, the development will cater for its own disabled parking requirements in the future;

Since it is within the Central Activities Zone and a Controlled Parking Zone, policy 5.6 of The Southwark Plan (saved) requires the development to be car-free aside from spaces for disabled users and car-clubs. This was more recently repeated in policy SPD12 of the Elephant & Castle SPD (March 2012). A departure from this policy has been justified by the applicant due to its impact on viability which, while not supported by any specific data, has been supported by the District Valuation Service as a fair representation. The applicant has acknowledged that the cost of providing parking is never fully recovered in sale prices, but claims that the benefits of an increased rate of sales outweighs the cost of funding the construction of the space;

A method of collecting data on the impact on sale price and sales rates from earlier phases in order to feed into viability calculations for later phases has been suggested by officers but rejected by the applicant, and the review of parking offered in the Transport Assessment has also been rejected. Similarly, methods of mitigating the impact of the parking and of additional trips on the network which would not affect viability have been suggested by officers but rejected;

In line with the reasons given for the policies of the Southwark Plan, the development should be motorcycle-free as well as car-free;

To protect the amenity of existing residents in respect of parking, all properties within the proposed estate will be excluded from eligibility for on-street parking permits and contracts to park in Council-owned car parks.

- Traffic Impact

Because of the relatively low level of parking, the traffic impact of the development is expected to be quite small and can be accommodated at local junctions without the need for improvement. A site-wide travel plan submitted in draft is generally acceptable and will be secured in order to provide support for measures to, among other things, reduce the traffic impact.

- Public Transport Impact

The development is expected to generate approximately 500 bus trips in the morning peak hour, equivalent to over 7 full double-deck buses. While there is a small amount of spare capacity on some bus corridors leaving the area towards Central London, the others are already full. It is therefore necessary to improve the bus services in order to cater for the additional demand generated by the redevelopment of the estate and TfL have accepted that the improvement can be delayed until the majority of the development has been built.

- Rail Services

The existing Elephant and Castle rail station is served by up to 21 trains per hour toward Central London in the morning peak. The impact of additional passengers generated by the development is minimal.

- Underground Services

Through the development of the Elephant & Castle Opportunity Area Planning Framework / Supplementary Planning Document and this planning application it has been shown that the addition of three lifts at the Northern Line ticket hall would be sufficient to cater for anticipated flows. The Elephant & Castle OAPF/SPD set a tariff for development which will contribute toward the cost of the necessary improvements.

- Servicing

The approach to servicing is acceptable, but it is recommended that a site-wide Servicing Management Plan is secured since, given the generally narrow nature of the roads within the estate, on-street servicing to one plot could impact on the acceptability of on-street servicing to an adjacent plot. Provision of support courier and supermarket deliveries would help to resolve conflict and so will be sought through the Servicing Management Plan.

- Construction

The draft Construction Management Plan provided at this stage is generally acceptable, but many of the details of construction will only be developed at reserved matters stage. It is therefore recommended that a site-wide CMP is secured, to be amended for approval at the reserved matters stage for each plot or cluster of plots.

3 Economic Development Team

- Retail;

The proposed distribution of the retail with key frontages along the Walworth Road and New Kent Road is appropriate to maintain and develop the town centre functions of these streets. The inclusion of a secondary retail street with a focus on independent and smaller retailers is supported. The distribution of the 10% affordable retail space within this secondary street and around the park is encouraged. The location of the affordable units should be given equal priority with market rent units in terms of accessibility and projected footfall on the site.

- Commercial;

The quantum of commercial floorspace remains an inadequate contribution to the SPD / OAPF target of 25,000sqm-30,000sqm of commercial floorspace given the significance of the site within the Opportunity Area and the potential for local market growth over the development period. Very limited justification has been provided for the very low levels of commercial space in terms of design and market constraints.

- Local Economic Benefits;

The difference between the maximum and minimum levels in the completed development is significant and the minimum levels are of concern. Clauses are recommended to be included in the s106 agreement.

4 Arboricultural Officer

- Landscaping proposals are generally acceptable, and suitable control of landscape establishment and future management works can be provided via condition to include a longer rectification period which bridges the establishment and maturation phases.

- The tree strategy considers the existing tree stock in relation to current and emerging

planning policy, and impacts assessment of the proposed development and the potential for an enhanced and maturing canopy cover. The general approach and longer term vision for green infrastructure seeks to increase the Capital Asset Valuation of Amenity Tree (CAVAT) value both on and off site so that, by completion, this is increased by 5% together with the target for canopy cover increase, the strategy therefore complies with London Plan and climate change adaptation policy objectives.

- Other than retaining the highest value trees, both in terms of condition and CAVAT, the strategy aims to provide a strong planting framework and creation of distinctive characters for streets, squares and courtyards. Inherent within this vision is the recognition of the important economic, cultural and climate change adaptation benefits which a mature landscape provides, as well as the more commonly understood environmental contribution. The rationale for tree retention is based on single specimen, group and avenue typologies, each of which play differing functions and roles. For example, an avenue may consist of individuals of relatively poor quality yet be important as a whole, whereas individual specimens should be of a higher quality in order to fulfil a more focal and aesthetic purpose. The control of more detailed testing of trees identified for retention can be provided via condition.

- Overall the proposed landscape layout is well designed and maximises the green infrastructure and design aims outlined within Open Space, Elephant and Castle SPDs and tree strategy.

- Conditions recommended concerning the following:-

Tree protection, landscaping plan, tree planting, and green roofs.

Comments on revised application documents following re-consultation on 08/10/12:-

- The amended tree strategy and landscape documents are restricted to changes at plot H11b, indicative cycle routes and related play areas. These have been made following pre and post-submission discussions with the council, public and other consultees.

- Overall the design changes result in a positive impact upon the quality and extent of amenity.

- The realignment of the mid-rise buildings and frontage conditions onto Heygate Street opens up internal green views across and into the park.

- The changes result in the removal of 1 mature category B Plane tree (T55) which is to be replaced as part of the tree strategy. This can be achieved as part of the proposed new planting within the site; on Heygate Street, to the rear of plot H7 and on the amended communal amenity space above the podium at H11b.

- Changes to the illustrative cycle routes cause no adverse impacts in relation to the landscape plan.

- It is important to note that although improvements are all made at grade, the proposed reconfigured amenity space is above basement slab conditions. Careful evaluation of design, engineering tolerances and maintenance specifications will therefore be required in order for the quality of landscape aspired to, to be sustainable. For example, mature trees are shown above 1.0-1.5m build up over the slab. This is potentially acceptable; however sufficient total exploitable soil volume needs to be confirmed.

5 Ecology Officer

The Ecological Assessment and bat surveys meet best practice and provide good evidence of the ecological value of the site and species present. Agree with the findings and recommendations. The proposed creation of new green space including new ecological features such as native planting and natural habitat creation will provide gain for biodiversity in the area. The outline application contains the correct level of detail

with regard to ecology and it is acknowledge that for further full applications, more detail of the proposals will be required. For example details of the composition of the brown roofs, details on the type and location of the nesting / roosting features and an ecological management plan. Further bat surveys may be required as a bat activity survey is valid for a year. The submitted bat survey is still valid.

6 Environmental Protection Team

The Environmental Protection Team has considered the areas of contaminated land, air, noise & Construction Environment Management Plans separately below. Conditions are recommended in relation to these topic areas.

In general the ES is comprehensive with regard to the these issues. The chosen method of presentation has led to some 'lack of flow' as information on some elements is located in several places within the documents provided. The results of some of the of the assessments with regard to Noise and Air Quality impacts from the demolition and construction phase are conservative, however, this is not unusual, nor unexpected, at the outline application stage. Please note that the demolition aspects have been commented on in a separate, but related consultation and the recommendations should be read together.

Each plot/phase of development will be required to produce a detailed planning application and bespoke Construction Environmental Management Plan. It is possible that each phase will be built by different contractors at different points in time. Also, as the development of the whole site will be spread over a number of years there is ample opportunity for the plot design, land uses around the site, best practice guidance and environmental standards to change. As each plot/phase of the development comes forward for detailed planning consent many of the issues identified in the ES will be revisited in more depth, depending on the location, detailed design and eventual use of each plot.

The Environmental Protection Team have addressed this outline application as if commenting on a set of design principles for the redevelopment of the Heygate area and where appropriate have suggested conditions that will overarch each plot/phase detailed planning application. Detailed matters will be addressed as each plot/phase comes forward for approval.

External Air Quality

The site is in an LAQMA, designated due to NO_x and particulates, where there is poor air quality due to road network. The ES for the outline permission is broad in scope, as would be anticipated. Using air quality data from 2010 as the reference year means that NO₂ levels are underestimated as the predicted reductions from anticipates changes in vehicle emissions have not materialised and monitored levels have increased between 2010 and 2012. Reference is made to the Old Kent Road figure for NO₂ being 45 ugm³. This has been superseded in time and the figure is now 57ugm³. It is agreed that the dispersion model ADMS – Roads is an appropriate model to use. Should the outline design remain significantly unchanged residential units proposed for the site (New Kent Road frontage/ Walworth Road Frontage/ in proximity to the CHP/Boiler Plant) will require mechanical, filtered ventilation to enable residents to keep windows closed to protect themselves from poor external air quality. The on-site NO₂ monitoring gives results that are in the right ball park for the area. Environmental air quality (and noise)

issues will need to be considered in the location and final design of the structures proposed, particularly with regard to New Kent Road, Walworth Road and the CHP/Boiler plant.

Internal Air Quality

As external air quality is known to be poor it is essential that indoor air quality is protected. The Environmental Protection Team would expect that all buildings constructed on site meet the principles of EN 13779 on Ventilation and Air-Conditioning Systems. Any underground car-parks or servicing areas will also require effective ventilation.

Construction phasing

It is considered that the co-ordination of the demolition and construction phasing is far from ideal and requires re-consideration

Emissions to Air from Construction

The identification of issues affecting the site during the construction and use phases is thorough and the results have great correlation with what would be anticipated. The Environmental Protection Team agree with the list of dust sensitive locations off-site, however, would recommend all schools/pre-school nurseries/hospitals/care homes and similar and should be annotated on the sensitive receptor map. The list of selected receptor addresses and the modelling of sensitive receptors gives results that would be anticipated for the area. The listed actions to reduce dust from both the demolition and construction phases are very general, as would be anticipated at this stage. Emissions to air from construction will be addressed in detail when considering the various Construction Environment Management Plans as the methods used will vary for each phase of construction. The developer's attention is brought to *The London Dust Code - The control of dust and emissions from construction and demolition - Best Practice Guidance*. This is the minimum acceptable standard for operations. That said it is recommended to expressly include:

- a) upward pointing exhausts for mobile plant on the site; and
- b) to include information/actions for extreme weather and the suspension of works where dust management becomes so onerous as to be ineffective and any dust generating actions must cease.

There are concerns regarding the levels of HGV traffic that the site will generate. Site practices will be required to work within parameters that have been considered as part of a Traffic Plan for the site. The Traffic Plan will include maximum numbers of movements per day, holding areas, loading areas, hard-standing areas, surfaced haul routes, delivery bays, stock areas, etc. The Traffic Plan will be designed to protect local air quality and the integrity and flow of traffic on designated approach routes.

The site perimeter will need to be well secured and will require a solid hoarding designed to minimise off site impacts. It shall have a minimum height of 3m.

It is anticipated that these issues will be addressed in detail in the Construction Environment Management Plans that will be conditioned on the detailed applications for each phase of build/plot.

CHP/Boiler Plant

No detailed information is provided on the likely dispersion of exhaust gasses from the

gas boilers/CHP plant. The LPA will require clarification regarding this as CHP is not recommended in this location due to poor background air quality. The Boiler/CHP plant will need full 3d dispersion modelling detail as any stack is highly likely to impact laterally on high buildings both on and off-site adversely affecting residents. It is anticipated worst case scenarios will be explored by the developer as the proposed stack heights may not be adequate given the height of some of the blocks proposed on the development. This issue has been identified within the ES as requiring further work. Recent nearby developments with similar plants that have gained permission have had abatement technology for the CHP/Boiler plant conditioned, this is strongly recommended in this location. There is draft guidance regarding CHP plants in London which is currently out for consultation which may be of interest to the developer called 'The Mayor's combined heat and power emissions standards for Nitrogen Oxides'

Odour due to Commercial Food Preparation

Potential odour nuisance from commercial kitchens in restaurants, take-aways and cafes that may locate to proposed commercial and retail units.

Noise Impacts from Construction

The construction noise assessment methodology appears sound but the results regarding impacts are conservative. The results of the baseline noise survey are as would be anticipated. The Environmental Protection Team considers the list of noise sensitive receptors is satisfactory. Environmental noise measurements have been taken at locations needed to assess off-site noise impacts on to the site. It will be necessary to take further noise readings at quiet locations where on-site noise from construction and use will impact onto off-site residents. This will be addressed at the detailed planning application stage as each plot/phase comes forward for full permission. The control of construction and demolition noise will be mainly dealt with using Construction Environmental Management Plans. these will also cover the routing of vehicles in and out of the site/s. Comments have been made with regard to site entrances when responding to the application for demolition on the site and it is reiterated that access and egress to the various plots/phases from Heygate Street is the preferred option due to road safety and public nuisance issues, other access points may be considered as part of one-way routes or for use in the case of emergencies.

Background noise monitoring locations – all the monitoring locations chosen are noisy locations, therefore, they are good for assessing the noise impacts on the proposed development from off-site noise, but, less useful for assessing the impacts of the construction and use of the site on completion at the quieter locations on the southern and eastern perimeters of the site. However, the identification of areas where adverse impacts will occur and what the causative activities will be are, if potentially understated, as anticipated. Further noise impact detail will be required for each plot/phase as the detailed planning applications are submitted. The Noise and Vibration Assessment described in the ES is thorough and comprehensive and all figures quoted appear broadly efficacious, some of the monitoring times are short but the quietest times of day between 03.00 and 04.00hrs have been mainly covered.

The Environmental Protection Team does not agree with the noise levels stated in Table 8.6 for when noise readings are above threshold (trigger level). It would be anticipated that working methodologies would be designed to not breach the trigger level/s and therefore suggest the following:-

<i>Level above threshold trigger</i>	<i>Definition</i>
--------------------------------------	-------------------

<i>dB(A) Laq T</i>	
0	Insignificant
0.1 – 3.0	Adverse Minor (technical breach of condition but minor impact)
3.1 – 5.0	Adverse Moderate (technical breach but investigate and resolve/change working practices)
5.1 +	Adverse Substantial (significant breach of condition – gather evidence regarding potential legal action for breach)

Noise Impacts from Road & Rail on Proposed Residential Units.

Should the outline design remain significantly unchanged some of the residential units on site such as the New Kent Road frontage, Walworth Road Frontage and in proximity to the CHP/Boiler Plant will require forced ventilation to enable residents to keep windows closed to protect themselves from high levels of external noise. Private external amenity space (balconies/private gardens) will not be appropriate in these locations depending on vertical or horizontal distance from the sources. The projected increase in noise from road traffic on Rodney Place could be mitigated through modifications to the road network, variable speed limits, planting, improved traffic management and the installation of protection measures for off-site sensitive uses. In general the results of the Road Traffic Assessment Calculations are as anticipated.

Noise Impacts from Commercial and Retail Activities both on-site (proposed) and off-site (existing).

The Environmental Protection Team would expect this issue to be addressed at the detailed design stage but it is flagged up as an early consideration as the sensitive consideration of the location and aspect of any leisure uses (in relation to residential units) proposed will maximise their flexibility under other licensing and permitting regimes. Also blocks with commercial units may require service yard (possibly underground) designing in to prevent noise nuisance from deliveries and waste collections.

Noise Impacts from Plant on Proposed and Existing Residential Units.

The proposals in the ES are satisfactory. It is anticipated that significant noise attenuation works will be required on the CHP/Boiler plant as the termination point of any stack and the plant housing are likely to impact on nearby proposed (and existing) residences. It will be essential that noise outputs from the CHP/Boiler plant are modelled in detail prior to agreement of the final design. It is agreed that there will need to be a condition to ensure plant noise from all plant, including lifts, fans, air handling units is 10dbA below background (L90). This condition would also apply to any retro fitted plant e.g. commercial kitchen extraction systems/air handling units, etc. It would be advised that the developers think about the termination heights for commercial kitchen extraction at the design stage e.g. leaving space for flues to get through structures, etc. It is recommended that any plant internal to buildings is as quiet as possible (silent running) and isolated from the structure to prevent flanking transmission of noise and tones.

Noise Impacts Residential to Residential.

The Environmental Protection Team will expect the preferred standards outlined in the ES, therefore, the good standards for internal acoustic environments stated in BS 8233:1999 are to be met within residential developments. Some external noise levels measured are very high and will require addressing at the design stage with appropriate

specifications on acoustic attenuation performance for glazing and building cladding. When designing internal layouts it is recommended that rooms with similar use patterns and type are next to each other in both the vertical and horizontal planes and that the scheme design should improve on the standard for internal sound transmission between residences in Building Regulations Document E by +5 dB(A). Private external amenity areas should meet a maximum of 55dB(A) LaeqT. Clearly some areas/aspects of the development will not be suitable for balconies. Mechanical ventilation and acoustic glazing of varying specifications will be required on different frontages. The suitability of the site for residential development is clear given its previous use; however, it is proposed to take some frontages closer to known noise sources. Required noise attenuation works will need to be checked by post-construction testing prior to habitation.

Noise Impact due to Proposed land Uses.

Plot H3 has a corner cut off facing toward existing Wansey Street residents and block H6. It is considered that the removed corner would be far better placed orienting towards Southwark Town Hall and Walworth Road to create a space that is more usable, easily accessible by the wider community and to minimise the noise impact that any community activities in the space would have on existing residents.

Vibration Impacts due to Construction

Vibration impacts affecting off-site residents during construction and in proposed residential units from rail and underground sources post construction. For vibration the standards are BS 6472-1:2008 Guide to evaluation of human exposure to vibration in buildings. Vibration sources other than blasting & BS 5228-2:2009 Code of practice for noise and vibration control on construction and open sites:

Note that comments made by the GLA regarding this application are all valid. It is most likely that these considerations will be applied at the more detailed stages in the development process.

Land Contamination - Desk Study

The conclusions of the desk study are adequate, the site is mainly low risk with some areas where previous land uses and made ground will need further investigation. This will be addressed in detail at the detailed planning application stage for each relevant plot/phase. There is also an identified issue with potential unexploded ordnance across the site. The verification strategy as outlined in the ES is acceptable. Contamination will be present in some areas. Conditions are required to ensure the developer follows recommendations of the Arup report dated March 2012 and reports any changes to the LPA in short order.

Construction Management Plan

The ES is adequate for the construction phase; all major considerations are addressed to some degree. There will be opportunity to clarify requirements through the Construction Environment Management Plans for each plot/phase prior to construction commencing. Some elements of the site preparation and construction will require the developer/contractor to use non-standard methodologies to reduce/remove identified environmental impacts.

Lighting

Following development there will be many pedestrian through routes under use at all

times of day, the development must be well lit throughout the night at ground level, especially in the park. The lighting design should be mindful of pedestrian security and the ILE Guidance notes on obtrusive lighting. Lighting of commercial hoardings, advertisements and residential entrances should contribute to street scene without causing glare or adverse impacts on road users.

7 Housing Regeneration Initiatives

No comments.

8 Elephant and Castle Regeneration Team – Property Division

Letter in support of applications 12-AP-1092 & 12-AP-3203

- The applications are a significant step forward in the council's plan to regenerate the Elephant and Castle;
- The site forms a significant component of the core site (39P) which has been saved as part of the Core Strategy adopted in 2011;
- Regeneration benefits in relation to place making, job creation, housing, affordable housing, Sustainability, corporate plan, s106 and public consultation (summarised key points, for more detail refer to letter dated 13th November).

9 Archaeology Officer

The applicants have submitted a desk based assessment, whilst this includes a baseline of data for this project important archaeological sites which have the potential to be impacted by the proposal are not included in the discussion or analysis;

The baseline archaeological data included does not reflect the full range of the archaeological resource detailed in the GLHER for this area. In terms of the study area for this document, no radius of sources has been indicated or included with the mapping. Generally a 250m radius is suitable;

This document requires revision starting with an adequate archaeological background from within a 250m radius around the boundary of the site.

Comments on revised application documents following re-consultation on 08/10/12:-

Following discussions with the applicants the broad conclusions of their desk-based assessment can be seen to be acceptable. Conditions are recommended concerning archaeological mitigation and reporting.

10 Planning Policy and Southwark NHS

The Health Impact Assessment (HIA) does not include a scoping exercise which involves consultation with key stakeholders and the community to establish firm foundations for the HIA;

A multidisciplinary and participatory approach to preparing an HIA is encouraged in best practice guidance. Minimal engagement with council and NHS officers has been undertaken and it is unclear whether active engagement with the local community on health impacts has been undertaken;

The HIA sets out that there is a good standard of primary healthcare facilities within 1km of the site, and capacity exists at GP practices to accommodate the increased population as a result of the development. The HIA identifies local GP numbers and patient list size, and whilst the HIA does state that the relatively low list size does not

necessarily imply surplus capacity in local primary car facilities, there has been no consultation undertaken with Southwark NHS on these assumptions. It is advised that further analysis is undertaken in consultation with Southwark NHS;

The proposal includes provision of 5,000sqm of D1 floorspace, of which a proportion could be provided for an additional healthcare facility which has been identified as being needed by Southwark NHS. Further discussion will be required in the preparation of the reserved matters applications;

In relation to the Statement of Community Involvement, in principle the extent of consultation seems well considered. The slightly underwhelming aspect is in terms of outreach and how they have engaged with harder to reach groups;

The submitted Equalities Impact Assessment is broadly based on the methodology the council uses in preparing Equalities Analysis of policy documents. The submitted EqIA addresses the groups identified as having protected characteristics in the Equality Act 2010. It states that broader policy and social factors are more likely to have equality impacts than the redevelopment of the Heygate estate, but nonetheless most likely affected. The statement says that whilst it is very difficult to quantify the potential impacts, they have tried to take into consideration the potential 'direction of any impacts'.

Comments on revised application documents following re-consultation on 08/10/12:-

- The Health Impact Assessment (HIA) is substantially as it was in the earlier version however welcome the areas of greater clarification. Also the fact that the need for ongoing monitoring and discussion with the local authority and NHS Southwark emerges clearly as a recommendation and that a summary matrix of selected health impacts has been added at the end.

- Request that earlier comments are carried forward, as it is not always clear if all of the original comments have been addressed.

- In terms of assessing how health / social care needs will be met, the cumulative impact of other developments in the area needs to be kept under consideration. Other developments that increase demand for the same local general practices mean that this development cannot be assessed in isolation. As the development is close to the borough border, any large schemes in North Lambeth which may impact on demand for healthcare also need to be assessed.

- The redevelopment of the Heygate could offer the NHS a purpose built community health facility, which incorporates, relocating one or several GP practices, sharing services with community health and providing dedicated mental health services. The building would also allow services currently housed in the Acute sector to relocate, to provide a more local service.

11 Highway Authority

- The Estate Management Strategy document included with the application assumes management of existing areas of adopted Highway by an Estate Management Company (and potential stopping up). No discussions have yet taken place between the applicant and highway authority regarding these proposals. Stopping up will not be acceptable whilst areas of existing adopted Highway will remain under the management of the Highway Authority. Alternative management arrangements may be acceptable subject to general Highway Authority control being retained.

- The application proposes the creation of a substantial number of new Highways within the site which it is not intended to offer for adoption. No discussions have yet taken place between the applicant and the Highway Authority regarding these proposals. Consequently their acceptability cannot be confirmed at this stage. The application is

advised that consent to new road access junctions shall, amongst other things, be subject in part to proposals for new private streets meeting adoptable standards of design.

- General concern is raised about the proposed number of new private streets (unadopted highways) within the application given the likely impact on the council's ability to control the network and manage the boroughs streets and spaces for the benefit of residents, businesses and the travelling public. If this course is pursued then it is strongly recommended that robust alternative management and enforcement regimes are included in any consent.

- Whilst there are some issues with proposed designs for new highways within the site, these are considered to be relatively minor and it is likely to be possible to resolve these through further design development through the course of later detailed design submissions. In general, highway design proposals are welcome though they will require further development in line with adoptable standards to meet safety and accessibility requirements.

- It is recommended that the minimum critical distance for streets be increased to 12m in all instances. In the absence of this it is unlikely that street trees and other planting will be accommodated adequately;

- Discussion has not yet taken place between the Applicant and the Highway Authority regarding the proposed works to existing adopted highways within the site, proposed off-street highway works, or proposed construction and demolition access and management works and arrangements. The acceptability of proposals in these respects cannot therefore be confirmed at this stage.

12 Waste Management

No comments.

Statutory and non-statutory organisations

13 Greater London Authority

London Plan policies on land use, housing, open space and trees, children's play space, urban design, inclusive access, equalities, noise, air quality, climate change mitigation and adaptation, and transport are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:-

- Land use: The proposed land uses are consistent with those anticipated by the London Plan, Southwark Core Strategy and the Elephant and Castle SPD and OAPF;

- Housing: The proposal is consistent with London Plan policies 3.4 and 3.5. The proposal is currently inconsistent with London Plan policies 3.8, 3.10, 3.11, 3.12 and 3.14.

Suggested change:

The applicant should, pending the outcome of the financial viability appraisal, discuss and agree the proposed approach to estate renewal and affordable housing provision with GLA officers towards compliance with London Plan policies 3.8, 3.10, 3.11, 3.12 and 3.14;

- Open space and trees: The proposal is consistent with London Plan policies 7.18 and 7.21;

- Children's play space: The proposal is inconsistent with London Plan Policy 3.6.

Suggested change:

The applicant should agree an approach to ensuring that the appropriate quantum and type of play space would be included in each part of the scheme and in each phase, and

demonstrate that the proposal would be consistent with the relevant policy and guidance;

- Urban design: The proposed design has much to commend it, especially in terms of compliance with London Plan policies 7.1, 7.3 and 7.4 but would not comply with the London Plan policies 7.6, 7.7, 7.8, 7.9, 7.10, 7.11.

Suggested change:

The applicant should address the matters raised regarding the masterplan and impact on strategic views and demonstrate that the proposal would be consistent with the relevant policy and guidance.

- Inclusive access: The proposed design is consistent with London Plan Policy 7.2;

- Equalities: The proposal is consistent with London Plan policy 3.1, subject to appropriate conditions and / or obligations;

- Noise and air quality: The proposal is currently consistent with London Plan policies 7.14 and 7.15;

- Climate change mitigation and adaptation: The proposal is consistent with London Plan policies 5.2, 5.3, 5.5 – 5.8 and 5.9 – 5.15;

- Transport: the proposals are inconsistent with London Plan policies 6.2, 6.3, 6.7, 6.9, 6.10, 6.11 and 8.3.

Suggested change:

The applicant should address the detailed comments raised in discussion with TfL and Council officers and ensure that the proposals would be consistent with all relevant policies and guidance.

14 Transport for London

Detailed response provided as part of the GLA stage 1 report.

15 London Underground

No objections – suggest conditions to ensure that redevelopment of the site will not be detrimental to London Underground tunnels or structures.

16 Thames Water

No objections – suggest conditions relating to piling, foundation works, groundwater and impact studies of the existing water supply infrastructure.

17 London Fire and Emergency Planning Authority

No comments.

18 Argiva

No concerns regarding the application. However, note that the EIA only considered fixed line electronic communications and not the potential impact on wireless networks. To that extent we do regard the EIA as deficient and whilst having no objection, it is possible that other wireless network operators may have concerns. Draw attention to the second bullet of paragraph 44 of the National Planning Policy Framework and document issued by OFCOM.

19 City of London

The proposed tall buildings lie to the southwest of the White Tower and World Heritage Site and would be of concern if they impacted on this setting. This issue should be addressed in the EIA and reference made to the views and approaches identified in the Local Setting Study by Historic Royal Palaces. The current submission does not include sufficient information to assess the impact, if any, of the development on the World Heritage Site.

Comments on revised application documents following re-consultation on 08/10/12:-
Satisfied that the proposed development of the Heygate Estate would not impact the setting of the World Heritage Site.

20 City of Westminster

No comments.

21 London Borough of Lewisham

No objection in principle.

22 London Borough of Islington

No objection.

23 English Heritage

Strongly object to the granting of planning permission because of the harm that would be caused to the London View Management Framework designated view from the Serpentine Bridge in Hyde Park, principally by the intrusion of the proposed tall building on Plot H4 upon the view of the two west towers of Westminster Abbey.

Comments on revised application documents following re-consultation on 08/10/12:-
Received a further detailed presentation from the applicants and their professional team, including the provision of large scale photographs which enabled a closer appreciation of the likely impacts than previously available. Notwithstanding the predicted impact of the consented Oakmayne Plaza scheme, it is clear that the building on Plot H4 would be visible in the view from the Serpentine Bridge, at least in the winter months. This would cause some harm to that view by intruding upon the skyline view of what is a key building in the Westminster World Heritage Site (WWHS). However, it is acknowledged that the redevelopment of the Heygate Estate would deliver significant public benefits in social and place-making terms. Whilst the Council will wish to consider a range of material considerations, request that the impact upon the view of the WWHS is taken into account.

24 Natural England

Our main comments on this development are contained in our letter dated 18th June 2012. We have also provided additional comments on the demolition aspect of the proposed development on the 2nd November 2012. Have no further comments to make on the information as currently submitted.

25 Environment Agency

No objection to the planning application as submitted, subject to conditions being attached to any planning permission granted. Informative regarding waste management also requested.

Conditions are recommended regarding the completion of the development in accordance with the mitigation measures recommended in the approved Flood Risk Assessment, contaminated land, piling, and Sustainable Urban Drainage systems.

Comments on revised application documents following re-consultation on 08/10/12:-

Note that the Environmental Statement by Waterman Energy, Environment and Design Ltd (dated March 2012 with reference EED11988.R.9.4.1.MP) makes reference to a desk-based study of ground conditions which concludes that there is the potential for contamination to exist and recommends that a site investigation be undertaken to inform whether remediation may be necessary (chapter 9).

No objection to the planning application as submitted, subject to the attachment of conditions concerning mitigation of flood risk, land contamination and SUDS.

26 London City Airport

Based on the maximum building heights of 104.8m AOD, the airport has no safeguarding objection to the proposals.

27 Heathrow

No safeguarding objections to the proposed development. However, make the following observation in relation to Cranes. The nature of the proposed development means that it is possible that a crane may be required during its construction. Therefore, would like to draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues'.

28 London Gatwick Airport

Site is outside the safeguarding area for Gatwick Airport, therefore no comments to make.

29 Department of Communities and Local Government

Acknowledgement of consultation received.

Neighbours and local groups

30 Local Groups

10 responses received from Local Groups, 9 in objection to the application and 1 with comments.

31 **Comment**

Southwark Living Streets

Applaud the developer's commitment to improving the conditions for those on foot (and

those who cycle) through the Heygate site and more generally the connections which they are seeking to make throughout the surrounding area in all directions. Also support the place-making that is intended and the creation of significant public spaces.

Make the following comments:-

- The council requirement for zero car parking over and above provision for disabled properties should be more closely adhered to;
- Question Lend Leases' insistence upon 25% parking, and the data that Arup have produced in support of this;
- Little regard should be given to the PERS scores that were identified for the area surrounding the development, no part of the TfL managed pedestrian environment in the area is fit for purpose and these assessments should be disregarded;
- Absence of a crossing of the New Kent Road at the northern end of Elephant Road;
- Consultation should be undertaken with local groups on the definition and design of the Tertiary vehicle routes;
- The design of Rodney Road between the junction with Rodney Place and the Orb Street junction appears to have been given insufficient attention.

In objection

32 Elephant and Castle Community Forum

Open Letter from the Chair

Summary of objections:-

- Concerns on the transparency of the process and the level and quality of information being provided;
- Lack of clarity of vision for the neighbourhood;
- Lack of cohesion and co-ordination across the regeneration area;
- Lack of communication with the community, heightened by extremely tight timescales and lack of a clear, detailed process that does not allow for effective community engagement, information that is not freely available or accessible, little material to focus discussion, with a strong feeling that the consultation is a one-way exchange;
- Short timescale for the adoption of the Elephant and Castle SPD;
- A lack of a comprehensive strategy for the existing mature trees on the site;
- Lack of adequate contextual description and precedents;
- A lack of hierarchy of scale of public spaces, absence of an approach to building entrances, frontages, depths and heights, and no description of the scale change between the existing grain and proposals;
- Impact on existing infrastructure and community facilities;
- Limited opportunities for social housing and recent changes in rent setting excluding those local to the area;
- Car parking strategy is unclear, and a car free solution should be promoted in dense urban areas with good public transport;
- Lack of detailed proposals for Rodney Road.

33 Drivers Jonas Deloitte, Representations on behalf of the Trustees of the Tate Gallery

Generally supportive of the proposal in principle, and make the following comments:-

- In relation to open space and positive linkages, Tate believes that the proposal has responded well to its initial surroundings and local area, but requests that wider and more strategic routes are incorporated into the scheme. This is a key principal of the Bankside Urban Forest (BUF) which seeks to ensure that open spaces are considered in

a coordinated (not piecemeal) way, meshing existing projects and initiatives with new opportunities. Tate supports the importance placed on the provision of trees on the site;

- In relation to design and layout, Tate notes that this is an outline application and the detailed design will be approved separately through reserved matters. Tate encourages the commission of local artists in the detailed phase of design. Tate would like to be informed and asked to comment when the detailed design comes forward;
- Tate notes the potential opportunities identified to respond to the existing creative energy with appropriate spaces and venues for art and cultural activities. Tate encourages the further exploration of how art and culture can be embedded into the scheme and how the proposal can respond and connect to the strategic cultural area along Bankside.

34 Elephant Amenity Network

Summary of objections:-

- Scheme Viability.

The disclosure of information relating to the basic modelling assumptions of the viability assessment and details concerning the transfer of public land is in the interests of the local community. Have the following questions:

Has the site now been formally and contractually sold, so that the council has a capital receipt, or is the sale conditional upon the approval of outline planning consent or completion of demolition?

If the land is being transferred to the applicant on a phased basis, what are the phasing arrangements for this? What other conditions might there be to any sale and will the Council be seeking equity retention or imposing any covenants on the land?

Is the sale on a freehold or long leasehold basis?

What are the modelling assumptions informing the viability assessment? Is viability being assessed according to the Residual land Value method – whereby the consideration paid for the land is based on what is remaining after the deduction of all costs and planning obligations (i.e. 35% affordable housing). Or is the viability assessment based on a 'Market Value' approach – whereby the land consideration is included as a fixed cost to the scheme, and the planning obligations are altered according to what is viable after the fixed costs have been covered?

What is the precise legal / contractual basis of the agreement for the minimum percentage of 25% affordable housing? What legal recourse has the Council should the applicant not meet this percentage?

How might the transfer of ownership to the applicant affect its capacity to raise funds for the scheme in the current financial climate?

Many of the original benefits of the scheme are being lost on the grounds that they are financially unviable, while the local community can make little independent judgement of the accuracy of the applicant's claim.

- Consultation Process.

Lack of relevant information (due to commercial sensitivity, oversimplification of what was presented and lack of clarity as to which issues were of material consideration);

The consultation process was misleading on the issues of affordable housing and sustainable development;

The pre-planning application consultation process has not raised the possibility of the development providing less than 25% affordable housing;

The pre-planning application consultation process did not include consultation on the feasibility of using biomethane gas as fuel for the development's new district heating system.

- The new park and estate management.

Concerned about the lack of open and green space in the development, as well as access to and management of this space;

Concerned that the management arrangements will reduce public access and tenant access to amenity spaces. Request that Southwark Council adopt amenity spaces and streets;

Strongly object to the off-site provision of recreational space for older children, rather than on-site provision.

- Sustainability.

Do not believe that the proposed development will contribute towards achieving the sustainability objectives set out in local planning policy;

The application does not support existing communities, or contribute to the creation of sustainable and mixed communities, and is not inclusive and encourages segregation, and will further exacerbate social, economic and other inequalities, as they do not reflect the diverse needs of existing and future residents;

All methods of supplying heat and water that rely on renewable sources of energy have been rejected on grounds of their cost impact on viability. The applicant suggests that at some point in the future it might be able to source some of its gas requirements through biomethane injection offsetting. We understand that this is still very much an untested technology experiencing widely acknowledged technical difficulties. There are no operational biomethane plants injecting within any capacity into the UK gas network, biomethane injection is also not listed as an allowable solution for carbon offsetting in the UK;

Homes will not be built to Code for Sustainable Homes Level 6, but to Code level 4. These are not carbon zero homes;

The application does not include embodied carbon within the carbon accounting methods;

The application does not include refurbishment of the estate as an alternative model;

The scheme has been artificially divided as a means of circumventing an assessment of the cumulative impact of the scheme, which is a breach of the 2011 EIA regulations;

The application does not guarantee retention of any existing trees, which 36 (of the existing 406 trees) identified for possible retention subject to further more detailed testing.

- Employment and Retail.

There should be a target for local jobs, defined within a catchment area that is local, and the training and support should be provided by the developer to achieve this;

The Retail Impact Assessment does not assess the development's impact on existing retailers on the New Kent Road, Harper Road, Rodney Road shopping parade, East Street Market and the Latin American Retail on Elephant Road and Eagle's Yard;

The application should secure commitment to affordable retail units for existing traders, should recognise the important contribution of small retail units and street markets surrounding the site, and also recognise the contribution of minority ethnic businesses to the variety of retail offers in the area and to cultural diversity.

- Car Parking & Assessment of Pedestrian Environment.

Support the comments of Southwark Living Streets on this matter;

Council should retain its vision of zero car parking in new developments.

- Access.

Absence of a crossing of the New Kent Road at the northern end of Elephant Road;

Consultation should be undertaken with local groups on the definition and design of the Tertiary vehicle routes;

The design of Rodney Road between the junction with Rodney Place and the Orb Street

junction appears to have been given insufficient attention.

- Cycling.

Object to the applicant's inadequate consideration of cycling, both in terms of trips generated by the development, and in terms of the impact of the development on trips passing through the development area;

There is insufficient data in the submitted Transport Assessment on cycle movements;

The developer makes no proposals to improve the strategic routes for cyclists in the area;

The development will have a negative impact on existing cycling routes, with a huge increase in bus and car traffic associated with the development;

Cycle parking is inadequate, and should exceed minimum London Plan standards;

While there is an intention to use part of the strategic transport tariff to utilise a new design to the northern roundabout, the intended changes fail to address the needs of cyclists.

- Section 106.

S106 contributions for affordable housing should be ring-fenced for social rented housing;

Applicant fails to provide for a library;

Request a planning condition to secure the involvement of the local community in determining all aspects and details of these facilities;

Concerned that an inordinate proportion of the total spend will be on transport infrastructure.

- Affordable Housing.

Object to 'affordable rent' forming any part of the affordable housing offer (ref Housing Statement 8.4 Viability). The rents are beyond the means of most local people and of the many thousands on Southwark's housing list;

Object to the omission of a commitment to build a minimum of 35% affordable housing as required by Southwark's Core Strategy;

Unless the application specifies the tenure, residential mix, affordability and space standards, it cannot be determined as policy compliant.

- Tall Buildings.

Object to the applicant's tall building strategy. The buildings proposed for the frontage of the park qualify as 'tall' according to the Core Strategy and should be treated as such;

Concerned that the tall buildings will have a negative effect on micro-climate, particularly sunlight, shading and ground level wind canyon effect;

Object to the tall buildings lacking public accessibility, with viewing galleries, exhibition spaces etc. Object to the cluster of tall buildings being separated physically or practically from the surrounding community creating a 'gated community' effect.

35 Pullens Tenants and Residents Association

Summary of objections:-

- The application provides no benefit or hope to the people of Southwark;

- The Council is already providing an extensive subsidy to Lend Lease through demolition costs, interest and land and the social housing offered by Lend Lease doesn't even cover these costs let alone comply with Southwark's policy of a minimum of 35% of social housing in such developments;

- No providing 35% social housing on the Heygate sites will lead to a mono-tenure led by buy-to-let landlords who will have no concerns for the broader community;

- Given the levels of multiple deprivation in Southwark and particularly around the Elephant and Castle, only an introduction of well paid jobs and training opportunities for

local residents will bring any improvements to the local businesses;

- The application provides no details of how the developer will enforce any imposed policy of local recruitment for jobs and training positions on their contractors and down the usual very long sub-contractor, agency and gang master chains;
- Even though this is an outline application, it should be rejected as even the very limited concessions do not comply with Southwark's current planning policy nor do they provide any benefit to the people of Southwark in terms of the acute housing and economic needs of most people in the borough.

36 Rodney Road Tenants and Residents Association

Summary of objections:-

- No commitment to affordable housing. This is contrary to Southwark's planning policy (35%), and a real scandal. Over 900 council homes are to be lost and no minimum number of affordable homes will be built;
- The removal of a large number of mature trees;
- 600 parking spaces, putting pressure on local roads and affecting the amenity of local residents.

37 Southwark's Group of Tenants Organisation

Summary of objections:-

- Lack of commitment to any affordable housing;
- Demolition of buildings on the estate, which are structurally sound and should be refurbished and brought back into use for council tenants;
- Planning policy requires a minimum of 35% affordable housing in developments, it is not acceptable for a multi-million pound operation like Lend Lease to insist that any provision of affordable homes will be subject to measures of viability;
- Object to the council's agreement to fund the demolition of the buildings on the Heygate.

38 Garland Court Tenants and Residents Association

Summary of objections:-

- If built out to the maximum building heights the resulting environment would be a seriously unpleasant one of narrow, canyon like streets;
- The application generally is very difficult to comprehend; the drawings are deceptively simple and the associated documents run to 500 pages;
- Other than the eastern end of Wansey Street, the combination of maximum building heights coupled with maximum plots would create dense, high buildings in narrow streets, creating a really unpleasant environment as well as damaging Garland Court residents amenity;
- The scale of new buildings would damage the setting of the planned Larcom Street conservation area and the listed town hall;
- One of the objectives of the Masterplan was to retain existing trees. It doesn't look like the plane trees in Wansey Street could be retained if the maximum building plot is adopted because they fall within the footprint of buildings;
- If buildings were built out to the minimum extents Wansey Street would feel more comfortable along most of the street and it may be possible to retain the existing trees in Wansey Street, but it is not clear without detailed dimensions;
- A mix of uses creates a recipe for a successful and lively place, but the scope for

B1/D1/D2 uses on the upper floors of block H.6 as well as ground floors in H.3 and H.6 opposite Garland court could generate unacceptable levels of noise and activity in a residential environment, especially as all bedrooms in Garland Court face north onto the public space;

- A new square located directly opposite Garland Court bedrooms, has the potential to damage residential amenity. Some of the proposed land uses on H.3 and H.6 have the scope when positioned over the square to generate unacceptable levels of noise and activity in a residential environment;
- The scope to damage residents amenity is greatly increased by the maximum height and plot option because it brings potentially unsuitable land uses for a residential street closer to Wansy Street and Garland Court;
- By shifting block H.3 closer to Walworth Road, the benefits of the new public square could be realised with less damage to residents amenity;
- It is not clear if the new routes between Heygate Street and Wansy Street will be for vehicles;
- Residents have concerns regarding the impact on parking space in Wansy Street;
- Object to the loss of a small local open space / playground on the site of the present Mobile Gardeners project, which was previously shown in the Masterplan;
- Request a background noise survey for Wansy Street before any work starts, as it is a quiet residential cul-de-sac with low traffic use. This will enable assessment of any future noise pollution as a result of demolition and construction.

39 Southwark Cyclists

This application fails to meet agreed standards with Southwark Council and fails those who travel across the borough by bike.

Summary of objections:-

Founding Analysis

- The analysis presented in documents to justify the proposed development is a gross misrepresentation of the state of affairs in Elephant and Castle; The Elephant and Castle Junction is the most dangerous junction in London, according to TfL figures obtained by Assembly Member Val Shawcross;
- New Kent road is highly congested fast dual carriage way, ending at another dangerous gyratory and flyover complex and accommodating an on pavement cycle lane that is frequently interrupted;
- Other key local roads make scant provision for cycling;
- The Transport Assessment is critically wrong in its founding premises. This error is incorporated in the proposed development to the detriment of local people and Londoners;
- Note with dismay that the Northern Roundabout is addressed in the Transport Assessment without one mention made of cycling, and that the Halcrow report similarly makes not mention of cycling. Therefore the proposals it recommends must be dismissed until a proper analysis is completed;

Roundabout Widening

- Object to the widening of the roundabout. The developer has not included any quantitative assessment of cycling volumes and requirements in their analysis, at key collisions blackspot, and they are then proposing to widen the roundabout to provide five lanes of motor traffic. This will increase speeds and thus danger to cyclists and an alternative design must be requested of the developer;

North South Access

- The SPD was altered to reflect suggestions for desired routes;

- A large number of respondents made a specific request for an eastern cycle bypass in the consultation stages. There is no reference in the statement of community involvement to this and fear that this omission will give an inaccurate picture of the demand for such provision;
 - Disappointed the developer has chosen not to develop these routes;
 - Object that the developer seeks to isolate 'commuters' from other uses with regard to bikes, but not by any other mode;
 - Object to the omission and urge the Council to insist upon a North South route, as noted in the SPD, that allows local journeys and facilitates the existing repressed demand for routes around the elephant junction;
 - The developer is concerned about fast commuter cyclists passing through the development. Unfortunately the hostile environment of SE1 for cycling has inhibited the broader uptake of cycle to date. It is not national, London or Southwark policy to discourage commuting by bike;
 - Do not consider the developers alternative route as acceptable, as it does not meet the SPD requirement to be convenient and direct;
 - The development will have a negative impact on existing routes. The existing heavily used London Cycle Network route from Camberwell up Portland and Brandon Street along New Kent road and into the E&C cycle bypass will be significantly worsened by the huge increase in bus and car traffic planned for Rodney Place and Heygate Street;
- Cycle Parking Standards
- It is stated in the Transport Statement that these arrangements have been discussed with Southwark Cyclists and this is incorrect, and we believe that the cycle parking is potentially inadequate;
 - There is no commitment to any spaces, and a minimum above London Plan requirements should be secured;
- Junction Arrangements
- It is unclear from the supplied documentation of the exact arrangements at a number of crucial junctions in the proposed development;
 - Particular attention should be drawn to Elephant Road which is not a safe cycling route, New Kent Road where the existing cycling route should be brought up to a better standard, and Heygate Street, Rodney Road as the only major road absorbed by the development these routes should have segregated cycling provision.

Additional response also received suggesting that conditions be attached to any planning consent, as summarised below:-

Requiring drivers of heavy vehicles associated with the construction of the development to be registered for membership of Transport for London's Fleet Operator Recognition Scheme to a Bronze standard or higher;

To ensure that safety equipment is included on all vehicles to allow clear visibility of drivers of cyclists;

That the drivers of vehicles have a driving licence check with the DVLA;

Driver training be required;

A Collision Report is produced;

A FORS Report is produced; and

That the developer obliged its contractors and subcontractors to comply with these conditions.

40 People's Republic of Southwark

Summary of objections:-

- Local community have not be listened to during community consultation with developer (log of concerns raised by the People's Republic of Southwark at consultation events provided);
- The outline application seems to have changed little, if at all, since the Masterplan concept and principles were first presented. The overall proposal remains very much developer-led, creating maximum quantity at minimum cost to ensure investor returns;
- The design of the proposal is an uninspired and unexciting grid of solid rectangular blocks of glass / brick / concrete;
- The commitment to provide affordable housing is highly arguable. Southwark Council core Strategy Strategic Policy 6 requires provision of 35% affordable housing, the Development Specification Documents says instead that 'as much affordable housing as is financially viable in line with planning policy. Future viability tests will establish the level of affordable housing to be provided on a phased approach';
- Proposal for an excessive provision of retail remained, although the community argued against it in the past. Little evidence to support the theory that concentration of retail within a narrowly defined town centre has a beneficial impact on the small, independent and local businesses and retail outside the 'town centre' boundaries;
- Ratio of affordable units needs to be carefully examined, to ensure that small, local and independent businesses as well as start-ups are not disadvantaged;
- Proposed provision of community, culture and leisure spaced remained poor, although the community argued in favour of more provision in the past;
- The proposal interpretation of 'public' space remained deeply cynical although the community repeatedly expressed their concerns about this in the past. A new park in the middle of an urban wasteland would be wonderful and praiseworthy. Heygate already has very publically accessible 'Pleasure Gardens'. The new park which wouldn't effectively be new would be smaller than what already exists;
- The proposal still includes provision of 616 (marginally less than originally proposed) car parking spaces, although the community argued against this in the past, and although the development, as stipulated in the existing policies, should be car free;
- It is not clear what percentage of jobs would be new (as opposed to existing retail / business / D1 / D2 moving into new units);
- It is not clear what percentage of jobs are to be provided to local residents;
- The proposal is not an example of sustainable development, it does not support existing communities and does not contribute to the creation of sustainable and mixed communities. The design is not inclusive and encourages segregation, and the uses proposed would further exacerbate social, economic and other inequalities;
- The development does not fulfil PPS, London Plan or Core Strategy requirements for consumer choice, distribution of facilities, local food production, 35% affordable housing, protection of open space and car-free developments.

41 **Neighbour Representations**

156 consultation responses were received in response to the first round of public consultation undertaken on the application.

Comment

42 **Email representation that states the following:** 'Happy for you not to change things.'

In objection

- 43 53 identical representations received raising an objection specifically in relation to affordable housing:

83a; 85c Balfour Street	8; 373b Walworth Road
Flat 7, 90 Queen's Road	14 Dante Road (2 responses received)
33 Manor Place	31 King Arthur Close
Flat 3, Signal House, 137 Great Suffolk Street (2 responses received)	Scrip, 31 Mill Street
Flat 23, Symington House, Deverell Street	183 East Street
3A Bawdale Road	Pembroke House, 80 Tatum Street (3 responses received)
Flat 52 Pullens Buildings, Penton Place	468 Wendover, Thurlow Street
53 Woodsford	c/o Cambridge House, 1 Addington Square
30 Longstone Court	63 Marston, Deacon Way
162 Caroline Gardens	58 Sutherland Square
1; 88 Amelia Street	35 Arrol House, Rockingham Street
Flat D, 6 Wescott Road	15 Hamilton Square
21B Rosenthorpe Road	95; 155 Brook Drive, Kennington
49 Cuddington Deacon Way (2 responses received)	16 Purbrook Estate
85 Grosvenor Park	7 Greig Terrace
222 Croxted Road, Herne Hill	32 St Mary's Road
102 Brandon Street	56 Lant Street
9 Heber Road	14 Bazeley House, Library Street (2 responses received)
56 Dawes House, Orb Street	5 Abinger House
94 Draper House, E&C	59 Stephenson House, Bath Terrace
7 Dauncey House, Webber Row	22 Great Dover Street, SE1
37 Alberta Street, SE17	

No / insufficient affordable housing - To lose 1,200 affordable homes on the Heygate estate in the middle of a housing crisis is not right. Southwark needs all the affordable homes it can get. A future "viability" test is entirely inadequate and belies the consistent promises throughout the applicant's "consultation" process. Even if 25% 'affordable' is to be included, the Council's policy will not have been followed. Throughout the consultation process the public has been misled about affordable housing provision.

- 44 46 identical representations received from:

54 Underhill Road	33 Wood Vale (2 responses received)
5 De Laune Street	56 Crampton Street
110 Lordship Lane	40 Denman Road
34; 38 Peacock Street, Pullens Buildings	103a Chadwick Road
1; 17; 50 Smeaton Court, Rockingham Street	60; 89 Albert Barnes House
10 St Matthews Court, Meadow Row	49 Wicksteed House, County Street
83a Balfour Street	177 Taplow, Thurlow Street

114 Brandon Street	SE15 2TP
39; 162 Caroline Gardens, Asylum Road	88 Amelia Street
32 Bridport, Cadiz Street	3 St Peter House, Queens Row Street
136 Coldharbour Lane	8 Livingstone House, Wyndham Road
120 Penrose House, Penrose Street	30 Ashfield Road
32 Henshaw Street	8 Charleston Street
18 Dunnice House, East Street	35 King Charles Court, Royal Road
63 Forsyth, Cooks Road	1B St Luke's Avenue
10 Muirfield Close	15 Phelp Street
166 Crampton Street	37 Vernon Road, Seven Kings
Flat B, 46 Surrey Square	22 Fielding Street
Flat 4, 15 John Maurice Close	34 Taplow House (2 responses received)
56 Dawes House, Orb Street	

The objections raised are:

- No affordable housing;
- No on-site renewable energy provision;
- The council's policy states there should be 35% affordable housing and 20% on-site renewable energy;
- Loss of vast number of mature trees;
- High number of parking spaces;
- Failure to provide essential cycle-route and public transport infrastructure;
- Privatisation of the public realm;
- Loss of amenity space; and
- Loss of community facilities.

45 16 identical representations were received from:

Valmar Road, Camberwell	E-mail address
26a Wickham Road	63 Amesbury Road, Dagenham
6 Inglemere Road	12 Aysgarth Road
Flat 901, 9 Steedman Street	71d The Cut
Apmnt 409; 8 Walworth Road (2 responses received)	62 Glenfarg Road, Catford
Flat 2, 101 Burton Road	48 Thorne Road
53b Barrett's Grove	4 th Floor, 93 Westminster Bridge Road
226 Sellincourt Road	

The concerns are summarised as:

- Don't agree that "Existing pedestrian and cycling facilities on the roads surrounding the site are generally good". Or that "The area surrounding the development is already well served by cycle routes on and off street". E&C is one of London's most hostile junctions for cycling, has been the site of 86 serious cycling injuries 2010-2011. Object to widening of the roundabout to 5 lanes as this will increase vehicle speeds and make cycling more dangerous.
- Failure to incorporate a north-south route that is 'convenient, direct and safe'. Many requested this route but have not been recorded in the statement of community engagement. The separation of 'leisure' and 'commuting' cyclists is not supported by

national, London or Southwark policy.

- Omission of a direct route between Brandon Street and Falmouth Road which was supported in consultation.

- Unclear how critical junctions will be arranged and these need to be clarified to the satisfaction of cyclists: 1. Elephant Road – how will this be used / arrangements for turns; 2. The New Kent Road – how will the existing cycle path be improved and integrated into the new scheme; 3. Heygate Street / Rodney Road – these routes should have segregating cycle provision with dedicated junction arrangements.

46 3 Individual responses specifically objecting to more residential units because of concerns regarding overpopulation in the area, received from:-

89 Albert Barnes House;

40 Smeaton Court;

20 Albert Barnes House.

Object to plans for more residential buildings because the area is already overpopulated. Impact on services which are already strained and at breaking point. Already have Strata Tower, should be reducing the population, not expanding.

47 11 Individual responses specifically objecting to impacts upon cyclists, received from the following addresses:-

Flat 1, 135 Dulwich Road;

226 Sellingcourt Road;

22 Gilbert Road;

No address provided;

No address, sent via 1 Marylebone High Street;

19 Sylvan Hill;

40 Linden Grove;

16 Sears Street;

201 Grange Road;

79 Sudbourne Road;

2 Coleman Road;

The objections raised are reflected in the response received from Southwark Cyclists. The development does not resolve the need for cycle bypass on the eastern side of the roundabout, and does not separate cyclists from lorries. Doesn't meet the requirements of the Elephant and Castle SPD for a north – south route that is 'convenient, direct and safe.' The Heygate Lorry Driver Induction Training Programme should be specifically development for frequent lorry drivers working on the Heygate project. Also unsafe for pedestrians.

48 4 Individual responses specifically in objection to the possible noise impacts resulting from the development upon Wansey Street (Garland Court) residents, received from the following addresses:-

21 Garland Court;

Garland Court (number not provided);

15 Garland Court;

3 Garland Court;

The objections specifically refer to the location of the proposed community centre, and public square, where there could be noisy activities and anti-social behaviour.

Residents request that the square is located towards the end of Wansey Street. The responses also refer to the Environmental Statement, and the lack of background noise data collected for Wansey Street.

49 Flat 59, 8 Shad Thames

Development has no renewable energy generation, inadequate cycling and pedestrian facilities. No affordable housing. Masses of public space will be privatised. More detail about the financial side of the development needs to be released.

50 9 Garland Court, Wansey Street (2 responses received)

- Dissatisfied and disappointed with Lend Lease and Soundings consultations with residents in Garland Court and Wansey Street. Suggestions have been ignored, any revisions to their proposals have diverted further away from the initial vision for the street;
- Difficult to understand the application documents, safeguards should be made clearer and more explicit;
- New public square would be placed in front of Garland Court, where there are bedrooms facing onto it, and this will be noisy and damage residents amenity;
- E&C Redevelopment should be divided into two zones on the axis of Heygate Street. The southern part should respect the residential character and continuous street lines of the neighbouring Victorian streets. The northern part could contain the taller, more commercial aspect of the redevelopment, community facilities and civic squares. The scale of the buildings in Plots H3 and parts of H6 would damage the setting of the planned Larcom Street CA. Proposals for these two zones should have been treated as two separate planning applications;
- The height and position of block H.3 will overwhelm the listed Town Hall;
- The eastern half of Garland Court would be faced by and overlooked from block H6, which could be 9/10 storeys high and only 15m away;
- Not clear whether access to proposed residential units within blocks H3, H6, H12, and H13 would be from Wansey Street. If so, it will increase vehicular traffic and reduce the quality and character of Wansey Street. All vehicular access should be from the Heygate axis;
- Open area at the end of Wansey Street is being transformed for interim garden use and would be eventually integrated as an open area / toddler play area. With the proposed location of H10 this would not be possible;
- The original masterplan proposed a small local open space at the eastern end of Wansey Street, a popular feature where the present Mobile Gardeners project is located. This will no longer be possible given the proposed building plot positions coupled with the proposed vehicle access arrangements;
- Assurances were given that Wansey Street would remain as a no-through road. The submitted drawings seem to leave Lend Lease with all options open. Will they allow vehicular access into Wansey Street from Brandon Road, Heygate Street as well as directly from Rodney Road?
- Object to the maximum building heights. Development on the north side of Wansey Street should reflect the character and heights of existing buildings;
- Object to community uses being located directly opposite Garland Court. This along with the civic square would damage residents' amenity;
- Not clear what is being proposed for the buildings. Object if any non-residential uses apply to the proposed buildings facing Wansey Street;

- Not clear whether Lend Lease are committed to retaining the plane trees that line Wansey Street. Principle objection to the masterplan is the loss of trees.

51 49 Cuddington, Deacon Way, SE17

- Sustainability

Application fails to consider the refurbishment of the existing buildings and other considerations affecting the carbon impact accounting. The failure to provide any on-site renewable energy production is a breach of local and national planning policies. The proposed plans to create a 'climate positive' development will have the opposite effect; it will result in the removal of an important carbon sink and the production of thousands of tonnes of unnecessary CO2 emissions.

Alternatives – considering alternatives to the demolition of existing housing is a national, London and Southwark plan policy. Allot & Max Study (1998) found that the homes were in structurally good condition and made recommendations for refurbishment. The application doesn't reference this report and fails to consider alternatives to demolition.

Carbon impact – application fails to include embodied carbon in its carbon accounting methods. The carbon emissions resulting from demolition and construction of the replacement homes will be disregarded.

Operative carbon – renewable sources of energy have been rejected on grounds of their cost impact on viability. Biomethane injection is an untested technology experiencing technical difficulties. It isn't listed as an 'allowable solution' for carbon offsetting in the UK. The new proposed district heating network will not extend beyond the Heygate footprint and will not supply telecoms, potable water, non-potable water, drainage, gas, fibre optics, and vacuum waste as the original MUSCO. New homes will be built to only CSH 4 and these will not be zero carbon homes. Energy Statement fails to include air conditioning in its energy demand forecasts. The sequestration value of existing trees is not included within the carbon accounting model. The loss of this vast carbon sink of 450 mature trees will have a significant on the carbon impact figures and climate change.

- Design / social mix

Design of the building will create a hostile environment and it proposes no affordable housing. The claim to deliver a more mixed community will result in an exclusively single tenure neighbourhood and increased social inclusion.

Proposed design – does nothing to address issue of noise disturbance from major roads. Existing design benefits from long-spanning blocks which protect existing homes from noise disturbance. Object to the number and height of the proposed tall buildings. Will give the area an oppressive monolithic character. They will have a negative effect on micro-climate, sunlight, shading and ground level wind canyon effect. Blocks / massing is overtly gridded and will feel as fortress-like and appear as a 'gated community'.

Social mix – replacement development comprising exclusively people on high income brackets which is physically and socially segregated from its surrounding community.

- Public realm improvements

The proposed public realm improvements will result in a significant depreciation of the existing public realm.

Public Park – will be just 0.8 ha in size, be hemmed in and overshadowed between two rows of tall buildings. Redevelopment will result in a net loss of more than half of the existing floorspace designated for community facilities and net loss of more than two thirds of existing open amenity space.

Estate Management Strategy – new part will be privately owned and managed. This will create further social exclusion

Tree strategy – there is no guarantee that any trees will be retained.

Northern roundabout – application proposes to increase the size of the traffic lanes on the roundabout. Plans appear to block TfL's proposed Cycle Superhighway 6 (Penge to the City).

Northern Line tube station – fails to mention how it intends to fund the £106m requirement to the necessary upgrade to the transport infrastructure at the tube station.

52 Resident of Garland Court, no number provided, sent via Keppel Street

Add to the objections raised by the Garland Court residents association. In particular concerned about buildings being built out to the maximum parameters and associated impacts upon buildings / trees in the street, and the omission of a green space previously shown at the far end of Wansey Street.

53 Resident of Wansey Steet, no number provided

- The character of Wansey Street is a quiet residential cul-de-sac is at threat from the proposed maximum heights of buildings to the north;
- The proximity of buildings to the north of Wansey Street could impact the retention of mature trees that are important to the character of the street;
- the street leading north from Wansey Street towards Elephant and Castle is narrow with tall buildings, and will be a wind tunnel;
- The building adjacent to the Town Hall will overwhelm this handsom building;
- The civic square has been moved to opposite Garland Court for no apparent reason, it's previous position was preferable. Garland Court has bedrooms overlooking this area.

54 23 Garland Court

- The height of buildings opposite Garland Court will be too high and not in keeping with the quiet residential cul-de-sac character of Wansey Street. The building potentially 9 storeys high close to Walworth Road will dwarf the listed town hall;
- The public square seems to have been moved outside Garland Court, concerned this stay outside Garland Court late into the night, with related noise and anti-social behaviour concerns. The bedrooms in Garland Court face this area;
- The community centre opposite Garland Court should be restricted to working hours opening to prevent noise impacts;
- Not clear whether all the trees on Wansey Street will be retained;
- Request a survey of noise levels in Wansey Street;
- The new road access from Brandon Street seems to cut through the space originally designated as a community green space.

55 88 Amelia Street

Object on the grounds that the development proposes no affordable housing and no renewable energy. Council's planning policy requires 35% affordable housing and 20% on-site renewable energy provision. Also object to the loss of large numbers of trees on the site, the high number of parking spaces and the failure to provide essential cycle-route and public transport infrastructure. Object that there appears to be no provision to provide new sports facilities, in particular a swimming pool to replace the leisure centre. Object to the privatisation of the public realm, the loss of amenity space and the loss of

community facilities.

56 63 Marston Deacon Way

Object to the demolition of any structures, bridges or rights of way that might affect my property directly or indirectly.

57 32 Smeaton Court

Do not support plans for residential units to be built because of the volume of people already living here, but do support a new park.

58 30 Albert Barnes House

Opposed to plans to build yet more homes. It would be better to build a MacDonald restaurant, it would be the worlds biggest restaurant to cater for the areas huge population.

59 55 Albert Barnes House

Not in favour of new homes being built in Elephant and Castle. The land could be used to build a world class football stadium which would generate jobs for the community.

60 88 Albert Barnes House

Against planning permission for residential blocks to be built. Would rather have a sports facility which would have table tennis.

61 6 Garland Court

- Omission of 'Wansey Street' as a labelled street on drawings and related concerns that this could lead to impacts on Wansey Street residents being overlooked;
- Wansey Street has been overlooked in relation to pre-construction noise level monitoring in the submitted Environmental Statement;
- Concerned about impacts upon residents of Wansey Street from noise;
- Concerned impacts upon Wansey Street residents from poor air quality, dust and vibration during construction;
- The planning application boundary line in Wansey Street is confusing as shown in all drawings, as it encompasses Wansey Street. The boundary line is drawn right up against Garland Court and Wansey Street residential buildings. Presumably there will be no demolition / construction across Wansey Street and therefore the boundary line should be clear on all drawings;
- The proposed uses for blocks H6 and H10 along Wansey Street, include retail, business, community and leisure, all of which would be inappropriate use in a quiet residential cul-de-sac;
- The documents are difficult to understand, there is an unhelpful overuse of acronyms which together with the huge volume of documents to plough through, makes the experience off-putting and likely to have deterred people from making representations.

62 130 Draper House & 28 Wollaston Close

- The development requested represents a substantial theft of public green space that will be irreversible. The proposed development will slash the amount of publicly accessible green space in the area, even when taking into account the new park, because so much green / shared area will be made into private, elevated courtyards;
- The reason given for privatising these spaces is to create gated gardens, but in practice these are underutilised in private developments compared to public development, and they will be overshadowed by the high walls surrounding;
- The true reason for the theft of public space is to provide valuable car parking spaces without having to pay the price of submerging them, as has been done at the neighbouring high quality Strata development and even Southwark Council's own Draper House;
- These raised courtyards will create long stretches of street with raised barrier walls, which will actively harm the streetscape;
- The development has too much parking. Planning policy for the Elephant and Castle Opportunity Area aims for new developments to be car free (with an allowance for disabled parking). This development proposes 25% of homes will have car parking spaces. The parking will have a negative impact upon traffic levels in the area;
- Affordable housing levels. The development provides insufficient affordable housing when compared to the council's planning policy minimum of 35% affordable housing as per the adopted Core Strategy. We are losing 1,200 affordable homes on the Heygate Estate in the middle of a housing crisis;
- A combination of allowing a disproportionate amount of parking and privatisation of garden space, will risk losing forever some of the precious and finite green public realm available in the E&C area. This will result in a short term private financial gain, but will impoverish both the privatised spaces and deprive the wider area of the value they could bring to the character of the area.

63 3 Garland Court

- The noise, dust and fumes from the demolition, construction and associated vehicle and plant movements will lead to a significant loss of amenity to residents of Garland Court / Wansey Street;
- Recommend conditions to ensure controls on these matters.

64 28 Thornton House

- Consultation with the developer has not been a transparent or engaging process. Misleading information has been provided. Told throughout the process that there would be 25% affordable housing, but the applicant has withdrawn this commitment.
- 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. Feedback forms did not cover issues such as doubling density, height and massing working well with established character or on pedestrian and cyclists having priority over vehicles;
- For the existing floorspace to either double or treble amounts to overdevelopment, and concerned about related impacts upon local residents, the local character and the identity of the place at Elephant and Castle;
- The basement floorspace applied for is very high and if an amount towards the upper end was sought (188,000sqm out of a maximum proposed floorspace of 330,741sqm) this would distort the development. Basement floorspace should be excluded from the

total floorspace sought and applied for separately;

- Object to the applicant proposing a net loss of community floorspace;
- 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 Masterplan design principles make no reference to what makes for an active and supportive local community;
- There is no provision of new social infrastructure;
- 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 size of homes (the policy aim should be to exceed minimum standards) are not compliant with the London Plan or HCA requirements;
- Object to failure to provide a diversity of housing choice;
- Object to the loss of open space, the new park is very small;
- 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;
- High density does not have to mean very tall buildings and repetitive massing;
- 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;
- Object to the inclusion of Elephant Road Park within both the Oakmayne and Lend Lease applications. This needs to be corrected and the playground reinstated;
- The Play Strategy breaches the London Plan by the non-provision of youth space on the site;
- 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;
- There has been a failure to support existing retail at the Shopping Centre, East Street Market and local shopping parades as part of the retail offer;
- The new retail development at the top end of Walworth Road will impact upon existing traders;
- The Development Specification fails to describe renewable energy and drainage, district heating / CHP and environmental sustainability. The Clinton designation was partly based on the innovative Multi Utility Services company (MUSCo) supplying low carbon energy, non-portable water and data connectivity and this has been deleted;
- 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 a social impact assessment or Strategic Environmental Assessment to cover this;
- 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. Interim uses should be blossoming throughout the development site.

65 58 Sutherland Square

- A sustainable community is one which is inclusive, vibrant and diverse and values people from all backgrounds. The principles of the masterplan place emphasis on raised courtyards and deep plan blocks, with vehicle servicing at the ground floor. The proposals, with the predominant typology of raised courtyards and towers, are exclusive rather than inclusive. There is little sense of human scale or tiering of scales within the

design of the blocks and streets;

- The lack of commitment of affordable housing is demonstrated in the Development Specification. The policy figure of 35% for Affordable Housing for the Elephant is not included in the Specification. A figure of 25%, 10% below policy, is included in the Section 106 agreement, this falls short of the requirements of the Core Strategy;
- Strong reservations regarding the masterplan in terms of typology, residential tenures and lack of human sensitivity in its design, has the hallmarks of a 'nowhere' place, a citadel disconnected from the surrounding neighbourhood;
- Central to building a new neighbourhood and community is the need to have a clearly defined vision. The statements made on vision are generic, rather than place specific. Part of the vision refers to new park, this is misleading as the park is part of the existing green space of the Heygate Estate. Images of the new park are oversized;
- Objections to the process of dialogue and consultation with the community. Information and documentation has been limited and confusing, and the consultation process has been one-way, with the community giving views and information, rather than a dialogue and discussion or exchange;
- Misrepresentation of the proposals, with an over emphasis on trees, concealing the physicality, amount, height and massing of the proposals. Lack of sections through the proposals, a sell of a new park, rather than a message of improving an existing green space, a lack of clear existing and proposed comparative drawings, and few on the ground perspectives linking with existing views;
- The proposals lack a cohesive legibility in terms of hierarchy and grain. This is evident in the deep plan blocks at ground and mezzanine floors, which bear little relationship in scale and pattern to the existing context;
- Blocks appear monolithic and have a limited relationship or connectivity with local context;
- The original brief and regeneration agreement have not been made available to local people, despite repeated requests. The distribution of tall buildings across the site demonstrates that the constraints on the site do not allow for a cohesive and appropriate grouping of built form, relative to the amount demanded by the brief;
- An approach which respects and enhances the existing urban condition, would retain the existing trees along the north of Heygate Street and celebrate the avenue of greenness;
- The Walworth Road edge needs far greater consideration of the urban pattern and public realm;
- These towers will have a poor relationship with the public realm at ground level and will have a detrimental effect on wind speeds and microclimate;
- The proposals make provision for a significant amount of car parking spaces. Many of the early housing sites in Southwark included provision for only one or two wheelchair accessible spaces on the basis of their proximity to the major transport hub at The Elephant. This approach of a minimal amount of car parking, and therefore vehicle movements, should be adopted for the masterplan;
- The development of Supplementary Planning Guidance in parallel with the masterplan for the Heygate Estate means that an objective strategy is a much greater challenge. The Council's partnership with the developers clearly establishes shared agendas, and therefore a greater possibility that the influence of developers' interests are placed before those of the people whom the Council represent;
- The impact of densification and major development on local services – doctors, schools, green spaces and services – has yet to be explained and communicated in an appropriate and understandable way to the existing community;
- The process over the last year or so has demonstrated a focus from the project team to

drive through the original proposals, disconnected from a real connectivity with place;

- Core objection to the masterplan is a strong concern on whether it can deliver a place for a sustainable, inclusive and integrated community. Remain unconvinced that the project team have fully considered the impact of densification on existing communities and services. Also concerned that an appropriate strategic framework for weaving new and existing communities together is not in place. Such a framework would demonstrate a celebration of Southwark's diverse community and champion people of all income levels. The regeneration is an opportunity to respond to current thinking and lead the way with an open and inclusive review. Therefore call for this outline application to be rejected.

66 87 Balfour Street

General objections and concerns raised regarding Southwark Council's management of development plans, relationship with the development and liaison with the community regarding regeneration initiatives. Criticisms of Southwark as the Local Authority and the treatment of the local community by the LA, as well as criticisms of Planners.

Summary of objections on the application proposals:-

- The most obvious outrage in the OMP is its careful and deliberate exclusion of the first phase of the process at Phase 1 – as per the Regeneration Agreement – from the provisions and process of the Masterplan application. Concern regarding the loss of trees, green spaces and infrastructure, and the excessive density of the proposal in a quiet low-rise residential neighbourhood. The plans represent a clear over-development of the site, abrogates OMP principles which talk of respecting the context of the place, its character with pre- and circa 1900 buildings of varying note, the tree-lined streets, parks including a SINC, and of building heights intended to rise from the low level residential intimacies of Balfour and Wansey Streets to significant height at the railways and motorways of the existing E&C;
- The site must be treated equally, honestly, openly and continuously according to the Regeneration Agreement and the OMP and adhere to London Plan provisions as a minimum;
- All the important variables in the plan and most obviously all the trees and green infrastructure, public space, green space, health and well being, 'public welfare' and amenity values herein are presented as Reserved Matters. These will only be addressed once the massively excessive plans are approved automatically – which is how Southwark have treated and will treat of them;
- These plans show wholly unacceptable maximal Ground Floor extents in almost every direction let along first floor ones and without even mentioning the sudden appearance of basements in the plans. Concerned that the extent of ground floors and basements will result in the loss of trees and the existing forest;
- The trees and green infrastructure must not be reserved for consideration separately from ground floor planning extent nor first floor extents but the two elements must be considered / approved together, otherwise this is a complete wholesale sham and needs to be called in to the GLA and stopped dead in its tracks;
- 25% affordable housing does not meet policy requirements of at least 35% social housing provision in new developments. This so-called affordable element must include either council housing or target rents in the half of the quantum that is to be rented as a very minimum;
- At present, the policy-flaunting proportion will be part-buy, which means they are essentially a private development, the other half of the so-called affordable quantum is to be rented at anything up to 80% of private rental market values which makes this

essentially a purely private development;

- This development requires a proper proportion of new housing, which replaces 100% Council housing, is Council housing and / or rented at target rents; actually affordable to the people who have been flushed away or who have held on tenaciously in the area around;
- Units should be tenure-build but also built to the highest standards conceivable in order to justify destroying easily updated / graded buildings so early in their natural life;
- Make the financial viability process open-book and let's have a proper meaningful discussion about it with a cross-section of the existing community and across generation;
- Object to the lack of sustainability in the development and the OMP. The original ideas for development of the site included measures that no longer feature in the development;
- Objection to building for cars in a car-free regeneration. This is supposed to be a car-free regeneration because the site is in the centre of London and boasts one of if not the best-connected public transport nexus in the city and although it is utterly incoherent and will according to these plans remain so afterwards;
- Objection to plans to increase the roundabout by a further lane, making it more attractive to motorised vehicles from across the city and beyond;
- Code 4 is another woefully low level to aim this so-called regeneration at. If it is not viable then don't destroy, or don't give the money to TfL like fools. Build less, build sustainably, build well. Request that the standard is raised to Code Level 6;
- Planning consents must be conditional upon retention and restoration and replacement of trees and green infrastructure as an elemental minimum;
- Phase 1 must restore already and soon-to-be destroyed large canopy trees on site, as well as replace off-site in as close proximity as possible to it, which in this case means along Balfour Street and it must do this early not late;
- These plans envisage a horrible uniformity of grid and block, detailed with chain retail outlets in a defiant stand against any ambition or attention to the place as possible;
- Should undertake a proper valuation of the trees, promise to restore every single tree should be upgraded to specify the type of tree, and restore large canopy trees.
- The provisions for tree retention and replacement is not good enough, more trees must be retained and not so needlessly destroyed;
- Publicness of the so-called 'public' private park. One obvious impact of the maximum ground floor plans, plus first floor extents is that the so-called 'public park' is down to 59m across at ground level, and less at high levels;
- The shrinking of the park will have direct and marked consequences for the ability to retain the trees which is why this must be conditioned. The park must be defined and that definition must measure 64m at ground and above levels. It must be the 200m it claims it will be and it must jag out in the southwest corner to about 85m;
- Objection to uniform barrier blocks or mega-cubes and narrow spaces between. The gaps between buildings must be widened and kept wide to make this meaningful. Gaps between buildings must adhere to minimums, or policy bottom lines, but aspire to something more;
- These massive characterless blocks of podia must be broken up and that breaking up (which can be done by alleyways, archways into open centres) should be inserted into any permissions granted here;
- The current plans and their visuals already look significantly dated;
- The OMP should have a real and convincing commitment to retain trees, forest, canopy cover, the whole green infrastructural continuity of it all and all that immediately links to it, to make it a better place for walkers, runners, cyclists, the very young, the very

old, visitors, residents, workers, to meet elementary 21st Century criteria, to add to London's green city not reduce it, and to invest much deeper in these elements in the absence of any others;

- That means giving real attention to sustainability, not to meet policy minimums or codes, but to set independent, much higher and more meaningful standards because they are part of a fully articulated vision or purpose for all this destruction and rebuild to take place;

- One obviously totem of this is to create a public park of meaningful proportion, with real active usability and improvised ongoing change and use allowed – food growing, wild gardens, quiet zones, and for the park to be actually public.

67 18 Market Place, Blue Anchor Lane

- Object that many of the original benefits of the regeneration scheme are being lost due to financial viability (MUSCO, affordable housing);

- Object that the pre-planning consultation did not raise the possibility of the development providing less than 25% affordable housing;

- The report should state that the local community was not informed or consulted about the amount of affordable housing being less than 25%;

- No pre-planning consultation on the use of biomethane gas as fuel;

- Loss of existing amenity open space;

- Object to the proposed management arrangements for the new park;

- Object that there is no detail of the Estate Management Company, and concerned that it will introduce unwarranted restrictions on the activities and the use of the park;

- Southwark Council should adopt and manage the streets and public areas in the development;

- Object to the off-site provision of recreational space for older children;

- Object to the Estate Management Strategy and the privatised public realm that will result from this development and this has not been addressed in the submitted Equalities Impact Assessment;

- No on-site or offsite provision of renewable energy generation;

- Object that the existing standard gas-fired boiler and district heating network is being replaced with a new standard gas-fired boiler and district heating network servicing just the new Heygate development, it doesn't provide the same services as the MUSCO;

- Object that all methods of supplying heat and water that rely on renewable sources of energy have been rejected on grounds of their cost impact on viability. Biomethane use is unrealistic and untested;

- The homes will be built to CSH level 4 and not level 6, these will not be zero carbon homes;

- The application does not meet Core Strategy requirements for carbon emissions and does not include embodied carbon within the carbon accounting methods;

- The rectangular grid design separates people, and much of the open space is private, the application does not support existing communities and does not contribute to the creation of sustainable mixed communities;

- Object that the application does not include the refurbishment of the existing estate;

- The cumulative environmental impact of both this scheme and that of the Heygate East application Phase 1 Rodney Road, should be considered together. Splitting the scheme into two applications is in breach of the 2011 Environmental Impact Assessment Regulations;

- There is no guarantee that the existing trees will be retained on the site;

- The application does not make clear what percentage of 750 jobs generated would be

new, what percentage of the jobs is likely to be provided to local residents, whether the existing local supply and demand for retail and catering work actually support the development proposal.

- Object to the Retail Impact Assessment as it does not assess the development's impact on the existing retailers on the New Kent Road, Harper Road, Rodney and Eagle's Yard;
- The s106 needs to include a long term commitment to provide affordable retail units for existing independent traders and shops;
- The application should be revised to recognise the important contribution of small retail units surrounding the site and cultural diversity, giving recognition to the 70 Latin American businesses at the Elephant and Castle;
- Support the Council's vision of zero car parking in new developments and object to the applicant's insistence on 25% parking as a baseline for the future;
- There should be a crossing of the New Kent Road at the northern end of Elephant Road;
- There should be commitment to consult with local interest groups about the definition and design of the Tertiary vehicle routes;
- For pedestrians to be genuinely safe, the streets should be designed to allow vehicles to move at no more than 10mph;
- Rodney Road, between the junction of Rodney Place and Orb Street, should have the carriageway reduced;
- Object to the applicant's inadequate consideration of cycling, both in terms of trips generated by the development and in terms of the impact of the development on trips passing through the development area;
- The application fails to meet Supplementary Planning Document requirements as there is no data provided or estimation of cycle 'desire lines' or any attempt to capture the existing volume of cycling on the cycle bypass and through the adjacent Northern Roundabout;
- Object to the critical failure to provide a route for the new cycle superhighway;
- Object to the omission of cycling and cyclists from consideration of the Northern Roundabout (the Halcrow Report) and the proposal to use part of the transport tariff for redesigning the roundabout without consideration of cyclists' needs;
- Object to the proposal to widen the Northern Roundabout to accommodate five lanes of motor traffic;
- The development will have a negative impact on existing cycle routes;
- The cycle parking proposals are inadequate and there is no commitment to a minimum number of spaces;
- The applicant fails to quantify s106 spend on affordable / social rented housing, it is imperative that a significant amount of s106 supports affordable housing;
- S106 contributions for affordable housing should be ring-fenced for social rented housing to ensure that the social rented housing targets can be met;
- Object that there is no provision for a library / lifelong learning centre, any building for use by voluntary and community sector groups and the kind of comprehensive range of facilities promised by the 2004 Elephant and Castle framework;
- Object to the inordinate proportion of total spend that will be on transport infrastructure at the expense of affordable housing, education, employment, public open and play space, public realm, health facilities and community facilities;
- Object to the inclusion of affordable rent which will be beyond the means of most local people and many thousands on the Southwark housing list;
- Object to the omission of a commitment to build a minimum of 35% affordable housing as required by Southwark's Core Strategy, and there is no commitment to fulfil the

- minimum 25% affordable housing included in the Regeneration Agreement;
- The application omits the tenure mix and levels of affordability for each tenure;
- The buildings that front onto the park qualify as 'tall' according to the Core Strategy and should be treated as such;
- Object that the tall buildings will have a negative effect on micro-climate, particularly sunlight, shading and ground level wind canyon effect;
- Object that tall buildings lack public accessibility;
- Object to the building blocks / massing being overtly gridded which will feel as monolithic as the blocks being replaced;
- Object to the cluster of tall buildings being separated physically or practically from the surrounding community, so that the effect is of a gated community.

In support

68 Camberwell Green (no address provided)

- As a worker in Hannibal House the plans will have direct impact upon quality of life;
- The Elephant and Castle is an area characterised by hideous 60s architecture, disused public spaces and substandard pedestrian access. The Heygate Estate is the main culprit;
- The shopping centre is also a monolithic eyesore and aesthetically speaking has no place opposite the Metropolitan Tabernacle;
- There is also a lack of decent coffee shops or drinking establishments;
- Therefore support the application as the area is in need of redevelopment;
- Improved pedestrianisation would make it a pleasant place to walk around;
- New trees are in the plans, they will improve the look of the area, and reduce air pollution;
- Strongly attracted by the green credentials of Lend Lease;
- New cycle paths will be incorporated into the development, which will improve the area; and
- The regeneration plans are essential for the reputation of the area and to improve safety (for pedestrians and cyclists).

Responses from Neighbours and Local Groups following re-consultation undertaken on the 8 October 2012.

Local Groups

69 Elephant Amenity Network

Consultation Process

- Note that the application now contains a commitment to 25% affordable housing, which deals with part of our objection 2.1, however, a large element of the affordable housing will be 'affordable rent'. We therefore make a fresh objection that there were no consultations on the introduction of this new, more expensive kind of affordable housing for rent, in place of 'social rented' housing;
- We also note the addendum to the Energy Statement about the use of biomethane gas, but maintain our original objection that there was no consultation on the feasibility of its use;

The new Park and Estate Management

- Note that there is no revision to the Estate Management Strategy. We understand from conversations with planning officers that the Park and public realm will not be

managed by the Estate Management team. The strategy refers to a 'Management Team' managing the public realm, without further detail (4.1), this requires clarification;

- Note and welcome the statement that the Developer 'may explore the opportunity for future adoption of the public realm by the local authority' (4.1) and request that adoption occurs;

Sustainability

- Note the changes made in the addendum to the Energy Statement. The addition of Phase 1 Heygate to possible future District Heat Network (DHN) connections (Table 8) is welcome. However achieving the DHN connections remain an aspiration rather than a concrete proposal and the capacity of the Energy Centre to do this awaits confirmation at the design stage (3.3.2 pg12). Making connections and providing the capacity should be a condition of approving the application;

- Note the changes to section (3.3.10). The developer's commitment to provide a detailed energy strategy as part of each detailed planning application is welcome. Concern about the reliance on biomethane gas remains however. The source of the gas still appears tenuous and the alternatives lack detail and are being reserved for later applications. 'Plan B' and the 'Options Summary' have also been removed from the application. Does this mean that Solar PV and Biomass have been discarded as alternatives? In light of these concerns we do not think the proposals are sufficiently robust for approval;

Section 106

- Welcome the increases in expenditure where they have been made, other than that for strategic transport, which has increased to £13.03m from £11.68m. Note the reduction in the education contribution and therefore reiterate original objections to this;

- Note that there has been no improvement to the presentation of the figures for affordable housing; despite the applicant confirming to providing 25% affordable housing the contributions are not quantified (reiterate original objections);

- Note that the existing Heygate floorspace has decreased considerably, and that while the uplift should increase the amount of s106 payments, the increase in total from £50m to £51.3m is matched by the increase in strategic transport infrastructure spending by £1.3m. It would therefore appear as if there is no local benefit from the gain, request confirmation on this;

- While there is an overall decrease in floorspace, there is now a greater loss of Heygate community and culture and retail floorspace. The minimum floorspace provided by the new development for these uses must ensure no net loss;

- The review mechanism reference in the original Heads of Terms has been omitted, request reasoning for this;

Affordable housing

- Welcome the improvement on the application made by the applicant's commitment to providing a minimum figure of 25%, however the application does not provide 35% affordable housing as required by Southwark's affordable housing policy. There will be no social rented 1 or 2 bed units, only 'affordable rent' units. Table 7.1 is highly confusing, it is impossible to say how many social rented units or affordable rent units there will be;

- Request a briefing note showing achieved or expected delivery of affordable and social rented housing on each housing site within the Masterplan and information on the impact upon the viability assessment resulting from the affordable housing change;

Tall Buildings

- Object to the revised Parameter Plans which leave several issues unclear – whether existing footpaths and pavements are within the red line and will cease to be public space, and whether balconies will be a minimum of 15m from an adjacent residential

building;

- Propose that the parameter plans be redrawn with a minimum 15m plot extent and for all footpaths and highways to be within the public realm.

[Respondent also restates original comments / objections]

70 Garland Court Residents Association

- The amendments and clarification go some way towards explaining why the worst case scenario of development to the maximum plot sizes cannot as well as must not take place;

- The Tree Strategy Plan shows Wansey Street's plane trees retained, so we presume that any new development has to sit behind them, and note that elsewhere on Wansey Street there is a minimum of 15m between building plots, a dimension which would complement the Victorian Street character;

- Nevertheless the majority of the original objections raised still stand. Principle objection continues to be the new public square immediately outside Garland court and its associated D1/D2 community uses. Even if built out to the minimum plot parameters, the space and its associated community uses will create a lot of new activity outside Garland Court, all of whose bedrooms face the public square, and damage resident's amenity;

- Don't consider that reserving subsequent approval for matters such as access, scale, appearance, layout and landscaping will overcome the fundamental problems created by the location of the square and its community uses. Continue to urge that it is moved towards Walworth Road where it can better relate to and complement the public activities of the listed old town hall building.

[Respondent also restates initial comments / objections]

71 Rt Hon Simon Hughes MP and Walworth Liberal Democrats

- Affordable Housing

The 2012 OAPF/SPD clearly states that there should be 35% (or approximately 900 units) of affordable housing delivered on-site. I support the current council policy and object to the considerably lower amount of social housing (25%) proposed;

Understand that the policy requirement of 35% in the Elephant and Castle SPD was adopted following a 2010 affordable housing viability assessment study that found it to be feasible;

When the community were consulted about the Heygate Estate, the promise was that there would be at least as many homes built (either by the council or by housing associations) as there would be council homes lost, but with rents at what were then defined as affordable rents – namely social rents or target rents. While the government has introduced a new definition of affordable rents, there is an obligation on the council and the developer to provide 1107 units at the old definition of affordability;

Southwark's residents should not be expected to sacrifice the prospect of new social rent and other affordable homes to enable increased returns for developers and their shareholders;

- Viability

Object to the financial viability tests being applied in the present confidential manner and believe they should be much more transparent for elected representatives and other members of the public to see and assess;

- Car parking and cycle parking

Given that the masterplan area has public transport accessibility levels of 5 and 6, object

to the fact that the proposed outline application has far too many car parking spaces; Propose that in recognition of the need to encourage families to move to the new homes, and in light of the high levels of public transport at the Elephant and Castle, car parking is limited to a maximum of 250 spaces for the three and four bedroom units only, including 10% reserved for disabled residents and 20% electric vehicles;

- Energy

Extremely disappointed at the abandonment of the MUSCO project to provide green and affordable energy – not only for buildings on the Heygate ‘footprint’ but also to link both new and existing buildings across the Elephant and Castle ‘opportunity area’. This disappointment has been compounded by the limited proposals in the outline application that only offer scope for 1,000 additional units to be connected to the energy centres for the new Heygate developments. While this may support the majority of new CHP boilers connected to a number of surrounding estates, such as Newington, Salisbury, Rockingham, and Browning. I also believe that a new green energy centre could play an extremely important role in the sustainable redevelopment of the Aylesbury Estate.

- Small businesses

Lack of reference to the impact of new commercial developments on both East Street market and many small businesses in the area, particularly the large number of Latin American businesses;

- Trees

Reaffirm the previous administration’s 2010 support of local residents for retaining the majority of existing mature trees on the site;

- Education and health facilities

Welcome the investment outlined in the draft 106 / CIL agreement but remain concerned about the complete absence of detail as to what these facilities will look like, and whether a new primary school will be forthcoming to serve both new and existing residents;

- Process for deciding planning application

Suggest that the committee meets as close to the Heygate site as possible to allow residents to attend; that the agenda is published further in advance than normal as it will be larger than one with the usual detailed applications for individual developments; and if necessary, the committee should consider meeting over two evenings to allow for representations from as many of the interested members of the public as possible and appropriate debate.

72 Pullens Tenants and Residents Association

- The revised application should be rejected just as the original application 12-AP-1092;
- There is no benefit to the people of Southwark and it does not comply with the London Borough of Southwark’s policy of 35% social housing. No independent forensic accounting assessment has been conducted and published to justify any reduction in this policy. No details have been given of the revised social housing proposals in the renewed application. The number of dwellings given does not specify room number or sizes or any breakdown of floor area;

- Such a large number of rentals under the current short term tenancy legislation will result in a largely transient population that will not encourage any communitiy regeneration, just the opposite.

73 Heygate Leaseholders Group (49 Cuddington, Deacon Way)

- Whilst the new revised housing statement does now include a minimum target of 25%

affordable housing, it is not proposing the type of affordable housing required by planning policy or negotiated in the Regeneration Agreement, which both require half of all affordable housing to be social rent;

- Affordable rent tenure is not affordable, and is beyond the means of most of our former neighbours here on the Heygate Estate;

- The planning application makes no provision for the retained equity homes;

- It will result in the creation of a private gated community for the wealthy, and will lead to a further segregation in London. This is further exacerbated by the planning application's Estate Management Strategy, which purposes that the entire 10 hectare footprint comes under the control of a privately managed 'Estate Management Company' patrolled by a private 'Town Centre Security Team';

- Sustainability, up until January 2011 the regeneration masterplan promised to replace this with an Energy Centre which would supply up to 10,000 homes in the entire E&C area with renewable energy. This strategy appears to have been abandoned in its entirety, the outline planning application makes no commitment to any renewable energy whatsoever. It proposes a replacement district heating network significantly smaller than the existing one, which supplies only those homes on the first phase of the Heygate redevelopment or any other developments in the area. Moreover there is insufficient capacity to supply any other developments due to the proposed size of the new Energy Centre. The Energy Strategy is also misleading in its attempt to mitigate the 20% on-site renewable energy requirement set out in local planning policy. It includes biomethane gas, but there is currently no such supply of biomethane available in the UK, and that there are a number of legal, technical and operational difficulties surrounding its implementation. The planning application's Tree Strategy is equally ambiguous and non-committal. The application therefore makes no firm commitment to retain any of the 400 mature trees on the existing site;

- Transport, there have been many people injured and killed in the roads around Elephant and Castle in the past two and half years. The original regeneration plans included proposals to tackle this problem by creating pedestrianised civic square spanning across the northern roundabout connecting the two tube stations and creating a pedestrian precinct. The northern roundabout is officially the most dangerous traffic interchange for cyclists in London and cannot be crossed by pedestrians. The final masterplan application has dropped all plans to reduce car domination. The civic square has been shelved, and it is actually proposed to reduce the size of the roundabout to increase the width of the vehicle traffic lanes. In addition the application proposes to block TfL's plans for a much needed eastern cycle bypass as part of the proposed superhighway. It is also proposed to create 678 new parking spaces at the Elephant, which is in breach of planning policy and unnecessary in a zone 1 public transport hub;

- Human Rights Act, as remaining residents on the Heygate Estate, this planning application affects our homes and therefore engages certain human rights under the Human Rights Act (HRA). The rights potentially engaged by this application, including the right to a fair hearing and the right to respect for private and family life are considered to be unlawfully interfered with by this proposal. The failure to provide residents with access to the financial viability assessment submitted along with this proposal, has affected our rights to effective participation by failing to provide us with access to all relevant information informing this decision, which directly affects our homes and thus our private and family lives.

74 Southwark Group of Tenants Organisations

Strongly object to the revised planning application.

The current application, whilst a small improvement on the original application (which committed to no affordable housing), is fundamentally flawed and should be rejected on the following grounds:-

- The application proposes 25% 'affordable' housing. This is contrary to the Council's own policy 6 in its adopted Core Strategy;
- The only genuine affordable housing within this 25% is the social rented housing. There are only 8 proposed social rented units in phase 1. Only the three bedroom units shall be social rented. All other 'affordable' units shall be 'affordable' rent or shared ownership. Therefore the majority of 'affordable' rent shall not be genuinely affordable;
- Affordable rent can mean up to 80% of market rent. This application proposes 50% of market rent. This would mean a two bedroom flat would cost £160.53 per week, whereas a social rented unit would be £112 per week. Whilst 50% of market rent is better than 80% this is still substantially more expensive than Council rents;
- It will be very hard for the Council to enforce s106 clauses in any agreement keeping shared ownership homes and affordable rented homes under affordability caps. The most likely outcome is that these affordability caps will be breached.
- Opposed to the demolition and redevelopment of the Heygate Estate on the basis that around 1,000 Council Homes are to be removed, and no Council Homes are to replace them. This amounts to social cleansing on a significant scale.

75 On behalf of the Latin American Women's Rights Services and Latin American retailers at E&C

- The Latin American Recognition Campaign (LARC) is a campaign in support of the Latin American community, and therefore considers the recent recognition from Southwark council towards the Latin American people in the borough as a great achievement of high significance;
- Request that a landmark or space within the borough is provided that the Latin American community can identify with such as a Community Centre, a statue, or a Latin American park;
- The Elephant and Castle area should be declared as a Latin American area (Barrio Latino);
- In support of affordable housing and an affordable rent scheme that can allow small businesses to carry on operating;
- In support of new library facilities, community centres, and for the development of any element that promotes culture and learning in the area for everyone;
- Object to the planning application because the Retail Impact Assessment does not assess the development's impact on existing retailers on the New Kent Road, Harper Road, Rodney Road shopping parade, East Street market and the Latin American retail on Elephant road and Eagle's Yard;
- S106 support needs to be given through a long term commitment to affordable retail units for existing independent traders and shops;
- Also object on the basis of sustainability of businesses during the regeneration process; ability to remain in the area after redevelopment; number of affordable retail spaces in the new development needs to be made clear; what support will be provided to existing business; there is a decrease in retail space for small local retailers; the capacity of the proposed plan to maintain the current mix of activities is of concern; there is a lack of commitment to protect current tenants from excessive rent increases in the next few years; landlords may favour well established brands displacing current tenants; reassurance needs to be given to retailers about the alternatives available to them; a clear definition of affordable space is needed and the percentage of affordable units on

the site;

- Object to the lack of any provision for social and community infrastructure in the current plans.

76 **Neighbour Representations**

46 consultation responses received in response to the re-consultation on 08/10/12.

In objection

77 26 identical responses received from the following addresses:

Flat 4 SE1 4HY (4 responses received)	7 th Floor, Hannibal House
2 Burwash House	32 Shad Thames
Apartment 409, 8 Walworth Road	15 Hamilton Square, Kipling Street
13 Hayles Street	21 Guinness Court, Snowfields
Department of Geography, Kings College	144 Borough High Street
64a Peckham Road	6 Dale Road
5 Melbourne Grove	52 Marmora Road
38 Wingfield Street	126 Grove Park
85A Danby Street	327 Lordship Lane
19 Pattinson House, Redcross Way	204 Baltic Quay, 1 Sweden Gate
39 Creasy Estate, Aberdour Street	10 Chatham Street
SE5 8LE	

The objections raised are:

- No affordable housing;
- No on-site renewable energy provision;
- The council's policy states there should be 35% affordable housing and 20% on-site renewable energy;
- Loss of vast number of mature trees;
- High number of parking spaces;
- Failure to provide essential cycle-route and public transport infrastructure;
- Privatisation of the public realm;
- Loss of amenity space; and
- Loss of community facilities.

78 **89 Albert Barnes House**

Against planning permission because Elephant and Castle has enough residential buildings.

79 **40 Albert Barnes House**

Against these plans because of the lack of green space the proposed park is too small. Elephant and Castle needs a big park similar in size to Burgess Park.

80 **Resident of Wansey Street**

- During demolition access to the site could be through Wansey Street and I think that

Heygate Street would be more suitable, as Heygate is not a residential street, there is a TfL bicycle station on Wansey Street, and there is a busy bus stop on Wansey Street / Larcom Street; and

- A square is planned opposite Garland Court. This would be better moved in the direction of the Walworth Road where it will cause less disturbance to residents.

81 Resident of Garland Court

- Object to the new public square, mainly the size and location;
- The open space will be used by non-residents who would have no reason to think about local residents, as they will view this as being a public place and will not focus on the potential high noise levels. There is also potential for anti-social behaviour in close proximity to bedrooms serving Garland Court; and

- As a current parking permit holder (M1 Zone), parking remains a priority concern. Parking for new residents should not negatively impact, restrict or minimize parking for existing parking permit holders.

[Respondent also restates original objections]

82 87 Albert Barnes House

- Object to lack of green space in the area;
- There are too many flats in Elephant and Castle;
- Examples of existing flat blocks in the area with insufficient parking and lack of space.

83 28 Matthews Court, 1 Meadow Row
11 St Matthews Court, 1 Meadow Row

Objections summarised as follows:-

Elephant and Castle (and London as a whole) is already overpopulated and cluttered with flat blocks.

84 9 Garland Court (2 responses received)

- Concern over the size of this application and its lack of clarity and complicated (and sometimes misleading) presentation;

- Strong concerns about the impact that the proposed redevelopment will have on the character of Wansey Street and on existing resident's amenities;

- Wansey Street is a quiet, solely residential cul-de-sac. It contains some 20 Victorian terraced houses as well as 31 flats within the award winning Garland Court;

- Proposals will alter the character of the existing cul-de-sac by redirecting the vehicular access;

- The existing garden at the current end of the cul-de-sac will more or less disappear;

- Not enough regard has been made to retain the character and continuous line of existing terraced houses in the proposals for the new side of the street;

- Building heights have been increased (in relation to the remaining buildings) and the street line interrupted with wide openings between proposed blocks;

- The street will effectively be reduced in length leaving Garland Court no longer a part of it;

- There is a danger that Wansey Street will be used extensively for access during demolition and construction work (large gates have been installed in the fence opposite Garland Court). As the Wansey Street buildings will probably be the last ones built this

would mean that residents would effectively live on a building site for the next 10-20 years;

- Strongly object to the plans to use Wansey Street for access or egress of any lorries, demolition / construction equipment, goods vehicles, workforce or deliveries to and from the redevelopment site;

- The location of the proposed Walworth Square (along with shops, cafes, overlooking roof gardens and a possible Community Hall) directly opposite Garland Court is the most damaging aspect of the proposals. Bedrooms within the 31 Garland Court flats face the street. Walworth Square should be relocated onto the Shell Petrol Station site.

85 28 Thornton House, Townsend Street

Original Objections Stand – in addition:-

- Consultation

The revisions are not easy to review and what they amount to is not highlighted in the Council consultation letter;

The continuing poor level of consultation by Lend Lease, and its public relations company Soundings, is also shown by the introduction through the revisions of the affordable rent product and the Design User Guide;

- Floorspace

A detailed survey of the floorspace at the existing Heygate Estate has significantly changed the amount of retail and community facilities (to increase) on the site;

Residents have previously argued that the applicant has seriously underestimated the existing community buildings on the Heygate estate. Because of previous misunderstandings, the detailed survey should be made available to verify the accuracy of this new figure. The applicant should also consider afresh the retention of at least some of these community buildings;

Given the loss of community facilities is greater than previously planned, it is disappointing that the applicant has not made any subsequent changes to the Development Specification. It is also disappointing that the applicant has amalgamated worship space and community buildings in para.4.27 of the Development Specification without consultation. Request that the minimum floorspace for community facilities be increased to 2,530sqm;

- Affordable Housing

The application does not provide the 35% affordable housing required by Southwark policy;

There will be no social rented 1 or 2 bed units, only 'affordable rent' units that will be about £140 and £160pw respectively, compared to about £90 and £100pw if they were social;

There is no quantified breakdown of the housing tenure, so it is impossible to say how many social rented units or affordable units there will be;

Despite the opportunity provided by the Housing Addendum to look afresh, the applicant makes no revisions to family housing, the size of homes or the diversity of the housing offer all of which remain inadequate;

Information should be provided to explain the impact on the viability assessment of the affordable housing change;

- Heads of Terms

Object to the Section 106 agreement showing an increase in the amount to be spent on strategic transport from £11.68 million to £13.03 million. This exacerbates the problem of strategic transport pushing out other section 106 spend, whilst making almost no impression on the huge funding gap for infrastructure delivery;

Object to the deletion of the review mechanisms from the Heads of Terms;
Object to the deletion of the reference to social housing in the draft heads of terms;

- Open Space and Public Realm

There is no revision of the Estate Management Strategy and the revised Parameter Plans are unclear whether pavements and footpaths are inside the red line;

- Developments in planning policy

The applicant has failed to address the adoption of the Elephant and Castle SPD and National Planning Policy Framework (NPPF) in the revised documents. The applicant seems to have put together a new phrase based on some wording in national policy in order to justify its breach of Southwark planning policies. On a number of occasions, the developer uses the expression 'the material consideration overriding planning policy is the viability and deliverability of the scheme as a whole.' (para.4.13 of the Planning Statement). Viability and deliverability are very much part of the planning policy (NPPF para.173). The developer also seems completely unaware that for a scheme to be viable it needs to demonstrate that the necessary infrastructure can be brought forward in a timely fashion. This application fails to do.

86 85e Balfour Street

Object to the Heygate Outline Planning Application.

- Believe that the Heygate application and Phase One (ref: 12-AP-2797) should be taken together and considered at the same committee. As well as other surrounding sites and the Opportunity Area Planning Framework (OAPF). There is a danger that planning applications are being considered in a piecemeal way in isolation of each other;

- A grid pattern of inward-looking courtyards does nothing to create and promote a sense of place and neighbourhood;

- Object to the breach of council policy on 35% affordable housing replacing 100% Council Housing, with an essentially private estate. There is a great need for genuinely affordable homes for a wide range of people, particularly families with children and also older people. This means homes comparable to council rents. The report should clearly indicate the review mechanisms that will be put in place the 20-25 year regeneration programme and how locally elected members and other stakeholders will be involved;

- Concerned regarding the amount of open and green space in the development, as well as access to and management of this space. The footprint outlined in the planning application currently contains a total of 2.42 hectares of amenity open space. The proposed park will contain just 0.8 hectares – an unwelcome loss of more than two thirds of the existing amenity open space;

- Also object to the management arrangements for the park. Propose that the estate management should be reconsidered and that Southwark Council adopt and manage the streets and public areas of the development. The Estate Management Strategy – and the 'privatised' public realm that will result from this development have not been addressed in Lend Lease's Equalities Impact Assessment;

- The application provides no guarantee of the retaining any of the existing trees on the site at all. Of the 406 existing trees, the applicant has identified 36 trees within the main forest canopy for the site for possible retention. However, these are all subject to 'further more detailed testing';

- The existing trees are actually about 60 years old;

- Concerned about the financial viability of the development scheme, but don't feel there has been any meaningful discussion of this aspect of the application in public. The disclosure of information relating to the basic modelling assumptions of the viability assessment and details concerning the transfer of public land is in the interests of the

local community. It appears that many of the original benefits of the scheme are being lost on the grounds that they are financially unviable, however without an 'open book' approach it is not possible for residents to make an assessment of this;

- Serious concerns about the poverty of the consultation process. The Statement of Community Involvement does not provide an accurate reflection of the process and the range of views presented;
- The proposal has given little thought to how the area might connect to adjacent neighbourhoods and community facilities;
- Object to the applicants inadequate consideration of cycling, both in terms of trips generated by the development, and in terms of the impact of the development on trips passing through the development area;
- The application fails to meet the SPD requirement in that there is no data provided or estimated about cycle 'desire lines' or any attempt to capture the existing volume of cycling on the cycle bypass and through the adjacent Northern Roundabout;
- The conclusions reached about cycle movements are unsound because there is no consideration of existing, generated and future underlying levels of cycling;
- Cycle parking is inadequate;
- Should be little need for financial contribution to public transport improvements as part of this development, which should be provided by the Mayor from the CIL he is already collecting;
- The Development Specification Document does not make clear, what percentage of jobs would be new (rather than existing retail / business / D1 & D2 moving into new units), what percentage of the jobs is likely to be provided to local residents, and whether the existing local supply and demand for retail and catering work actually support the development proposal;
- Object that the Retail Impact Assessment does not assess the development's impact on existing independent retailers on the New Kent Road, Harper Road, Rodney Road shopping parades, East Street market and the Latin American retail on Elephant Road and Eagle's Yard;
- The council should retain its vision of zero car parking in new developments. The PTAL level at the site is 6b – the highest level of accessibility, so question the applicant's insistence on 25% parking as a baseline for the future;
- Do not believe that the proposed development will contribute towards achieving the sustainability objectives set out in local planning policy and nor are they examples of sustainable development, as identified within National Planning Policy Framework;
- The existing gas-fired boiler and district heat network supplied heat and hot water to over 2,000 homes on the Heygate and neighbouring Salisbury estates, which the new network will not extend beyond the Heygate footprint and will not supply telecoms, potable water, non-potable water, drainage, gas, fibreoptics, and vacuum waste, as the original Multi Utility Services Company (MUSCo) was designed to do;
- Object to reliance on biomethane as a non-proven and unidentified 'allowable' solution;
- Object that homes will only be built to Code for Sustainable Homes level 4 and not 6;
- The split of the two applications (Heygate and Phase 1 applications) is a means of circumventing an assessment of the cumulative impact of the scheme as a whole, contrary to the 2011 Environmental Impact Assessment Regulations;
- There must be conditions requiring Section 106 monies to be spent on public realm and green infrastructure improvements to Balfour Street;
- The applicant fails to quantify the s106 spend on affordable / social rented housing;
- The applicant fails to provide a library / lifelong learning centre; and
- Concerned that an inordinate proportion of the total spend will be on transport infrastructure.

87 7M Peabody Estate

- Large private estates such as these suck life out of communities;
- This development does not factor in any plans whatsoever for affordable housing, something that is in violation of Southwark's own policy. As what is typically designated 'affordable housing; is still out of reach for many of Southwark's lifelong residents;
- Southwark council must insist that the minimum 35% of properties are affordable housing, and that some is designated as much-needed social housing. Furthermore, this development should not be allowed to be private and cut off from the wider area.

88 By Email – No Address

- Object to no social housing, which is contrary to the Council's Core Strategy;
- Concern regarding sustainability and the development.

89 3 Individual responses specifically in objection to the possible noise impacts resulting from the development upon Wansey Street (Garland Court) residents, received from the following addresses:-

Flat 28 Garland Court
2 Garland Court
9 Garland Court

The objections specifically refer to the location of the proposed community centre, and public square, where there could be noisy activities and anti-social behaviour, in close proximity to bedrooms in Garland Court. Residents request that the square is located towards the end of Wansey Street. The responses also refer to the Environmental Statement, and the lack of background noise data collected for Wansey Street.

90 15 Garland Court

This application will affect the character and setting of a number of Listed Buildings and Conservation Areas as well as a World Heritage Site. It is not clear how and where the buildings will appear and whether they will impact Wansey Street Residents. It is not clear if there will be traffic problems, or parking problems affecting Wansey Street. It is not clear if existing features are affected or daylight and sunlight. It is not clear if the development will be noisy, and if Garland Court residents with bedrooms facing Wansey Street will be impacted. It is not clear if there are any shops proposed on Wansey Street.

91 Flat 2, 33 Wood Vale

- The amount of development is simply too great. The cost of this redevelopment will involve an unacceptable loss of green space and of mature trees in the borough;
- Plans could easily be designed to fit around the concentrations of trees between the maisonettes and on Walworth Road by the bus stop;
- Preferred outcome would be for the Heygate Estate would be to see it turned into a public park; this more than any redevelopment would surely help regenerate Elephant and Castle in a meaningful way.

In Support

92 2 response received following re-consultation.

93 12 Soane House

- It will change the perception of Elephant and Castle and Heygate Estate in particular, from an ugly place to an attractive environment and this will make a big difference in the area. The redevelopment of sites such as the one in Albany Place / Ruskin Way has proved that new modern homes are key to the transformation of the area;
- Modern, high quality homes are much needed in the area;
- The proposed open space and new park are welcome as there is never enough open space in an area for outdoor activities such as running. The new park will be a great addition to the existing Burgess Park;
- Commercial uses at ground floor will ensure that the environment will be active and alive;
- The proposed cafes and restaurant will be a great addition to the offer in Elephant and Castle as an evening destination;
- Although the height of the proposed buildings does appear small when compared to Strata the massing is well proportionate overall and will create new landmarks in Elephant and Castle.

94 19 West Square

- Write in support of the application as the proposals will result in a number of benefits;
- Over 2,000 high quality homes close to the centre of London which are desperately needed;
- The benefit of a new Park that celebrates the existing trees on the site, and creates a new central focus in the area;
- Space for cafes, restaurants and shops that will complement and enhance the existing economy;
- New jobs both in the construction and the completed development; and
- An important catalyst in the regeneration of the wider area, in particular the desperately needed improvements to the Northern Roundabout.

APPENDIX 3

Responses from Internal Consultees on application for demolition reference 12/AP/3203

1 Ecology Officer

The bat monitoring survey established that there are no bat roosts on the site. Low numbers of bats have been recorded on the site in 2011. The site has limited ecology value due to the dominance of buildings and hard standing. No concerns are raised regarding ecology and the demolition of buildings. There will be some short term ecological impact from the tree removal, however the proposed mitigation measures will result in an enhancement and gain for biodiversity.

2 Arboricultural Officer

A tree strategy has been submitted which includes an arboricultural survey, however the outline protection plan provided (12-AP-1092; drawing no.120207-EC-TPP-AM-1.0, scale 1:750) requires further detail in order for the prevention of damage to be sufficiently assured. The report does not include roof protection area calculations on which the protection areas are shown and refers to a superseded British Standard. Given the constraints related to the proximity and size of retained trees next to blocks due to be demolished, and the variety of level changes throughout the site, tree and root protection plans are required to a larger scale with detailed cross sections. The extent and duration of operations will also require close monitoring and supervision by a site arboriculturist throughout the demolition and site preparation phases. Lastly, confirmation is required of the type of pruning works specified for retained trees which in some cases may need substantial crown reduction. Conditions are recommended concerning tree protection.

3 Environmental Protection Team

Recommend approval subject to conditions concerning air quality, noise and vibration, land contamination, demolition environmental management plan and lighting. Comments on these topic areas below.

Air Quality

This demolition will be taking place within an LAQMA designated due to NO₂ and Particulates. Even using the most appropriate and up-to-date abatement methods, demolition (and construction) on this scale will cause significant local pollution to air due to dust and emissions from plant associated with the site. As the site is in an area where air quality is already a concern the developer and contractors on site will need to have high regard for minimising emissions to air from all activities.

Demolition Phasing

The EP Team are aware that there are several households still in occupation on the site. There is great concern that the developer is considering commencing demolition whilst there are still households in residence. Given the high likelihood of the presence of asbestos within buildings, the activities and methods both proposed, and anticipated, with a large scale demolition (retaining safe access, large vehicles, high levels of atmospheric dust, falling masonry, etc.) the Environmental Protection Team would

strongly counsel against this unnecessarily risky approach which holds clear health threats to the individuals concerned and to not commence works until the site is clear of inhabitants.

It is considered that the demolition phasing is far from ideal and that it does not co-ordinate with the construction phasing. Demolition Area 1 is discrete and unoccupied; however, it is not phase 1 of the build but phase 5. Its blocks would shield the residential areas to the south of the development from the noise, dust and undesirable views that the redevelopment will cause as this area is not likely to be rebuilt for several (over 5) years. Demolition Area 2 contains large tall blocks which are substantial barriers which would minimise the off-site impacts the development will cause with the block parallel to New Kent Road, in particular, having value to protect the sensitive land uses on the other side of the road. Demolition Area 3 is the heart of the site and would be better as Phase 1 of the demolition. It would be anticipated that the proposed park area would be the last area to be developed rather than developing it in construction phases 1 & 2. The space could be used for on-site storage of materials and machinery and it would not be damaged in the subsequent phases of construction if it were completed in the latter stages of the redevelopment.

Overall, given the length and local impacts of this large scale re-development the EP Team would urge the developer to better consider the phasing of the demolition (and construction) phases and better co-ordinate them with each other to prevent adjacent land uses being next to a large open site for up to, and in some cases over, a decade.

The currently proposed phases of demolition (and construction) will lead to long term stockpiles and open areas which will generate dust and potentially attract vermin and unauthorised occupation. Any open areas and stockpiles which are proposed to be left open for more than 3 months will require securing and sealing/seeding to consolidate the surfaces and to prevent the wind entrainment of dust. It is essential that all drains and sewers on the site are located and effectively capped to prevent infestation by vermin.

Demolition methodology

This will be addressed in detail when considering the various Demolition Environment Management Plans as the methods will vary for each phase of the demolition. The developer's attention is brought to *The London Dust Code - The control of dust and emissions from construction and demolition - Best Practice Guidance*. This is the minimum acceptable standard for operations.

There are concerns regarding the levels of HGV traffic that the site will generate. Site practices will be required to work within parameters that have been considered as part of a Traffic Plan for the site. The Traffic Plan will include maximum numbers of movements per day, holding areas, loading areas, hard-standing areas, surfaced haul routes, delivery bays, stock areas, etc. The Traffic Plan will be designed to protect local air quality and the integrity and flow of traffic on designated approach routes.

There are concerns that crushing operations, which create significant noise and dust, have not been well considered. It is strongly recommended that the developer consider a single and central crushing location and that the crusher is housed in a structure designed to contain noise and dust.

The site perimeter will need to be well secured and will require a solid hoarding

designed to minimise off site impacts. It shall have a minimum height of 3m.

Dust Monitoring

The developer, or their contractors, will be required to undertake a background air quality survey before demolition commences, monitor for particulates (PM10, PM2.5, TSP) at agreed locations throughout the demolition phase/s and to ensure local soiling levels due to dust remain within specified parameters. The surveys, both before and during the demolition phase/s, will need to take account of the prevailing wind and sensitive receptors in the environs of the site.

Noise and Vibration

The access points to the site from Heygate Street, New Kent Road, Rodney Road and Walworth Road are appropriate, however, the access points proposed for Wansey Street, Brandon Street and Elephant Road are inappropriate due to reasons of undue and unnecessary dust, dirt, noise and vibration impacts for adjacent land users. The residents of Wansey Street would also lose safe access to their premises. Unless these access points are for emergency use only, or to facilitate a one way system for the site, the Environmental Protection Team would ask that the developer better consider the access and egress points to minimise off site disturbance.

Demolition on this scale will cause significant noise and vibration to residents and businesses adjacent and nearby to the site.

Lighting

For safety reasons there shall be minimal working after dark. Should lighting be required for either work or site security contractors must ensure that any lighting used shines into the site from the periphery and does not cause glare to any land, highway or railway beyond the site boundary.

4 Archaeology Officer

The Heygate represents a major phase of public housing construction in the Borough of Southwark, as such it is an important site and is worthy of record prior to its demolition. The recording should include an assessment of the documentary archive for these buildings and the archaeological recording of a small selection of the individual flats or houses present on site together with some general photography of the complex. Conditions are suggested concerning building recording and archaeological reporting.

5 Elephant and Castle Regeneration Team – Property Division

Letter in support of applications 12-AP-1092 & 12-AP-3203

- The applications are a significant step forward in the council's plan to regenerate the Elephant and Castle;
- The site forms a significant component of the core site (39P) which has been saved as part of the Core Strategy adopted in 2011;
- Regeneration benefits in relation to place making, job creation, housing, affordable housing, Sustainability, corporate plan, s106 and public consultation (summarised key points, for more detail refer to letter dated 13th November).

Responses from Statutory Consultees on application for demolition reference 12/AP/3203

6 Environment Agency

No objection to the planning application submitted, subject to conditions regarding the application of the mitigation measures outlined in the submitted Flood Risk Assessment to the demolition works, contamination, piling and SUDs.

7 Natural England

Main comments regarding this application are contained in the consultation response submitted in relation to application 12-AP-1092 Outline application for redevelopment of the Heygate Estate. In relation to demolition, expect to see a clear dust management plan included in the Demolition Environmental Management Plan (DEMP): this should also include details of the tree protection zones and how any dust build up on trees will be addressed. The DEMP should also include clear procedures should any bats be discovered on site and for nesting birds. Vegetation clearance should only occur outside the bird breeding season March to August inclusive. If outside this period hand inspection by suitably qualified personnel should precede any clearance and if nesting birds found, work to cease in that area until the young birds have fledged.

8 London Fire and Emergency Planning Authority

No comments on the application.

The development should comply with the requirements of B5 of Approved Document B and a full building consultation will take place with the Southwark Building Control (or other approved assessor) when the application is received from them.

9 Transport for London

Request that TfL is consulted during the drafting of conditions and the section 106 agreement. Request that a condition is included to require submission of a construction management plan for each phase of the demolition, to be approved by the LPA in consultation with TfL prior to commencement.

Responses from Neighbours and Local Groups on application for demolition reference 12/AP/3203

Local Groups (application 12/AP/3203)

10 Garland Court Tenants and Residents Association

This application does not contain any conclusive details about vehicle access to the Heygate South demolition site.

Key Concerns expressed by Wansey Street Residents:-

- Wansey Street is a heavily pedestrianised no-through road;
- School children (St. John's C of E) use the public pathway into Larcom Street mornings and afternoons;
- The One-Stop Shop is accessed by numerous visitors from 9am-5pm directly opposite one of the new gates;
- There is a cycle docking station right next to one gate used all day by people who may be unsteady on their bicycles;

- Local residents and visitors have no other pedestrian access to and from Walworth Road;
- 10 bus routes along Walworth Road pass and / or queue during busy hours at the end of Wansey Street already making it difficult for vehicles exiting or entering Wansey Street;
- Buses block traffic, making it awkward both for pedestrians and cyclists crossing the top of Wansey Street;
- Number of cyclists travelling south down Walworth Road would be endangered by lorries moving in and out of Wansey Street;
- The situation would be made worse with lorries turning the corner and / or backing up to the entrance into Wansey Street;
- The bedrooms in Garland Court directly face the Wansey Street gate onto the estate so vehicular noise and pollution will reduce the Garland Court resident's amenity;
- Wansey Street already has been used by articulated lorries queuing as early as 6am when the student block was built in Walworth Road.

Neighbour Representations

11 responses received in objection to the application.

11 **Flat 15 Garland Court 26 Wansey Street**

Email – address not provided

Email – address not provided

6 Garland Court

4 Garland Court

Key concerns and Objections:

As set out above in the Garland Court Residents Association comments:-

- Wansey Street is a heavily pedestrianised no-through road;
- School children (St. John's C of E) use the public pathway into Larcom Street mornings and afternoons;
- The One-Stop Shop is accessed by numerous visitors from 9am-5pm directly opposite one of the new gates;
- There is a cycle docking station right next to one gate used all day by people who may be unsteady on their bicycles;
- Local residents and visitors have no other pedestrian access to and from Walworth Road;
- 10 bus routes along Walworth Road pass and / or queue during busy hours at the end of Wansey Street already making it difficult for vehicles exiting or entering Wansey Street;
- Buses block traffic, making it awkward both for pedestrians and cyclists crossing the top of Wansey Street;
- Number of cyclists travelling south down Walworth Road would be endangered by lorries moving in and out of Wansey Street;
- The situation would be made worse with lorries turning the corner and / or backing up to the entrance into Wansey Street;
- The bedrooms in Garland Court directly face the Wansey Street gate onto the estate so vehicular noise and pollution will reduce the Garland Court resident's amenity.

12 **9 Garland Court (2 responses received)**

- Object to the use of Wansey Street as a vehicle access route for demolition and construction on the Heygate south site;
 - It will damage Wansey Street residents' amenity and disrupt pedestrians and the bus lane at the very busy Walworth Road / Wansey Street junction. Heygate Street would be a much more sensible route for both access and egress.
 - Lack of clarity of this application with regard to the effects the proposed work will have on the daily life and amenities of existing residents living in Wansey Street;
 - Unsure why the pavements are included within the marked site boundary, seek assurances that this is solely due to the proposed surface work to the road and pavements at the end of the redevelopment work and not in order to include the whole road into the proposed building site;
 - Would also like assurance that the two gates which have already been put in place, near the Walworth Road end of Wansey Street, when the fencing was erected a few months ago, does not indicate that these will be used during demolition and construction. Any access / egress will be from Heygate Street, which would not affect residents and which has no bus routes;
 - Wansey Street already has been used by articulated lorries queuing as early as 6am when the student block was built in Walworth Road;
 - Strongly object to any plans to use Wansey Street for access or egress / parking of any lorries, demolition equipment, goods vehicles, workforce or deliveries to and from the redevelopment site, or related to any works or demolition as part of the entire regeneration;
- (The respondent also restates the key concerns set out by the Garland Residents Association detailed above).

13 Resident of Wansey Street

- During demolition access to the site could be through Wansey Street and I think that Heygate Street would be more suitable, as Heygate is not a residential street, there is a TfL bicycle station on Wansey Street, and there is a busy bus stop on Wansey Street / Larcom Street; and
- A square is planned opposite Garland Court. This would be better moved in the direction of the Walworth Road where it will cause less disturbance to residents.

14 K10 Peabody Estate, Rodney Road

Shocked to read that the Southwark Central Library, Cuming Museum and other building in that area are in line for being demolished. These are beautiful buildings, full of character and part of the history of Southwark.

Case Officer Comment:-

To clarify, the Southwark Central Library and Cuming Museum are not proposed for demolition and this application relates to the demolition of the Heygate Estate only.

15 95 New Kent Road

- The ES identifies sensitive receptors at Albert Barnes House and 154 New Kent Road. The former is not directly opposite the demolition site, being 90m from the nearest building to be demolished, plus there is a substantial set back from the highway. The latter is nowhere near the site, being 180m from the nearest building to be demolished, with substantial buildings between in line of sight;

- Fail to see how the ES can robustly conclude on the magnitude of the effect, when on the extensive northern boundary of the site only one receptor has been chosen and then only just within 100m, and thus how reasonable conclusions on the effects that will be experienced by at least 100 residential properties that directly face the site and lie within 100m of the site;
- There are bedrooms in surrounding buildings within 6m of the demolition site;
- The ES does not assess any of the 100 or so residential properties facing the site;
- The ES is defective in respect of construction phase air quality assessment. It cannot be considered a worst case in respect of the 100+ properties described; indeed it is not capable of providing a robust assessment of the likely effects at those locations; the choice of 154 New Kent Road is irrational when judged simply by the ES's own methodology which refers to a 100m distance for soiling; and the absence of a sensitive receptor identified despite some being within 6m of the pedestrian footbridge demolition is also irrational;
- It is concerning that the phasing of the demolition will see the large continuous block along New Kent Road potentially demolished early on, preventing it from forming a 'screen' for dust that could impact surrounding properties;
- It would be irrational for the ES and application to make no commitment as to the phasing of demolition regarding the retention of that building as mitigation for air and noise impacts;
- Clarity on whether the Rodney Place / New Kent Road junction will be modified and then a proper assessment of its noise and air quality impacts is required;
- The crushing of concrete on site will take months of continuous operation of crushers, and no assessment is made in the construction noise assessment of this equipment, nor in the ES, nor in the CEMP, yet it could be noisier than percussive piling and more continuous;
- Works should not start at 8am on Saturdays given the close proximity to residential properties;
- Request that the Environmental Health Officer look at this in some detail and that a Regulation 19 request for revised assessment and commitments is made; and
- Do not consider that these matters can be left to reserved matters stage, given the scale of demolition, its proximity to homes and especially when demolition is to start in a few months time. They could affect the EIA assessment findings adversely, and would not be subject to oversight by the Council, being delegated decisions.

16 15 Garland Court

This application will affect the character and setting of a number of Listed Buildings and Conservation Areas as well as a World Heritage Site. It is not clear how and where the buildings will appear and whether they will impact Wansey Street Residents. It is not clear if there will be traffic problems, or parking problems affecting Wansey Street. It is not clear if existing features are affected or daylight and sunlight. It is not clear if the development will be noisy, and if Garland Court residents with bedrooms facing Wansey Street will be impacted. It is not clear if there are any shops proposed on Wansey Street.

17 **In Support**

No responses received.