Southwark Green Party objects to the planning application for the reasons set out below.

1. Social housing: According to Southwark Council's own planning policies, new developments must comprise of a minimum of 35% affordable housing of which the majority should be social rented. The Applicant does not make any provision for social rented housing, flouting both the spirit and specific guidelines of the Council's own planning policies. This is unacceptable, especially given the scale and impact of this development. We propose the affordable housing be managed by a housing association, with tenants offered assured tenancies.

2. Retail and trade: The Applicant has made no provision for affordable retail units and states that it "may not be financially viable for [existing retailers] to survive in the wider area over the longer term". The Applicant also provides no details of a relocation plan for retailers and merely states that one will be developed if the planning application is successful. This is unacceptable at two levels:

(a) A promissory note to develop a relocation strategy is worthless unless the principles and values of that strategy are made clear and transparent at this stage, which they are currently not. As it stands there is no way to judge whether the relocation strategy would be an acceptable and proportional solution.

(b) More fundamentally, it is not clear why relocation is the most appropriate solution to the disruption created by this development. The Applicant should be encouraged to think more creatively about alternative strategies that would preserve and enhance the current ecosystem of shops, cafes and stalls along with the communities and livelihoods that depend on them. This is a sustainable alternative to the Applicant driving out existing retailers (and therefore communities) with every intention of creating conditions which would make it unviable for existing retailers to return.

3. Leisure facilities: The current Shopping Centre and surrounding area provides a diverse range of activities, including bingo, bowling, music venues and community centres. The proposed development does not provide an adequate range of leisure facilities to cater for the whole community.

4. Heritage and conservation: There have been significant objections to the demolition of The Coronet theatre, which dates to 1872 and is widely used by the community. We support the position of the Theatres Trust, a statutory consultee, in objecting to the demolition. Two nearby listed buildings (the Metropolitan Tabernacle and Metro Heights Central) may also be negatively affected as they are eclipsed by towering skyscrapers.

5. Green spaces: Little attention has been paid to the provision of green spaces in the redevelopment. This is a missed opportunity to ensure that the development benefits existing communities. The 2013 Southwark Open Space Strategy identifies Elephant and Castle as one of the parts of the borough "in greatest need for good quality open space to

help address socio-economic issues". It is disappointing that the proposed development fails to address this need, either by creating new green spaces or improving access to the existing ones. The proposed height of the new tower blocks would significantly add to the skyline, blocking out light to existing buildings, limiting privacy in existing buildings and providing an overbearing aspect to the general area.

6. Air quality assessments: the draft Air Quality Strategy and Action Plan indicates that the borough will require developers to submit air quality assessments – where is the evidence that this has been done in this case? As Southwark's 2016 Air Quality Action Plan Technical Appendix 3 indicates, Elephant & Castle to St George's Circus has been designated an Air Quality Focus Area by the GLA. This is a missed opportunity to use design to enable active travel, and reduce emissions.

7. Travel and transport: The Travel Plan 6.6.21 states only that 'Sustainable delivery initiatives will also be pursued where practicable' and that 'Such initiatives could include the synchronisation of deliveries from common suppliers therefore reducing both the number of deliveries…' but it will be left to individual businesses to co-ordinate. This is a vague aspiration, not a plan. Similarly, home delivery must be rationalised not just 'discouraged'. Reducing the number of delivery trucks is essential to reduce traffic congestion around the Elephant and Castle and reduce air pollution. We would like to see both hard infrastructure (e.g. space for commercial and domestic delivery consolidation, with a local delivery service using cargo bikes) and practical coordination (e.g. dedicated staff post). The provision of only 484 cycle parking spaces for 2,238 UAL staff and students seems an underestimate given current demand. Residential and visitor cycle parking should include provision for specialist cycles for the mobility impaired, and for trailers and cargo bikes.

Kind regards, Liba