

GREATER LONDON AUTHORITY

██████████
(By email)

Our Ref: MGLA150321-8276

5 July 2021

Dear ██████████

Thank you for your request for information which the Greater London Authority (GLA) received on 13 March 2021. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for:

Request for all information relating to planning proposals and discussions regarding the development of "21 St George's Road", known as "21 St George's Road", since 1st March 2019.

Please provide notes and minutes of any meetings, conversations or calls held with representatives of the Greater London Authority and parties related to or acting on behalf of "Create REIT Limited" (the developer). This includes "Latitude" (architects), "DP9" (planning consultants), or "Kanda" (community engagement).

For the avoidance of any doubt please provide in relation to development of 21 St Georges Road, including:

- *Pre-application advice reports or notes and its relation to "21 St Georges Road"*
- *Planning application advice reports or notes and its relation to "21 St Georges Road"*
- *The dates, attendees, and location of any meetings held by the Greater London Authority with this party or their representative, solely and/or with the London Borough of Southwark on this planning proposal; minutes of those meetings and all electronic correspondence (emails etc) and file notes*
- *Options discussed for the proposed development of the site*
- *Correspondence between the developer, their representatives, Greater London Authority, and Southwark Council Southwark Planning officers and the planning department*
- *Timelines and guidance provided by Greater London Authority*

The above includes, but should not be limited to, internal discussions and advice as well as correspondence with the owner/ developer "Create" regarding the entity known as "21 St George's Road".

Our response to your request is as follows:

Please find attached the information that the GLA holds within scope of your request. Some of the information we hold is too large to send via email and I have uploaded this content directly on to our disclosure log at:

[EIR - 21 St George's Road \[Jul 2021\] | London City Hall](#)

Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. Information that identifies specific employees constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely



Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at: [Freedom of information | London City Hall](#)

[REDACTED]

From: Pre-Applications <[REDACTED]@london.gov.uk>
Sent: 16 October 2020 12:57
To: [REDACTED]@dp9.co.uk
Cc: [REDACTED] Urban Design Team; [REDACTED]@tfl.gov.uk;
[REDACTED]@tfl.gov.uk; [REDACTED]@tfl.gov.uk; [REDACTED]@tfl.gov.uk; [REDACTED]@southwark.gov.uk;
Subject: Pre-applications
Proposed Date for Pre-application Meeting 2020/6580 21 St George's Road

Dear [REDACTED]

GLA reference number: 2020/6580/P2I

Site name: 21 St George's Road

Address: 21 St George's Road, Elephant and Castle, London SE1 6ES

Local Planning Authority: Southwark

Proposal: Demolition of existing building and erection of mixed-use building including hotel, office and retail floorspace.

Case Officer: [REDACTED]

Thank you for your request for a Level 2 meeting for the above pre-planning application proposal.

We can only comment on information provided in advance of the meeting. Where we have no or limited information we will not be able to provide a comprehensive assessment. The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

The advice response you will receive will only address issues that you have sent documentation on. A meeting note will be sent to you two working days prior to the meeting which will outline the issues that will be discussed.

Finance

As per GLA Financial Regulations we can only confirm the meeting date upon receiving payment or a correct payment form.

The payment form you have sent to us is correct and we can confirm the meeting date upon your acceptance of the proposed meeting date and time at the bottom of this email.

In order to invoice the company paying for the meeting, we need to confirm whether or not they use a purchase order system and the purchase order number. Please could you confirm this?

Cancellation

If, due to circumstances out of our control, we cancel the meeting we will reschedule for another time as soon as practical. Meetings can be rescheduled at your request up to 48 hours prior to the date agreed. The fee is non-refundable on cancellation.

Proposed meeting date

We can offer a tentative date and time of **Wednesday 28th October 2020 at 1pm time.**

Please let us know if this is acceptable and who will be attending.

Kind regards,

[REDACTED]
Greater London Authority

From: [redacted] <[redacted]@dp9.co.uk>
Sent: 21 October 2020 18:13
To: Pre-applications; [redacted]
Cc: [redacted] Urban Design Team
Subject: RE: Meeting Confirmation 2020/6580 21 St George's Road

Hi [redacted]

The team will be:

- . [redacted] and [redacted] – Create REIT (applicant)
- . [redacted] and [redacted] – Latitude Architects
- . [redacted] and [redacted] – Caneparo Associates
- . [redacted] and [redacted] – DP9
- . [redacted] and [redacted] – Peter Stewart Consultancy

Thanks

[redacted]
[redacted]
Senior Planner

direct: 020 [redacted]
mobile: [redacted]
e-mail: [redacted]@dp9.co.uk

DP9 Ltd

100 Pall Mall

London

SW1Y 5NQ

telephone: 020 7004 1700 facsimile: 020 7004 1790 website: www.dp9.co.uk

This e-mail and any attachments hereto are strictly confidential and intended solely for the addressee. It may contain information which is privileged. If you are not the intended addressee, you must not disclose, forward, copy or take any action in relation to this e-mail or attachments. If you have received this e-mail in error, please delete it and notify postmaster@dp9.co.uk

From: Pre-Applications <pre-applications@london.gov.uk>

Sent: 21 October 2020 17:44

To: [redacted] <[redacted]@dp9.co.uk>; [redacted] <[redacted]@dp9.co.uk>

Cc: [redacted]@london.gov.uk; [redacted]@london.gov.uk; urban.design@london.gov.uk

Subject: Meeting Confirmation 2020/6580 21 St George's Road

Dear [redacted]

GLA reference number: 2020/6580/P2I

Site name: 21 St George's Road

Address: 21 St George's Road, Elephant and Castle, London SE1 6ES

Local Planning Authority: Southwark

Proposal: Demolition of existing building and erection of mixed-use building including hotel, office and retail floorspace.

Case Officer: [redacted]

Your request for a pre-planning application advice meeting has been confirmed for **Friday 13th November 2020 at 12pm** via Microsoft Teams.

Please could you let us know who will be attending the meeting?

Getting the best out of the Pre-app meeting

Please give us the information, which you want the planning team to comment on, well in advance of the meeting. We want to give you the most comprehensive response possible however, realistically, we are only able to give you advice on information that has been reviewed in advance of the meeting.

For consistency, the follow up advice letter will only address issues that were covered at the meeting.

The advice given by officers does not constitute a formal response or decision by the Mayor and does not prejudice the outcome of any future planning applications.

Freedom of Information

The Freedom of Information Act 2000 allows the public to request information from public authorities, including the Greater London Authority. The public has a right to request information, which includes pre-planning application advice and associated documents. If a Freedom of Information request is made, each case will be taken on its individual merits. If you have any concerns or wish to discuss this matter please contact [REDACTED] on [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk).

Cancellation

If, due to circumstances out of our control, we cancel the meeting, we will reschedule for another time as soon as practical. Meetings can be rescheduled at your request up to 48 hours prior to the meeting. The fee is non-refundable on cancellation.

Comments and complaints

We aim to provide you with the best possible service, if you have suggestions on ways that we can improve this service, please contact the Planning Support Manager, [REDACTED] on email [REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk).

Further queries regarding the process can be sent to [REDACTED] the GLA reference number, whilst queries regarding policy and the content of the meeting should be sent to the case officer, email: or phone:

Kind regards,

[REDACTED]
Greater London Authority

This message has been scanned for viruses by the Greater London Authority.

Click [here](#) to report this email as spam.

[REDACTED]

From: [REDACTED]
Sent: 13 November 2020 11:31
To: [REDACTED]
Subject: RE: 21 St George's Road - pre-app tomorrow
Attachments: 6580 pre meeting note.pdf

Hi [REDACTED]

If you could circulate the above to the attendees from your side that would be greatly appreciated.

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk
[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED] <[REDACTED]@dp9.co.uk>
Sent: 13 November 2020 10:56
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: 21 St George's Road - pre-app tomorrow

Hi [REDACTED]

It will be:

- [REDACTED] and [REDACTED] – Create REIT
- [REDACTED] and [REDACTED] – Latitude Architects
- [REDACTED] and [REDACTED] – DP9
- [REDACTED] – Caneparo Associates
- [REDACTED] – Peter Stewart Consultancy

Thanks

[REDACTED]
Senior Planner
direct: 020 [REDACTED]
mobile: [REDACTED]
e-mail: [REDACTED] [dp9.co.uk](https://www.dp9.co.uk)

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100 Pall Mall

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 13 November 2020 10:39

To: [REDACTED] <[REDACTED]@dp9.co.uk>

Subject: RE: 21 St George's Road - pre-app tomorrow

Good morning [REDACTED]

I am just finalising the agenda now. If you are able to confirm the list of attendees from your side I will circulate shortly.

Sincerely

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

london.gov.uk

[REDACTED] london.gov.uk

From: [REDACTED] <[REDACTED]@dp9.co.uk>

Sent: 12 November 2020 13:46

To: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: 21 St George's Road - pre-app tomorrow

Hi [REDACTED]

We have a pre-app with you tomorrow on 21 St George's Road. Did you have an agenda in mind? Happy to discuss.

Kind regards

[REDACTED] [REDACTED]

Senior Planner

direct: 020 [REDACTED]

mobile: [REDACTED]

e-mail: [REDACTED] [dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)

DP9 Ltd

100 Pall Mall

London

[REDACTED]

From: [REDACTED]
Sent: 04 January 2021 17:44
To: [REDACTED]
Subject: RE: St. George Street - GLA/6580

Hi [REDACTED]

I actually think I can just upload the new pdf, the 14 reference is the only thing that needs changing and only appears 3 times (descriptions and one in text) so I think I'd be happy to just upload the new copy. The template has JF's signature so I think its good to go if you are happy with this?

Sincerely

[REDACTED]

[REDACTED]

Senior Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](https://www.london.gov.uk)

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 04 January 2021 17:15
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: St. George Street - GLA/6580

Hi [REDACTED]

Slightly annoying, but given it's pre-app I suppose we can re-issue without too much trouble. I'm happy to chase it through the approval process quickly for you.

Thanks

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 04 January 2021 17:01
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: FW: St. George Street - GLA/6580

Hi [REDACTED]

Sorry I meant to ask about this, I could circulate a revised report (would mean sending back to JF so sign) or stick with the Email?

Sincerely

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

london.gov.uk

[REDACTED] london.gov.uk

From: [REDACTED] [REDACTED] <[REDACTED]@dp9.co.uk>

Sent: 04 January 2021 11:35

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: St. George Street - GLA/6580

[REDACTED]

Thanks for the response and I am glad of this. I know for the client's backers having this clarified in the actual document would provide reassurance, I would be grateful if you could please reissue the report with the corrections made.

Thanks

[REDACTED] [REDACTED]

Associate

direct: 020 [REDACTED]

mobile: [REDACTED]

e-mail: [REDACTED] dp9.co.uk

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100 Pall Mall

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telephone: 020 7004 1700 facsimile: 020 7004 1790 website: www.dp9.co.uk

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 04 January 2021 11:31

To: [REDACTED] <[REDACTED]@dp9.co.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: St. George Street - GLA/6580

Hi [REDACTED]

Please accept my apologies for this typographical error. We wouldn't update the report but please accept this email which should be read in conjunction with the report.

I acknowledge the building as proposed would be 15-storeys. This does not effect the assessment or conclusions reached in the pre-application report GLA/6580 issued on 21 December 2020.

I hope this is helpful

Sincerely

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

london.gov.uk

[REDACTED] [london.gov.uk](mailto:[REDACTED]@london.gov.uk)

From: [REDACTED] [REDACTED] <[REDACTED]@dp9.co.uk>

Sent: 22 December 2020 16:20

To: [REDACTED] <[REDACTED]@london.gov.uk>

Cc: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: St. George Street - GLA/6580

Hi [REDACTED]

I note the advice refers to the building as 14-storeys. It is actually 15-storeys as shown in the pack we presented to you. Is it possible to update the references please?

Kind regards

[REDACTED] [REDACTED]

Senior Planner

direct: 020 [REDACTED]

mobile: [REDACTED]

e-mail: [REDACTED] [dp9.co.uk](mailto:[REDACTED]@dp9.co.uk)

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telephone: 020 7004 1700 facsimile: 020 7004 1790 website: www.dp9.co.uk

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From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 21 December 2020 15:46

To: [REDACTED] [REDACTED] <[REDACTED]@dp9.co.uk>

Cc: [REDACTED] [REDACTED] <[REDACTED]@[london.gov.uk](mailto:[REDACTED]@london.gov.uk)>

Subject: St. George Street - GLA/6580

Good afternoon [REDACTED]

Please find attached our pre-application feedback in relation to the above site.

Sincerely

[REDACTED]

[REDACTED] [REDACTED]

Senior Strategic Planner, Development Management

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

020 7983 [REDACTED]

london.gov.uk

[REDACTED] [\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

Good Growth

■■■■■ ■■■■■

Our ref: 2020/6580/P2I

Date: 18 December 2020

By email

Dear ■■■■■ ■■■■■

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: 21 St George's Road, Elephant and Castle

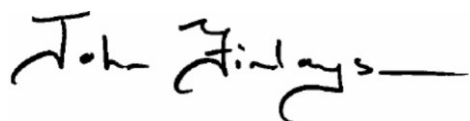
LPA: London Borough of Southwark

Our reference: 2020/6580/P2I

Further to the pre-planning application meeting held on 13 November 2020, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



John Finlayson

Head of Development Management

cc ■■■■■, Deputy Head of Development Management
TfL

pre-application report 2020/6580/P2I

18 December 2020

21 St George's Road, Elephant and Castle

Local Planning Authority: Southwark

The proposal

Demolition of existing building and erection of mixed-use building including hotel, office and retail floorspace. The proposed development would have a maximum height of 15-storeys.

The applicant

The applicant is **Create REIT Ltd** and the architect is **Latitude Architects**.

Assessment summary

The proposed redevelopment of this brownfield site located within the CAZ, Elephant and Castle Opportunity Area and Town Centre for a mix of hotel, office and retail space is strongly supported. Early engagement from the applicant is welcomed and should continue in the lead up to the submission of any application to resolve issues in respect to urban design, heritage and views, transport and sustainable development should be addressed prior to the submission of a formal planning application.

Key next steps

The future application will need to address the issues raised in this report with respect to affordable workspace, urban design, sustainable development and transport.

Context

1. On 13 November 2020 a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held virtually through Microsoft Teams with the following attendees:

GLA group

- [REDACTED] – Senior Strategic Planner, GLA (case officer)
- [REDACTED] [REDACTED] – Team Leader – Development Management, GLA
- [REDACTED] – Design Lead - Urban Design, GLA
- [REDACTED] – TfL

Applicant

- [REDACTED] [REDACTED] and [REDACTED] – Create REIT
 - [REDACTED] and [REDACTED] – Latitude Architects
 - [REDACTED] and [REDACTED] [REDACTED] – DP9
 - [REDACTED] – Caneparo Associates
 - [REDACTED] – Peter Stewart Consultancy
2. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3. The plot is located within the Central Activities Zone, Elephant and Castle Opportunity Area and Town Centre. The site falls on the south side of St George's Road at the junction with Oswin Street. The existing site comprises a pair of 4-storey buildings currently in mixed use as office and retail space (the exact nature of which must be confirmed at application stage). The site is located to the east of the Elliot's Row conservation area falling just beyond its boundary, the conservation area contains a number of listed buildings. The West Square conservation area falls to the west of Elliot's Row conservation area. The character of the area is mixed with a number of lower rise mixed use buildings along St Georges Road and the London College of Communications masterplan which is adjacent to this site with heights of up to 20, 24 and 40-storeys.
4. The site records a Public Transport Accessibility Level (PTAL) of 6b on a scale of 0-6b where 6b represents the most accessible locations. The site fronts St George's Road, which forms part of the Transport for London Road Network (TLRN).

Details of this proposal

5. Demolition of existing building and erection of mixed-use building including hotel, office and retail floorspace. The proposed development would have a maximum height of 15-storeys.
6. The future application is expected to be referable to the Mayor under the following category of the Mayor of London Order 2008:

- 1C.(c). “Development which comprises or includes the erection of a building of one or more of more than 30 metres high and is outside the City of London”

Strategic planning issues and relevant policies and guidance

7. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the Southwark Core Strategy (2011); saved policies of the Southwark Plan (2007); and the London Plan 2016 (Consolidated with Alterations since 2011).
8. The following are relevant material considerations:
 - National Planning Policy Framework and National Planning Practice Guidance;
 - London Plan - Intend to Publish Version (December 2019), which should be taken into account on the basis explained in the NPPF;
 - Southwark Borough Views Background Paper (2017);
 - New Southwark Plan Proposed Changes (August, 2020), which should be considered on the basis explained in the NPPF;
 - Secretary of State’s Directions on the Intend to Publish London Plan, issued 13 March 2020 and 10 December 2020.
9. The relevant issues and corresponding policies are as follows:

• CAZ	London Plan; Central Activities Zone SPG;
• Opportunity areas	London Plan;
• Town centres	London Plan;
• Visitor accommodation	London Plan;
• Office	London Plan;
• Retail	London Plan;
• Urban design and heritage	London Plan; Shaping Neighbourhoods: Character and Context SPG;
• Inclusive design	London Plan; Accessible London: Achieving an Inclusive Environment SPG;
• Transport	London Plan; the Mayor’s Transport Strategy; and,
• Sustainable development	London Plan; Sustainable Design and Construction SPG; Mayor’s Environment Strategy.

Summary of meeting discussion

10. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use principles including; the CAZ, opportunity areas, town centres, visitor accommodation, office space, retail and urban design, sustainable development and transport. Issues with respect to energy matters were not discussed in detail at this stage. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Principle of development

Central activities zone

11. London Plan policies 2.10, 2.11 and 2.12 and Policy SD4 of the Mayor's Intend to Publish London Plan sets out the international, national and London-wide roles of the CAZ, based on an agglomeration and rich mix of strategic functions and local uses, which should be promoted and enhanced. Policy SD4 notes that the unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism functions should be promoted and enhanced as well as the retail and commercial functions of the CAZ. The provision of appropriate CAZ uses at this site is strongly supported in line with the aspirations of the policies outlined above and assessment below.

Town centre

12. London Plan Policy 4.7 and draft London Plan Policy SD6 all set out a town centre first approach to the provision of new town centre uses. Policy SD7 of the Mayor's Intend to Publish London Plan states that boroughs should discourage out-of-centre development of main town centre uses and ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment. The provision of town centre uses at this site is strongly supported in line with the aspirations of the policies outlined above and assessment below.

Opportunity Areas

13. London Plan Policy 2.13 and Policy SD1 of the Mayor's Intend to Publish London Plan London Plan paragraph 2.58 states that Opportunity Areas are the capital's major reservoir of brownfield land with significant capacity to accommodate new housing, commercial and other development linked to existing or potential improvements to public transport accessibility, which is echoed in the supporting text to Intend to Publish London Plan Policy SD1. The London Plan recognises the Elephant and Castle opportunity area as undergoing major transformation with significant investment in housing and potential for new retail provision integrated with a more efficient and attractive transport interchange. The Intend to Publish plan notes the transport infrastructure serving Elephant and Castle is set to improve with the Mayor proposing to extend the Bakerloo line from Elephant & Castle to Lewisham and beyond, serving Old Kent Road and New Cross Gate. The extension will improve connectivity, increase the capacity and resilience of the transport network and reduce journey times between key destinations. This will help London to grow by supporting new homes and jobs. In light of the above the proposed uses are supported in line with the assessment below.

Visitor accommodation

14. London Plan Policy 4.5 sets a target of 40,000 net additional hotel rooms by 2036, and identifies appropriate locations for visitor accommodation, stating that beyond the Central Activities Zone, visitor accommodation should be located in town centres and Opportunity Areas with good public transport access. The Mayor's Intend to Publish London Plan Policy E10 also supports such accommodation, and paragraph 6.10.2 identifies that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041. The Mayor's Intend to publish London Plan also stresses the importance of business

visitors and the provision of meeting, conference and exhibition facilities. The provision of 3,199 sq.m. of new hotel floorspace within this highly accessible CAZ, opportunity area and town centre location is strongly supported and would contribute to meeting the strategic need identified in the Mayor's intend to publish London Plan.

Office space

15. London Plan Policy 2.13 identifies the Elephant and Castle Opportunity Area as having capacity to accommodate a minimum of 5,000 jobs and 5,000 homes. Policy SD1 of the Mayor's Intend to Publish London Plan sets an indicative target of 5000 new homes and 10,000 jobs for the Opportunity Area. London Plan Policy 4.2 and Policy E1 of the Mayor's Intend to Publish London Plan seek improvements to the quality, flexibility and adaptability of office space of different sizes stating planning decisions should support new office provision, refurbishment and mixed-use development. These policies seek to support the provision of office space within appropriate locations with a focus on town centres.
16. The proposals deliver 778 sq.m. of office floorspace across the ground to second storey, which at application stage could include an affordable component in response to local need. This represents an uplift of 106 sq.m. It should be noted that the site is located within the CAZ, a town centre and an Opportunity Area which anticipates an increased level of employment. Through increased internal efficiencies and the uplift in floorspace the proposals are expected to result in an uplift in the density of employment uses at the site (anticipated employment density should be confirmed at application stage). The new office space would be complimentary to the emerging development within Elephant and Castle and is supported in strategic planning terms.
17. Policy E3 and E8 of the Mayor's Intend to Publish London Plan identify that planning obligations may be used to secure affordable workspace in the B Use Class, in areas suitable for this form of development at rents maintained below the market rate for that space for a specific social, cultural or economic development. The purpose of this policy (amongst others) is to support start-up and early stage business or regeneration. Accordingly, the applicant should continue its discussions with the LPA to establish the most suitable community benefits which could be secured as part of these proposals. The Council should secure any affordable workspace provision within a s.106 agreement.
18. These supporting uses are welcomed and given the above policy context, the principle of new office floorspace is supported.

Retail

19. Policies SD6 and SD7 of the Mayor's Intend to Publish London Plan direct retail to town centres. Policy E9 of the Mayor's Intend to Publish London Plan seeks to secure a successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres. The applicant is proposing 122 sq.m. of lower ground floor retail uses, this represents a net decrease of 459 sq.m. from the existing provision. Given the sites location within the Elephant and Castle major town centre the reduction of retail space would be outweighed by the provision of other strategically recognised town

centre uses including hotel and office floorspace. The inclusion of retail uses to support the other strategic functions proposed on site and the wider town centre is strongly supported.

Principle of development conclusion

20. The proposed redevelopment of this brownfield site located within the CAZ, Elephant and Castle Opportunity Area and Town Centre for a mix of hotel, office and retail space is strongly supported.

Urban design

Layout

21. The proposals are orientated to front onto St Georges Road. The main entrance to the building would be at the chamfer at the junction of St Georges Road and Oswin Street. This arrangement establishes a prominence to the entrance and concentrates the active frontage along the public highway. This is supported and would contribute positively to the vibrancy and vitality of this part of the town centre. This active frontage should be maximised as far as practical to maximise this benefit to the public realm. The buildings interface with the western flank and pocket park adjacent is a key point of the scheme which at application stage must be fully rationalised and could be a unique asset to the scheme. To this end the applicant should continue to engage with the pocket park to bring the pocket park into the scheme through the sensitive design of this boundary. Given the proximity to the neighbouring scheme the noise and vibration impacts arising from the neighbouring plots servicing access should be fully resolved by application stage with any appropriate mitigation outlined within the planning documents.

Height and massing

22. London Plan Policies 7.1 and 7.4 and the Mayor's Intend to Publish London Plan Policies D1 and D2 require development to have regard to the form, function and structure of an area and the scale, mass and orientation of surrounding buildings, and Policy D3 promotes the optimisation of a site's capacity, with higher density developments in areas that are well connected to services and public transport. London Plan Policy 7.7 sets out requirements for tall buildings, broadly reflected in Policy D9 of the Intend to Publish London Plan, which states that development plans should define what is considered a tall building for specific localities and identify suitable locations. Requirements for tall buildings include addressing visual impacts at different distances; aiding legibility and wayfinding; having exemplary architecture and materials; avoiding harm to heritage assets; not causing adverse glare; and minimising light pollution. Functional impacts should consider internal and external design; servicing; entrance capacity; area and transport capacity; maximise benefits to the area; and not interfere with communications. Environmental impacts should consider wind, daylight, sunlight, and temperature; air movement (dispersal of pollutants); and noise creation. Cumulative impacts should also be considered. The immediate context of the site is mixed with a range of building heights and typologies. The Southwark Local Plan broadly identifies the Elephant and Castle Opportunity Area as potentially suitable for tall buildings and within the wider town centre there are a range of existing and emerging heights which include tall buildings. The adjacent plot to

this site forms part of the Elephant and Castle Shopping Centre and London College of Communication masterplan - with heights of up to 20, 24 and 40-storeys. The applicant has engaged closely with the borough to establish an appropriate height, massing and scale strategy for the site. The applicant is proposing a building which would have a maximum height of 15-storeys. The proposed building would be of a similar scale to recent developments surrounding the site. The height and massing of the proposals has been arrived at through collaborative discussions with the borough through the pre-application process and is broadly supported in design terms. Accordingly, GLA officers are of the view that, on balance, a tall building may be acceptable here at application stage where both the GLA and LPA are satisfied that the relevant tall building assessment criteria referred to above have been appropriately addressed. Pursuant to this the applicant must continue to engage closely with the Council on matters of neighbourhood amenity and local mitigation and ensure that the matters raised in the urban design and sustainable development sections of this report are appropriately addressed at application stage.

Architecture

23. The proposed building would have a faceted base with a flatter façade for the mid-section of the building returning to a faceted façade for the upper section of the building. This approach is supported. The full detail of the architectural treatment is yet to be finalised however the applicant is indicatively proposing a robust treatment of masonry for the main body of the building with generous areas of glazing to the ground floor where the commercial units would be sited. GLA officers note the positive response to the surrounding conservation area through the use of masonry which runs up the building and draws on the visual cues from the surrounding conservation area. The proposed architecture would provide for a harmonious addition to the streetscene which subject to the heritage assessment below could be supported.

Fire safety

24. In line with Policy D12 of the Mayor's Intend to Publish London Plan the future application should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
25. Further to the above, Policy D5 within the Mayor's Intend to Publish London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.

Heritage and views

26. London Plan Policy 7.8 states that development should identify, value, conserve, restore, re-use and incorporate heritage assets where appropriate. Intend to Publish London Plan Policy HC1 seeks to ensure that development proposals

affecting heritage assets, and their settings, should conserve their significance. These policies also apply to non-designated heritage assets.

27. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. Regarding listed buildings, all planning decisions should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses” and regarding conservation areas, special attention must be paid to “the desirability of preserving or enhancing the character or appearance of that area”. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset’s conservation and the more important the asset, the greater the weight should be. Significance is the value of the heritage asset because of its heritage interest, which may be archaeological, architectural, artistic or historic, and may derive from a heritage asset’s physical presence or its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
28. The site is located to the east of the Elliot’s Row conservation area falling just beyond its boundary, the conservation area contains a number of listed buildings. The West Square conservation area falls to the west of Elliot’s Row conservation area. The applicant should continue discussions with the Council to agree key views from within the conservation area which must be provided at application stage to allow the full impacts of the development to be assessed in relation to its impact to the conservation area.

Strategic views

29. Policy HC3 of the Mayor’s Intend to Publish London Plan identifies that Strategic Views include significant buildings, urban landscapes or riverscapes that help to define London at a strategic level. They are seen from places that are publicly-accessible and well-used. Development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view. The proposals would fall within the viewing corridor from the Centre of Bridge over the Serpentine to the Palace of Westminster. Whilst based on the information provided it is not anticipated that the proposals would give rise to any strategic concerns in respect to its impact on this view the applicant must robustly demonstrate this through the submission of verified views which establish this.

Accessible design

30. London Plan Policy 7.2 and Policy D3 of the Mayor’s Intend to Publish London Plan seek to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The future application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and,

provides independent access without additional undue effort, separation or special treatment.

31. The Mayor's Intend to Publish London Plan at Policy E10 requires that new visitor accommodation provides sufficient levels of accessible bedrooms setting out an expectation that any new provision provides 10 per cent of new bedrooms to be wheelchair-accessible or 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. At application stage the proposals must demonstrate that at least one of these standards is met.

Transport

Trip generation

32. The site is well served by public transport, with the highest PTAL rating of 6b, however capacity is constrained at peak times on some route corridors and at Elephant and Castle London Underground station. As such a corridor-based multi-modal trip generation assessment would be expected to accompany a subsequent planning application. Mitigation may be sought, particularly for the office element as this is not covered by Southwark's CIL, receipts from which fund the Elephant and Castle Northern roundabout removal/Northern line ticket hall projects.

Cycle parking

33. Cycle parking should be provided to be in line with the draft London Plan standards, contained within Table 10.2. Cycle parking design should be in accordance with London Cycle Design Standards (LCDS). The transient nature of hotel users and location within safe and easy reach of central London attractions means it is well matched to the Santander Cycle Hire model, so funding may be required to expand local cycle hire capacity. Further detail is required regarding the type of cycle stands provided, which should include 5% wider spaces for non-standard cycles. Cycle parking must be secured by way of appropriate planning condition.
34. The site is also well located at hub of the strategic cycle network, being at the intersection of CS7 and C6. C6 provides a predominantly segregated cycle route across central London. Elliot's Row is of mixed quality and users of CS7 could benefit from resurfacing adjacent to the site.

Vehicle parking

35. London Plan Policy 6.13 and draft London Plan Policy T6 require developments to provide the appropriate level of car parking provision. Servicing arrangements will need to consider taxis and coaches, given the hotel use. Only taxis and some private hire vehicles can drop off/pick up from the St George's Road frontage, however no ranking is allowed, and coaches cannot stop lawfully there, due to the double red line restrictions. The changes to the TRO in Oswin Street will need to be processed by TfL due to the red route return.

Healthy streets

36. Policy T2 of the Mayor's Intend to Publish London Plan requires that promote and demonstrate the application of the Mayor's Healthy Streets Approach to:

improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities. In Opportunity Areas, new and improved walking, cycling and public transport networks should be planned at an early stage, with delivery phased appropriately to support mode shift towards active travel and public transport. Designs for new or enhanced streets must demonstrate how they deliver against the ten Healthy Streets Indicators. Pedestrian crossing of St George's Road will also need to be considered in the context of current and future accident risk, as part of the Active Travel Zone (ATZ) assessment.

Travel, delivery and servicing and construction logistics

37. At application stage the applicant must submit a delivery and servicing plan, construction management plan and travel plan. The Council must agree and appropriately secure final versions of these documents.
38. Construction will require early engagement with TfL in respect of basement excavation/construction directly adjacent to the TLRN. The full impacts on the TLRN during construction and maintenance to road user amenity and safety must be fully rationalised and evidenced at application stage. This may also require highway licences/traffic management approvals, and possible interaction of foundations with the Bakerloo line extension project.

Sustainable development

Energy

39. At application stage the applicant must submit an energy assessment, in accordance with London Plan Policy 5.2 and Policy SI2 of the Intend to Publish London Plan. Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

Whole life-cycle carbon

40. Intend to Publish London Plan Policy SI2 states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions. A Whole Life-Cycle Carbon template (produced by the GLA) should be completed in accordance with the assessment guidance. The applicant should use these tools as the design progresses to calculate and reduce WLC emissions against the GLA's benchmarks provided in the guidance. The assessment guidance and template are available on the GLA website at:
<https://consult.london.gov.uk/whole-life-cycle-carbon-assessments>.

Flood risk and drainage

41. A flood risk assessment (FRA) must be submitted as required under the NPPF. The FRA must consider the risk of flooding from a range of sources. The approach to flood risk management for the proposed development must comply with London Plan Policy 5.12 and Policy SI.12 of the Intend to Publish London Plan. A surface water drainage strategy must also be submitted which should

aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. The surface water drainage strategy for the proposed development should comply with London Plan policy 5.13 and Intend to Publish London Plan Policy SI.13. There should also be a preference for green over grey features. The proposed development should meet the requirements of London Plan Policy 5.15 and Intend to Publish London Plan Policy SI.5.

Urban greening

42. Policy G5 of the Intend to Publish London Plan states that major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage. A target score of 0.4 for developments that are predominately residential, and 0.3 for predominately commercial is recommended. The UGF figure for the proposed development should be calculated at application stage and should meet the relevant target outlined above.

Circular economy

43. Policy SI7 of the Intend to Publish London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process. The GLA has released draft guidance for developers on how to prepare Circular Economy Statements and a 'Design for a circular economy' Primer that helps to explain the principles and benefits of circular economy projects. Therefore, a Circular Economy Statement is required in accordance with the GLA guidance, available at: <https://consult.london.gov.uk/circulareconomy-statements>.

Conclusion

44. The proposed redevelopment of this brownfield site located within the CAZ, Elephant and Castle Opportunity Area and Town Centre for a mix of hotel, office and retail space is strongly supported. Early engagement from the applicant is welcomed and should continue in the lead up to the submission of any application to resolve issues in respect to urban design, heritage and views, transport and sustainable development prior to the submission of a formal planning application.

for further information, contact GLA Planning Unit (Development Management Team):

██████████ Senior Strategic Planner (case officer)

email: **██████████** [London.gov.uk](mailto:██████████@London.gov.uk)

██████████ Team Leader – Development Management

email: **██████████** [London.gov.uk](mailto:██████████@London.gov.uk)

██████████ y Head of Development Management

email **██████████** [@London.gov.uk](mailto:██████████@London.gov.uk)

John Finlayson, Head of Development Management

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Lucinda Turner, Assistant Director of Planning

email: **██████████** [@London.gov.uk](mailto:██████████@London.gov.uk)

21 St George's Road, Elephant and Castle

in the London Borough of Southwark

meeting date: 13 November 2020

meeting time: 12:00

location: Virtually - Microsoft Teams

The proposal

Demolition of existing building and erection of mixed-use building including hotel, office and retail floorspace

The applicant

The applicant is **Create REIT Ltd** and the architect is **Latitude Architects**.

Background

GLA officers received a request for a meeting to discuss a scheme for this site, as described above. Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion:

Principle of development

1. The scheme in the context of the existing CAZ, Opportunity Area and town centre designations,
2. The principle of the proposed redevelopment of the site to provide a mixed use building to contain, hotel, office and retail spaces.

Urban design

3. Layout, response to surrounding area/conservation area contexts,
4. Response to context, massing and scale,
5. London view management framework and impact to the view from the centre of the Bridge over the Serpentine to the Palace of Westminster
6. Public realm and landscaping,
7. Materials and building appearance, sustainability through design.

Inclusive design

8. General discussion on inclusive access principles for the building.

Transport

9. General discussion regarding the approach to transport principles and the transport assessment, including access, car parking, trip generation, pedestrians, cycling and cycle parking, public transport, travel planning, contributions, Mayoral CIL.

Attendees

GLA group

- [REDACTED] – Senior Strategic Planner, GLA (case officer)
- [REDACTED] [REDACTED] – Team Leader – Development Management, GLA
- [REDACTED] – Design Lead - Urban Design, GLA
- [REDACTED] – TfL
- [REDACTED] - TfL

Applicant team

- [REDACTED] [REDACTED] and [REDACTED] – Create REIT
- [REDACTED] and [REDACTED] – Latitude Architects
- [REDACTED] and [REDACTED] [REDACTED] – DP9
- [REDACTED] – Caneparo Associates
- [REDACTED] – Peter Stewart Consultancy

[REDACTED] DP9

[REDACTED] Southwark

[REDACTED] architect

NOTES

- You mentioned you had been in pre-app discussions with the borough, would you mind doing a brief piece summarising those discussions

Principle of dev:

office

- This is a very well rationalised scheme which fits very comfortably within the strategic destinations of the site,
- E1 supports the improvement to quality, flexibility particularly within the CAZ
- What is the existing office floorspace and how would this compare to the proposed? Is there any loss?

- What is the nature of the existing users? What lease terms are they on? Is there any relocation plan?
- Obviously located within a town centre and the CAZ which are identified as suitable locations within the plan as locations for new or improved office space
- A key aspiration of the DLP is sustainability and its increasingly something the Mayor is aware of, by the time this is submitted I would anticipate the DLP will certainly be more advanced if not adopted, given the existing buildings on site it would be worth beginning work on a circular economy statement and establishing what if any of the existing structures/foundational work could be re-used or recycled. This would need to be submitted as part of the app docs
-

Hotel

- The intend to Publish plan is clear that London's visitor economy and associated employment should be strengthened and specifically seeks to concentrate these forms of development to the CAZ and town centres
- In terms of the hotel offer Policy E10 sets a requirement for 10% wheelchair accessible bedrooms or 15% accessible. I presume one of these options is being progressed?

Retail

- As you have said, would sit comfortably alongside an office and hotel use and falls within the wider town centre which again in land use terms we would be comfortable with

Other

- Tall building – potentially a really useful mediator between the height of the wider masterplan towards the station and your site/wider conservation area

Summary

- Very well rationalised proposals which speak positively to the aspirations of the intend to publish London plan through the sustainable intensification of this brownfield site to deliver a wider mix of policy compliant uses
- Where there is any reduction in office floorspace this should be justified in terms of local need
- Opportunities to explore an affordable component or wider community benefit could be explored

Questions:

- Intend to Publish plan emphasises the need for public benefit. I just wondered if Southwark had led any discussions around the potential inclusion of any affordable

workspace etc? failing that as I said DLP wants public benefit, is there any plan to include a community benefit we could point to when reporting this to the Mayor? For example community access to conference space within the hotel or affordable retail space at GF?

5 pre-apps with borough – design and height were key points
They have seen a reduction in height totalling 15 metres
Southwark concern views from west square and subservient to LCC buildings adjacent – southwark are now comfortable
Building marks the entry to the elephant and castle town centre
Conscious it has to bridge the transition is scale
Height and design happy with

Mix of uses we welcome – uplift in office space – hotel they have wanted in Elephant and castle for some time
Hotel is welcomed by the borough
Council want active frontage a gf
Daylight and sunlight is primary concern and public realm

Design:

- Any way to increase visual connection
- Interface with the western flank and pocket park is a key point which could really be an asset to the scheme
- Any way to engage with the pocket park and have flexibility on their western flank to bring the pocket park into the scheme in some way
- Activation of ground floor should be maximised as far as possible
- Mitigating any noise to the neighbour from servicing access should be fully resolved
- LVMF – no impact – full TVIA to be submitted to support this
- Positive that they draw on the visual cues from the conservation area, masonry piers which run up the building and masonry panels which is good
- Faceted bottom to the building a flatter façade with modulation on it for middle then faceted form at the top of the building which looks really positive
- Quality of architecture is good – we would seek as much detail to be secured up front given this prominence from the conservation area
- Really positive no part issues

for further information, contact GLA Planning Unit, Development & Projects Team:

██████████ **Strategic Planner (case officer)**
020 7983 ██████████ @london.gov.uk



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Drawing to be read in conjunction with all information by architects, structural engineer & service consultants.

The contractor is not to scale from this drawing. All written dimensions to be checked on site before work commences. Discrepancies, where identified, must be reported to the architect immediately.

NOTES

ISSUE	DATE	DRAWN	ISSUE NOTES
STATUS		SCALE	JOB NUMBER
PRELIMINARY		1:2 A3	1901
PROJECT	SOURCE	VOL	LOC
1901-LAT-XX-ZZ	M2-A-15000-X		
TITLE			
PROPOSED TOP	PLAN		
PROJECT NAME			
21 ST GEOR E'S ROAD			

1901

1901-LAT-XX-ZZ M2-A-15000-X

PROPOSED TOP PLAN

PROJECT NAME

21 ST GEOR E'S ROAD

latitude

www.latitudearchitects.com T +44(0)20 7234 0235
Latitude Architects, 15 Weller Street, London, SE1 1QU

GREATER**LONDON**AUTHORITY

Pre-Planning Application Payment Form

1. APPLICANT DETAILS

Company name:	<input type="text" value="Create REIT Ltd"/>
Company registration number:	<input type="text" value="55079"/>
Company registered address including postcode:	<input type="text" value="7 Berthelot Street
St Peter port
GY1 1JS"/>
Invoice address (if different from registered address):	<input type="text" value="c/o Create Asset Management Ltd
53 Thrale Street
London SE1 9HW"/>
Contact name:	<input type="text" value=""/>
Phone:	<input type="text" value=""/>
E-mail:	<input type="text" value="camlondon.co.uk"/>

2. AGENT DETAILS

Company name:	<input type="text" value="DP9 Limited"/>
Company registration number:	<input type="text" value="05092507"/>
Address:	<input type="text" value="100 Pall Mall, London SW1Y 5NQ"/>
Contact name:	<input type="text" value=""/>
Phone:	<input type="text" value=""/>
E-mail:	<input type="text" value="@dp9.co.uk"/>

3. SITE NAME AND FEE

I the undersigned, confirm that I have requested a pre-planning application advice meeting for

(ENTER SITE NAME):

and agree that I will pay the full fee for the meeting [plus VAT at the standard rate] on receipt of an invoice (PLEASE SELECT MEETING TYPE):

- Meeting type:
- ☐ LEVEL 1 - Pre-app in Principle £2,500 (plus VAT at the standard rate)
 - ☒ LEVEL 2 - Initial Pre-Application Meeting £10,000 (plus VAT at the standard rate)
 - ☐ LEVEL 2 - Follow-Up Meeting £2,000 (plus VAT at the standard rate)

4. GLA SALES INVOICES - Sales invoices will normally be addressed to the **APPLICANT**

If exceptionally the **AGENT** is paying and requires the GLA Sales Invoice to be issued in their name, please tick this box ☐

Is a Purchase Order system used by the entity paying the GLA Sales Invoice?

- ☐ YES - please provide a copy of the Purchase Order document.
- ☒ NO - if a Purchase Order system is not used, please state below the name of the entity paying the GLA sales invoice

Signed:

Print name:

Company name:

Date:



To: [REDACTED] – GLA
From: [REDACTED] – TfL Spatial Planning
Your ref: GLA 2020/6580
Our ref: STWK/20/115
Phone: [REDACTED]
Email: [REDACTED]@tfl.gov.uk
Date: 16/11/2020

21 St George's Road, SE1, LB Southwark; TfL pre-app comments

TfL has its own pre-application service, further details on which can be found on the TfL website at:

<https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

The site is well served by public transport, with the highest PTAL rating of 6b, however capacity is constrained at peak times on some route corridors and at Elephant and Castle London Underground station. As such a corridor-based multi-modal trip generation assessment would be expected to accompany a subsequent planning application. Mitigation may be sought, particularly for the office element as this is not covered by Southwark's CIL, receipts from which fund the Elephant and Castle Northern roundabout removal/Northern line ticket hall projects.

The site is also well located at hub of the strategic cycle network, being at the intersection of CS7 and C6. C6 provides a predominantly segregated cycle route across central London. As mentioned at the meeting, Elliot's Row is a rather poor-quality surface and users of CS7 could benefit from resurfacing adjacent to the site.

The site fronts St George's Road, which forms part of the Transport for London Road Network (TLRN), so TfL will be a key consultee throughout the planning process.

Given the site's location and nature of the proposal, the potential for cycle mode share is high, so the application should focus on this and provide measures to support, for example very high-quality cycle parking and travel plan measures for both office and hotel uses. The transient nature of hotel users and location within safe and easy reach of central London attractions means it is well matched to the Santander Cycle Hire model, so funding may be required to expand local cycle hire capacity.

Servicing arrangements will need to consider taxis and coaches, given the hotel use. Only taxis and some private hire vehicles can drop off/pick up from the St George's Road

frontage, however no ranking is allowed, and coaches cannot stop lawfully there, due to the double red line restrictions. The changes to the TRO in Oswin Street will need to be processed by TfL due to the red route return.

Given that St George's Road is TLRN and that changes are proposed to this frontage, TfL will need to be consulted on these changes as they develop, both as the highway authority and, potentially landowner (to be confirmed). The issues to be addressed are:

- Relocation of existing stalls and possible compensation for loss of revenue
- Location of short stay cycle parking
- Relocation/removal of the telephone kiosk and other utilities cabinets
- Planting of trees on the TLRN
- Repaving in line with TfL Streetscape Guidance
- Current and residual pedestrian comfort levels

Pedestrian crossing of St George's Road will also need to be considered in the context of current and future accident risk, as part of the Active Travel Zone (ATZ) assessment.

Construction will also require early engagement with TfL in respect of basement excavation/construction directly adjacent to the TLRN (Approval in Principle), impacts on the TLRN during construction and maintenance of road user amenity and safety, which may also require highway licences/traffic management approvals, and possible interaction of foundations with the Bakerloo line extension project.