

XXXXXXXXXX <XXXXXXXXXX@latinelephant.org>

To: XXXXXXXXXXXX

Bcc: XXXXXXXXXXXXXXXX

7 Dec at 14:27

Dear Vikki,

Thank you for confirming this information.

While we still wait for the clarification on the affordable space at Elephant Park, and conscious of the fact we are close to the date of Planning Committee, Latin Elephant would like to raise the following points after reading through the Officers Report. You may also file it as a formal objection.

The application for Castle Square is a scheme we welcome and believe it necessary in the context of the potential loss of the Elephant and Castle shopping centre. However, after carefully reading through the report Latin Elephant would like to further raise some concerns in order to achieve improvements to the application. These are set out below, and please refer to the attached documents (Tables and Drawings) that substantiate our research.

**Number of units and GIA in Castle Square.** The gross internal retail area (GIA) of 492.1 sq m does not take into account internal wall partitions between units. According to our assessment, 26 is the upper limit of the number of units that the current proposal can accommodate: 10 on the ground floor, 14 on the first floor and 2 on the second floor, totalling 18 single modular units, 6 double modular units, 1 triple unit and 1 40-ft unit.

The development is shell-and-core (Paragraph 43 Officer's Report)<sup>1</sup>, which effectively means that some solid and structural external walls do not provide for openings and would block the access to some single modular units that have been considered as potentially available (Drawing 1 attachment). Should the number of units wish to be increased to 33 as identified by the Applicant -or 32 as stated in the Officer's Report-, the layout would require further amendments to the façade, i.e. new doors.

**Size of the proposed market.** Considering the gap between the current floorspace occupied by existing independent traders within the red line (4,005 sqm according to figures by Southwark Council) and the sum of the proposed relocation sites as part of the Elephant and Castle redevelopment (around 1,500 sqm), we are asking for Castle Square to be bigger in size. From the different relocation sites, Castle Square is the only premise that is a new purpose-built building ('newly created area', as described in Officers' report) and therefore can still be enlarged to accommodate a larger number of traders, narrowing the gap and therefore mitigating the displacement of traders.

Our research estimates a deficit of about 2,500 sqm (see tables attached) for immediate relocation.

**Rent levels.** (from Paragraph 42 of the Officer's report) It is unclear as to why some independent businesses with short-term leases that are operating in the red line and are indeed eligible for relocation in Castle Square are nonetheless disregarded when calculating their rent levels for the new site. We believe that all rents regardless of the length of the lease should be factored in. In fact, our own survey shows that over a dozen rents are below the stated £65/sq ft, in some cases one third of that alleged average.

**Leases.** When consulted by Latin Elephant, traders are of the idea that security of tenure is paramount when creating and maintaining a business. Therefore, limiting the length of leases only to 5 years is detrimental to their intention of remaining in the area. And, moreover, it is contradictory to the Applicant's public intentions of keeping the traders in Elephant and Castle. If the Applicant has agreed to offer first-refusal offer in the 10% affordable retail space in the new development in 5 years, there is no reason why the leases for Castle Square could not be for longer periods of time, and traders continuing to trade with same long-term lease in the new Town Centre with same landlord. Hence, we will continue to ask for the Applicant to offer leases for 10 or more years. This will also contribute to the relocation strategy being more 'robust'.

**Design (Windows).** Windows are unevenly distributed throughout the façade (see Drawing 6). This results in some retail units with windows while others have solid walls with no such openings facing the street. This lack of visibility is particularly concerning for some traders, since the access to the shops will be solely from the square, on the other side of the road. As per the design, two traders in different singular units on the same floor would be paying the same rent but one benefiting from a shopfront and the other one with no possibility of displaying stock to the public. We welcome improvements in this respect.

**Design (Shopfronts).** The smallest proposed unit, the single modular one, is 13.1 sq m (2.24m wide x 5.85m deep as measured on the Architect's drawings). Considering a 1 m wide door, as drawn on the plans, this means just over 1 m wide shopfront window to exhibit wares (Drawing 5), being too narrow for existing retail use class A1 such as greengrocery, clothes, mobiles, etc. that heavily rely on exhibiting their goods. Such existing A1 businesses are usually the ones that use proportionally the smallest area in the shopping centre (Table 4) and they will be more likely that, given their rent levels at this moment, will opt for smallest units in Castle Sq. Consequently, 1 m wide shopfront seems insufficient for them.

In sum, we believe that increasing the size of the proposed shopfronts in parallel with an overall enlargement of this project will effectively satisfy the needs and specificities of the independent traders who could be displaced from the red line.

**Design (A3-A4 classes).** Use class A3 spaces ('restaurants and cafés for sale of food and drink for consumption on the premises') generally require larger area for kitchen provisions and seating space in the existing context of the shopping centre and its environs. This is particularly illustrative when looking at Table 4, when the area occupied per independent business is sorted by use class A1 to A5.

On the scenario that the Applicant maximises the offer of units in the benefit of the greatest number of traders, the highest number of units would predominantly be comprised of single modular units (13.1 sq m each). As a result, it follows that this new facility is not adequate for existing A3-A4 restaurants. We can foresee a major deficit of spaces in this project for existing businesses such as Tai Tip Mein, Distriandina, Miko's, The Castle Tandoori/Brasserie, Sundial, or Jenny's Burgers, to name a few.

Although it is not questioned here that the current design may be suitable for new small restaurants and cafés, we argue that it is not tailored to the needs of the existing traders. This reinforces our argument that the increase in floorspace in Castle Square is necessary and would also attenuate the lack of adequate space for existing businesses.

**Consultation (Trader Panel).** Overall, most of the above mentioned issues could have been solved with a more effective consultation from the Applicant and the Council. At the time of its design, Castle Square wasn't envisaged taking into consideration the different sizes of units or shopfronts, the class uses nor the ample corridors (communal spaces) in the shopping centre. We believe a fully functioning Trader Panel (not yet constituted) could have facilitated discussing these issues, and we regret that this has not been established by the Developer.

I hope these are useful.

Please let me know if you have any questions.

Best,

