

Flat 14, 61 Tanner Street
London, SE1 3PP
Email: amcooper@live.com

Attention: **Simon Bevan**
Director of Planning
Southwark Council, Planning Division
PO Box 64529
London, SE1P 5LX

1 June 2020

Your Reference: 19/AP/0865

Dear Simon

As a leaseholder at 61 Tanner Street, I am writing to oppose planning permission for the revised hotel application at 67-71 Tanner Street. I believe such a development at this location would have significant detrimental effects on the surrounding area and community, which I will outline below.

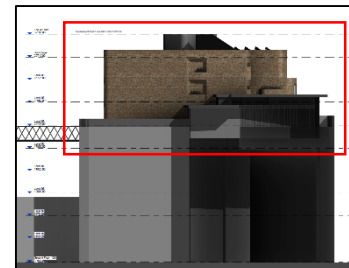
Please note I am escalating this case to you directly as I grow increasingly concerned that the Southwark Council Planning Department are working to prioritise the commercial interests of the applicant and their client, above the very genuine and material considerations of local residents. This is evidenced by the multiple meetings, correspondence and support in principle your team have afforded the applicant, in stark contrast to the lack of responses and communication with residents. As an example, revised plans were posted on 21 February 2020, yet notice of the re-consultation process only came 3+ months later after constant reminders to your team from myself. The deadline for responses is now set at 18 June 2020.

Executive Summary

- The previously concealed 9FR plant room has been moved to the roof increasing the height and unsightly appearance of the building, as well as noise and air pollution levels
- Contrary to your collaborated view, the addition of another hotel would categorically create an overdominance of visitor accommodation, and the borough has already exceeded its 2026 target
- Disruption and safety risks created by the grossly underestimated increase in traffic to an over congested area is a critical concern, and there is no consideration for emergency vehicles access
- The noise and disturbance from ~200 visitors/staff coming and going 24hrs a day all year round would destroy the character, community, peace and rightful enjoyment residents are entitled to
- Air quality will deteriorate further, both during the protracted construction phase and ongoing operation, as already demonstrated at the nearby Premier Inn, Tower Bridge Road
- Employment reduces to just 6 full time jobs versus the approved office scheme

The Council has already consented to a 33M tall building which completely overshadows adjacent properties creating a significant loss of light, privacy and outlook for numerous tenants. The change of use application from an office building to a hotel development would completely overwhelm the local community, reduce the range of services for local residents, as well as harm the character and successful functioning of our area.

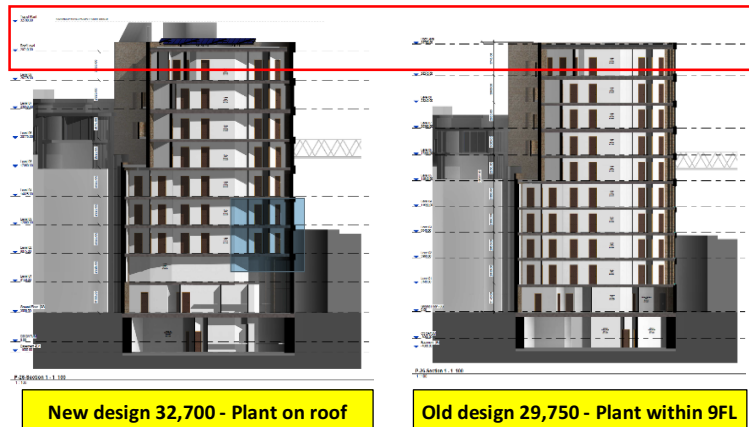
I therefore urge the Planning Division to act in the best interests of local residents by rejecting this application.



Proposed outlook for 61 Tanner St

Design Change

The revised Planning Statement details the plant room is located on the 9th floor, per previous submission. However, new drawings and measurements clearly show the design has changed to house the plant room, access stairwell and photovoltaics on the roof. The height goes from 29,750 to 32,700 adding to the unsightly appearance of the building, creating more overshadowing for our apartment and terrace area, as well as undoubtedly increasing noise disturbance, smells and already poor air quality levels.



Overdominance of Visitor Accommodation

The various policies and plans referenced throughout the correspondence concur that planning for hotels should *“not be permitted where they would result in an over dominance of visitor accommodation in the locality”*. Further it is stated that *“an over-concentration of hotels can detract from the vitality of a place, reduce the opportunity for a range of other services to be provided, and increase the transient population in an area. This can manifest itself in harm to the character and successful functioning of an area and can undermine the stability of a community”*.

There are already 23 hotels and apartments offering more than ample accommodation within a ~1km radius of the site. This increases to 58 within 2km, including 3 Travelodge properties. These numbers exclude multiple Airbnb and private rental options. In the case of the recently rejected hotel planning application for nearby 160 Blackfriars Road, it was stated that *“the borough had already met its target for new visitor accommodation for the period until 2026”*. The site is neither in the Central Activities Zone or an Opportunity Area.



I therefore contest the Planning Department and applicants collaborated view that this is not a case of over dominance. It is in fact blatantly obvious that the addition of another hotel would significantly increase noise, disturbance, traffic congestion, air pollution and crime thus destroying the character, community, peace and rightful enjoyment that existing residents are entitled to.

Transport, Design and Access

Southwark Plan Policies state that *“Planning permission will not be granted if a development has an adverse impact on transport networks”*. Furthermore, developments *“must create or contribute towards more direct, safe and secure walking and cycling routes”*.

Council Transport Planner, Manuela Piasentin shared her position that *“Considering the road is very narrow, increased vehicle trips would have a detrimental impact on road safety for cyclists and pedestrians”*.



I consulted a former General Manager of a comparable hotel in the vicinity who suggested the applicant has grossly understated the increased traffic for this hotel development. In his experience, the number of taxis/coaches/private cars related to hotel guests and restaurant visitors, combined with service vendors, multiple waste disposals, inspectors, emergency services, etc. would easily exceed the 100 AADT screening criteria necessitating a fuller assessment. I note that the applicant conveniently estimated 99 AADT. This being the case, data used for the Traffic, Design & Access and Air Quality Assessments, as well as the Service Management Plan is flawed. Therefore, I deem the conclusions drawn unreliable.

The Council’s apparent acceptance of high levels of on-street servicing for up to 40 minutes on double yellow lines will result in major disruption and safety issues in our over congested and narrow streets. Other vehicles and bicycles would have to pass delivery vehicles on the wrong side of the road for prolonged periods endangering other drivers, cyclists and pedestrians. Numerous traffic reducing initiatives have been introduced by the Council to this designated “quiet route” in recent years. These include a 20 MPH limit, speed humps, red lines, one-way systems, restricted entrances, road closures at weekends, cycle paths, limited parking, etc. Thanks to these preventative measures there have been no serious incidences in the immediate area. It is frankly irresponsible that the Council will now undermine all this progress to accommodate the applicant’s commercial interests.

The proposal that coaches, service vehicles and most importantly emergency vehicles entering the area can manoeuvre at the junctions on Tanner Street is not workable. Due to established parking spaces, Riley Street is effectively a single lane carrying 2-way traffic. The area of Tanner Street outside the proposed site is restricted throughout weekends when the popular Maltby Street market is extended. It becomes a dead-end road with no access to the proposed side delivery site. Travelodge have stated they need access for deliveries 6 days a week, which will not be possible.



Impossible turning for coaches and trucks



Street closures throughout weekends



Impeded access to delivery side entrance

Finally, the revised application continues to promote the notion that hotel guests can use the very limited number of nearby parking spaces overnight and all day throughout weekends and public holidays without charge. This will obviously be to the direct detriment of local residents.

Given the overwhelming evidence that the proposed hotel application will have an adverse impact on transport networks, create numerous safety issues and is frankly unworkable, I am justifiably perplexed by the applicant’s statement that “The Servicing and Delivery Management Plan has been agreed with Transport Officers at the pre-application stage and sets out the agreed strategy for servicing the hotel”. I ask that the Transport Planner clarifies whether this statement is true.

Noise and Disturbance

I do not believe the council has properly considered the impact of ~200 guests, staff, restaurant customers and vendors visiting a hotel operating around the clock 365 days a year. Surely the team can differentiate between office staff commuting to and from work during office hours on weekdays in the consented plan, versus hotel guests/restaurant visitors coming and going at all hours every day of the year. The Council must also recognise the difference between low-level disruption of courier drop-offs to an office building compared to trucks picking up multiple forms of waste, delivering linen, food, beverages plus other supplies and services to a fully operational 73-room hotel. By design, the hotel deliveries are often timed in the early hours of the morning, which would create another major noise disturbance to local residents.

In addition, the revised plan to locate a plant facility on the roof, sufficient to power the much higher demands of a fully operational hotel in comparison to the consented office block, is a further key cause for concern. Noise and air pollution will undoubtedly increase, and our property will be most susceptible.

Finally, and very importantly, Designing Out Crime (London Plan 2016) states that *“development should reduce opportunities for criminal behaviour and should contribute to a sense of security”*. Input from the former hotel GM is that we must expect an increase in crime should a hotel open in our neighbourhood. According to Metropolitan Police statistics, Southwark already has some of the highest levels of crime in London, with the ward for this proposed site among the worst. The addition of more visitors unfamiliar to the area, carrying valuables etc. will undoubtedly become a target for criminal gangs. In the GM’s experience, incidences of antisocial behaviour, loitering, harassment, theft and muggings will be common. The applicant will be well aware of this, given instances in existing Travelodge hotels. However, the initiatives listed in the Designing Out Crime section of the application are wholly inadequate to counter such threats, demonstrating a complete disregard for the safety of local residents.

Air Quality

The Southwark Plan Policies state that *“Planning permission will not be granted for developments that would lead to a reduction in air quality,”* since LBS *“has a responsibility to reduce activities which cause air pollution in order to contribute to achieving national air quality objectives.”* It is therefore alarming to see the applicant’s own assessment concluding that given the sensitivity of the area, the potential impact on local residents *“human health”* and *“dust soiling”* will be predominately high throughout the protracted construction phase.

From a longer-term perspective, the site is situated within an Air Quality Management Area, recognising already poor levels of air quality. As a point of reference, the Air Quality Assessment indicates Tower Bridge Road has by far the worst NO₂ measurements in the vicinity rendering it an Air Quality Focus Area. I don’t believe it is coincidental that this is the location of a local Premier Inn hotel.

The applicant’s Assessment also acknowledges *“that the proposed development may extend an existing ‘street canyon’ along Tanner Street, impeding pollutant dispersion and increasing pollutant concentrations at the residential façades (at first floor level and above) opposite”*.

Add to this the fact that *“building emissions are unknown”* (major plant equipment has not been selected and the plant room has been moved to the roof), and the view that AADT data is potentially under-stated, and I believe the applicant’s conclusion air quality is neutral is unreliable.

Employment Opportunities

The Council consistently highlights the importance of introducing employment opportunities to the area. At the previous committee hearing this was given as a key reason the office use application was granted. It is unclear now how the reduction to just 6 full time jobs in the new proposal can in any way mitigate the multiple negative aspects of the applicant's application.

Conclusion

Tanner Street is not an appropriate location for a hotel. In requesting a change of use and design from the consented office building to a hotel development, the applicant demonstrates a wanton disregard for the needs and interests of local residents on multiple fronts.

Individual planning team members have been presented with numerous reports procured by and biased toward the applicant and their client. Many of these reports contain what I believe to be under-stated data used to draw incorrect conclusions in the applicant's favour.

I would strongly suggest the Planning Team assess the **combined impact** of building scale and design, loss of light and privacy, increase in people and vehicular traffic, road safety and highway disruption, worse air quality, major levels of noise and disturbance, as well as the probability of increased crime. These factors will occur around the clock throughout 365 days a year.

It is also important to take note of the overwhelming negative opinion local people voiced via feedback on the portal during the last consultation. It was then extraordinary that their concerns were partly countered by a very suspicious number of vague and questionable supportive comments added around and after the deadline. This was reported to the Planning team immediately, but no action was taken.

In summary, contrary to the guidelines and policies outlined, a decision to approve this application would:

- overwhelm the local community and reduce the range of services for local residents
- increase the transient population and undermine the stability of a community
- harm the character and successful functioning of our area
- destroy the peace and rightful enjoyment residents are entitled to
- render our property a far less attractive place to live

I therefore urge the Planning Division to act in the best interests of all local residents by rejecting this application outright.

Your sincerely,

Andrew Cooper