

Shad Thames Residents' Association

Comment on the Management Plan for Tower Bridge Court

The Management Plan has been produced as a requirement of Condition 9 in approving planning application 19/AP/1975 by the Fore Partnership.

Condition 9 specified that measures are taken “to control noise and disturbance within the locality that may arise from the proposed uses.” The reason given was “To ensure that occupiers of neighbouring premises (although these premises are not defined) do not suffer a loss of amenity by reason of noise nuisance in accordance with: the National Planning Policy Framework 2019; Strategic Policy 13 (High Environmental Standards) of the Core Strategy 2011, and; Saved Policy 3.2 (Protection of Amenity) of the Southwark Plan 2007”.

The issue:

The Shad Thames Residents' Association believes that the abandonment of the semi-public route from Tower Bridge Road to Horselydown Lane - proposed in the original application - has increased the potential for residents living in the locality to experience problems from noise and disturbances caused by activities emanating from the retail unit at Tower Bridge Court and from guests leaving Tower Bridge Court late in the evening.

The importance of this “semi-public route” between the ground floor and the first floor providing a “generous stair and hallway” was specifically mentioned five times by the Planning Officers report that accompanied planning approval (Para 5, Para 44, Para 82, Para 91, Para 97) in February, 2020.

As originally proposed, the “semi-public route” between Horselydown Lane and Tower Bridge Road - which would be used by any guests exiting the building after 20.00 - would have solved many of the other issues raised with the developers - including hours of operation and number of guests - now created by the entrance and exit of 418 customers during the evening hours onto Horselydown Lane. However, the subsequent “minor changes” application 22/AP/1241 - approved in June 2022 and detailing a change of use for the first floor and the newly submitted layout plans - omitted this semi-public route. The route simply disappeared from the plans and was never mentioned to residents, despite its obvious impact on the adjoining neighbourhood.

The consequences:

Rather than acknowledging the impact this change will have for residents, the revised management plan seeks to minimise it.

The Planning Officers report for 19/AP/1975, para 11, describes the area surrounding TBC as “**mostly** converted to residential accommodation with retail, offices and restaurants on their ground floors”. Para 13 again stresses residential accommodation on the corner of Gainsford Street and Horselydown Lane.

By comparison, while the Management Plan seeks to lessen any impact on residents despite Para 1.1 promising: “TBC.London is committed to being a good neighbour; having a positive impact on the local neighbourhood and enhance the experience of people in the area,” it also seeks to minimise the residential character of the area. This is apparent in Para 6.1 which reads: “It must be remembered at all times that TBC.London is located in an area of diverse occupiers with significant

numbers of retail premises, local businesses, a variety of food and beverage operators and a strong community of local residential occupiers” - please note that residents are now last on the list, despite the acknowledgment of the Officers that the surrounding areas is mostly residential.

While there is acknowledgment for the potential for noise and disturbance to spread from the immediate area (para 6.2) by offering to work in conjunction with the management team at Courage Yard “to understand how best to control the use of the Courage Yard area as a focal point for people wishing to consume food off-site,” this is an impractical and nonsensical suggestion. It would be outside the responsibility of the managing agent. The managing agent is employed by the freeholder - Southwark Council – to oversee maintenance, cleaning, and routine services, they have no role in security nor in decisions in the running of Courage Yard, neither would they want to be involved. This highlights a dilemma for the operator of the retail unit - how to deal with noise and nuisance that spreads from the retail unit – it is a deficiency in the Management Plan.

The proposal:

The only practical way (as the Developer has accepted in principle during the CLG meetings) to dealing with potential noise and disturbances and other problems from activities in the retail unit that may be faced by the “locality” is to engage with the locality through established routes provided by constituted community groups. The management plan, apart from unspecified communication with local councillors, offers no way for residents to express concerns. It would be in the retail operator’s interests to agree this, as not having a process in place is likely to lead to repeated complaints to Southwark’s Planning Enforcement and Licensing Department.

Consultations with residents should take place regularly over the first six months (say every two months) reduced to every three months and subject to review thereafter. This would establish a pattern of behaviour by customers to the retail unit and ensure the “good neighbour” policy proposed by the applicant.

Responsibility

The consultations would cover areas where the Management Plan is vague over how the retail unit will operate.

- Para 6.1 states the “retail operator shall take all precautions to minimise noise and nuisance in the area”. The area is not defined, it should include, Horselydown Lane, Shad Thames as far as Lafone Street, Courage Yard, Gainsford Street as far as Lafone Street and part of Queen Elizabeth Street.
- Para 6.2 fails to define how and where the location of taxi pick-up and collection sites will be apart from saying there will be “consideration.” Taxis will not be allowed to idle in Horselydown Lane but restrictions for Gainsford Street and Queen Elizabeth Street are not mentioned. How will this be patrolled?
- The retail operator promised to manage the flow of customers to and from the retail space in such a way that would always minimise noise, but especially so after 19:00. Para 7.4 says guests will be directed to exit via Shad Thames, moving in a westerly direction under Tower Bridge Road or up the stairs leading from Shad Thames to Tower Bridge Road and staff will be posted at the exits during the close down period to remind guests to keep noise to a minimum and ensure guests do not gather or linger outside the building after the operation

closes. No mention is made of the number of security staff needed to control 418 customers exiting the premises or how practically controls will be implemented.

- Para 11.16 specifies external areas along Horselydown Lane and Shad Thames will be patrolled regularly for rubbish with para 11.21 saying that street cleaning around the perimeter is conducted during opening hours at hourly intervals and increased where necessary. No mention is made of the specific area that will be patrolled. If rubbish is to be picked up in this area why is unruly behaviour and noise not similarly included?
- Para 15.1 specifies 24-hour security with guards undertaking at least hourly site patrols though no mention is made of patrolling outside areas after the premises closes to ensure customers have dispersed.
- The control of takeaway collections is vague, and monitoring is needed to ensure proposed deliveries and collections are adequate and do not lead to a “loss of amenity” for the residents, as specified in the Planning Officers report.

These potential problems could be contained and controlled through direct contact with those most affected – the residents.

Advertising and Displays:

The Management Plan details advertising and signage on the building. A drawing in Para 8.2 shows displays in the Eastern lower level with two blanked out windows carrying promotional material some 6m tall and four other windows, around 2.5 m tall (shown red in the drawings) The front signage advertising the premises logo covers 18m (shown blue in the drawing). The intensive signage and scale of these promotional signs as it stands would be contrary to controls on advertising and signage in the Tower Bridge Conservation Area Appraisal and the Shad Thames Area Management Plan, adopted by the Council in 2003 and 2014 respectively, as well as in Historic England’s ‘Streets for All’ guidance (page 39).

Consideration should be given as to whether planning permission would be needed for the signage.

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