

London Borough of Southwark

NOTE TO PROOF OF EVIDENCE ERRATA AND DRAWINGS EXPLANATION

Appellant: GPE (St Thomas Street) Limited

Local Planning Authority: London Borough of Southwark

Council reference: 18/AP/4039 and 18/AP/4040, 21/AP/1361 and 21/AP/1364

PINS references: APP/A5840/W/22/3290473 and APP/A5840/Y/22/3290477,
APP/A5840/W/22/3290483 and APP/A5840/Y/22/32904790

New City Court, 4-26 St Thomas Street, London, SE1 9RS

By ELIZABETH ADAMS

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Director Adams & Sutherland

1 Introduction

- 1.1 This note includes an Errata section, which explains corrections that should be made to my proof of evidence. It also includes a Drawings Explanation section in which I explain the source of the drawings that are included in my proof of evidence that are not simply reproduced directly from the Appellant's drawings.

2 Errata

- 2.1 The following corrections are made to the figure numbering:

- p. 28, delete figure '3', insert figure '12'
- p. 29, delete figure '4', insert figure '13'
- p. 35, delete figure '5', insert figure '21'
- p. 36, delete figure '6', insert figure '22'
- p. 37, delete figure '7', insert figure '23'
- p. 67, delete figure '8', insert figure '48'
- p. 91, delete figure '9', insert figure '61'

- 2.2 **P. 30 Figure 15** – the orange shading in the key is described as 'public realm'. The correct description is 'empty space'.

- 2.3 **P. 62 Figure 44 and p. 107 Figure 69** – Both show an overall building height of 102m. The correct figure is 108m as stated in paragraph 4.4.1.

- 2.4 **P. 87 Paragraph 5.3.5.1** – The 'width to height' ratios described in this paragraph are in fact height to width ratios. For example, 5:1 means that the building height is 5 times its width rather than the other way around.

3 Drawings Explanation

- 3.1 In this section, I provide a list of the drawings in my proof of evidence, by reference to figure numbers, that I have created, and I provide an explanation as to the process that I undertook to put together those drawings.

- 3.2 As a general point, for those drawings that I produced that are based on drawings submitted by the Appellant, where the dimensions were not explicitly written on the drawings I used the bar scale from hard copies to identify dimensions.

3.3 2018 PROPOSAL

- 3.3.1 **P. 22 Figure 4** – This was based on the Appellant's Drawing 'Location Plan – Existing' (14032_X_(00)_P001). To create figure 4, I opened the Drawing in Photoshop (a raster graphics editing software) and added fills and text to describe the four sub-areas that I have identified.

- 3.3.2 **P. 30 Figure 15** – This was based on the Appellant’s Drawing ‘Location Plan – Existing’ (14032_X_(00)_P001). To create figure 15, I opened the Drawing in Vector Works (a 2D and 3D drawing software) and scaled it using the scale bar. Next, I traced and added fills to the areas of public realm and Tower footprint in different colours to compare the two. The areas were calculated using the ‘object info’ provided by Vector Works and annotated in Adobe InDesign (a layout and page design software).
- 3.3.3 **P. 35 Figure 21 (labelled as fig 5 – see errata)** – To create figure 21, I took a screenshot from Google Earth and opened it in Adobe Illustrator (a vector graphics editing software). Next, I added fills, outlined the Appeal site, and annotated buildings and relevant dimensions to describe the relationship between the proposed Tower and the south side of St Thomas St. The dimensions were measured using the scale bar provided in the Appellant’s Drawing ‘Location Plan – Proposed’ (14032_X_(00)_P002).
- 3.3.4 **P. 37 Figure 23 (labelled as fig 7 – see errata)** – This was based on the Appellant’s Drawing ‘East Elevation Proposed’ (14032_X_(00)_P203). To create figure 23, I opened the Drawing in Vector Works and scaled it using the scale bar. Next, I traced relevant parts of the drawing and added fills to distinguish between existing and proposed. Relevant dimensions and building and street names were added in Vector Works to describe the relationship between the proposed Tower and the South side of St Thomas St.
- 3.3.5 **P. 47 Figure 32** – This was based on the ES Part 3 TVIBHA Part 16 View 50 and the Appellant’s Drawings ‘North Elevation Proposed’ (14032_X_(00)_P201) and ‘East Elevation Proposed’ (14032_X_(00)_P203). To create figure 32, I opened the View and the Appellant’s Drawings in Adobe Photoshop. Next, I adjusted the Appellant’s Drawings to align with the TVIBHA view to show the full height of the Tower. This was then opened in Adobe Illustrator where I outlined the Tower’s shape.
- 3.3.6 **P. 48 Figure 33** – This was based on the Appellant’s Drawings ‘Tower TN03 GA Plans Level G’ (14032_X_(00)_P120) and ‘Tower TN03 Plans Level 03 (14032_X_(00)_P123). To create figure 33, I opened the Drawings in Vector Works and scaled them using the scale bar. Next, I traced and added fills to the areas of public realm and ground floor Tower footprint in different colours to compare the two. The area of the Tower’s third floor was also drawn to describe the general footprint of upper floors. The areas were calculated using the ‘object info’ provided by Vector Works and annotated in Adobe InDesign.
- 3.3.7 **P. 56 Figure 39** – This was based on the Appellant’s Drawing ‘East Elevation Proposed’ (14032_X_(00)_P203). To create figure 39, I opened the Drawing in Vector Works and scaled it using the scale bar. Next, I traced relevant parts of the Drawing and added fills to distinguish between existing and proposed. Relevant dimensions were added in Vector Works to describe the space between the proposed Tower and the existing Georgian terrace.
- 3.3.8 **P. 59 Figure 42** – This was based on the Appellant’s Drawings ‘Location Plan – Proposed’ (14032_X_(00)_P002), ‘Tower TN03 GA Plans Level G’ (14032_X_(00)_P120) and ‘Tower TN03 GA Plans Level 04’ (14032_X_(00)_P124). To create figure 42, I opened the Drawings in Vector Works and scaled them using the scale bar. Next, I took a screenshot of the local area from Google Maps and imported it into the Vector Works file. The screenshot was scaled

according to the 'Location Plan – Proposed' Drawing. I then traced and added fills to the areas of relevant local open spaces and the proposed covered and uncovered public realm in different colours for comparison. The areas were calculated using the 'object info' provided by Vector Works and annotated in Vector Works.

- 3.3.9 **P. 82 Figure 56** – To create figure 56, I took a screenshot from VU-City and opened it in Vector Works. Next, I traced relevant parts of the screenshot and added fills to distinguish between existing and proposed.
- 3.3.10 **P. 91 Figure 61 (labelled as fig 9 – see errata)** – This was based on the Appellant's Drawings 'Tower TN03 GA Plans Level G' to 'Level 36' (14032_X_(00)_P120 to 14032_X_(00)_P156). To create figure 61, I opened the Drawings in Vector Works and scaled them using the scale bar. I traced each plan and then imported the drawing into SketchUp (a 3D modelling software). Here, I extruded the plans based on the Appellant's Drawing 'East Elevation Proposed' (14032_X_(00)_P203) to create a 3D model of the proposal. This process was repeated using the Appellant's Drawing 'Location Plan – Proposed (14032_X_(00)_P002) and measurements from VU-City to create a 3D model of the context. Finally, I exported a 2D graphic of the model and added fills in Vector Works to distinguish between existing and proposed. Annotations were added in Adobe Illustrator.

3.4 2021 PROPOSAL

- 3.4.1 **P. 36 Figure 22 (labelled as fig 6 – see errata)** – To create figure 22, I took a screenshot from Google Earth and opened it in Adobe Illustrator (a vector graphics editing software). Next, I added fills, outlined the Appeal site, and annotated buildings and relevant dimensions to describe the relationship between the proposed Tower and the south side of St Thomas St. The dimensions were measured using the scale bar provided in the Appellant's Drawing 'Location Plan – Proposed' (20065_X_(00)_P002).
- 3.4.2 **P. 62 Figure 44** – This was based on the Appellant's Drawings 'GA Plans Level 00 Ground' to 'Level 25 Upper Plant' (20065_X_(00)_P120 to 20065_X_(00)_P145). To create figure 44, I opened the Drawings in Vector Works and scaled them using the scale bar. Next, I drew a section through the Tower and the existing Georgian terrace and added fills to distinguish between existing and proposed. Relevant dimensions were then annotated to describe the space between the proposed Tower and the existing Georgian terrace.
- 3.4.3 **P. 63 Figure 45** – To create figure 45, I took a screenshot from VU-City and opened it in Vector Works. Next, I traced relevant parts of the screenshot and added fills to distinguish between existing and proposed.
- 3.4.4 **P. 64 Figure 46** – This was based on the Appellant's Drawing 'North Elevation Proposed' (20065_X_(00)_P201). To create figure 46, I opened the Drawing in Adobe Photoshop and added fills and text to describe the relationship between existing and proposed.
- 3.4.5 **P. 65 Figure 47** – This was based on the Appellant's Drawings 'GA Plans Level 00 Ground' (20065_X_(00)_P120) and 'GA Plans Level 03' (20065_X_(00)_P123). To create figure 47, I opened the Drawings in Vector Works and scaled them using the scale bar. Next, I traced and added fills to the proposed public realm, ground floor Tower footprint, and third floor

Tower footprint to show the area of covered public realm. The areas were calculated using the 'object info' provided by Vector Works and annotated in Adobe InDesign.

- 3.4.6 **P. 107 Figure 69** – This was based on the Appellant's Drawings 'GA Plans Level 00 Ground' to 'Level 25 Upper Plant' (20065_X_(00)_P120 to 20065_X_(00)_P145). To create figure 69, I opened the Drawings in Vector Works and scaled them using the scale bar. I traced each plan and then imported the drawing into SketchUp. Next, I extruded the plans based on the Appellant's Drawing 'East Elevation Proposed' (20065_X_(00)_P203) to create a 3D model of proposal. This process was repeated using the Appellant's Drawing 'Location Plan – Proposed' (20065_X_(00)_P002) and measurements from VU-City to create a 3D model of the context. I then exported a 2D graphic of the model and added fills in Vector Works to distinguish between existing and proposed. Finally, I imported an image of the Flat Iron into the Vector Works file and scaled using known dimensions which were then annotated.
- 3.4.7 **P. 114 Figure 73** – This was based on the Appellant's visualisation and Drawing 'North Elevation Proposed (20065_X_(00)_P201)'. To create figure 73, I opened the visualisation and Drawing in Adobe Photoshop. Next, I adjusted the Drawing to align with the visualisation to show the full height of the Tower.
- 3.4.8 **P. 114 Figure 74** – To create figure 74, I took a screenshot from VU-City and opened it in Vector Works. Next, I traced relevant parts of the screenshot and added fills to distinguish between existing and proposed.
- 3.4.9 **P. 118 Figure 76** – This was created using the same SketchUp model as used for Figure 69. I exported a 2D graphic of the model and added fills in Vector Works to distinguish between existing and proposed. Annotations were added in Adobe Illustrator.

3.5 BOTH PROPOSALS

- 3.5.1 **P. 105 Figure 66** – This was based on the Appellant's Drawings 'North Elevation Proposed' 2018 (14032_X_(00)_P201) and 2021 (20065_X_(00)_P201). To create figure 66, I opened the Drawings in Adobe Photoshop and added fills and text to describe the relationship between the 2018 and 2021 proposals.