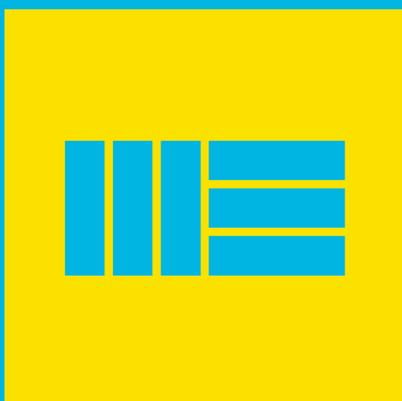


PLANNING STATEMENT- ADDENDUM

LAND BOUNDED BY ST THOMAS
STREET, FENNING STREET, VINEGAR
YARD AND SNOWFIELDS INCLUDING
NOS. 1-7 FENNING STREET AND NO. 9
FENNING STREET, SE1 3QR

ON BEHALF OF
ST THOMAS BERMONDSEY LIMITED

JANUARY 2022



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1.0 INTRODUCTION

- 1.1** This Planning Statement Addendum (“the Addendum”) has been prepared by Montagu Evans in connection with an application for full planning permission submitted on behalf of St Thomas Bermondsey Limited (“the Applicant”) for the redevelopment of land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowsfields including Nos. 1-7 Fenning Street and No.9 Fenning Street (“the Site”). It should be read in conjunction with the Planning Statement and suite of submission materials prepared and submitted to the Greater London Authority (“GLA”) in November 2021 (GLA ref. 2020/6665).
- 1.2** The purpose of this Addendum is to provide further details in relation to certain aspects of the development proposals, including how the proposed land-uses will be implemented, operated, and regulated.
- 1.3** Other than as set out in this Addendum the proposed development is as described in the suite of materials submitted to the GLA in November 2021.
- 1.4** The remaining sections of this Addendum are presented as follows:
- **Section 2.0** confirms the updated description of development; and
 - **Section 3.0** provides further detail and clarity on the proposed land-uses in respect of which consent is being sought; and
 - **Section 4.0** provides a table summarising the changes between the 2018 and 2021 versions of the Environmental Statement.

2.0 DESCRIPTION OF DEVELOPMENT

2.1 The description of development, as submitted in November 2021 was as follows:

“Redevelopment of the site to include the demolition of existing buildings, retention and refurbishment of the warehouse and the erection of a ground, mezzanine and 18 storey building (with plant at roof) and 3 basement levels, comprising of café and community space within the warehouse and within the new building office, flexible medical and research and development, and flexible retail and affordable workspace, alongside cycle and disabled car parking, servicing, refuse and plant areas, public garden (including soft and hard landscaping), highway improvements and all other associated works”.

2.2 This was updated by the GLA, and agreed by the Applicant, prior to the consultation that took place in November/December 2021, as follows (Montagu Evans tracked changes):

“Redevelopment of the site to include the demolition of existing buildings, retention ~~and~~, refurbishment ~~and use~~ of the warehouse ~~as a retail and community space~~ and the erection of a ground, mezzanine and 18 storey building (with plant at roof) and 3 basement levels, comprising ~~of café and community space within the warehouse and within the new building office~~ ~~new office space~~, a flexible medical and research and development ~~space~~, flexible retail ~~at ground floor~~ and affordable workspace, alongside cycle ~~and disabled car~~ parking, servicing, refuse and plant areas, ~~public garden (including soft and hard landscaping)~~, highway improvements and all other associated works”.

2.3 It has been further updated and agreed by the GLA for the purposes of the January 2022 consultation (required as a result of a potential postal error with the November/December 2021 consultation) as follows (Montagu Evans additional tracked changes):

“Redevelopment of the site to include the demolition of existing buildings, retention, refurbishment and use of the warehouse as a retail and community space and the erection of a ground, mezzanine and 18 storey building (with plant at roof) and 3 basement levels, comprising new office space, a ~~flexible~~-medical ~~and or~~ research and development space, flexible retail at ground floor and affordable workspace, alongside cycle parking, servicing, refuse and plant areas, soft and hard landscaping, highway improvements and all other associated works”.

2.4 The changes to the wording are principally to ensure there is further detail in the description of development on the range of land uses being sought as part of the application and their location within the proposed scheme. It also reflects the clarification regarding the proposed medical or research and development floorspace as set out in Section 3 of this Addendum.

3.0 PROPOSED LAND USES

Medical or Research & Development floorspace

- 3.1** The November 2021 submission refers to “flexible” medical and research & development floorspace being provided on the lower floors of the main building (levels one to ten) (the ‘Lower Floors’). This section of the Addendum seeks to clarify the applicant’s proposals for this element of the proposed development. No changes are required to the development or drawings since the November submission to effect this.
- 3.2** The application seeks consent for two alternative uses for the Lower Floors: (i) medical floorspace (Use Class D1) (‘Option 1’); or, to the extent permitted by the S106 agreement (see further below), (ii) research & development floorspace (Use Class B1(b)) (‘Option 2’).
- 3.3** The medical floorspace’s D1 Use class prevents residential health care i.e. where patients stay overnight, such that health care functions would be restricted to day clinics and outpatient functions only. The applicant is also willing to accept conditions that preclude accident and emergency functions as well as associated ambulances. Details of further restrictions to prevent undue highways and residential amenity impacts, for example, will be negotiated.
- 3.4** The S106 agreement and planning conditions would control how and when the applicant could move from Option 1 to Option 2 (likely to be during the construction phase). Once an option is committed to, the permission would not allow any further flexibility for further change between the two Options. At that point therefore, the consented use for the Lower Floors would be fixed.
- 3.5** There are some design changes that would be required depending on which option is pursued. The submitted drawings pack therefore includes a number of alternative drawings to allow for an Option 1 or Option 2 scenario to come forward (see drawings PA-100, PA-100a, PA-103, PA-103A, PA-108, PA-108A, PA-210, PA-210a and Pages 45-49 in the Design and Access Statement). A planning condition would control this such that only one set of approved drawings would ultimately be capable of being built out.
- 3.6** The design changes between the two options are, in summary:
- The retail provision at ground floor would increase from 588 sqm GIA in Option 1 to 618 sqm GIA in Option 2 due to ground floor gas storage not being provided or required in Option 2 (B1(b)). This allows the eastern ground floor retail unit to become larger. Further details of this are set out on Page 48 of the Design and Access Statement.
 - The quantum and configuration of plant on levels 3 and 8 would change (less plant being required for Option 2) – see drawings PA-103, PA-103A, PA-108 and PA-108A. Further details of this are set out on Page 47 of the Design and Access Statement.
 - The difference in air handling requirements between the two uses results in a differing requirement for glazed louvres serving levels 03 and 08. Option 2 (B1(b)) requires less fresh air than Option 1 (D1). This results in slightly less glazed louvred required on the northern façade in Option 2. Further details of this are set out on Page 48 of the Design and Access Statement and drawings PA-210 and PA-210A.

- 3.7** Whilst the Section 106 agreement legal provisions are not finalised, it is proposed that the Lower Floors will first be offered to Guys and St Thomas' for use as D1 medical space (Option 1). In the event that the S106 requirements are met, but the D1 use is not confirmed within an agreed timeframe, the developer would be able to implement Option 2 (research and development Use Class B1(b)). Some or all of the Lower Floors could still be taken by Guys and St Thomas', but the S106 will also allow for marketing to other medical/SC1 Life Science related users. Details of the SC1 Life Science and Innovation District is included below in order that that nature of 'related uses' can be more readily understood. Detailed definitions will be the subject of negotiation and will be set out clearly in planning obligations (with the Section 106 agreement).
- 3.8** The remainder of the upper floors of the main building (levels 11 to 18) will comprise a B1(a) office use under both Option 1 or Option 2. This could be occupied by Guys and St Thomas or indeed any other user.

SC1 Life Science and Innovation District

- 3.9** The SC1 Life Science and Innovation District refers to the emerging place based vision intended to accelerate growth of the health science economy in south central London, founded by Southwark and Lambeth councils, Guys and St Thomas's Foundation, and King's Health Partners. The objectives of the SC1 district are:
- a) *to connect organisations and nurture new collaborations;*
 - b) *to attract inward investment and develop the health science business ecosystem ;*
 - c) *to develop the progress, promise and potential of the south central London area as a globally recognised centre of excellence for health and life sciences;*
 - d) *to secure benefits for local people, including skills and employment opportunities;*
 - e) *to bring the best in scientific and medical expertise to the south central London area;*
 - f) *to enable better health outcomes for patients and the community; and*
 - g) *to increase the sector base to act as a catalyst for economic growth.*
- 3.10** The three existing geographical hubs in the SC1 District are:
- i. The Biomedical Hub focused on advanced therapies, genomics, cellular medicine, cancer and biomedical sciences;
 - ii. The MedTech Hub which is home to interdisciplinary research and development teams with innovative medical technologies; and
 - iii. The Translation Hub concerning mind and body research with a focus on the brain and metabolic medicine, children's and young people's mental health, psychology and psychiatry, neurology and the liver.

Permitted development rights

- 3.11** As set out above, permission is sought for two alternative uses for the Lower Floors as opposed to an ongoing flexible dual use.
- 3.12** A planning condition would disapply permitted development rights (in Class V of Part 3 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015) that might otherwise allow for ongoing flexibility between the two uses.
- 3.13** The only means of changing between the uses will be in accordance with the terms of the Section 106 agreement and planning conditions.

Affordable workspace

- 3.14** As outlined in the November 2021 Planning Statement, irrespective of the implementation of either a medical (Option 1 - D1) or research and development (Option 2 - B1(b)) use for the Lower Floors, the proposed development will achieve a policy compliant level of affordable workspace, being 10% of total employment floorspace. In Option 1 (medical) the proposed development will in fact exceed the policy requirement, as there would be no requirement for affordable workspace generated by the Lower Floors, but Option 1 does not seek to reduce the quantum of affordable workspace.
- 3.15** A total of 3,067 sq.m. (32,432 sq.ft.) (GIA) affordable workspace is proposed across the Ground Floor Mezzanine Level, Basement Mezzanine Level and Basement Level 1 (as shown on drawings PA-100-M, PA-099-M & PA-099). The quantity and location of affordable workspace has not changed since the November 2021 submission.

Deep discount affordable workspace

- 3.16** As set out in our November 2021 Planning Statement, it is proposed that Southwark Studios will occupy a minimum of 1,190 sq.m. (12,817 sq.ft.) (GIA) of the Basement Mezzanine Level and Basement Level 1 as affordable workspace. This area would be available at a deeper discount (c.70%) than the remainder of the affordable workspace (which would be provided at the more usual 30% discount).
- 3.17** Southwark Studios is included on LBS' list of approved affordable workspace providers and they provide desk space and studios with shared facilities and associated public events or gallery space for local creative industries. It is proposed that they will occupy this space under an open B1 use. In the event that Southwark Studios do not take the space, the applicant has committed to the same level of discount for another approved affordable workspace provider.

Other affordable workspace – 30% discount (1,877 sq.m.; 20,203 sq.ft. GIA)

- 3.18** The 30% discount affordable workspace would be located across the Ground Floor Mezzanine Level and remainder of Basement Mezzanine Level and Basement Level 1.

(a) Ground Floor Mezzanine (1,035 sq.m; 11,140 sq.ft. GIA)

- 3.19** Given the Ground Floor Mezzanine Level is internally linked to the Lower Floors, it is proposed that this would comprise a D1/B1(b) use which operates in the same way as the Lower Floors (i.e. it would be offered to Guys and St Thomas' as medical (D1) floorspace in the first instance (Option 1) and, if this outcome is not secured in accordance with the S106 provisions it could then be made available as 'medical related' or SCI Life Science and Innovation District related B1(b) floorspace (Option 2).

(b) Basement Mezzanine and Basement Level 1 (842 sq.m.; 9,063 sq. ft (GIA))

- 3.20** With regard to the remaining affordable workspace at Basement Mezzanine Level and Basement Level 1, it was proposed in the November 2021 submission that the affordable workspace at these levels would comprise a dual D1/B1(b) use. To take into account the aspirations of emerging LBS Policy P30, it has been decided that this affordable workspace should now comprise a B1 use. A B1 use for this affordable workspace would also permit Guys and St Thomas to occupy this space under a B1(b) use.

Total affordable workspace provision

3.21 In summary, the table below provides a schedule of the proposed affordable workspace provision, which remains consistent for both Options 1 and 2:

| Building level | Floorspace quantum (GIA) | Use Class |
|---------------------------------------|--|-----------------------|
| Ground Floor Mezzanine & Lobby | 1,035 sq.m. / 11,140 sq.ft. | Use Class D1 or B1(b) |
| Basement Mezzanine & Basement Level 1 | 2,032 sq.m. / 21,872 sq.ft. <i>Southwark Studios / deep discount operator – 1,190 sq.m. / 12,817 sq.ft.</i> <i>Other tenant – 842 sq.m. / 9,063 sq.ft.</i> | Use Class B1 |
| Total Affordable Workspace | 3,067 sq.m. / 32,432 sq.ft | |

Use Classes

3.22 The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 made substantial changes to the previous use classes, which are now applicable to all new planning applications. However, as the application was submitted to the Council in April 2019 (before 1 September 2020 when the new use classes would have applied), it will be determined by reference to the previous use classes.

3.23 However, on completion of the scheme the consented uses would be treated as if they were those currently in force (i.e. following the 2020 amendments).

3.24 For absolute clarity's sake, the below table provides a comparison of the Use Classes being sought as part of this application with those applicable following the 2020 changes:

| Proposed Development Use Classes | Equivalent Use Classes further to 2020 Amendments |
|--|---|
| Use Class B1(a) <i>Offices</i> <i>Floors 11-18</i> | Use Class E(g)(i) <i>Offices to carry out any operational or administrative functions</i> |
| Use Class D1 – OPTION 1 <i>Non-residential institutions (clinics / health centres)</i> <i>Floors 1-10</i> <i>Ground Floor Mezzanine (main building)</i> <i>Ground Floor Lobby (main building)</i> | Use Class E(e) <i>Provision of medical or health services (except the use of premises attached to the residence of the consultant or practitioner)</i> |
| Use Class B1(b) – OPTION 2 <i>Research and development of products or processes</i> <i>Floors 1-10</i> <i>Ground Floor Mezzanine (main building)</i> <i>Ground Floor Lobby (main building)</i> | Use Class E(g)(ii) <i>Research and development of products or processes</i> |
| Use Classes A1, A2, A3 & A4 <i>A1 – Shops</i> <i>A2 – Financial and professional services</i> <i>A3 – Restaurants and cafes</i> <i>A4 – Drinking establishments</i> | Use Class E(a)(b)(c) & Sui Generis <i>E(a) – Display or retail sale of goods, other than hot food</i> <i>E(b) – Sale of food and drink for consumption (mostly) on the premises</i> <i>E(c) – Provision of:</i> |

| | |
|--|---|
| <p><i>Ground Floor (main building)</i> <i>Ground Floor (warehouse)</i></p> | <ul style="list-style-type: none"> • <i>E(c)(i) – Financial services;</i> • <i>E(c)(ii) – Professional services (other than health or medical services); or</i> • <i>E(c)(iii) – Other appropriate services in a commercial, business or service locality.</i> <p><i>Sui Generis – drinking establishments</i></p> |
| <p>Use Class B1 <i>Business</i> <i>Basement Level Mezzanine (main building)</i> <i>Basement Level 1 (main building)</i></p> | <p>Use Class E <i>Commercial, Business and Service</i></p> |
| <p>Use Class D2 <i>Assembly and leisure</i> <i>Mezzanine Level (warehouse)</i></p> | <p>Use Class F2(b) <i>Halls or meeting places for the principal use of the local community</i></p> |

Area schedules

3.25 We set out below two separate area schedules that show the floor areas (GIA) across the proposed development depending on whether the Lower Floors are built out as medical D1 floorspace (Option 1) or research and development B1(b) (Option 2). The floor areas remain consistent with the information submitted in November 2021. These tables below are simply intended to more clearly show the changes between the two proposed options:

| OPTION 1: MEDICAL (USE CLASS D1) SCENARIO - | | |
|--|-----------------------------|------------------------------------|
| Building Level | Use Class | Quantum of Floorspace (GIA) |
| Main Building | | |
| Levels 11-18 | Use Class B1(a) | 8,207 sq.m. |
| Levels 1-10 | Use Class D1 | 12,314 sq.m. |
| Ground Floor Mezzanine (AWS) | | 918 sq.m. |
| Ground Floor Lobby | | 320 sq.m. |
| Ground Floor Mezzanine (AWS circulation) | Use Class D1 | 117 sq.m. |
| Ground Floor | Use Classes A1, A2, A3 & A4 | 408 sq.m. |
| Basement Mezzanine (AWS) | Use Class B1 | 914 sq.m. |
| Basement Level 1 (AWS) | Use Class B1 | 1,118 sq.m. |
| Mechanical plant | N/A | 5,827 sq.m. |
| Warehouse | | |

| | | |
|----------------------------------|-----------------------------|-----------|
| Mezzanine | Use Classes D1 / D2 | 180 sq.m. |
| Ground Floor | Use Classes A1, A2, A3 & A4 | 180 sq.m. |
| Totals | | |
| Above ground | 24,952 sq.m. | |
| Below ground | 5,551 sq.m. | |
| TOTAL PROPOSED FLOORSPACE | 30,503 sq.m. | |
| TOTAL D1 FLOORSPACE | 13,552 sq.m. | |

| OPTION 2: RESEARCH & DEVELOPMENT (USE CLASS B1(B)) SCENARIO - | | |
|--|-----------------------------|------------------------------------|
| Building Level | Use Class | Quantum of Floorspace (GIA) |
| Main Building | | |
| Levels 11-18 | Use Class B1(a) | 8,207 sq.m. |
| Levels 1-10 | Use Class B1(b) | 12,644 sq.m. |
| Ground Floor Mezzanine (AWS) | | 918 sq.m. |
| Ground Floor Lobby | | 320 sq.m. |
| Ground Floor Mezzanine (AWS circulation) | Use Class B1(b) | 117 sq.m. |
| Ground Floor | Use Classes A1, A2, A3 & A4 | 438 sq.m. |
| Basement Mezzanine (AWS) | Use Class B1 | 914 sq.m. |
| Basement Level 1 (AWS) | Use Class B1 | 1,118 sq.m. |
| Mechanical plant | N/A | 5,467 sq.m. |
| Warehouse | | |
| Mezzanine | Use Classes D1 / D2 | 180 sq.m. |
| Ground Floor | Use Classes A1, A2, A3 & A4 | 180 sq.m. |

| Totals | |
|----------------------------------|---------------------|
| Above ground | 24,952 sq.m. |
| Below ground | 5,551 sq.m. |
| TOTAL PROPOSED FLOORSPACE | 30,503 sq.m. |
| TOTAL B1(B) FLOORSPACE | 13,882 sq.m. |

4.0 ENVIRONMENTAL STATEMENT

- 4.1 The Application is supported by an Environmental Statement (ES). The ES was first prepared in 2018 to support the submission of the Application to the Council. To respond to the scheme revisions which were made over the course of 2020 and 2021, a new ES was prepared and submitted to support the November 2021 submission to the GLA.
- 4.2 The below table has been prepared to highlight the key changes between the 2018 and 2021 versions of the ES. There is no new environmental information provided. The 2021 ES is a complete and standalone document that provides all of the environmental information required for determination of the application.

| ES Chapter | Comparison of 2018 ES v 2021 ES |
|---|--|
| Chapter 0: Preface | The 2018 ES did not include this ES Chapter. The Preface ES Chapter was provided within the 2021 ES only to set out the history of the planning application for the Vinegar Yard scheme and how the scheme has responded to various iterations of design responses since the original scheme was submitted in 2018. |
| Chapter 1: Introduction | No material change. |
| Chapter 2: EIA Methodology | Updates to local and regional planning policy have been made within the 2021 ES Chapter (i.e adoption of the new London Plan) as well as any additional cumulative schemes that have been submitted and/or approved since the submission of the 2018 ES. |
| Chapter 3: Alternatives and Design Evolution | Further detail is provided within the 2021 ES Chapter with regards to the changes that were made to the scheme since the 2018 ES and submission of the application (i.e the removal of the Pavilion, the introduction of the medical use as well as changes in massing of the Main Building). |
| Chapter 4: Proposed Development | Updates to ES Chapter 4 include a list of design changes since 2018, an updated description of the scheme proposals in terms of massing, layout and scale plus changes to the landscaping and facades. |
| Chapter 5: Demolition and Construction | Minor change to construction programme (reduction) and materials. The 2021 ES Chapter does base some of the information within the ES Chapter on a scheme that comprises D1 medical use as a worst case scenario. |
| Chapter 6: Socio-Economics | The 2018 Socio-Economic ES Chapter assessed employment and spending once the scheme is operational based on the 2018 office led scheme. The 2021 ES Chapter assesses two Options, Option 1 assumes level 1-10 of the Main Building comprises medical use and Option 2 assumes levels 1-10 of the Main Building comprises research and development use. A comparison of effects between the 2018 assessment and 2021 assessment has been provided within the 2021 ES Chapter. |
| Chapter 7: Traffic and Transport | The 2018 Traffic and Transport ES Chapter assessed the effects of construction and operational traffic on the 2018 office led scheme. The 2021 ES Chapter assesses two Options, Option 1 assumes level 1-10 of the Main Building comprises medical use and Option 2 assumes levels 1-10 of the Main Building comprises research and development use. A comparison of effects between the 2018 assessment and 2021 assessment has been provided within the 2021 ES Chapter. |
| Chapter 8: Air Quality | Baseline air quality data has been updated in the 2021 ES Chapter. Effects of demolition and construction related air quality effects have been scoped out of the 2021 ES Chapter. In the 2021 ES Chapter, the operational air quality effects with regards to traffic assesses two Options, Option 1 assumes level 1-10 of the Main Building comprises medical use and Option 2 assumes levels 1-10 of the Main Building comprises research and development use. The Air Quality Neutral assessment also assesses the two options in the 2021 ES Chapter whereas the 2018 ES Chapter only assessed the 2018 office led scheme. An Air Quality Positive statement has also been provided within the 2021 ES Chapter appendices in line with the aspirations of the new London Plan. A comparison of effects between the 2018 assessment and 2021 assessment has been provided within the 2021 ES Chapter. |

| ES Chapter | Comparison of 2018 ES v 2021 ES |
|---|---|
| Chapter 9: Noise and Vibration | <p>The 2018 Noise and Vibration ES Chapter considered the control of noise egress from the proposed performance venue within the Pavilion. The Pavilion has been removed from the updated proposals and so the 2021 ES Chapter does not consider this. The demolition and construction effects and the effects once the scheme is complete and operational has considered the two Options as described in the above sections within the 2021 ES Chapter. The 2018 ES Chapter assessed the 2018 office led scheme only.</p> <p>A comparison of effects between the 2018 assessment and 2021 assessment has been provided within the 2021 ES Chapter.</p> |
| Chapter 10: Wind Microclimate | <p>The methodology of the wind microclimate assessment remains the same. However, the wind tunnel has tested an updated massing proposal as part of the 2021 ES Chapter.</p> <p>A comparison of effects between the 2018 assessment and 2021 assessment has been provided within the 2021 ES Chapter.</p> |
| Chapter 11: Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution | <p>The methodology of the daylight, sunlight, overshadowing, solar glare and light pollution assessment remains the same. However, the assessment has tested an updated massing proposal as part of the 2021 ES Chapter.</p> <p>A comparison of effects between the 2018 assessment and 2021 assessment has been provided within the 2021 ES Chapter.</p> |
| Chapter 12: Archaeology | <p>No material change.</p> <p>A comparison of effects between the 2018 assessment and 2021 assessment has been provided within the 2021 ES Chapter.</p> |
| Chapter 13: Effect Interactions | <p>The methodology remains the same. A comparison of effect interactions between the effects identified within the 2018 ES and the 2021 ES has been provided within the 2021 ES Chapter.</p> <p>Option 1 and Option 2 described in the sections above has been considered within the 2021 ES Chapter</p> |
| Chapter 14: Likely Significant Effects and Conclusions | <p>The methodology remains the same. A comparison of likely significant effects between the effects identified within the 2018 ES and the 2021 ES has been provided within the 2021 ES Chapter.</p> <p>Option 1 and Option 2 described in the sections above has been considered within the 2021 ES Chapter</p> |
| Chapter 15: Mitigation and Monitoring Schedule | <p>Any updates to mitigation measures since the 2018 ES have been included within the 2021 ES Chapter.</p> <p>Option 1 and Option 2 described in the sections above has been considered within the 2021 ES Chapter.</p> |
| Chapter 16 Glossary and Abbreviations | <p>No material change.</p> |

5.0 CONCLUSION

- 5.1** To conclude, this Planning Statement Addendum has been prepared to provide further details in relation to certain aspects of the development proposals, including how the proposed land-uses will be implemented, operated, and regulated.
- 5.2** It should be read in conjunction with the Planning Statement and suite of submission materials prepared and submitted to the GLA in November 2021 (GLA ref. 2020/6665).
- 5.3** Other than as set out in this Addendum, the proposed development is described in the suite of materials submitted to the GLA in November 2021.