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Ms Zoe Brown
Planning and Growth
London Borough of Southwark
160 Tooley Street
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Sent by Email

2nd November 2022

Dear Ms Brown

On behalf of Tribe Avonmouth House Limited ("Tribe"), we write in response to the very late representations received on 31st October 2022 on behalf of the adjoining landowners, Blyford Investment Co Ltd and Brightbay Ltd. The objections relate to proposed development at Avonmouth House, specifically, the live planning application (22/AP/2227) and a previous application (21/AP/4297) that is the subject of an appeal for non-determination.

The representations have sought to outline why the proposed development at Avonmouth House would unreasonably compromise development on neighbouring sites.

We are of the strong view that this is not the case, and we wish to make the following comments in response to the objections:

1. The adjoining landowners have known about the proposals for Avonmouth House for well over a year, having met with Tribe on two separate occasions last year: 09/09/21 (Blyford Investment Co Ltd) and 17/09/21 (Blyford Investment Co Ltd and Brightbay Ltd). The feedback received was generally positive and no objection was raised at the time. It is only now, following a breakdown in relationships between the respective landowners, that they've chosen to submit a very late objection.
2. The subject Site Allocation (NSP46) does not require the individual sites (in individual ownerships) within the allocation to come forward comprehensively, nor does it require a masterplan to be prepared. It is expected that the allocation will come forward in parts and at different times, which is outside of the control of the planning system.
3. Notwithstanding the above, Tribe produced an *illustrative* masterplan to show, at high-level, how the rest of the site **could** come forward for redevelopment in the future in the context of the Avonmouth House proposals. It is by no means the only outcome and there are, clearly, numerous ways and scenarios that could come forward.
4. We are aware of Policy 18 of the Southwark Plan, and we are of the view that the proposed scheme complies with it. Indeed, Southwark Council have not raised this as an issue or area of non-compliance.
5. The letters of objection make reference to separation distances, which would apply to residential developments. However, there is every possibility that commercial development could come forward on other

parts of the site allocation, given the land use requirements set out within it. In the absence of any planning approval, application, or firm proposal on any of the neighbouring sites, we cannot be expected to, nor is it reasonable to expect us to, respond to an unknown development scenario or outcome. In any event, taking into account an 18-metre offset from our proposed scheme's habitable room windows, there is still a significant remaining developable area on the adjacent sites.

6. The proposals for Avonmouth House optimise the site as required by the National Planning Policy Framework, the London Plan and Southwark Plan. This view is endorsed by the GLA in their Stage 1 report (para 38) as follows: *"Given the highly urbanised environment and good transport accessibility, the proposed development is considered to appropriately optimise the development of the site through a design-led approach."*
7. Finally, we have discussed these late objections with Leading Counsel, who considers them to be entirely unmeritorious, emanating as they do from parties who have been fully aware of the proposals for well over a year and have at no stage expressed objections to these proposals. They have every appearance of "tactical" objections designed to disrupt the progress of the current application and appeal, rather than to raise matters of substance which would genuinely demand refusal of the applications.

We trust that this will be taken into consideration by Southwark Council prior to any decision being made by the Planning Committee on both the live planning application and the appeal.

Yours sincerely

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