

**Simon Allford's Response to the Statement of Stephen John Platts filed on behalf of the London Borough of Southwark**

**18 July 2022**

All paragraph references relate to the Statement of Mr Platts. Where I do not respond to matters raised by Mr Platts this should not be taken as agreement with his statement.

**Paragraph 6:**

1. It is incorrectly stated that the Design and Access Statements (DAS) do not include reference to the consultation process undertaken with the Council and key stakeholders. The DAS include statements as to the periods when consultation occurred, demonstrated via a design timeline that multiple iterations of the tower forms have been discussed / considered, and noted throughout the document where consultation has informed the design of the scheme. My Proof of Evidence goes into greater detail as to the number and nature of those meetings, documenting the evolution of the design in close collaboration with the Council. I would contend that these are a full and accurate summary of the discussions – and no evidence has been presented to the contrary (i.e. alternative contemporary record of events).

**Paragraph 7:**

2. I agree with Mr Platts' summary of the 2018 Scheme, that he attended some, but not all the meetings described as 'leadership', most if not all meetings described as 'regeneration' and none of the 'pre application' meetings. I would note at the 'leadership' meetings Steve Platts was for the most part an observer, neither advocating for, nor raising any points against, the scheme generally.

**Paragraph 8:**

3. I also agree with Steve Platts' summary of the 2021 Scheme, in that he did not attend any of the meetings I have described in section 8 of my Proof of Evidence. The meeting listed by Steve Platts are not meetings that I attended and they are not summarised in my proof. I am advised by the Appellant that meetings also took place on the following dates between the Council and the Appellant's team in respect of the Appeal Schemes which were attended by Mr Platts:
  - 6 August 2019;
  - 17 April 2020;
  - 18 June 2020;
  - 24 September 2020;
  - 8 January 2021; and
  - 25 May 2021.
4. I am instructed that at a number of these meetings positive feedback was received including on matters such as servicing approach, roof gardens, the galleried route through the site and

the revised architecture; and the Appellant was told that certain individuals at the Council were excited about the revised proposal and were reporting back positively internally.

**Paragraph 9:**

5. The point stated as to the lack of Steve Platts' notes of these meetings is not disputed, although without notes and diary records, little weight should be attached to Mr Platts' recollections.

**Paragraph 10**

6. The Council leader / members listed by Steve Platts were present at respective meetings, over the extended duration in which the redevelopment of this site has been discussed with the Council, noting that the attendance has changed over time.

**Paragraph 11:**

7. The summary of attendance at 'leadership' meetings by Simon Bevan is accurate, and he was generally present at all such meetings. Michael Tsoukaris was generally not present and was in attendance by exception.

*2018 Scheme*

**Paragraph 12:**

8. Schemes as tall as 212m were presented to the 'leadership' team. From the outset it was made clear that a proposal would only be brought forward that would deliver on identified (and appreciated) public benefits, on the basis of also delivering a tall building. It was put to Simon Bevan at an early meeting, by the leader of the Council – "Simon [Bevan] it's not a no?" to which Simon Bevan's response was "it's not a no, but it will be very challenging".
9. Many workshops at officer, and leadership team level were conducted to flesh out those challenges and evolve the design in response to those discussions. The consistent position from Simon Bevan was that he felt that a tall building should be seen as the 'foot hills' of the Shard, however the exact height could not be identified / stated, and as such many alternative design proposals were brought forward and were assessed against a draft TVBHIA views set. In Simon Bevan's letter it was advised that the difficulty the Council had with the height of the 2018 scheme related to the top third of the building, i.e., levels above the HUB level (i.e level 23 and above), and it was here that the Council considered there was significant harm. It should be noted that this height would be AOD +95.56m.
10. Once the broad principals of the height and design of the 2018 scheme had been concluded through workshops with the Council, (leaders and officers), it was asked of Simon Bevan the next steps to progress the scheme to planning. The simple point raised was to draw up an extensive consultation plan, engage and then respond to that feedback – i.e. the normal planning process.

**Paragraph 13:**

11. The planning judgement is in the appropriate balance of perceived heritage harms vs. heritage and public benefits – not on harms alone. In all the discussions with Simon Bevan it was acknowledged that there would be some impacts and that these would be appropriately assessed – the scope of these studies to be agreed with the Council. It was also clarified during earlier iterations of the scheme that the application of the (at the time) emerging

policy regarding a location of landmark significance should be considered in the design, and this included the removal of a lower / larger podium levels, such that the 2018 scheme could be read as a standalone building.

12. It should be noted that the extent of the site, its location and the designation of the conservation area have not changed since the first discussions.

**Paragraph 14:**

13. It was not suggested that the application would not follow due process (as it has), simply that through extensive dialogue a scheme had been developed for the Site which met with personal approval.
14. I am instructed that at the leadership meetings, the attendees were a mixture of the Leader, Cabinet Member, Chief Executive, Director of Planning and Director of Regeneration. The purpose of the meeting was to discuss at the highest level the Council's collective view. During the meeting, Mr John (then Leader of Southwark at the time) would seek views from the cabinet member as well as senior officers. Mr John would then sum up, which the Appellant took to be the Council's collective position.

**Paragraph 15:**

15. Mr Platts' personal views on the architecture was noted, (not a fan of steel and glass) but was in a stated context (by Mr Platts) that both the design officers and the leadership team generally were supportive of the design.

**Paragraph 16:**

16. I was not suggesting anything other than the application would follow due process. As noted Mr Platts does not deny that the statements included in my proof were accurate.
17. The Appellant was pleased that the regeneration team welcomed the public benefits of the scheme, to be weighed against any harm to heritage assets.
18. The Appellant and its wider professional team have the highest regard for the Southwark team and has welcomed the extensive consultation and interaction prior and post submission of the 2018 and 2021 schemes. I understand that it was with regret that GPE took the decision to lodge the appeals for non-determination.

*2021 Scheme*

**Paragraph 18:**

19. When the Council were approached regarding the option of developing an alternative proposal (the 2021 scheme), it was clarified that this solution would follow a similar brief to the 2018 scheme, i.e. the Appellant would retain (and where possible improve upon) the public benefits offer, but the overall quantum of development would be similar, inclusive of new policy requirements for 10% affordable workspace. All discussions on massing form / appearance were underpinned by those principals. As noted Mr Platts did not attend those meetings with design / case officers.

**Paragraph 19:**

20. This is a simplification and misrepresentation of the feedback provided. Early discussions with officers on the design evolution of the 2021 scheme were positive to the extent that it moved in to matters of detailed design on the roof terrace as an example.