

**THE TOWN AND COUNTRY PLANNING ACT  
1990 (AS AMENDED)**

**INQUIRY INTO AN APPEAL IN RESPECT OF APPLICATIONS FOR PLANNING AND LISTED  
BUILDING CONSENT FOR THE PROPOSED REDEVELOPMENT OF NEW CITY COURT, 4-26 ST  
THOMAS STREET, LONDON SE1 9RS**

**Appeal references:  
APP/A5840/W/22/3290473;  
and  
APP/A5840/Y/22/3290477**

**STATEMENT OF COMMON GROUND – SERVICING**

## **1 RELEVANT TRANSPORT POLICY**

1.1.1 This section provides a summary of the relevant transport policies in relation to the servicing of the site and the car parking provision. The main policy and guidance documents in this regard are:

- The London Plan (2021);
- Southwark Plan (2022).

### **1.2 Regional Planning Policy**

#### ***The London Plan (2021)***

- 1.2.1 The London Plan 2021 was adopted in March 2021 and aims to make effective use of land reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes to ensure impacts on London's transport network are mitigated.
- 1.2.2 Policy T1 'Strategic approach to transport' states that all development should make effective use of land, reflecting connectivity and accessibility, and ensuring any impacts on London's transport networks are mitigated
- 1.2.3 Policy T2 '*Healthy Streets*' states that development proposals should demonstrate how they will deliver improvement to support the 10 Healthy Streets indicators, reduce dominance of vehicles on London's streets whether stationary or moving and be permeable by foot and cycle to connect to local walking, cycling and public transport networks.
- 1.2.4 Policy T4 '*Assessing and mitigating transport impacts*' states that Transport Assessments should ensure that impacts on capacity of the transport network are fully assessed and incorporate the Healthy Streets Approach. Mitigation in the form of direct provision of financial payments should be made for public transport, walking and cycling infrastructure, where appropriate. The cumulative effects of developments should be taken into account. Development should not increase road danger.
- 1.2.5 Policy T6 '*Car Parking*' states that car parking should be restricted in-line with levels of existing and future public transport accessibility and connectivity. Car parking should not exceed the maximum parking standards. T6(J) states that where non-residential car parking is proposed, a parking design and management plan should be submitted that draws on TfL guidance.

- 1.2.6 All non-residential uses should provide access to at least one on or off-street disabled person parking bay.
- 1.2.7 Policy T7 '*Deliveries, Servicing and Construction*' states that development proposals should facilitate safe, clean and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Developments should be designed and managed so deliveries can be received outside of peak hours.

### **1.3 Local Planning Policy**

#### ***Southwark Plan (2022)***

- 1.3.1 The Southwark Plan (2022) sets out the new borough-wide planning and regeneration strategy up to 2036. The draft Southwark Plan was submitted to the Secretary of State on 16th January 2020 and underwent Examination in Public from February 2021 to April 2021. The Plan was adopted at Council Assembly on 23 February 2022. This document sets out the aspirations of the borough's distinctive neighbourhoods and contains sites allocated for development across the borough with requirements on how they should be developed and planning policies for making decisions on planning applications and development proposals.
- 1.3.2 Whilst the application was submitted in relation to the relevant policy at that time the proposals are assessed against this current policy below.
- 1.3.3 Policy P50 requires a new development to:
- Minimise the demand for private car journeys; and
  - Demonstrate that the road network has sufficient capacity to support any increase in the number of the journeys by the users of the development, taking into account the cumulative impact of adjoining or nearby development; and
  - Ensure safe and efficient operation of the local road network, the bus network and the Transport for London Road Network; and
  - Ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys; and
  - Incorporate delivery and servicing within major development sites and not on the public highway; and

- Demonstrate how the construction phase of the development that needs to use the public highway can be safely accomplished and how vehicular movements will be minimised and strictly controlled to reduce danger to vulnerable road users

1.3.4 Policies P54 and P55 require minimal car parking to be provided, to only meet the needs of Blue Badge holders. These bays should have electric vehicle charging points.

## 2 2018 SCHEME – PROPOSED SCHEME

### 2.1 Introduction

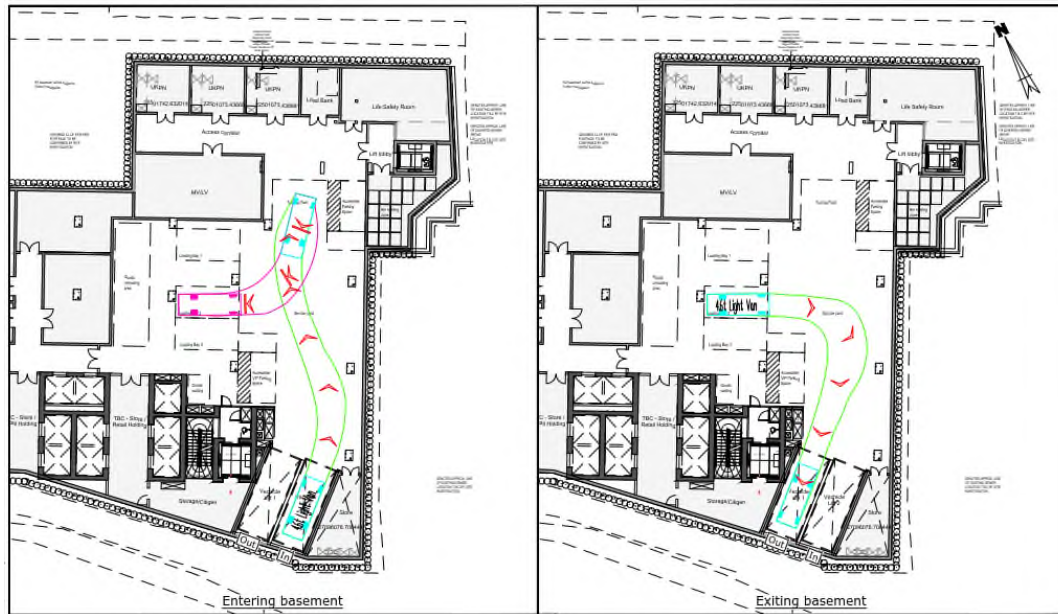
2.1.1 This section provides details of the proposed development from a transport perspective including the proposed access, parking, and servicing arrangements.

### 2.2 Vehicular access

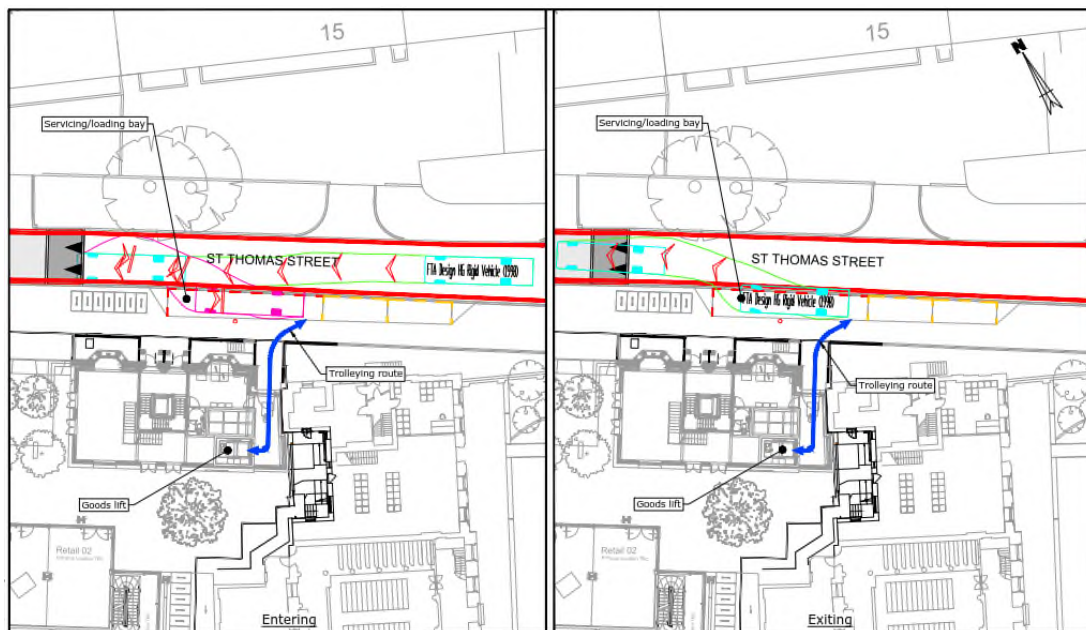
2.2.1 Light Goods Vehicles (LGVs) would access (and exit) the basement service area via Borough High Street, White Hart Yard and then via vehicle lifts directly accessed from Kings Head Yard. Two vehicle lifts would be provided, one for entering and one for exiting vehicles. The lifts would be positioned at the widest part of the yard to enable vehicles to undertake all the required manoeuvres when entering/exiting the site. Sufficient visibility would be provided between exiting vehicles and vehicles and pedestrians at the lift entrance/exit on King's Head Yard. These lifts would also be used to access the two accessible parking bays located in the basement which will be available to Blue Badge Holders. The swept path of an LGV accessing the lifts is indicated below.



2.2.2 Three loading bays are proposed within the development's service area as detailed in the Transport Assessment and indicated below.



- 2.2.3 A dedicated goods lift would be provided within the refurbished Keats House to allow for transfer of goods from the loading bay to the basement, with items trolleyed across the footway. The swept path of a 10m rigid lorry servicing the site is indicated below.



- 2.2.4 Heavy Goods Vehicles (HGVs), including refuse collection vehicles, would be able to access a ground level delivery and waste management area adjacent to Keats House from a relocated on-street loading bay on St Thomas Street. Vehicles will approach along St Thomas Street from the east, although access from either direction has been assessed to cater for any future variations in vehicle access routes.

- 2.2.5 In the event that St Thomas Street has double red line restrictions (no stopping at any time) once the temporary footway-widening scheme is made permanent, all motorcycles and couriers would also need to use the loading bay.

## **2.3 Car parking**

- 2.3.1 The development is proposed to be car-free with the exception of two accessible parking bays within the service area for the use of blue badge holders. The parking would be accessible via White Hart Yard and use of the vehicle lifts.

## **2.4 Alterations to public highway**

- 2.4.1 At the time of the 2018 submission TfL had recently consulted on options for St Thomas Street following the London Bridge Station/Thameslink remodelling works. Following submission, feedback from stakeholders resulted in an option drawn up with one-way eastbound traffic flow and contraflow westbound cycle track, and a cost estimate was produced, however work on this was halted during the pandemic to focus on the London Streetspace Plan (LSP). These plans were only draft and were never released publicly, though they have been shared informally with developers of the St Thomas Street cluster of developments to inform the design of the new building frontages.
- 2.4.2 The LSP delivered temporary widening to the footways of both St Thomas Street (southern footway) and Borough High Street. TfL is planning to make these changes permanent following a public consultation which is planned for this summer.

## **2.5 Waste storage and collection arrangement**

- 2.5.1 Waste would be stored in 1,280l Eurobins at basement level with separate containers provided for the various waste streams (general/recyclables). The on-site management would transport the relevant waste stream to a ground level storage room via a bin lift on collection day. The storage room would be located at ground level fronting St Thomas Street where an on-street loading bay is located allowing a refuse vehicle to stop within 10m of the waste storage room, as required by LBS.
- 2.5.2 Waste would be collected by private contractors daily for each of the waste streams based on a 5 day week. A planning obligation in the s106 Agreement would require that waste collection is undertaken outside the morning, lunchtime and evening peaks. It is envisaged that waste would be collected early morning.
- 2.5.3 On street waste collection by a private contractor is as per the existing situation.

## **2.6 Servicing**

- 2.6.1 The proposed arrangement combines servicing via the development's basement servicing yard and from the public highway on St Thomas Street. The service yard is proposed at basement level B2 accessed via vehicle lifts from White Hart Yard. Two vehicle lifts will be provided, one for entering and one for exiting vehicles.
- 2.6.2 Surveys have identified that the existing New City Court building generates 9x 2-way servicing trips on a daily basis: 5x LGVs, 2x HGVs and 2x Motorcycle couriers. These deliveries are made via the loading bay or pay and display bays on St Thomas Street. Note that these arrangements have changed since the footway widening on St Thomas Street. The original delivery, servicing and waste management plan submitted for the 2018 Scheme identified that the proposal would generate between 126x and 162x 2-way daily servicing trips, split between the basement and St Thomas Street (see figures 2.3 and 2.4).
- 2.6.3 Following comments received from the LBS and TfL all deliveries are subject to a proposed servicing consolidation strategy. Building on the initial research into consolidation by TPP, the evolving strategy has been developed in consultation with a specialist logistics company, Davies & Robson (D&R) who have developed bespoke consolidation strategies for other sites, including Guy's and St Thomas's Hospital adjacent to New City Court. The consolidation strategy now being proposed for New City Court would allow for a significant reduction in vehicle numbers.
- 2.6.4 A key aspect of the servicing strategy, as detailed in the revised Delivery and Servicing and Waste Management Plan, is utilisation of an off-site consolidation centre where individual deliveries that are identified for consolidation will be stored, consolidated and then transported to the site. The strategy has been based on D&R's extensive experience and is underpinned by empirical data sourced through a servicing survey at an existing GPE office at 200 Gray's Inn Road.

### ***Consolidation potential based on D&R assessment***

- 2.6.5 The D&R study has provided an up-to-date baseline for the servicing assessment. This utilises empirical and up to date data, robustly sought and subsequently comprehensively scrutinised and adjusted by TPP.
- 2.6.6 Whilst this does provide an updated baseline against which to measure any potential reductions in servicing loads, the principal purpose of the D&R study is to use their logistics expertise, and real world data, to identify the consolidation potential for New City Court, and the associated reduction in vehicle numbers. This



study sets out in detail how deliveries to the office development at New City Court can be consolidated. The recommendations set out in the D&R study are evidenced-based and therefore represent a tangible and deliverable strategy.

2.6.7 As a starting point to its study, D&R undertook a survey at 200 Gray's Inn Road categorising deliveries into different types to understand their suitability for consolidation.

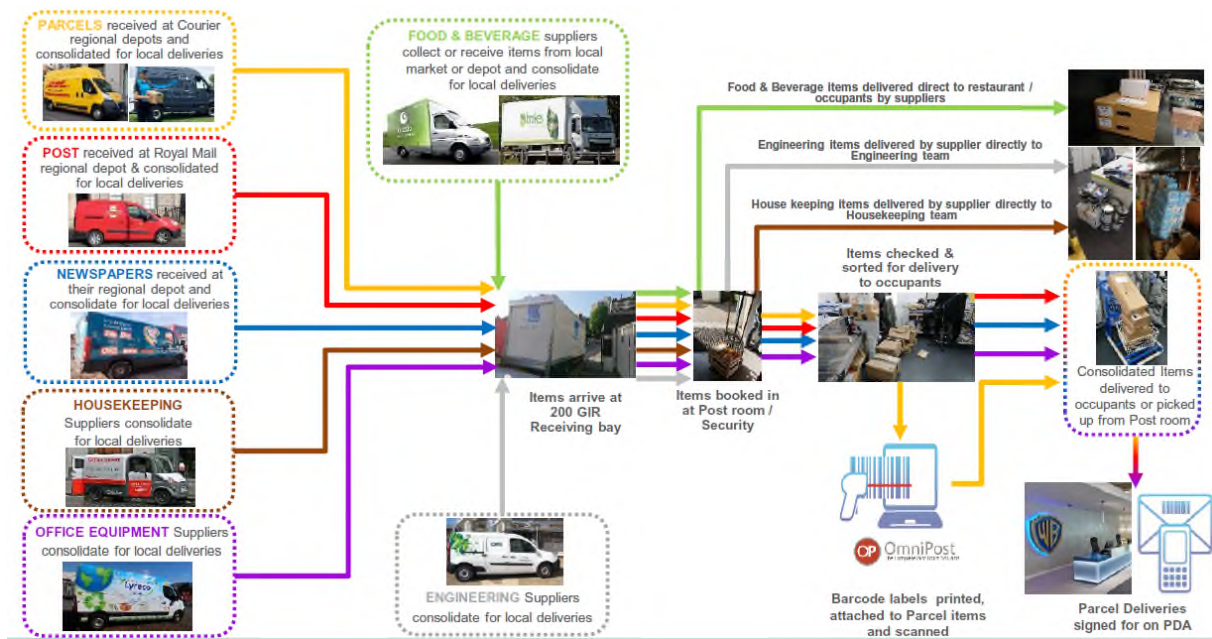
2.6.8 Table 2.1 summarises the various groups and whether they are considered suitable for consolidation.

**Table 2.1 – Delivery types and consolidation suitability**

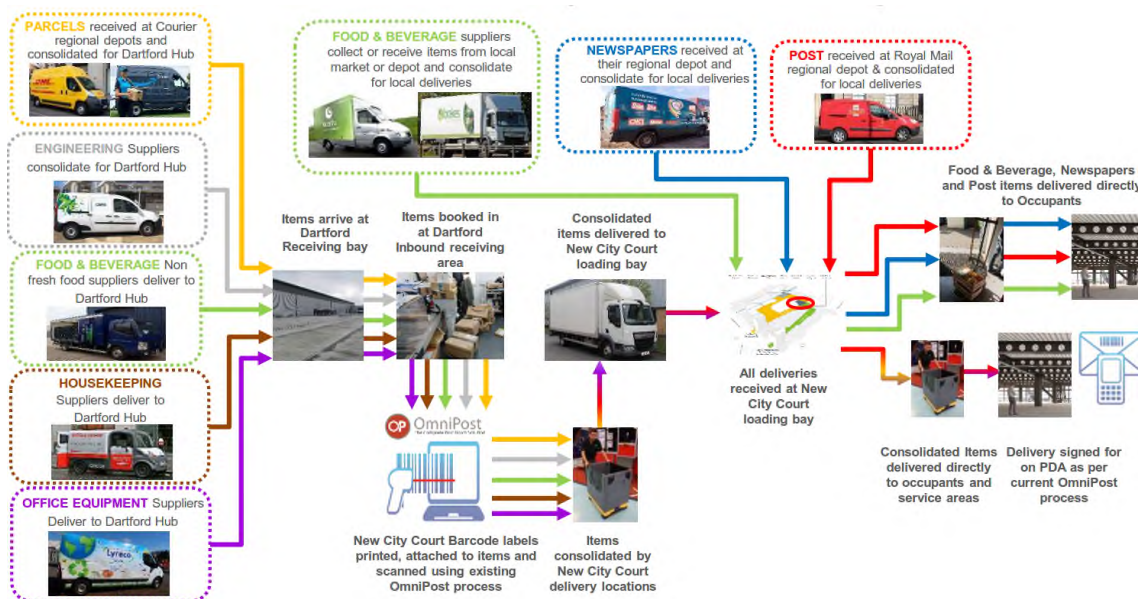
Item	Suitable?	Comment
1. Parcels and couriers	Yes	Including personal deliveries
2. Post	No	Urgent deliveries
3. Food and beverage	Limited	Fresh food not consolidated but potential for water towers and ambient vending machines
4. Engineering deliveries for building repairs and maintenance	Yes	Typically non-urgent
5. Housekeeping. Cleaning and washroom items	Yes	Not time critical
6. Newspapers and magazines	No	Time/Date specific
7. Office equipment, stationary.	Yes	Not time critical

2.6.9 The assessment demonstrates many delivery groups are suitable for consolidation; this includes parcels and courier deliveries which according to D&R make up over 50% of all deliveries. The flow diagrams below show the process for how the consolidation would work for different elements, with Figure 2-4 showing the existing delivery process and Figure 2-5 showing the proposed consolidated approach.

**Figure 2-1 Existing delivery process**

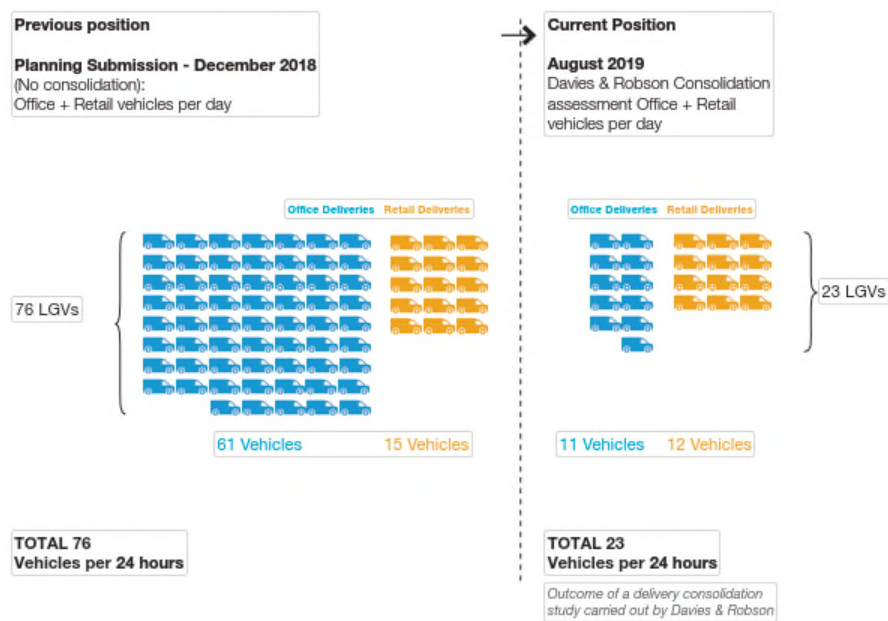


**Figure 2-2 Proposed consolidation approach**

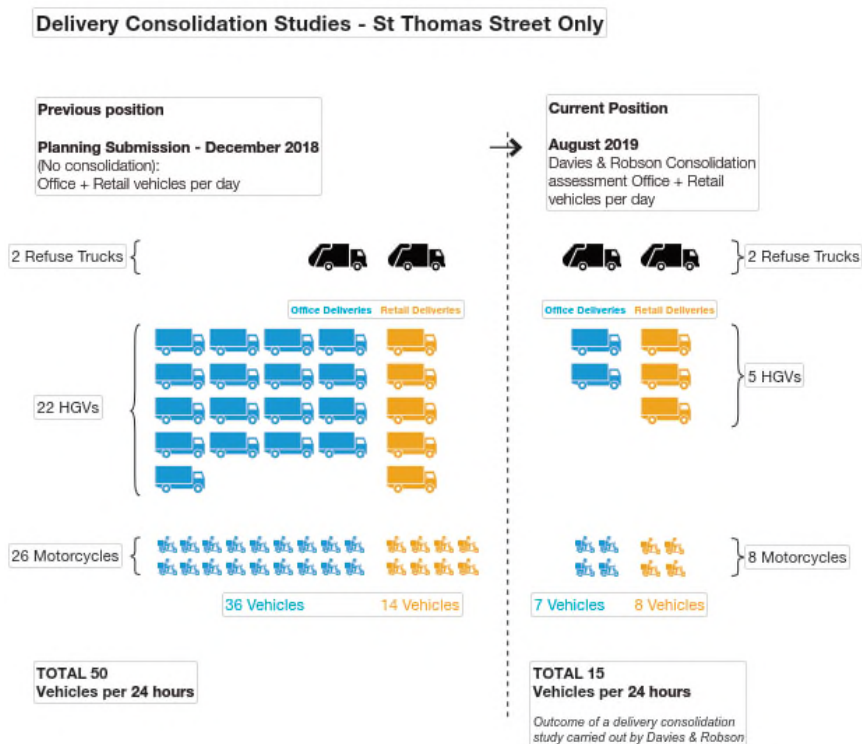


2.6.10 Prior to consolidation 126 delivery vehicles were expected each day (rising to 162 delivery vehicles each day in the sensitivity test). The expected number of consolidated deliveries is 38 a day. This results in an anticipated reduction of 53 vehicles using the Borough High Street and White Hart Yard route to access the basement servicing yard compared to a non-consolidated option (23 vehicles instead of 76 vehicles). The number of vehicles servicing from St Thomas Street is anticipated to reduce from 50 vehicles to 15 vehicles with a maximum of seven HGVs, including refuse vehicles. These are summarised in the figures below.

**Figure 2.3 Consolidation study for White Hart Yard**



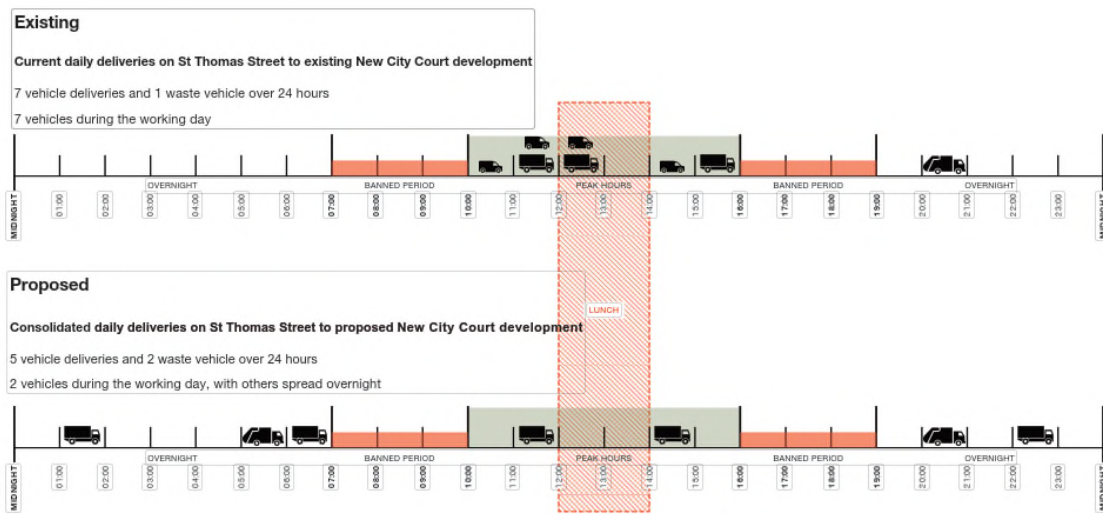
**Figure 2.4 Consolidation study for St Thomas Street**



2.6.11 As indicated below, no deliveries would take place in the AM, PM or lunchtime peak hours in order to reduce conflict with pedestrians. It is acknowledged that the loading bay cannot be dedicated to a single user and will be available to other users under the waiting and loading restrictions. Therefore there may be times

when the loading bay is not accessible and vehicles will have to find somewhere else to lawfully wait until the loading bay is free.

**Figure 2.5 Daily deliveries on St Thomas Street (Excluding motorbikes)**



### **3 AREAS OF AGREEMENT**

#### **3.1 Policy**

##### ***London Plan 2021***

- 3.1.1 The servicing proposals accord with the following relevant London Plan policies:
- 3.1.2 T6 restricting parking - Subject to a parking management strategy being secured by condition, the proposals would comply as only two disabled parking spaces are provided in the service area.
- 3.1.3 T7 Deliveries, servicing and construction (Part H) – Subject to the relevant s106 obligation being agreed, and notwithstanding the lack of control over the availability of the St Thomas Street loading bay, deliveries and servicing activity would be managed such that it can be accommodated outside of peak hours

##### ***Southwark Plan 2022***

- 3.1.4 The servicing proposals accord with the following relevant Southwark Plan 2022 policies:
- 3.1.5 P54 and P55 requiring minimal car parking to be provided, to only meet the needs of Blue Badge holders, and for such bays to have electric vehicle charging points.

## **3.2 Design**

### ***Areas of the design relating to servicing that are in agreement:***

- 3.2.1 Smaller vehicles will predominantly service via White Hart Yard whilst larger vehicles will use an on-street loading bay on St Thomas Street, subject to a cap in daily vehicle movement numbers for both (secured in the s106 Agreement and future DSP).
- 3.2.2 The basement service area design is satisfactory.
- 3.2.1 Following consolidation, the expected number of deliveries to the development is 38 vehicles a day, with a maximum of seven HGVs, including refuse vehicles and these numbers will be reflected in the s106 Agreement.
- 3.2.2 No deliveries will take place in the AM, PM or lunchtime peak hours in order to reduce conflict with pedestrians and cyclists. This will be secured in the s106 Agreement.
- 3.2.3 The development is proposed to be car-free except for two accessible parking bays within the service area for the use of blue badge holders.

## **4 AREAS OF DISAGREEMENT**

### **4.1 Policy**

#### ***London Plan 2021***

- 4.1.1 Whether the proposed servicing arrangements are broadly compliant with policy T2 and therefore deliver improvements that support the ten Healthy Streets Indicators, in particular 'people feel relaxed', 'pedestrians from all walks of life', 'people feel safe' and 'not too noisy'.
- 4.1.2 Whether the proposed servicing arrangements unacceptably increases road danger contrary to policy T4 (see paragraph 1.2.4) and Vision Zero accident reduction policy (no killed or seriously injured on London's road network by 2041).
- 4.1.3 If the proposed servicing arrangements are safe and efficient and whether some level of on-street servicing is acceptable, or if this conflicts with policy T7 (see paragraph 1.2.7).

#### ***Southwark Plan 2022***

- 4.1.4 P50 which requires the development to ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys; and incorporates delivery and servicing within major development sites and not on the public highway
- 4.1.5 There is disagreement as to whether it is acceptable for some deliveries (namely the HGVs) to take place on St Thomas Street and whether the increased intensity of servicing activity via White Hart Yard is appropriate.

### **4.2 Design**

- 4.2.1 Whether the loading bay on St Thomas Street is acceptable and if it would preclude any of TfL's current or past options for altering the configuration of St Thomas Street.
- 4.2.2 The acceptability of vehicles accessing the site via Borough High Street and White Hart Yard and the level of pedestrian conflict.
- 4.2.3 The ability of the scheme to provide an at grade on-site alternative servicing solution accessed from St Thomas Street.



## 5 2021 SCHEME - PROPOSED SCHEME

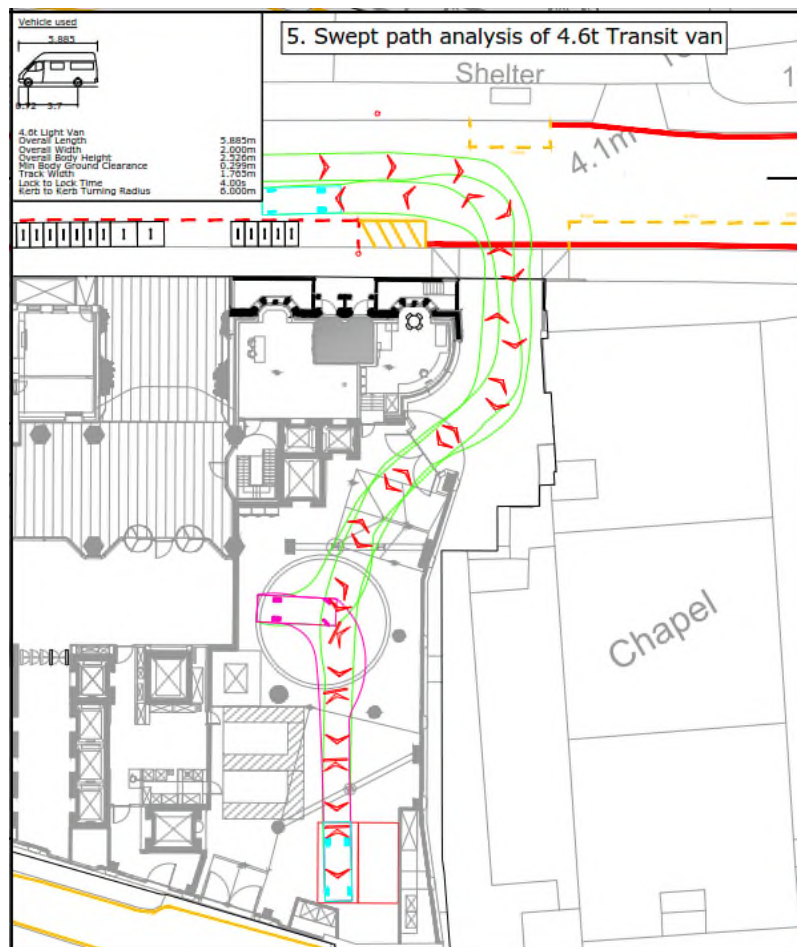
### 5.1 Introduction

5.1.1 This section provides details of the proposed development from a transport perspective including the proposed access, parking, and servicing arrangements for the 2021 Scheme.

### 5.2 Vehicular access

5.2.1 All cars and service vehicles would enter the ground level service area from St Thomas Street via a new vehicle route to the east of Keats House. Having passed through a secure gate the vehicles can service the development before exiting back onto St Thomas Street in a forward gear.

5.2.2 Whilst the swept path analysis below shows an LGV entering and exiting to the west, the scheme has been tracked to ensure that access is possible regardless of direction of approach.





- 5.2.3 Vehicle sizes would be managed in order to minimise the number of deliveries taking place from large HGVs. Notwithstanding this, a turntable would allow larger vehicles to turn around within the service area.

### **5.3 Car parking**

- 5.3.1 The development is proposed to be car-free with the exception of two accessible parking bays within the service area for the use of blue badge holders. The parking will be accessible via St Thomas Street.

### **5.4 Alterations to public highway**

- 5.4.1 In 2018 TfL consulted on options for St Thomas Street following the London Bridge Station/Thameslink remodelling works. Following submission, feedback from stakeholders resulted in an option drawn up with one-way eastbound traffic flow and contraflow westbound cycle track, and a cost estimate was produced, however work on this was halted during the pandemic to focus on the London Streetspace Plan (LSP). These plans were only draft and were never released publicly, though they have been shared informally with developers of the St Thomas Street cluster of developments to inform the design of the new building frontages.
- 5.4.2 TfL has also proposed an interim solution whereby the western end of the road remains two-way but with a 7.5 ton restriction i.e. taxis will be able to access from Borough High Street but delivery vehicles will not. Note this has been superseded by the footway widening scheme.
- 5.4.3 Due to the various highway options associated with St Thomas Street, it is unclear which, if any, option is most likely to be taken forward. In light of this the current scheme, with a simple vehicular access off St Thomas Street would not preclude any of the above options.
- 5.4.4 Whilst the scheme design therefore assumes a narrowing of the carriageway and a subsequent increase in footway adjacent to the site, if TfL prefer to switch the direction of vehicle flow on the road this can be accommodated.
- 5.4.5 Notwithstanding this the scheme could operate successfully without the one way operation if TfL decide not to progress with this idea.

### **5.5 Waste storage and collection arrangement**

- 5.5.1 With regard to refuse, the strategy is that waste would be stored in 1,280l Eurobins at basement level with separate containers provided for the various waste streams (general/recyclables). The arrangement would be for the on-site management to

transport the relevant waste stream to a ground level storage area via a bin lift on collection day. The temporary storage area is located at ground level within the service area allowing a refuse vehicle to stop within 10m of the bins, as required by LBS.

- 5.5.2 Waste would be collected by private contractors daily for each of the waste streams based on a 5 day week. A cardboard baler is also proposed given that paper is expected to make up the majority of the office recyclable waste. It is envisaged that waste would be collected early morning to avoid highway peak periods.

## **5.6 Servicing**

- 5.6.1 The proposed arrangement is for servicing to take place from the development's service yard away from the public highway.
- 5.6.2 Service vehicles will park in the service bays and the goods will be trollyed to the offices via the B1 level, except for the Georgian Terrace, where the goods will be transported at ground level.
- 5.6.3 Following comments received from LBS and TfL all deliveries are subject to a proposed servicing consolidation strategy. Building on the initial research into consolidation by TPP, the evolving strategy has been developed in consultation with a specialist logistics company, Davies & Robson (D&R) who have developed bespoke consolidation strategies for other sites, including Guy's and St Thomas's Hospital adjacent to New City Court. The consolidation strategy now being advanced for New City Court allows for a significant reduction in vehicle numbers.
- 5.6.4 A key aspect of the servicing strategy, as detailed in the Delivery and Servicing and Waste Management Plan, will be utilisation of an off-site consolidation centre where individual deliveries that are identified for consolidation will be stored, consolidated and then transported to the site. The strategy has been based on D&Rs extensive experience and is underpinned by empirical data sourced through a comprehensive servicing survey at a comparable existing GPE office at 200 Gray's Inn Road.

### ***Consolidation potential based on D&R assessment***

- 5.6.5 The D&R study has provided an up-to-date baseline for the servicing assessment. This utilises empirical and up to date data, robustly sought and subsequently comprehensively scrutinised and adjusted by TPP.

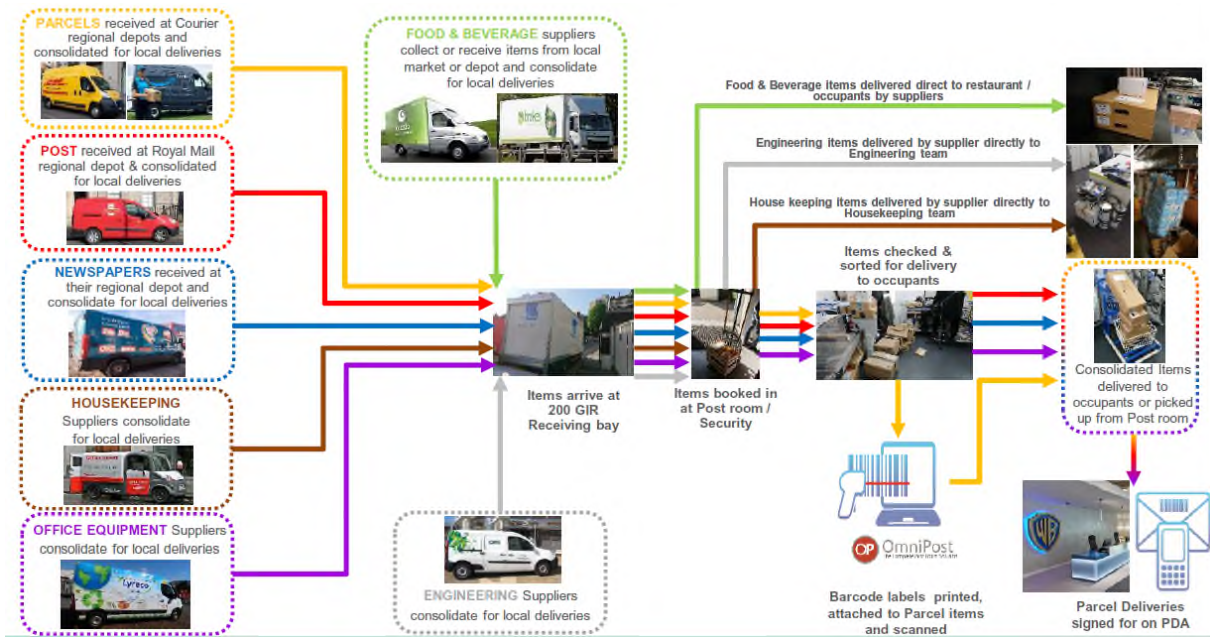
- 5.6.6 Whilst this does provide an updated baseline against which to measure any potential reductions in servicing loads, the principle purpose of the D&R study is to use their logistics expertise, and real world data, to identify the consolidation potential for New City Court, and the associated reduction in vehicle numbers. This study sets out in detail how deliveries to the office development at New City Court can be consolidated. The recommendations set out in the D&R study are evidenced-based and therefore represent a tangible and deliverable strategy.
- 5.6.7 As a starting point to its study, D&R undertook a comprehensive survey at 200 Gray's Inn Road categorising deliveries into different types to understand their suitability for consolidation.
- 5.6.8 Table 2.1 summarises the various groups and whether they are considered suitable for consolidation.

**Table 2.1 – Delivery types and consolidation suitability**

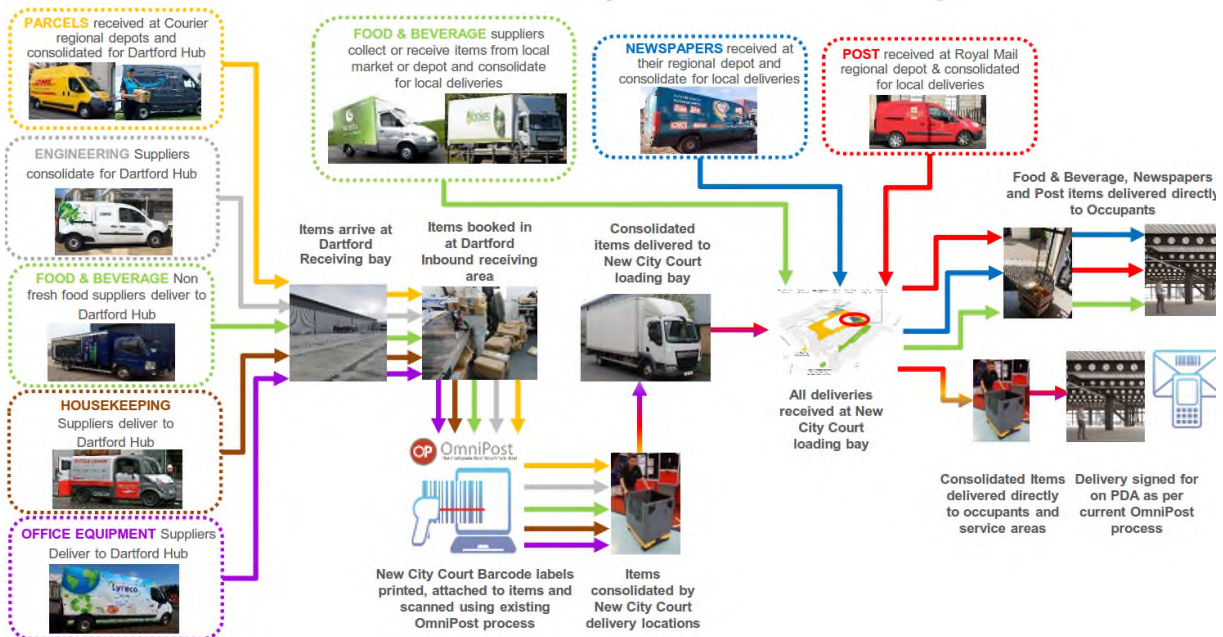
Item	Suitable?	Comment
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9. Post	No	Urgent deliveries
10. Food and beverage	Limited	Fresh food not consolidated but potential for water towers and ambient vending machines
11. Engineering deliveries for building repairs and maintenance	Yes	Typically non-urgent
12. Housekeeping. Cleaning and washroom items	Yes	Not time critical
13. Newspapers and magazines	No	Time/Date specific
14. Office equipment, stationary.	Yes	Not time critical

- 5.6.9 The assessment demonstrates many delivery groups are suitable for consolidation; this includes parcels and courier deliveries which according to D&R make up over 50% of all deliveries. The flow diagrams below show the process for how the consolidation would work for different elements, with Figure 2-4 showing the existing delivery process and Figure 2-5 showing the proposed consolidated approach.

**Figure 5-1 Existing delivery process**



**Figure 5-2 Proposed consolidation approach**



5.6.10 Prior to consolidation 126 delivery vehicles were expected. The expected number of consolidated deliveries is only 38 a day, with a maximum of seven HGVs, including refuse vehicles. No deliveries would take place in the AM, PM or lunchtime peak hours in order to reduce conflict with pedestrians.

## **6 2021 SCHEME - AREAS OF AGREEMENT**

### **6.1 Policy**

#### ***London Plan 2021***

- 6.1.1 The servicing proposals accord with the following relevant London Plan policies:
- 6.1.2 T2 which seeks to reduce dominance of vehicles on London's streets. This is achieved by consolidation and controlling vehicle times.
- 6.1.3 T4 which requires the impact on the transport network to be fully assessed, as it has been in the Transport Assessment and EIA.
- 6.1.4 T6 restricting parking. The proposals comply as only two disabled parking spaces are provided in the service area as per policy.
- 6.1.5 T7 G states that development proposals should facilitate safe, clean and efficient deliveries and servicing, made off-street, with on-street loading bays only used where this is not possible. T7 H states that developments should be designed and managed so deliveries can be received outside of peak hours. These requirements are met by use of the consolidated off street servicing arrangement and ban on peak hour deliveries.

#### ***Southwark Plan 2022***

- 6.1.6 The servicing proposals accord with the following relevant Southwark Plan 2022 policies:
- 6.1.7 P50 which requires the development to ensure safe and efficient delivery and servicing that minimises the number of motor vehicle journeys; and incorporates delivery and servicing within major development sites and not on the public highway.
- 6.1.8 P54 and P55 requiring minimal car parking to be provided, to only meet the needs of Blue Badge holders, and for such bays to have electric vehicle charging points.

#### ***Summary***

- 6.1.9 Subject to securing an appropriately worded s106 Agreement, the scheme complies with all relevant policies relating to servicing and car parking.

### **6.2 Design**

- 6.2.1 Areas of the design relating to servicing that are in agreement:

- 6.2.2 All cars and service vehicles would enter the ground level service area from St Thomas Street via a new vehicle route to the east of Keats House. Having passed through a secure gate the vehicles can service the development before exiting back onto St Thomas Street in a forward gear.
- 6.2.3 The development, with a simple vehicular access off St Thomas Street would not preclude any of TfL's current or past options for altering the configuration of St Thomas Street.
- 6.2.4 The service area design is satisfactory.
- 6.2.5 The waste collection arrangements are acceptable.
- 6.2.1 Following consolidation, the expected number of deliveries to the development is 38 vehicles a day, with a maximum of seven HGVs, including refuse vehicles.
- 6.2.2 No deliveries would take place in the AM, PM or lunchtime peak hours in order to reduce conflict with pedestrians
- 6.2.3 The development is proposed to be car-free except for two accessible parking bays within the service area for the use of blue badge holders.

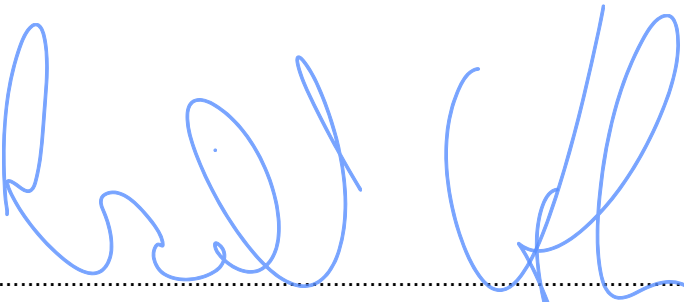
***Summary***

- 6.2.4 Subject to the detailed design of the vehicle crossover and an appropriately worded s106 Agreement to secure these works, there are no contentious design issues relating to the proposed servicing and car parking arrangements.

## **7        2021 SCHEME - AREAS OF DISAGREEMENT**

- 7.1.1    There are currently no disagreements regarding the compliance and acceptability of the servicing proposals for the 2021 scheme, subject to suitable mitigation being agreed with TfL.


## 8 SIGNATURES



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Signed and dated on behalf of the Appellant


19 July 2022



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Signed and dated on behalf of the Council

19 July 2022



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Signed and dated on behalf of Transport for London

19 July 2022