



Appeal Decision

Inquiry held on 11 to 14, and 18 to 20 January 2011

Site visit made on 20 January 2011

by John Papworth DipArch(Glos) RIBA

an Inspector appointed by the Secretary of State for Communities and Local Government

Decision date: 18 February 2011

Appeal Ref: APP/A5840/A/10/2134836

200 Great Dover Street, London SE1 4YE

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant planning permission.
 - The appeal is made by Helical Bar (Great Dover St) Ltd against the decision of the Council of the London Borough of Southwark.
 - The application Ref 09-AP-2128, dated 21 September 2009, was refused by notice dated 24 February 2010.
 - The development proposed is demolition of existing buildings and erection of one six storey building, plus basement, (maximum height 29.05m AOD), comprising 163sq.m of commercial floorspace (Class A retail/B1 office/D1 community uses), and 3,131sq.m of office (Class B1) floorspace and once part seven/part seventeen storey (including mezzanine floor) building, plus basement, (maximum height 53.75m AOD) comprising 370sq.m of commercial floorspace (Class A retail/B1 office/D1 community use) and 237 beds for student accommodation together with landscaped courtyard, bicycle and refuse storage.
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Decision

1. I dismiss the Appeal.

Procedural Matters

2. Towards the end of the Inquiry, and in response to a point raised over the timetable for receipt of the Core Strategy Inspector's Report, I stated a likely date for the despatch of this Decision. That date was based on my workload and the need to meet other similar statements of despatch dates prior to this one. As a result it was apparent that the Inspector's Report would be received prior to the issue of this Decision. Arrangements were agreed between the parties to allow submissions to be made on the matter of emerging Strategic Policy 8 – Student Homes, and I shall address this later in my Decision.

Main Issues

3. The main issues are;
 - The effect of the proposal on the character and appearance of the area, including the setting of listed buildings and adjacent conservation areas, and having regard to policies on tall buildings.
 - The effect of the proposal on highway safety and the free flow of traffic.
 - The effect of the proposal on the aims of policies on climate change and use of energy.

Inspector's Reasons

Character and Appearance

4. The existing building on the site is not suited to modern office use and its low height, the diagonal placing and the poor quality of the architectural treatment all mean that the loss of the building would not harm the character and appearance of the area. Its removal would provide the opportunity for a more appropriate form of replacement building.
5. The site has various constraints on the design of any replacement proposals. It is close to both the Borough High Street Conservation Area and the Trinity Square Conservation Area. It is within the setting of two listed buildings, the Church of St George the Martyr at Grade II* and 17 Tabard Street at Grade II. It is prominent in open views from and across Borough High Street and from the entrance to the underground station, and forms the edge of an open area that, notwithstanding the appearance of the existing building and the traffic system, has townscape value and potential for improvement. An additional constraint is that Duke House, a building that occupies a corner of the block, is to be retained. Unitary Development Plan Policies 3.12 on the quality of design and 3.13 on urban design set out criteria on which proposals can be judged and Policy 3.11 seeks the efficient use of land whilst ensuring the protection of amenity, positively responding to the local context and complying with all policies relating to design, among other things.
6. Although designed as one building, there would be the lower front block facing the church and turning the corner from Tabard Street round alongside Long Lane to have a frontage on Great Dover Street, and the higher student accommodation block behind, having a frontage on Great Dover Street and Silvester Street, as well as abutting the site of Duke House. Unlike the present building, the lower block would be sited at the rear of the footway, but in view of the expanse of space between the site and the church, this would be acceptable, providing an urban edge to the area with the lower block enclosing what is at present a nondescript and ill defined space. The success of the location of the existing block at the inner corner of Long Lane and Tabard Street shows the merit of that arrangement. Similarly that adjacent building's height provides an attractive enclosure and setting for the church, a feature that would be continued by the lower part of the appeal building. The entrance courtyard would, due to the controlled height of the building relative to the width of the space, be a welcome articulation to the facade and would be plainly legible as the main entrance.
7. Policy 3.13 includes requirements for active frontages which are defined as being building facades designed to add interest and vitality to the public realm. Buildings with active frontages feature frequent doors and windows, with no blank walls, articulation of facades with projections such as bays and porches and, where appropriate, internal uses visible from the outside or spilling on to the street. The three frontages of the lower parts include a mix of materials forming the walls and varied uses to be enclosed. Much would be glazing showing activity behind in the flexible spaces although there would be lifts and servicing areas, but the architectural expression of these areas would be acceptable. In the terms of the policy there would be frequent doors and windows and the frequency and individual run of other areas would not amount to 'blank walls', but would be more akin to solid between the voids of doors and

windows, again, not an unusual or inherently harmful occurrence. In particular, with regard to the higher block, the cycle store would be a run of impermeable wall, but could be translucent, giving the impression of internal uses and a spill of light. Having regard to the aims of the policy, the nature of the uses and the hierarchy of the four surrounding streets a reasonable balance of glazing, other openings and use of materials is evident.

8. It is agreed that the building falls to be considered as a 'tall building' under Unitary Development Plan Policy 3.20 because the student accommodation block would be more than 30m high. The first part of that policy refers only to buildings which are significantly taller than their surroundings or have a significant impact on the skyline. As this is set in the alternative it is sufficient that the building is significantly taller than its surroundings. Sites should have excellent accessibility to public transport facilities, and that is true here, with excellent links between the building and public transport services. They should be located in the Central Activities Zone, again true, and the fact that it is not in an opportunity area is not critical.
9. The policy goes on to state that sites should be outside landmark viewing corridors. It appears that the landmark viewing corridor from Alexandra Palace to St Paul's Cathedral stops at that landmark, the protected area beyond, which covers the appeal site being the Background Assessment Area. Whilst there are requirements for this area and the new building would breach the planes thus defined, there are presently intervening trees which would prevent the building being seen from the viewpoint and to a great extent it would be subsumed into the built environment beyond from the elevated vantage point north of the City. The form and importance of St Paul's would continue to be recognised and appreciated, and it is difficult to identify real harm.
10. The second part of the policy mentions the 30m condition, exceeded in this proposal, and states that such a building should ensure that it makes a positive contribution to the landscape, is located at a point of landmark significance, is of the highest architectural standard and relates well to its surroundings, particularly at street level. It should contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
11. Dealing first with the locational requirement, both London Bridge and Elephant and Castle are areas of tall buildings, the Borough Station area being between. Although the site is within the highest Public Transport Accessibility (PTAL) rating it is a fact that both of the other two areas have multiple rail links and many more bus routes radiating, with a substantially greater number of destinations directly accessible. In addition, they are both large areas in themselves, with the transport links having stops and access points somewhat spread. As landmarks, the area of influence can be said to be more than a point, and at Elephant and Castle, the tall building is actually set a little off the geographical centre.
12. The Borough Station junction is a point of landmark significance as the spire of the church on its island location, at a bend in the High Street and at the convergence of other routes is prominent from various viewpoints and assists in navigating the area, pinpointing this transport and townscape node. In the appeal case the point of landmark significance is clearly occupied by the church, but does not extend greatly away from a line of view along Borough

High Street. It does not appear to be essential to 'landmark' the appeal area further than it already is, by way of the church, as an aid to navigation, although the tests remain in the further parts of the policy, and others, over the effect of the building. The existence of the Empire Square tower was referred to; it predates the policy on tall buildings and frees up space at ground level for public access and recreation. It is however not at any particular nodal point nor does it aid navigation other than to itself. A proliferation of such isolated tall buildings could harm the legibility of the city. Empire Square tower is attractive of itself but limited weight attaches to the need to mediate between it and the church; that would serve to spread the cluster too wide for the importance of this landmark area.

13. Turning then to consider the effect of the building on the surrounding area and views, that area includes the designated heritage assets, as defined in Planning Policy Statement 5 "*Planning for the Historic Environment*", referred to earlier. The Grade II* church is striking in its location, and the significance of its presence derives, to a substantial degree, from its isolated position and its setting among buildings of limited stature. There is the increasing height of 'The Shard' to the north, but that is some distance away, and the Empire Square tower, both of which become somewhat confused with the spire of the church in certain views, but the buildings that define the space around the church are more in the way of being background buildings through their height and form.
14. The lower frontage building proposed for the site conforms to this arrangement as stated, but the higher, rear accommodation building would be significantly out of scale with the other encircling buildings and would tend to unbalance the setting of the church. There is some evidence that the loss of the Duke House site caused the equivalent accommodation to be placed on top of the previously proposed block, and it does appear that the ratio of width to height, affected by the retention of Duke House, results in a building that seems tall for its surroundings. The rectilinear block thus formed would not be seen behind the spire from public viewpoints, but would be seen over and behind the nave of the church, and that view, even if fleeting as Borough High Street is traversed, would disrupt the strong roofline of the listed church. There does appear to be some differences in the architectural treatment of the church nave as compared with the front bay supporting the tower and spire, but the stone quoins start again and are at either end of the nave, and there is some fine detailing. Whether or not the church was designed to be seen as it presently is, the setting does now extend right around the building and the nave and its roof are important parts of its significance. The higher part of the appeal building would cause substantial harm to the setting of the highly graded listed church.
15. 17 Tabard Street is listed at Grade II and the difference in scale of a redevelopment of the appeal site, with or without Duke House, is likely to be noticeable but need not be harmful. The appeal proposal's height would not be detrimental to the detailing and historic interest of the building.
16. The two conservation areas would not be affected other than in terms of views into and out of them. The Borough High Street Conservation Area is busy in parts and views already encompass a variety of townscape and buildings. There are views from the gardens by the Marshalsea prison wall where the increase in scale that would be brought about by the appeal proposal would

appear incongruous to this small-scale green space. With regard to the Trinity Square Conservation Area, there is a more homogeneous feel to the character and appearance, and the emergence of the appeal block over and behind terraces and in views containing the church in that square would be an unwelcome addition. However much these designated areas are worthy of protection, they are in a bustling city where change may well occur at some distance from them. Whilst harm can be identified, it is less than substantial and, were all other matters acceptable, could be outweighed by the advantages of redevelopment of this site.

17. Lastly, there was comment regarding the blank wall by Duke House. Blank walls are not an uncommon solution to development within a tight city context, and allow development to the boundary without adversely affecting the ability to develop the adjoining site. There are cases where buildings just appear to have been 'sheared-off' leaving an unattractive blank wall exposed. That is not the case here; there is some modelling of the wall similar to the blind windows that are a feature of end walls to older terraces. This feature continues the aesthetic of the other walls whilst not adversely affecting development next door or the character and appearance of the area. As a design solution to a particular need, the treatment of the wall is acceptable.
18. In conclusion on this issue, the lower building is acceptable but the higher building fails to accord with UDP Policies 3.11 and 3.13 as it does not respond positively to the local context, Policy 3.12 in not achieving a high enough quality of both architectural and urban design, and Policy 3.20 in not satisfying important requirements regarding tall buildings. Similar concerns are referred to in the advice of both English Heritage and the GLA which add weight to the view that the taller part of the proposed building would cause harm to the character and appearance of the area, and in particular to the setting of a listed building.

Highway Safety

19. In addition to the accompanied site visit made on 20 January after hearing the evidence, unaccompanied visits were made at various times to verify matters raised in evidence with particular regard to traffic flows and parking which will inform consideration of this main issue. The agreed arrangement of traffic flows is that Silvester Street is one-way north-east, with a contraflow cycle lane, and on exiting that road vehicles have a choice of a left turn into the one-way end of Tabard Street then only left into Long Lane, or on turning right that part of Tabard Street is two-way but with only one-way exit points at the lower end of Tabard Street or Nebraska Street. The only other route giving access to Tabard Street is the exit from the car park to Empire Square.
20. Of relevance to the considerations here, it can be surmised that vehicles using the north-west end of Tabard Street alongside the loading bay are mainly likely to be those originating in Empire Square and those having reason to enter by Silvester Street and then needing to exit to the Borough High Street area. Similarly vehicles using Silvester Street would be aiming for Empire Square, or to service or visit properties on Tabard Street, Sterry Street and Nebraska Street, including buses laying over, with the possibility of this being a short-cut to Pilgrimage Street, although this appears to have limited advantages. Lastly, cycles using the contraflow would need to originate from Empire Square, which

- has a large number of cycle spaces, or to have gained access to Tabard Street through dismounting and walking the bike, or by less legitimate means.
21. Pedestrians are able to roam freely regardless of the traffic system although there are designated crossing points on Long Lane and Great Dover Street and some barriers to prevent crossing elsewhere. The desire lines pointed out at the site inspection include to and from local schools on the west side of Borough High Street.
 22. There would be no off-street loading bay provided within the site boundary and vehicles seeking to service the appeal buildings would need to make use of the kerbside with its restrictions, including the existing loading bay on Tabard Street. This does not appear inherently harmful in this location and given the likely traffic flows. To allocate room for servicing would reduce the extent to which the proposals make good use of land and could result in unattractive frontages. There was a difference of opinion over the likely numbers and any risk of conflicting demands on the bays. The examples found through the database did appear to include operations that are not truly comparable and could have skewed the results. There would be a variety of uses within the building and it is not yet clear the extent or possible servicing requirements of the flexible spaces. Nevertheless, a servicing plan could be devised to control the routine situation with the apparent spare capacity catering for emergencies and unusual deliveries. None of this seems out of the ordinary for a site such as this, within a busy urban area and close to the City, and there are particular aspects of the road arrangements in the vicinity that limit the likelihood of harm. The footways around the site would still be generous, particularly near the Tabard Street/Long Lane junction.
 23. The accommodation block would be for students and whilst day-to-day travel is readily available through use of public transport, and there is access to cycling, either their own bikes stored on the ground floor or use of the hire scheme on Swan Street, there would be a likely peak demand for vehicle access either end of terms, particularly at the beginning and end of years. It is possible that rooms would need to be vacated at Christmas and Easter for letting. Even with facilities built-in or provided, students are likely to have numerous possessions needing to be unloaded and taken to rooms. There are only limited parking spaces available nearby and the more distant ones require crossing main roads. Some unloading in no-waiting areas may be inevitable. However, a timetable could be devised, and if well publicised in advance would inform the decision on whether this was suitable accommodation in the first place, or whether public transport would suit. A management regime such as temporary storage should suffice and to provide permanent physical facilities on the basis of this limited, controllable, occurrence would not represent best use of land or resources.
 24. There is also a need for refuse to be collected, and the video footage does give some cause for concern. A better management is called for, avoiding the risks inherent in vehicles reversing into one-way roads then leaving the wrong way. Such measures as banks-men are not unusual, and refuse is successfully collected from all manner of commercial premises in built-up areas. In Silvester Street the presence of the refuse lorry would cause other traffic to pass on the offside, and into the contraflow cycle area, which is not clearly marked as such, by way of even intermittent lines. But, the occurrence would be limited in frequency of event and duration, the likelihood of an accident

would be low, with cyclists using this stretch of road likely to know of its arrangement, as it does not appear to be an obvious through route, and the consequences are unlikely to be serious. In an assessment of risk, and subject to management action, the collection of refuse could be carried out satisfactorily despite there being no off-road loading facility.

25. With respect to the three separate aspects of servicing, it is concluded that adequate provision can be made for servicing, and access to and from the site as sought by Unitary Development Plan Policy 5.2.

Climate Change and Energy

26. The main policy framework is within the climate change policies of the London Plan, and Policy 4A.1 seeks the mitigation of and adaptation to climate change and to minimise emissions of carbon dioxide. The following hierarchy will be used to assess applications: using less energy, in particular by adopting sustainable design and construction measures (Policy 4A.3), supplying energy efficiently, in particular by prioritising decentralised energy generation (Policy 4A.6), and using renewable energy (Policy 4A.7). Policy 4A.3 seeks developments that reduce carbon dioxide and other emissions that contribute to climate change, and use renewable energy where feasible among other measures. Policy 4A.4 requires an energy assessment for major developments that should demonstrate the expected energy and carbon dioxide emission savings from the energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP. Decentralised energy is the subject of Policy 4A.6 with systems being selected to minimise carbon dioxide emissions. Policy 4A.7 seeks a reduction in carbon dioxide emissions of 20% from on site renewable energy generation (which can include sources of decentralised renewable energy) unless it can be demonstrated that such provision is not feasible. There is emerging London Plan policy that places emphasis on the reduction of CO₂ rather than on particular ways of doing this.
27. There are three aspects to the appellant's approach, based on the energy hierarchy. The first level is to reduce the use of energy and the appellant quotes a CO₂ reduction only slightly less than the average of other schemes considered. There is scope however to improve on this with domestic hot water use being high. Metering to link use more positively with costs should secure savings, and not only could this be the subject of a condition, but this low level of intervention is likely to be easily accomplished without major re-design; it would be an internal detail in the fitting-out. The second level is the use of decentralised sources of energy, in this case a 'combined heat and power' (CHP) plant, and the appellant quotes a 21% reduction in CO₂ compared with a 9% average. The Council are concerned over how the plant has been sized, considering that it should be sized to serve the combined heating and hot water requirement for the building. There does appear to be some scope for improvement, and a plant so sized could dispose of excess electricity through a feed-in tariff. It is accepted that the need for cooling has been all but designed-out of the scheme so that CCHP is not warranted.
28. The third level is the use of renewable energy, (in that the CHP uses fossil fuels). Here the appeal scheme achieves only a 1.1% saving in CO₂ from on-site renewable energy generation compared with 10.4% in the other schemes looked at. Greater use of photovoltaic cells is said not to be viable, with the

pay-back exceeding their design life, and the arrangement of roofs and walls indicates the less efficient vertical array as the only feasible way of increasing the area. Biomass burners could be accommodated and the archaeological hurdles can now be overcome according to the Council. Choice of pellets would also allow flexibility in storage and deliveries and air quality concerns can be overcome through design and monitoring, with city centre burners being used successfully. Either way, it does appear to be the case that design decisions already taken have limited the degree to which further CO₂ savings can be made in this third level of the hierarchy.

29. There are various references in the London Plan to solutions only being chosen where feasible. It is noted also that Policy 4A.1 contains the text '*The Mayor will work with other agencies to promote measures to increase the cost-effectiveness of, and incentives to use, technologies and applications that support mitigation of and adaptation to climate change*'. This appears to accept that there may be financial constraints to the use of certain technologies. On the other hand, there is weight to the argument that if the market was able to achieve reductions as cost effective solutions, there would be no need for policy imperatives. It is likely that the required approach is somewhere between the market and imperative; there needs to be incentives to use the technology and not just to install it. An analogy was made with affordable housing. In that instance, policy requires something that would not otherwise be provided and that cost is spread over the scheme. Reliance only on a commercial payback of individual aspects of the energy strategy is not in accordance with the aims of policy, that heating, cooling and power systems are selected to minimise carbon dioxide emissions. Whatever technology is chosen to achieve policy objectives, it is likely to be cheaper, more effective and more visually harmonious, to design them in rather than add them to an established design.
30. To conclude, it appears here that there is scope for savings through conditions, and that is feasible. There might have been scope for improving the second level of the hierarchy through a different sizing of the CHP plant, but the figures achieved are reasonable and resizing need not be out of the question as a detail requirement. However, very little attempt has been made to save CO₂ by way of renewable sources, and this is a lost opportunity that would be very hard to retrieve with this design. It is not therefore possible to say that the scheme satisfies the requirement in Policy 4A.1 to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise emissions of carbon dioxide, nor Policy 4A.7 with regard to the level of on-site renewable energy generation.

Other Considerations

Affordable Housing

31. The emerging Core Strategy has been the subject of an examination in public and a binding Inspector's Report which endorsed the policy aim of balancing the supply of student housing with that of other types of housing for which there is significant need. This is not yet part of the Development Plan, but having mind to the stage reached and the likelihood of it becoming adopted policy, significant weight attaches to this.

32. The Council's case is that affordable housing at the rate of 35% should now be provided with acceptance that because the scheme is designed without it, the provision could be by way of a payment in lieu amounting to £8.12m. It is further suggested that due the circumstances of the case and the timing of the Report, some flexibility should be applied, with a condition requiring a scheme to be proposed on which agreement could be reached.
33. The appellant does not agree with the principle of provision, and cites the existing Affordable Housing Supplementary Planning Document, the adopted London Plan and draft policy in the emerging Replacement London Plan, as well as extracts from the Core Strategy Inspector's Report.
34. It appears that a concern being addressed in the draft policy is that sites identified in the Strategic Housing Land Availability Assessment (SHLAA) and the Development Capacity Assessment (DCA) as housing sites, for which an element of affordable housing would be provided, might be developed for student housing with no such provision. This would clearly lead to a reduction in affordable housing numbers. However, the appeal site is not so identified and no, even notional, loss would occur. The implementation of the policy will be detailed in documents which are yet to be produced, as referred to by the Inspector. The existing guidance identifies students as a group that require housing that is affordable to them, rather than a group targeted for delivering it. The new guidance will need to address these matters and provide a robust methodology for implementing Strategic Policy 8. Until that time and having regard to the timing of this application, the discussion that took place with officers during the process and the aims of policy, it does not appear appropriate to attach adverse weight to the lack of affordable housing associated with this scheme.

Student Accommodation

35. Local residents expressed concern over there being more students living in the area and the effect that this would have. The Council had initially raised an objection on need but had not pursued it at the Inquiry. This is not the first proposal in the area for student accommodation and there is evidence, in the recently received Inspector's Report, of a pan-London need for such accommodation. Emerging Strategic Policy 8 states that the development of student homes within the town centres and places with good access to public transport services will be allowed provided that they do not harm the local character. London Plan Policy 3A.25 supports the provision of student accommodation.
36. If this was a proposal to supplant family housing provision, as identified in such studies as the SHLAA or DCA, it could be seen as causing harm to the balance of housing provision, but that is not the case here. There would be a greater number of students in the area, and the demand for shops and facilities for their lifestyle would, no doubt, be met. But, there is little evidence of this being at the expense of facilities for families or other residents or of real harm resulting.
37. Nevertheless, the harm that is identified in the first main issue, to the character and appearance of the area is, in part, a result of the physical manifestation of housing this number of students on this site, as the harm is caused by the accommodation block rather than the offices and other uses.

Other than that, and on balance, there are advantages in the provision of purpose built student accommodation in this sustainable location that outweigh the disbenefits of introducing further student numbers to the area.

Conclusions

38. There are aspects of the scheme that are acceptable in their effect on the character and appearance of the area and the setting of heritage assets, and the servicing effects can be accommodated as a balance between making the best use of land and setting aside space specifically for servicing. The case of the provision of affordable housing at this time is not made and the benefits of providing student housing outweigh the effects of extra numbers.
39. Nevertheless, the harm to the setting of the listed Grade II* church and the character and appearance of the immediate area caused by the taller block is real and serious and such a building here is not supported by policies designed to inform decisions on the location of tall buildings. The energy performance of the scheme is, for the most part, reasonable but there are omissions that are not capable of being made-good by conditions. The shortcomings of the scheme as identified are not outweighed by the advantages nor overcome by the provisions of the S106 Agreement. As a result and for the reasons given above I conclude that the appeal should be dismissed.

S J Papworth

INSPECTOR

APPEARANCES

FOR THE LOCAL PLANNING AUTHORITY:

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He called;

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INTERESTED PERSONS

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Cllr Claire Hickson London Borough of Southwark
Patrick O'Keefe Resident and on behalf of Empire Square
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Nicholas Xenakis Resident
Helen Holden Resident
Dr Graham Winyard Resident and on behalf of Empire Square
Residents Association

Danuta Solowiej Resident

DOCUMENTS

Document	C1	Notification letter dated 13 December 2010
Document	C2	CABE ' <i>Design Review – How CABE Evaluates Quality in Architecture and Urban Design</i> '
Document	C3	Department for Transport ' <i>Guidance on Transport Assessment</i> '
Document	C4	Transport for London ' <i>Transport Assessment Best Practice Guidance Document</i> '
Document	C5	' <i>Sustainable Transport Supplementary Planning Document</i> '
Document	C6	' <i>Index of Multiple Deprivation 2007</i> ' ward boundaries
Document	C7	Letter Council to PINs 4 February 2011 advising of receipt of Core Strategy Inspector's Report and setting timetable for responses
Document	C8	' <i>Further Written Representations of Behalf of the Council</i> ' on Core Strategy Inspector's Report. (Pages 21 & 22 of the Report attached)
Document	A1	Energy Proof Thomas Lefevre in response to Proof of Evidence of Jonny Lewis
Document	A2	Rebuttal Proof Steven Gosling and appendices
Document	A3	Map of slides positions re Robert Taverner evidence
Document	A4	Photo map re Robert Taverner evidence
Document	A5	Statement of Common Ground and letters
Document	A6	New CD ' <i>Supplementary Visual Study – Kinetic Studies</i> '
Document	A7	Video of refuse lorry movements
Document	A8	S106 Agreement dated 19 January 2011
Document	A9	' <i>Monitoring the London Plan Energy Policies</i> '
Document	A10	Print of slides re Alex Lifschutz evidence
Document	A11	Bundle energy documents, 'London Renewables', CIBSE, DCLG, GLA
Document	A12	Proof of evidence Simon Bevan re 1 and 20 Blackfriars Road
Document	A13	Documents London GOR Index of Multiple Deprivation
Document	A14	Appellant's response on Core Strategy Inspector's Report
Document	3/1	Speaking notes submitted by Dr Winyard
Document	3/2	Speaking notes submitted by O'Keefe