

**Consultation responses : Bermondsey Neighbourhood Area boundary extension application**

I personally strongly support this proposed extension. These are intimate streets and places that will benefit significantly for their granular attention that being in a Neighbourhood Forum can offer. There are lots of interesting and special places which will benefit including the areas to the north and south of the railway line which if treated carefully have the potential to be strong additions to the plans for a Low Line route stretching south-east towards Bermondsey Spa. More importantly there is the future of the Vinegar Year Warehouse. This for me is one of the finest examples of a heritage building in the northern part of the borough and it should be preserved and subject to a careful restoration to bring it back into use. Its loss after surviving so long and with so much character would be a tremendous loss to the Southwark and its built and cultural heritage.

Yes

Why does this area wish to be represented differently

Bermondsey is Bermondsey

It's diversity is unique and people will start feel excluded .

I have lived my whole life in this borough born and grown in East Dulwich and a resident of SE1 since 1993 and proud .

Social inclusion and not having one area with a specific identity goes against social interaction

In a nutshell the areas that want to be revised I note are nearer to the Thames and borough market are they trying to make their area flourish more so than us in south Bermondsey .

The revised area includes St Johns Churchyard which has recently been taken over by Potters Fields Park Trust, which has its own Board (including Southwark Council). Potters Fields Park itself is not included in the Neighbourhood area. What would happen if the Trust and the Neighbourhood Forum had different views of what should be done in St Johns Churchyard? Any extended boundary arrangements should acknowledge the potential for conflicts and spell out how these would be resolved.

I think it makes a lot of sense. I've lived in the local area since 2001, initially on Whites Grounds Estate, and now in Royal Oak Yard. The boundaries proposed by the expanded area to the north match the 'natural' boundaries in terms of feel of the area. Tooley Street is a clear boundary, but the area south of there, albeit north of the train tracks, has a very similar feel to the area of Bermondsey Street. Similarly, the area towards Guy's Hospital is clearly linked to the Bermondsey Street area currently designated.

I fully support the revised (extended) OBF area.

I am fully supportive of the extended area. It seems extremely odd that specific areas around Guy's Hospital, St Thomas street and snowfields were originally excluded.

These adjoining streets to the Bermondsey Street area are crucial to the fabric and make up of the area and local community.

I can understand the Council is incentivised to develop these areas to increase income but I would strongly encourage them to act in the best interest of the local community and extend this neighbourhood area.

I fully support the application to extend the Neighbourhood area to the area as designated by the extension, especially with regards to Melior St and its surrounding areas. The numerous small businesses, not to mention the Church based in the area, are intrinsic parts of a 'local neighbourhood' and contribute to the neighbourhood feel. They deserve the ability to have representation as part of a Neighbourhood Forum, and as off-shoots from Bermondsey Streets, it would be ridiculous to exclude

them from the careful coordination of neighbourhood planning.

Additionally, the extension areas are of a character that is in keeping with the area designated 'Area A', and it makes little sense (beyond greed to profit from the geographic location of these areas) to exclude them from the ability to function as part of a neighbourhood/under the auspices of a neighbourhood forum.

I support the extension of the Neighbourhood Area. This is a key area where significant development is planned that will impact the residents and workers in this 'Old Bermondsey Village' area; and there should be the opportunity for closer liaison and collaboration, where our voices should be heard

I fully support the extension of the Neighbourhood Area, to include the areas around my flat up to St Thomas Street and the area up to Tooley Street

I fully support the extension of the neighbourhood area. The character and heritage of the area would be greatly affected by the wrong type of developments and land use and I feel it is important that local residents and business has a say.

I support the forums application for the extended area to preserve the character and business culture around the Bermondsey street area.

I approve the revision of the area boundary to protect thriving local businesses and the local heritage that makes the Bermondsey area a great place to work and socialise. To support local businesses over the increase in "chain" stores and high-rise buildings which would spoil the character of the Bermondsey area.

I approve of this proposal.

In addition to this:

- Adding in a large quantity of flats in the area will increase road traffic, increasing congestion and pollution in the area
- There will be further congestion with local train stations, especially with London Bridge, which are already very busy in rush hours
- Local independent businesses may not be able to withstand against property bidding from larger chains, reducing attractiveness of other independent businesses in the area and local economy
- Sewage might not be able to keep up
- Air quality will be further reduced
- Parks will be overcrowded

I support extension the current neighbourhood area to preserve the special cultural, architectural and economic area that has grown in Bermondsey. Our business benefits hugely from the close-knit community of creative independent businesses that reside here, and I support any work to preserve the area's character and charm.

I fully support the extension proposed by OBF. I have worked in the area for around 3 years, and I think the character and atmosphere of Bermondsey village is so unique and perfectly suited to benefit from Neighbourhood Planning. I regularly walk up Bermondsey Street, under the viaduct into the area proposed to be included, for lunch or as a pleasant long-way around to get to London Bridge station. It's clear that the area to the north of the viaduct matches that to the south in character and architecture, and I consider including it in the "plannable" area along with the rest of Bermondsey the most sensible direction, given that the opposite seems to be further development like the proliferation of professional services and expensive chains that is More London, on the other side of Tooley Street.

Two examples which I would give as to the enduring quality of the area proposed to be included are first,

one of the buildings on the south side of Tooley Street, which I noticed only today still has a large old brick chimney attached - a wonderful piece of history and connection of the area to the past. The second is the vinegar warehouse between Snowsfields and St. Thomas' Street. This is a beautiful building which, sadly, has been neglected over the years in favour of modern high-rise, high-capacity developments., but which could be easily restored and maintain the great feel that the area enjoys. Allowing this area to be included in Neighbourhood Planning for Bermondsey would be a huge asset in maintaining this attractive and historic area.

The alternative, leaving this area out of the Neighbourhood area, would open the door for more of the aforementioned high-rise, high-capacity developments - further excluding local residents and bringing more of the sorts of over-priced, under-occupied property that blights much of central London. Not only that, but the (in my opinion) well-designed London Bridge works will already bring increased foot and motor traffic to the area. Additional high-rise apartment blocks would only exacerbate the problem of capacity, which already results in some entrances of the station being closed in busy periods to restrict overcrowding. Neighbourhood planning would instead allow the residents and business in the area to develop more open spaces and use this increased traffic to fuel the already thriving local community, and continue to build an environment that encourages walking and cycling, and maintains the area's desirability for small businesses of the sort that brought me to London, and the area, myself.

I work in the area within the current Bermondsey Village Neighbourhood. I believe OBF policies have strengthened my personal and work life specifically by supporting small businesses and startups as well as independent retailers. I support the BVN extension as it will allow us to further protect the style and vibe of our neighbourhood.

I approve of the plans to extend the area of influence. I work on Bermondsey St and it is paramount to the sustainability of this unique area which attracts so many visitors and small businesses. Bermondsey St is known for its culture, art and independent ventures and all this is at a high risk of being diluted to big business demands as we have seen across so much of London. I fully back the OBF so save our heritage

I am in favour of the extension.

Having lived in a town where buildings (and areas) of cultural significance have been erased or altered irrecoverably over the last 60 years. As well as watching Camden Market be invaded by chain stores, destroying it's uniqueness.

I feel it my moral obligation to prevent the same happening in Bermondsey.

I approve the expansion due to seeing the traditional feel of London, including history, heritage and experience being swallowed up by gentrification, high rise buildings and soulless opportunistic commercialisation of any square foot that remains.

This area is no longer home to the traditional buildings that survived the war, the pie and mash shops and the factories that once stood. Now we are one or two high rise buildings away from being a generic, non-descript area where you won't be able to tell that you're in the heart of London.

The sights and sounds tourist come to see will basically be the same as they will see in the airport terminals, just without the lack of tax.

I approve this plan because Bermondsey has been a great place for me to work and spend my time. I believe that high-rise residential buildings and big companies would destroy what has made Bermondsey so special.

The extension is needed for the reservation of the few beautiful buildings that remain after the Nazi

bombers during World War II. I feel like my heritage is being taken away from me :(

I think it is essential that this revised Neighbourhood area be put into effect. The amount of change in the area around London Bridge station and the Shard has been immense and the ongoing development runs the risk of sterilising the historical character of the surrounding areas including the one proposed. The local community must have input into changes within proposed area to ensure that aspects the community values can be argued for.

Agree

Pls confirm if Dawkins Court, Garland Close is contained in the new designation

This could be extended to cover Harper Road

Yes. The area designated by the Council does not optimise the planning process in which the Forum is engaged and its boundaries do not reflect an area in line with neighbourhood planning purposes. This is because the areas between Druid Street, Crucifix Lane, Snowfields and Newcomen Street to the South and Tooley Street to the North, which were included in the original application, fit better in character, urban grain and scale with the northern part of the area designated by the Council, as they mainly consist of small independent businesses and residences with several buildings having some historic or architectural interest. It would be to the detriment of the local community if the area the Forum is seeking to reinstate is excluded by the Council.

I strongly support the revision of the neighbourhood area to cover the area proposed by the OBF.

As longstanding local resident living very close to the proposed extended area I would welcome the opportunity for the community to input into planning decisions in the extended area that will have a big impact on us.

I think the proposal is valid on the basis that the land on the other side of Snowfields and the railway is very similar in character to the existing area in age, style and type of use (for example the council block the other side of Snowfields is exactly the same style as Tyers Gate). It is however clearly different to More London/Guys/LB station which make the new boundaries very logical.

The extended area is integral to the maintenance and development of the unique character of the neighbourhood. As such I view it as essential it is included in the area the OBF consults on for there to be a realistic ability for the community to have a voice in the area on planning.

OBF provides a valuable service for the community relying only on the goodwill of volunteers. The work to produce this proposal is more evidence of this and I support them in representing the community.

I would support the extension.

The style of the building in the proposed 'new' area has more in keeping with the neighbourhood than the Bermondsey forum currently oversees than the Shard or More London complex.

It makes sense for it to be included.

It makes unquestionable sense for the area named "Area A" (and coloured yellow in the questionnaire) to be extended to include the area named "Proposed Extension" (and shaded blue in the questionnaire). Given the similarity in architecture (e.g. Vinegar Yard warehouse and the warehouses on Bermondsey Street), the shared character (e.g. alleyways and low-rise buildings both north and south of the railway lines) and the close proximity it is logical and coherent for "Area A" to include the "Proposed Extension" area. I fully support OBF's proposal to extend the area of coverage for the Revised Neighbourhood Area.

It would be a great shame if Southwark Council cannot see the overwhelming rationale for a united area with a clear vision. The team at OBF are an open, welcoming and engaging community group who would

almost certainly do a fantastic job at delivering a neighbourhood vision that truly reflects the people who live, work and relax here.

As long-term residents of this area, please look favourably on this application, thank you.

Guy's and St Thomas's NHS Foundation Trust wishes to formally object to the Area extension proposal. An extension to Area A would also further complicate, delay and add expense to the current situation in terms of the Trust's ability to adequately respond to existing healthcare / education needs and plan for the future provision for local people.

We believe the new boundary would lead to contradiction and confusion with the New Southwark Plan, in particular NSP51: London Bridge Health Cluster. It would also contradict London Plan opportunity area policies for the London Bridge area.

The supported site boundary for NSP51 extends into the existing Area A to the south of Snowfields. Extending Area A to the north, alongside the western boundary of NSP51 site boundary, would increase conflict between planning policies in the New Southwark Plan, existing Southwark Plan and the London Plan.

Rather than extend, we believe that the boundary should reduce to ensure no conflict with NSP51. By accepting an extension of Area A then Council would be unwittingly causing future operational difficulties and delays to the essential activities of the hospital and its university partners.

We accept that it may not be possible at this stage to reduce the size of Area A to respect the new NSP51 site boundary, but we wish to strongly object to further extension of Area A due to the long-term operational impacts and restrictions on future flexibility it would have on the Trust. If it is possible to propose a reduction in Area A to respect NSP51 then we would strongly support that.

King's College London wishes to formally object to the Area extension proposal. An extension to Area A would further complicate, delay and add expense to the current situation in terms of the university's ability to adequately respond to existing education/healthcare needs and plan for the future provision for local people.

We believe the new boundary would lead to contradiction and confusion with the New Southwark Plan, in particular NSP51: London Bridge Health Cluster. It would also contradict London Plan opportunity area policies for the London Bridge area.

The supported site boundary for NSP51 extends into the existing Area A to the south of Snowfields. Extending Area A to the north, alongside the western boundary of NSP51 site boundary, would increase conflict between planning policies in the New Southwark Plan, existing Southwark Plan and the London Plan.

Rather than extend, we believe that the boundary should reduce to ensure no conflict with NSP51. By accepting an extension of Area A then Council would be unwittingly causing future operational difficulties and delays to the essential activities of the hospital and its university partners.

We accept that it may not be possible at this stage to reduce the size of Area A to respect the new NSP51 site boundary, but we wish to strongly object to further extension of Area A due to the long-term

operational impacts and restrictions on future flexibility it would have on the university. If it is possible to propose a reduction in Area A to respect NSP51 then we would strongly support that.

I approve of the revision of the area boundary to protect local businesses and the local heritage that makes the Bermondsey area a great place to work and socialise.

In addition, I'd like to state my support of the application to preserve the character and business culture of the bermondsey street area.

I have looked the revised Neighbourhood area as proposed by Southwark Council and think it both inadequate and probably deliberately divisive. It allows the proverbial horse and cart to be driven through the area by excluding parts purely to preserve commercial interests of a few private companies.

The Neighbourhood Area as proposed by BVAG and Old Bermondsey Forum seems much more appropriate for the areas needs. It includes all the sensitive areas and would allow proper and fully consultative development of the Bermondsey Street and St Thomas areas which MUST be considered as a whole.

I fully support the proposed extension to Area A

Basically this extension area shares the same character and history as area A and inclusion will enable residents and small business owners to be heard more strongly in any planning processes that may effect them in the future.

I SUPPORT the extension of AREA A.

It is creates a homogenous area of buildings with similar characters and history. It is also an area that deserves, and requires, preservation given that character and history.

I support the plan to extend the conservation area of Bermondsey as shown in the proposed area extension.

I don't want to see the history, heritage and culture of the area disappear. Particularly as it was home to my grand parents.

It should be allowed and actioned.

I enjoy working in this area as there is a great number of independent shops and business all adding to the thriving community feel. The Old Bermondsey Village Neighbourhood Forum plays a large role in maintaining this and protecting the area from large international companies making the area soulless with generic international names and large high-rise buildings. A more increased area and role for this Forum will only be a good thing, and safe-guard this area further and keep it a thriving community that is enjoyable to visit and work in.

I work in the area within the current Bermondsey Village Neighbourhood. I believe OBF policies have strengthened my personal and work life specifically by supporting small businesses and startups as well as independent retailers. I support the BVN extension as it will allow us to further protect the style and vibe of our neighbourhood.

The Extension area proposed by OBF helps to enhance the protection of the landscape of the iconic building's backdrop.

It is shameful to have allowed the construction of the Shard behind the view of St. Paul cathedral and what else after?

I very much support the proposal by OBF to revise, and expand, the Neighbourhood area. The proposal is modest in scale, logical and appropriate, in my view.

I really want this neighbourhood to be revise, please make it happen.

We do not want these building developments to commence! This will be damaging to the beauty and historic significance of this area. STOP!

I am opposed to the proposed changes to the area, the area is comprised of low rise buildings, mainly historic tanneries and warehouses which contribute a certain feel and developing high rise buildings in the area would entirely mar the charm and overall character of a beautiful area.

Yes.

It is essential that the local community have a say in the extension area - in order to preserve the character of the are and prevent those extension sites being turned into anonymous high rise development sites.

I live opposite the Victorian railway arches in Crucifix Lane - which are obviously closer in character to Bermondsey Street - rather than The Shard and Guys Tower. As is Holyrood Street and Shand Street. It is ludicrous to exclude them from the local community input.

I strongly support the revision of the OBF Area to include the area as shown.

I'm not really keen on the changes put forth and would object to any development in and around this area. Bermondsey must retain its charm and these plans would go a long way to ruining it.

I have looked the revised Neighbourhood area as proposed by Southwark Council and think it both inadequate and probably deliberately divisive. It allows the proverbial horse and cart to be driven through the area by excluding parts purely to preserve commercial interests of a few private companies. The Neighbourhood Area as proposed by BVAG and Old Bermondsey Forum seems much more appropriate for the areas needs. It includes all the sensitive areas and would allow proper and fully consultative development of the Bermondsey Street and St Thomas areas which MUST be considered as a whole.

I support as it includes as the wider area includes additional areas that can affect Bermondsey Village

It's a good proposal since we are talking about completely attached areas with many things in common

Having looked at the area as proposed by Southward Council and find it to be very divisive and not inclusive of all areas. It seems other areas are being favoured over others in the interests of few commercial organisations.

BVAG and the Old Bermondsey Forum have proposed a much better Neighbourhood Area Extension proposal and is better suited to the areas needs and would allow for the area to be considered as a whole which is vital.

The revised area has a much more sensible boundary as it includes buildings that are common with the village feel of Bermondsey street. The extended area also includes the vinegar yard warehouse which is one of the most prominent buildings in the area. Vinegar yard represents the historic industrial nature of the area, it is this very aspect that makes London Bridge such a desirable neighbourhood. It would be a crying shame for the community to lose this building. If people wanted glass and stainless steel high rise they would go to Canary Wharf. The people of Bermondsey Village/London Bridge appreciate the medieval infrastructure and the industrial victorian heritage. I know this as I have lived on Bermondsey

street for 20 years.

Having looked at the existing area as shown by South Council, I find it to be divisive and non inclusive and inadequate and seems to server the interests of few commercial organisations while ignoring others...

I feel the plans put forward by the BVAG and the old bermondsey forum are much more aligned to the greater needs of the area .

The proposed neighbourhood area omits parts that in my opinion should be included, especially given heritage buildings under threat from development, including buildings off St Thomas St and buildings off Snowsfields.

I believe it will help to preserve a more consistent and cohesive neighbourhood feel to the area at the top of Bermondsey Street. I live and work in the immediate area and do not approve of large-scale high-rise development immediately at the top of Bermondsey Street.

I support the extension to the boundary of BVAG/the neighbourhood plan. That this area was calculatingly and incongruently 'hived-off' from the influence of our neighbourhood, represents a deliberate undermining of democracy and is plainly underhand. Given its geographic prominence and dominance in the neighbourhood there can be no reason why this boundary was re-drawn other than to isolate it from the influence of neighbouring people, who must therefore pose some threat to the Councils agenda. Last time I checked I'm not living in Russia.

Yes, it should be extended to include St Thomas Street, Snowsfields and Crucifix Lane

Having just Southwark Council's notional "Area A" set as the scope of the Neighbourhood Forum area appears to me to be missing what it is that makes up the Character of the area. The inclusion of the extra northern section, as suggested by OBF, is much more in keeping with the tone and fabric of the area as a whole.

I agree with the "Revised Neighbourhood Area applied for by the Old Bermondsey Village Neighbourhood Forum (OBF) under application submitted to the council during September 2017"

I fully support the extension proposed by the OBF. It will help to retain the wonderful and unique character of the area.

I support the application to extend the area that the Old Bermondsey Forum is designated to to under take and represent the local community. They are vital to the preservation of the character of the area.

I would like the Old Bermondsey area to be extended to protect some of our older, traditional properties

The revised area will take in St John's Churchyard - an areas which Southwark Council have leased to Potters Fields Park Management Trust - the Trust is in the process of re-developing (on a small scale) the SJCy to make it more community friendly - i.e. planting, boule ground, etc. This particular part of the revised area should therefore be excluded from the extension as it is being very well developed to make it a better place for the neighbourhood.

The PFPMT is also aware of plans to develop the City Mission Church and will take all possible steps to protect the SJCY.

I support the proposal to extend the boundary area with a view to protecting local businesses and the architectural heritage of Bermondsey where I enjoy working



Supportive of the extension in the area.
I think that the look and feel of the area should be maintained and not modern, dated, eyesore buildings. The new builds should keep with the heritage and look of the area.
I strongly support its extension, and the principles behind the current area.
I work locally and really enjoy working in this area. I support the BVN extension as I think it will help us protect the great neighbourhood that we have here. There lots of small businesses and independent shops in the area, which makes it a fantastic place to work and I am pleased with the support shown to these kind of businesses. It's great that the OBF policies have supported the local area in this way.
I believe it would be a very , very bad thing to Jose our Giatory in this area and any building work should have that in mind
EXTREMELY NEEDED IN TIME OF HUGE, HIGH RISE DEVELOPMENT BEING ENVISAGED WITHIN THIS AREA WHICH WOULD NOT BENEFIT THE LOCAL COMMUNITY, IE: OFFERING HARDLY ANY SOCIAL HOUSING, OR AMENITIES FOR THE PEOPLE LIVING RIGHT IN THE AREA. THE "PUBLIC REALM" CANNOT BE SOLELY FOR RESTAURANTS AND WATERING HOLES WHICH MAKE BERMONDSEY A DESTINATION TO COME ONCE TO AND VISIT ..... A STOP TO DESTRUCTION OF THE LITTLE SURVIVING IS REQUIRED HENCE THE NEED FOR THE EXTENSION.
I fully support the extension of the current neighbourhood area.
BDSAP supports this application to extend the neighbourhood planning area. The mixed residential/small business area north of the railway viaduct is similar to Bermondsey St and will benefit from the emerging policies to protect small business space and preserve its 'mixed character. The extension to include St Thomas St is important as that area is increasingly the gateway to Bermondsey St for people using the London Bridge stations and as such provides the context for the Bermondsey St conservation area.
I support the proposed extension. I have worked in the area for over 4 decades and I think the forum will improve the area for small businesses.
Please protect the area the buildings are of historic interest.
I support the proposal to extend the boundary area with a view to protecting local businesses and the architectural heritage of Bermondsey where i enjoy coming to work
We work in the area within the current Bermondsey Neighbourhood. we believe OBF policies have strengthened our personal and work life specifically by supporting small businesses and startups as well as the independent retailers.
It seems that this would have a negative impact on the environment of Bermondsey Street--one of the reasons why so many people come here to visit.
I support the revised area
I support the extension into zone A. This is consistent with the character of the Bermondsey neighbourhood and will allow more effective feedback from residents.
My office is directly on the boundary of the existing and extended area (Crucifix Lane), so I have a strong vested interest in the surrounding area.
I love what has been taking place with regard to the redevelopment and extension of London Bridge

station, and am excited to see the new shops and restaurants/cafes start to open there.

HOWEVER, what is right and good within a mainline station, where speed and practicality is key, is not always right and good for the area that station inhabits. Bermondsey is a culturally and architecturally rich (and historically important) part of London and any development within the area should be agreed in consultation with the people who care for it, live/work in it and - crucially - understand it.

As such, knowing the immediate area under consideration - and much of its character - I would urge the council to extend the Neighbourhood area as outlined in the proposal.

I am highly supportive

The planned extension area to the Old Bermondsey Village Neighbourhood Forum should not include the area to the north of Tooley Street as this street provides a natural barrier from predominantly residential to commercial use. This area does not have the same context quality or feel of the current predominantly residential area. Furthermore, the railway provides a natural division to the current area and while the extension incorporates further residential it does not have the same quality.

The Bermondsey street area is under threat of losing its character due to large scale anti social development. Against the internet of the local community. I therefore fully support the extension of the neighbourhood plan area to include st Thomas street as this is the most critical area to keep the character of.

yes I support this extension as the area affected does not have enough protection at the moment, but there are many unique buildings and strong development pressure

I think the area absolutely needs to be extended to the area that the OBVNF have asked for. Local residents and local small businesses recognize that the character of the area south of the railway arches is distinct to the More London and Shard business-style area, and that this finer-grain, lower-rise and independent nature needs to be recognised and represented. Residents from the little area north of the arches have specifically requested to be within the OBVNF area boundary, as that part of the neighbourhood shares the characteristics of the southern part. They want to be represented by OBVNF. It makes no sense to cut this area out of the OBVNF area, as many of our members live in it, and it is recognised as one and the same neighbourhood.

The future developments along St Thomas Street are going to have a huge impact on residents of Snowfields, the council estates to the south, and locals and small businesses within the rest of the designated area, and as such locals should have some power to say how they want the area to develop. The Localism Bill is written in favour of the Neighbourhood Forum being allowed to decide what they see as their area, and so this is a straightforward decision, and so I, and we, would appeal to you to recognise this.

Many thanks.

Best wishes,

I support the application to extend the area. Local residents and local small businesses recognize that the character of the area south of the railway arches is distinct to the More London and Shard business-style area, and that this finer-grain, lower-rise and independent nature needs to be recognised and represented. The little area north of the arches shares the characteristics of the southern part, and as such is part of the same neighbourhood.

It makes no sense to cut this area out of the OBVNF area, as people recognise it as one and the same neighbourhood.

The future developments along St Thomas Street are going to have a huge impact on residents of Snowsfields, the council estates to the south, and locals and small businesses within the rest of the designated area, and as such locals should have some power to say how they want the area to develop. This means that the boundary needs to be extended to include the whole area that OBVNF wish to represent.

The revised neighbourhood area is what it should have been in the first place. It makes logical and aesthetic sense to include the area along St. Thomas Street as it is the natural boundary to our neighbourhood and community.

The revised neighbourhood area, extended to include the natural boundary before the core 'More London' site and St Thomas St, makes far more sense as a defined neighbourhood area than the existing boundary.

It includes housing and public space that the local community uses and cares about. A key London characteristic that defines it as one of the great world cities is the character and strength of individual identity that the numerous neighbourhoods have, and with the existing neighbourhood area this is diluted.

The revised extended area should be supported by the council. The neighbourhood forum, which has been running under different guises for almost a decade now, includes people who live in this extended area.

It encompasses established housing with Long Term residents, several buildings that contribute to the character of the area, and development sites that should actively engage and consider the needs of the local community and the integrity of legacy left to this area once developed.

I am in support of the proposed extension of the Old Bermondsey Forum Neighbourhood Area. I think it is a very good idea to extend this area to the north, as proposed in blue. Doing so will help create a very much more coherent area in neighbourhood planning terms and will be a considerable advancement and benefit to the local residents and businesses in the Neighbourhood Area as a whole. Also, the additional area in the proposed extension is similar in nature, character, urban grain and scale to the built environment in the already designated Area 'A' and will be further enhanced by this proposed extension.

#### SUPPORT THE EXTENSION

— other than as a (minimal constraints) 'favour' to incoming volume developers, to facilitate their commercial aspirations, there would seem to be no sound 'neighbourhood' reasons/justification for the existing Neighbourhood Area having excluded:

i) MELIOR STREET — defined by local pub, church and public gardens, residential blocks with ground-floor small business commercial units — this small back street has always, in living memory, been seen as an integral part of the Bermondsey Street 'neighbourhood' both in terms of lived experience (the day-to-day services and amenity provided to the 'neighbouring' local businesses and residents) and the visual 'look and feel' and perception of neighbourhood architecturally and geographically, in that not only is there no obvious 'visual break' in the urban grain or 'neighbourhood' land-use that would demarcate it as being 'outside'/beyond' but there are sites and indeed buildings that extend right to/into one of the neighbourhood's key thoroughfares east-west and the quietway-cycleway.

ii) the northern side of SNOWSFIELDS and eastern side of WESTON STREET north the Snowsfields junction, which includes buildings that are specifically identified in the conservation management plan as of townscape merit and integral to the setting of heritage buildings opposite that are rightly inside the Neighbourhood Area. This street block, being long-standing residential above ground-floor commercial

(an 1870's to 1970's 'neighbourhood' model replicated by the new, 2015, Snowfields Yard development — Snowfields through to Melior Street, see point 1.), has no place in, and indeed no voice as part of, the 'London Bridge Opportunity Area' or any 'Business district'. To put it simply, the people populating these streets at most times of the day-night-week-weekend, defining its 'active frontages' and the lively and welcoming street scene more generally are 'neighbourhood' people (BID-based employees and Guy's patients being in the minority, and concentrating their 'appearances' to weekday lunchtimes)

iii) the NORTHERN GATEWAYS to the Bermondsey Street Conservation Area more generally. In order to facilitate 'on the ground', indefinitely in the future, the strategic (Planning) management of the CA in line with agreed LBS planning and heritage guidance and policy, both general and area-specific, while also complying with The London Plan and all relevant Conservation/Heritage and Planning legislation, the conservation area must not be split with 'half a street view' and or street inside the Neighbourhood area but key parts outside it, even though there is no 'visual break' and or change of urban grain/land-use/ architectural vernacular that might support such encroachment and 'creaming off'.

iv) streets that happen to fall within the TEAM LONDON BRIDGE AREA simply because 1 or 2 'small business' member-businesses have found more affordable/versatile/characterful premises within our long established 'neighbourhood' (as perceived by those who live and work here, and indeed those who made it the successful, cohesive, highly recognisable 'neighbourhood' that it is and as such one of the draws for incoming developers who in the last 10 years having been buying up street frontage, one and then the next, making successive, deeper incursions)

v) DRUID STREET-ST THOMAS' STREET ARCHES – despite all the 'Tunnels and Arches' place-making forums, workshops and surveys, led by Team London Bridge, that emphasised and indeed were premised on retention and diverse small-business use, the BID in conjunction with the local authority have proved to be a poor heritage-viable use advocates and have sadly overseen too greater losses to be trusted with these key 'boundary' (frontier) parts of the 'neighbourhood' on an ongoing basis. If the case is indeed made by others that they must remain within the BID area due to TLB's 'business model' and funding, i.e the location of a handful of outlying BID funder-businesses and of course TLB's own offices on the north side of Snowfields, then I would assert the value of a healthy 'overlap' of boundaries to ensure true diversity in and supply of working knowledge pertaining to conservation, community, SME and 'place-making' thereby tempering the overly-domineering and self-interested influence of Sellar, Greystar, CIT, Threadneedle (St Thomas Street land-owners) et al, especially now that TLB is no-longer chaired by a design-savvy, community-attuned 'resident' architect but by Kings' College's Estates Director, Professor Simon Howell who is known to favour wholesale redevelopment and 'scaling up' whatever the cost in terms of heritage assets and community cohesion and engagement.

Thank you for this opportunity to contribute to and hopefully influence decision-making that will fundamentally impact my community for years to come

Hi

I am currently living and working in Bermondsey/London Bridge and have done for 10 years. I would like to add my support to the OBF for the St Thomas Street extension, as I believe their ideas and concepts are far more in harmony with the local community -residents/workers- than those currently being presented by developers and the council - for example: the overtly high and imposing new development on the 'quill' site, Becket house, Capital House and Vinegar Yard warehouse and carpark, which I believe will have nothing but a negative impact on residents and those working in the area. Sincerely

I am writing in support of the application by the Old Bermondsey Neighbourhood Forum to secure an

extension to its area.

The additional areas now being applied for show a number of similarities with the northern parts of the (already designated) "Area A" in terms of business and residence type, and many of the buildings manifest a degree of heritage and/or architectural interest.

The revised Neighbourhood Area should prove more cohesive as well as giving a better opportunity for local people to have a voice in the planning process.

As someone who has lived in Bermondsey for 15 years I would like to add my support to the OBF for the St Thomas Street extension as I truly believe their ideas and concepts are far more in harmony with the local community than those currently being presented elsewhere - suggest as the insanely high and imposing new development on the 'quill' site which will have nothing but a negative impact on anyone living (and working) in the area..

Thank you for consulting the Environment Agency on the above. We have no objection to the extension of the boundary of the Bermondsey Neighbourhood Forum Area. Having reviewed the submitted documents, we note that the majority of the proposed area falls within Flood Zone 3. Flood zone 3 is defined by Table 1 of the Planning Practice Guidance (PPG) as having a 'High Probability' of flooding. Although the designated area is protected by the Thames Tidal flood defences from a 1 in 1000 (0.1%) chance in any year flood event, the majority of the area could be at risk of flooding if there were to be a breach in the Thames Tidal Defences.

Any planning application submitted within this area would need to follow the requirement of the National Planning Policy Framework (NPPF). The borough Strategic Flood Risk Assessment (SFRA) should be the primary source of flood risk information in considering whether particular neighbourhood planning areas may be appropriate for development. As pointed out in the National Planning Policy Practice Guidance paragraph: 064 Reference ID: 7-064-20140306, where the neighbourhood planning area is in Flood Zone 2 or 3, or is in an area with critical drainage problems, advice on the scope of the flood risk assessment required should be sought from the Environment Agency. Where the area may be subject to other sources of flooding, it may be helpful to consult other bodies involved in flood risk management as appropriate.

In all cases where new development is proposed, the sequential approach to locating development in areas of lower flood risk should still be applied within a neighbourhood planning area. We would object to any proposal within this area that includes a basement dwelling, in line with the borough SFRA. The SFRA requires all residential floor levels to be set no lower than 300 mm above the 2100 Maximum Likely Water Level, anticipated through a breach in the River Thames. All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future.

For other most up to date and accurate environmental evidence we recommend using Open Gov Data service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. Please visit:

<https://data.gov.uk/publisher/environment-agency>

You may also request our most recent data through our Customers and Engagement Team by emailing

I support the above initiative by local residents.

These representations are submitted to Southwark Council (the 'Council') on behalf of Greystar Europe Holdings Ltd ('Greystar') and the Migration Museum Project (the 'Migration Museum') in respect of the Revised Neighbourhood Area Boundary for Bermondsey.

Greystar is a global real estate company headquartered in the United States and manages over 420,000 rental homes worldwide. Since entering the UK market in 2013, Greystar has acquired and developed a rental portfolio of some 5000 homes in London with a further 4,000 in planning or under construction. Of the existing portfolio, 4,500 are student beds across eight sites within zones 1 and 2.

Greystar has significant interest in Southwark following its acquisition of Capital House at 40-46 Weston Street and is looking to bring forward a flagship development to its current student portfolio. It is within this context that Greystar welcomes the opportunity to make representations on the revised Neighbourhood Area Boundary.

The Migration Museum is a project dedicated to the knowledge and appreciation of how migration has shaped Britain across its history through hosting events, exhibitions and education workshops. The Migration Museum is currently a pop-up based at The Workshop in Lambeth, and has already attracted over 100,000 visitors with the educational workshops attended by over 5,000 school and university students. The Migration Museum in collaboration with Greystar is seeking to establish a new home at Capital House to provide a nationally significant museum dedicated to migration.

#### **History of the Neighbourhood Area Designation**

Southwark Council received two applications in 2012 for the designation of neighbourhood areas in Bermondsey, from two separate groups, the Bermondsey Neighbourhood Forum and the Bermondsey Village Action Group. The proposed areas which together extended from New Kent Road to the south bank of the Thames. In 2014, Southwark Council proposed an amended area (referred to as 'Area A'). The Bermondsey Village Neighbourhood Forum now proposes an extension to Area A.

#### **Extension to Area A**

We are firmly of the view that the boundary of the Neighbourhood Area Boundary should not be extended northwards.

Referring to the application prepared by the Old Bermondsey Village Neighbourhood Forum, we strongly disagree with the claim that 'the Council does not optimise the planning process in which the Forum is engaged and that the boundaries do not reflect an area with coherence for neighbourhood planning purposes'.

It is considered that the extension proposed to Area A by the Old Bermondsey Village Neighbourhood Forum does not take into account the current and emerging Development Plan in Southwark, as required by Neighbourhood Plans by virtue of Paragraph 184 of the National Planning Policy Framework, which requires Neighbourhood Plans to be in general conformity with the Strategic Policies for the area.

We consider that it would be inappropriate for the Neighbourhood Area Boundary to overlap the boundary of the London Bridge District Town Centre. The proposed extension to Area A would incorporate into the Neighbourhood Plan, the core of the Bankside, Borough and London Bridge Opportunity Area, which in the Southwark Core Strategy (2011) seeks to deliver 1,900 new homes and around 25,000 new jobs. The current Old Bermondsey Village Neighbourhood Forum area is characterised by historic properties of mainly brick, domestic in scale, primarily residential in use and concentrated within the Bermondsey Street Conservation Area. The network of streets and spaces is also heavily based on the history of the area with narrow lanes, yards and pockets of open space. Conversely,

the St Thomas Street East area is defined by the Shard, London Bridge Station and Guy's Hospital to the west and Snowfields and Bermondsey Street to the south and east. This area contains a mixture of hospital uses, civic uses, offices, restaurants and a secondary amount of residential. The area is characterised by its diversity of uses but generally commercial and with a far more modern larger scale townscape. These uses and scales of buildings are expected to increase in line with adopted policy and move even further from the character of Old Bermondsey Village Neighbourhood Forum area.

Since the publication of the Core Strategy, the requirement for new homes and new employment opportunities has increased, which is reflected in the submission draft of the new Southwark Plan, which identifies 4 sites for comprehensive redevelopment within London Bridge (2 of which are included in the proposed extension area), and 9 sites for comprehensive redevelopment within Bankside and Borough, with visions to improve these areas as globally significant central London business districts.

This is also reflected in the overarching objectives of the draft London Plan which identifies a need for 66,000 new homes annually, 3,500 purpose built student accommodation bed spaces annually and an office floorspace demand in London of 6.1 million sqm of office floorspace between 2016 and 2041.

The proposed extension to Area A would also include a significant portion of the London Bridge Strategic Cultural Area, which is located to the north of the boundary beyond Snowfields. The Strategic Cultural Area is designated to protect and enhance the provision of arts, culture and tourism, a notion which the Migration Museum harness in the future. The cultural importance of London Bridge goes hand-in-hand with the area's strategic importance in terms of housing and employment. We consider that this adds further justification for why the extension of Area A would be inappropriate.

For the reasons explained above, we agree fully with the assessment made by Southwark Council in 2014 which identifies the proposed extension area as being distinctly different north of Snowfields, comprising a corporate business area of high density and large-scale infrastructure (including the environs to the south east of London Bridge Station, one of the busiest in the United Kingdom in terms of footfall). It is considered that despite the reduction in the proposed area from the 2012 submission, the proposed area of extension still forms a very different character to that of the predominantly residential context of Area A, and given its strategic international importance, would still not be appropriate for inclusion within the Neighbourhood Plan Boundary. As stated in 2014, we agree with the principle that it would be inappropriate for this area of strategic importance to be included in a neighbourhood forum.

We are therefore of the view that Southwark Council should refuse this request for the extension of the Neighbourhood Plan Area, on the basis that this would be contrary to the wider strategic and policy objectives for the proposed area of the extension.

We trust that our representations will be fully considered and taken into account as the consideration of the revised Neighbourhood Plan Area continues. If you require any clarification on any matters, or wish to discuss our representations further, please contact Tom Horne or Edward Law of this office.

On behalf of Greystar Europe Holdings Limited ('Greystar'), Zurich Assurance Ltd c/o Threadneedle Portfolio Services Ltd ('Threadneedle' – represented by Indigo as planning consultants) and St Thomas Street Bermondsey Ltd represented by CIT Group Partners LLP ('CIT' – represented by Montagu Evans as planning consultants), we write about the current consultation on the revised Neighbourhood Area Boundary proposed by the Old Bermondsey Village Neighbourhood Forum.

The three landowners of which this letter represents, have significant interest in the proposed extension area, each with the ownership of sites on the southern side of St Thomas Street in the London Bridge Opportunity Area, bound by St Thomas Street, Weston Street, Melior Street and Fenning Street. These sites form two strategic sites in the submission draft of the New Southwark Plan (sites NSP52 and NSP53), which reflects the need and desire for comprehensive and transformative redevelopment to deliver homes, employment, cultural and commercial opportunities in line with the aspirations for the strategically important London Bridge Opportunity Area. The three landowners have been working together to deliver a comprehensive redevelopment proposal for this element of St Thomas Street with progress made in delivering St Thomas Street Boulevard which is identified in the London Bridge Plan.

Taken as a whole, the proposed developments are distinct and jointly identified as St Thomas Street East, a destination closely located to the western portion of St Thomas Street, Guys and St Thomas and London Bridge Station.

It is within this context that the three landowners welcome the opportunity to make representations on the revised Neighbourhood Area Boundary.

### **Background**

Two applications were submitted to Southwark Council in 2012 for the designation of neighbourhood areas in Bermondsey, from the Bermondsey Neighbourhood Forum and the Bermondsey Village Action Group. The proposed areas extended from New Kent Road to the south bank of the Thames, including London Bridge Station, the Shard and More London. In 2014, Southwark Council proposed an amended area (referred to as 'Area A'). The Bermondsey Village Neighbourhood Forum proposes an extension to Area A north of Snowfields and bound by Tooley Street to the north and Tower Bridge Road to the east.

### **Representations on the Proposed Neighbourhood Area Boundary Extension**

The three landowners of whom this letter represents are firmly opposed to the boundary of the Neighbourhood Area Boundary being extended northwards. It is the belief of the three landowners that it would be inappropriate for the Neighbourhood Area Boundary to overlap the boundary of the London Bridge District Town Centre and incorporate St Thomas Street East.

St Thomas Street East contains a number of strategic sites which are significant in the future growth of the London Bridge Opportunity Area, envisaged to deliver 1,900 new homes and around 25,000 new jobs. This need has increased further, which is reflected in Southwark's ambitions for the two strategic sites (sites NSP52 and NSP53 in the submission draft of the New Southwark Plan). The draft NSP seeks to facilitate comprehensive redevelopment of these sites to provide new homes, office floorspace, town centre uses and significant public realm improvements. It is also important to note that both of these sites are identified for significant increases in density, as demonstrated through their identification as potentially suitable for tall buildings.

On this basis, we consider that St Thomas Street East is of significantly different character than the adopted Old Bermondsey Village Neighbourhood Forum Area. The Forum area is predominantly characterised by residential uses, domestic scales and historic properties comprised of mainly brick which is concentrated within the Bermondsey Street Conservation Area. The urban grain of the area within the current boundary is reflective of the history which consists of narrow lanes, yards and pockets of open space. This is in significant contrast to the St Thomas Street East area, which along with the aforementioned sites, is located adjacent to the Shard, Guy's Hospital, and London Bridge Station which is one of the busiest in the United Kingdom. On this basis, we are firmly of the view that the St Thomas Street East Area is far more akin to that of the character of the core of the London Bridge Opportunity Area, which is of strategic international importance, as reflected in Southwark Council's and the three landowners' aspirations for the sites.

In consideration of the above, we are of the view that the proposed extension of the Neighbourhood Area Boundary does not take into account the current and emerging Development Plan in Southwark, or Greater London and is at odds with the strategic objectives for the area. As such, we believe the extension of Area A conflicts with Paragraph 184 of the National Planning Policy Framework, which requires Neighbourhood Plans to be in general conformity with the Strategic Policies for the area.

On this basis, the three landowners of whom this letter represents, agree with Southwark Council's assessment in 2014, which identified the proposed extension area as being distinctively different in character to that which is currently included in the Neighbourhood Area Boundary, on the basis that this comprises a high-density business area and large-scale infrastructure. It is considered that this area is more appropriately covered by Team London Bridge and the Business Improvement District, which has the aspiration of promoting London Bridge as a leading place for global commerce while acting as a strong local centre for enterprise, culture and entertainment.



The three landowners are of the view that the extension of the Neighbourhood Area Boundary should be refused for the reasons set out above.

Each of the respective landowners have made separate representations in relation to the interests of their respective sites and organisations. This letter should be considered alongside those individual representations. We trust that this joint response and the individual site-specific representations will be taken in to account during determination of the revised Neighbourhood Area Boundary.

We write on behalf of Guy's and St Thomas' Charity. Thank you for giving us the opportunity to comment on the application submitted for the revised Neighbourhood Area by the Old Bermondsey Village Neighbourhood Forum.

The Charity wishes to formally object to the proposed Area A extension (shown in blue in the following map) for the reasons discussed below.

The Old Bermondsey Neighbourhood Forum (OBF), have sought to justify the proposed extension by stating that the character and design of the proposed extension is in keeping with that of the northern part of the existing designation and should therefore be included within the Neighbourhood Area. 2

However, in coming to a conclusion on the exact area of the neighbourhood boundary it is important to understand the history of the neighbourhood forum and the boundary dispute which has taken place over a number of years.

The exact location of the northern boundary of the neighbourhood area is a much discussed subject with the Council concluding in 2014 *"that the area north of Snowfields has a distinct and differing character from that of the designated area. The report concludes that the area to the north of Snowfields is a predominantly corporate business area, with taller building heights and large scale infrastructure. Whereas the area to the south (designated area) is characterised by lower rise, lower density, predominantly residential properties"*.

Between the Council's conclusion on the character of the area in 2014 and now, we suggest it would be difficult for the Council to reasonably reach a different conclusion. The character of the two areas remains distinctly different and therefore the charity do not consider the proposed extension of the neighbourhood area to be appropriate.

In addition to the above, the proposed extension area is already well served by a suite of planning policy documents. The Proposed Submission Version New Southwark Plan 2017 contains policies which specifically relate to the London Bridge area and include the extended sites. In particular, Site allocations NSP52 and NSP53, allocate the land between Melior Street, St Thomas Street, Weston Street and Snowfields, for mixed use redevelopment, with particular focus on providing office and other work spaces. The design guidance for the redevelopment of the sites reflects the existing character to the north of Snowfields. Given that the Council are already undertaking a thorough consultation exercise of a development plan document which covers this part of the borough we would suggest that the inclusion of the extended area in the neighbourhood boundary is unnecessary and would provide an additional layer of planning policy that is not required.

Furthermore, it is worth noting that the proposed extension sits within the adopted and draft London Plan's London Bridge, Borough and Bankside Opportunity Area. The proposed further expansion of the Neighbourhood Plan area into an opportunity area contrasts with the aims of the opportunity area to regenerate and intensify the area. This contrasts with the lower density residential character of the existing defined neighbourhood area, further enhancing the differences between the two.

Lastly, Guy's and St Thomas' Charity work closely alongside King's College London and Guy's and St Thomas' NHS Foundation Trust to help tackle the major health challenges affecting people living in urban,

diverse and deprived areas. To this end we understand the University and the Trust have objected to the proposed extension as it would further complicate, delay and add expense to the current situation in terms of the abilities of the Trust and University to adequately respond to existing healthcare / education needs and plan for the future provision for local people. On this basis we support the Trust and university in their own objection to the proposals.

We thank you again for considering these representations We would be grateful for confirmation of receipt of these representations.

Please do not hesitate to contact us on the details at the head of this letter should you require any further information.

We represent Guys & StThomas' NHS Foundation Trust (the "Trust") and have been asked to review the application made for a revised neighbourhood area boundary on behalf of Old Bermondsey Village Neighbourhood Forum (the "Application").

We have reviewed:

- The application
- Supporting appendices
- Committee Report dated 20 August 2014 entitled "Neighbourhood Planning - Designation of a Neighbourhood Area in Bermondsey"
- Committee Report dated 18 June 2015 entitled "Neighbourhood Planning - Further report on Application for designation as a neighbourhood forum by Old Bermondsey Village, Neighbourhood Forum".

We write to lodge an objection to the extension of the designated area on behalf of the Trust.

Background

1. In 2012 Southwark Council (the "Council") received two applications to designate overlapping neighbourhood areas in Bermondsey. The Council did not designate either but designated a different area, Area A, in October 2014.
2. Two organisations, Bermondsey Neighbourhood Forum ("**BNF**") and Bermondsey Village Action Group ("**BVAG**") applied to become Neighbourhood Forums. The Council did not designate either organisation.
3. The areas proposed for designation in 2012 incorporated the Trust's land, London Bridge Station and, in the case of Bermondsey Neighbourhood Forum, extended to the river and incorporated City Hall.
4. The Council refused the application for a larger area proposed by BNF for reasons set out in paragraph 23 of the Committee Report dated 20 August 2016 namely:  
*The inherent differences in character, building heights, land use and density of the northern and southern parts of the specified area indicate that the area does not form a coherent neighbourhood which would be appropriate for neighbourhood planning.*
5. The Council refused an application by BVAG for a smaller area than that proposed by BNF for reasons set out in paragraph 24 of the Committee Report dated 20 August 2014 namely:  
*The planning and development of which would have implications well beyond the neighbourhood area proposed by BVAG. For a neighbourhood forum (potentially comprising as few as 21 persons) to control the London Bridge and Hospital sites, and to formulate a neighbourhood plan which could potentially have impacts much further afield than the proposed neighbourhood boundary, is not considered to be appropriate.*
6. In June 2015 Old Bermondsey Village Neighbourhood Forum ("**OBVNF**") was designated as the Neighbourhood Forum for Area A.
7. The Application extends to the north east of Area A.

### **The Application**

The Application is dated 13 September 2017. We have the following observations to make:

1. OBF do not answer question 1 (p3).
2. OBF do not explain in its reply 8 (p4) how many households and businesses in the extended area were given the questionnaire leaflet.

Further, the reply states that 65 replies were received including comments from residents in the proposed extended area. We have seen only three responses from the residents in the proposed extension (which are included as part of the application documentation at appendix 7). With such a small number of responses exhibited the applicant does not establish that the extension represents the wishes of the area or those who responded to the leaflet drop. We cannot be certain therefore that the views of the residents and businesses in the area are being taken into account.

### **Objection**

1. The 2014 applications to create neighbourhood areas were refused by the Council who considered a smaller area to be suitable for Neighbourhood Planning. We acknowledge that part of the proposed extension might be considered appropriate for inclusion in the Neighbourhood Area. However, we are concerned that a significant part of the proposed area has the same characteristics as the areas previously applied for; areas which the Council considered to be inappropriate for inclusion in the Neighbourhood Area.

2. Land to the west of Barnham Street should be excluded from the extension area as it contains largely high-rise, high density, commercial sites. It shares the same characteristics as the previously excluded areas. There has been no change to these areas and in the circumstances it would be inappropriate for this additional land to be subject to neighbourhood planning. It is very different in character to Area A.

3. As identified in paragraph 24 of the committee report dated 20 August 2014:

*"The area identified consists of two clearly different forms of development, with residential uses located largely in the east, and the strategic sites mainly in the west. The area does not read as a coherent neighbourhood."*

However, we consider that land to the east of Barnham Street might be more appropriate for inclusion as part of the extension of the neighbourhood area due to its predominantly residential nature. In the circumstances it would be inappropriate for the extension to be granted as proposed.

Dear Sir/Madam,

Thank you for your email dated 14 December 2017, advising Highways England of the above consultation.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN).

Having examined the relevant documents, the area is located away from the SRN and we have no comments at this time as there seems to be no evident potential impacts on the SRN. Thank you for consulting with us and if you have any queries please do not hesitate to contact me.

Dear Southwark Council

I live and work in the Bermondsey Street area and have been a resident for 10 years. I support the OBF extension for St Thomas Street. Their ideas are much more in keeping with the local environment than those being presented by developers and the council at present. The current proposals from the developers/council for St Thomas Street are far too high and will dominate the area creating an overshadowed wind tunnel which will have a negative effect on workers and residents in the area.

Hi

I am currently working in Bermondsey/London Bridge and have done for 4 years. I would like to add my support to the OBF for the St Thomas Street extension, as I believe their ideas and concepts are far more in harmony with the local community - residents/workers - than those currently being presented by developers and the council - for example: the overtly high and imposing new development on the 'quill' site, Becket house, Capital House and Vinegar Yard warehouse and carpark, which I believe will have nothing but a negative impact on residents and those working in the area.

Hi,

I support the extension of the current plan asked by the old Bermondsey forum!  
Please add my name to petition

Dear Planning Policy Team

### **Consultation on the Bermondsey Neighbourhood Revised Plan Area, LB Southwark**

Thank you for consulting Historic England in respect of the application to revise the boundary of the proposed Bermondsey Neighbourhood Development Forum

The Government through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012) has enabled local communities to take a more pro-active role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest to be affected by the Plan. As Historic England remit is advice on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.

### **Historic England Advice**

We note the decision as set out in the Council's report to revise the original application to resolve conflicts from other potential boundaries, and in response to land use and existing local policy. As our remit is in respect of the Historic Environment we have considered the current proposed revision in that respect.

The existing Area A Boundary includes numerous designated heritage assets, including partial inclusion of the Bermondsey Street CA. The introduction of the proposed extension will encompass parts of the Tooley Street CA, the complexes of listed buildings and structures associated with the Vinegar Factory and St Johns Churchyard, and will fall within part of the strategic viewing corridor to St Paul's. The inclusion of heritage assets within the neighbourhood plan may enable the identification of opportunities to enhance such assets and their settings and to consider how these help to secure a sense of place and underpin local character. We would however advise that in developing policies for heritage assets that the neighbourhood ensure that, where boundaries bisect existing heritage designations, these reflect the wider significance of the conservation areas and seek to ensure that protection of the historic environment is not diminished.. However, we see no reason that carefully worded policies should not benefit the character and appearance and setting of the designated heritage assets and the neighbourhood.

In the event of the proposal being approved we would be keen to encourage the opportunity to review the local evidence base and promote policies for the positive management of heritage assets as part of the Neighbourhood Planning Process. In developing a robust evidence base, upon which to develop policies which sustain and enhance the positive elements of local character, and their settings, we would encourage the Neighbourhood Forum to identify those areas of which require updating or further analysis.

We would also suggest consulting the Greater London Archaeological Advisory Service, Heritage Environment Record as a primary resource for the identification of heritage assets). The Heritage Environment Record should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes. It may also be useful to involve local voluntary groups such as local Civic Societies or local historic groups in the production of the Neighbourhood Plan.

Further guidance on techniques for identifying and managing character and heritage assets are available on our website which includes links to the following publications: Good Practice Guide for Local Listing; Understanding Place: An Introduction; and Streets for All. These documents can be viewed at: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

In the event of agreement to the designate the proposed boundary and Neighbourhood Forum, we would be happy to comment further on the developing plan. If you wish to discuss any of the above observations please do not hesitate to contact me.

Finally, I must note that this advice is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this application, and which may have adverse effects on the historic environment

Dear Sirs ,

I am writing in response to the planning in and around Bermondsey , around London Bridge , As a resident and also Business owner , I feel that Southwark Council needs to make sure any planning around this area , keeps as much History as possible , it would be a travesty is we lose our History To Company's making a quick Buck and for us to lose our Fantastic Buildings And History .

To this, I support The OBF area Application !

We write on behalf of Sellar, who own properties within the adopted Bermondsey Neighbourhood Area and in the area identified now for extension of the area. We have reviewed the submission provided by the Old Bermondsey Village Neighbourhood Forum (OBF), as well as the Neighbourhood Planning (General) Regulations 2012, and object to the extension for the reasons set out below.

The submission seeks to justify the extension of the Neighbourhood Plan area on the basis that the current boundaries do not reflect an area for coherence and that the proposed additional areas fit better in terms of character, urban grain and scale.

Having reviewed the character of this area, the current planning context and future development visions for these areas it is clear that this is not the case.

The area to the north, particularly the land and sites around St Thomas Street, that is sought to be included is intrinsically different in character to the current allocated Neighbourhood Plan area. The additional area is designated as Strategic Cultural Area in the LB Southwark adopted Proposals Map and is within the District Town Centre, unlike the current adopted area. The area therefore meets a different purpose to the current designation and its purpose and future planning is based on a different context to the designated area, which is principally residential. The extended area is characterised by a predominantly commercial nature, this includes significant elements of office and retail uses which incorporates a range of occupiers. This character reflects that existing along St Thomas Street to the West, Borough High Street and Tooley Street, rather than the residential character of the area to the south which is the subject of the current Neighbourhood Plan designation. The transformation of the station on St Thomas Street, including the opening up of the new concourse and entrance, together with recent developments including the Shard, provide a new different context to St Thomas Street to the west of Bermondsey Street. The District Town Centre boundary, which currently forms the northern boundary of the designation, provides a natural subdivision of these two distinct areas and the existing boundary of the Neighbourhood Plan area is therefore appropriate.

In addition, the future potential development opportunities within the current designation and of the proposed extended area are fundamentally different, with different visions and opportunities. The extended area includes the identification of opportunity sites within the emerging Local Plan for new residential and commercial development, which will reflect the scale and form of developments around London Bridge, sought by LBS. This also follows the London Plan's strategy of seeking higher densities around central transport hubs, like London Bridge. The inclusion of this area within the Neighbourhood Plan designation would be incongruous with these potential future development opportunities and strategic visions.

The comments in the submission statement relating to the issues surrounding lack of engagement, under representation and delays in formulating initiatives are also noted. Given the current lack of progress on the preparation and publication of a plan for the existing designated area since its designation in 2015, there is concern about adding additional areas, which could have the potential to delay the progress of strategic sites through the planning process and ultimately their delivery. We suggest that activity should concentrate on resolving the issues identified in the statement within the current Neighbourhood Area and developing an appropriate plan based on the current designation.

We strongly consider that the Neighbourhood Forum should continue to be taken forward on the basis of the current identified area and not be extended, with the focus provided on establishing an appropriate plan to cover the area as designated to drive forward pro-active planning strategies.

The extension of the area as proposed would not be appropriate and therefore we would respectfully request that the Council do not approve this application to extend the current Neighbourhood Area.

We write of behalf of St Thomas Bermondsey Limited (owners of the 'Vinegar Yard' site – please see enclosed Area Plan), to explain why we consider the proposed revision (extension) to the existing Bermondsey Neighbourhood Area to be inappropriate and contrary to the good planning of the area as well as national legislation and guidance.

The Vinegar Yard site forms an important part of the St Thomas Street East area (please see enclosed Area Plan), an important group of designated development sites of a likely strategic scale. The sites also benefit from emerging allocations in the New Southwark Plan, in which there is already detailed planning policy indicating how they may be developed.

The St Thomas Street East area is included, inappropriately in our view, within the proposed extension to the existing Bermondsey Neighbourhood Area.

### *Background*

We understand that in 2012 Southwark Council received two applications for the designation of neighbourhood areas in Bermondsey by two separate groups (the Bermondsey Village Action Group and the Bermondsey Neighbourhood Forum). Neither of the area boundaries applied for were designated but instead a revised boundary, proposed by Southwark Council, was put forward and designated in August 2014. We understand all groups concerned refer to this boundary as 'Area A'. Southwark Council, as required by statute (The Localism Act 2011 (by amending the Town and Country Planning Act 1990)) and by the National Planning Practice Guidance (the NPPG), issued a detailed and reasoned report explaining why this boundary was the most appropriate. The report will be referenced in more detail later in this representation. The following, primarily referencing the considerations set out in Paragraph 033 Reference ID: 41-033-20140306, explains why the proposed extension would 'not be appropriate for neighbourhood planning', as required by the NPPG.

### *Existing and Proposed Bermondsey Neighbourhood Area*

The area shaded yellow is 'Area A', the currently designated neighbourhood area. The area shaded blue is the extension proposed by the Old Bermondsey Village Neighbourhood Forum. The site owned by St Thomas Bermondsey Limited and on whose behalf we submit this representation, is encircled in red.

### *The NPPG*

The NPPG provides detailed guidance on all aspects of producing an Neighbourhood Plan, including designating a Neighbourhood Forum. The NPPG is also clear as to what considerations could be taken into account when selecting an appropriate neighbourhood boundary. The considerations, set out Paragraph 033

Reference ID: 41-033-20140306, are:

- ☐ *“village or settlement boundaries, which could reflect areas of planned expansion*
- ☐ *the catchment area for walking to local services such as shops, primary schools, doctors' surgery, parks or other facilities*
- ☐ *the area where formal or informal networks of community based groups operate*
- ☐ *the physical appearance or characteristics of the neighbourhood, for example buildings may be of a consistent scale or style*
- ☐ *whether the area forms all or part of a coherent estate either for businesses or residents*
- ☐ *whether the area is wholly or predominantly a business area*
- ☐ *whether infrastructure or physical features define a natural boundary, for example a major road or railway line or waterway*
- ☐ *the natural setting or features in an area*
- ☐ *size of the population (living and working) in the area”*

In light of these considerations and Southwark Council's previous neighbourhood analysis, we explain below why the proposed boundary extension is inappropriate.

### *Boundary Extension Analysis*

As explained, Southwark Council have already considered two previously proposed boundaries for the Bermondsey Neighbourhood Area. Both of the previously proposed areas (shown in the map below) and the current proposed boundary extension have the effect of amalgamating the areas to the north and south of Snowfields.

#### Bermondsey Neighbourhood Plan Boundaries Refused by Southwark Council

The adopted Proposals Map makes it clear that the areas to the north and south of Snowfields are distinct in their function and, largely as a result of that, in their physical nature. Snowfields is the boundary of the District Town Centre within which, as you would expect, commercial uses and larger buildings predominate. The St Thomas Street East area, includes three strategic development sites, forms an essential part of Southwark Council's aspirations to reinforce the commercial function of the area around London Bridge Station and create a distinct location akin to More London. Emerging policy is clear that St Thomas Street East, taking reference from the Shard and other tall commercial buildings in the immediate vicinity, will optimise commercial floorspace delivery and in future secure significant increases in employment in the area as outline in emerging plan policy.

Outside the District Town Centre designation, to the south of Snowfields, uses are predominantly residential in nature and the buildings are of a lesser density and scale.

With reference to the considerations set out in the NPPG, St Thomas East and Vinegar Yard and the wider area to the north of Snowfields does not form part of the 'Bermondsey' neighbourhood because:

- ☒ The proposed extension does not reflect a settle boundary, an area of planned expansion, a catchment for walking to local services or an area where community groups operate (many such groups cut across this area, though their geographical areas of interest do not reflect the proposed boundary);
- ☒ The area within the proposed extension is predominantly a business area and therefore distinct from the predominantly residential area within 'Area A'. Reflecting the distinct functions, these two areas are also distinct in their physical appearance and characteristics;
- ☒ The proposed area too is not a coherent estate for residents or business (it would instead inappropriately straddle two such areas, one commercial, one residential) nor would it be defined or distinct by virtue of natural setting, features or a particular population size.

We are therefore of the view that the proposed extension is inappropriate for the same reasons for which Southwark rejected the previous boundary proposals. The reasons, quoted below, reference the considerations listed Paragraph 33 of the NPPG and as such are legitimate and, in our view, correct positions to take in the interest of good neighbourhood planning.

With regard to these previous boundary proposals Southwark Council wrote:

*"Bermondsey Neighbourhood Forum proposes the designation of an area from the River Thames, as far south as the Bricklayers Arms roundabout [area edged in blue above]. This area incorporates two distinct types of neighbourhood; a predominantly corporate business area to the north of Snowfields with taller building heights and large scale infrastructure, and a lower rise, lower density, predominantly residential area to the south. The Council does not consider this area in its entirety to be appropriate for the purposes of neighbourhood planning. The inherent differences in character, building heights, land use and density of the northern and southern parts of the specified area indicate that the area does not form a coherent neighbourhood which would be appropriate for neighbourhood planning."*

And,

*"Bermondsey Village Action Group proposes the designation of a smaller area [edged in red above], including Guy's Hospital, London Bridge Station including very few residents. This area comprises mainly strategic sites, the planning and development of which would have implications well beyond the neighbourhood area proposed by BVAG. For a neighbourhood forum (potentially comprising as few as 21 persons) to control the London Bridge and Guy's Hospital sites, and to formulate a neighbourhood plan which could potentially have impacts much further afield than the proposed neighbourhood boundary, is not considered to be appropriate."*

*"The area identified consists of two clearly different built forms of development, with residential uses*



*located largely in the east, and the strategic sites mainly in the west. The area does not read as a coherent neighbourhood. For these reasons, the Council does not consider this area to be appropriate for the purposes of neighbourhood planning."*

Despite this clear analysis, the effect of the boundary revision now sought would again be to amalgamate these two distinct areas, broadly north and south of Snowfields. Again, the area to the north of Snowfields, being a business area of predominantly taller buildings, is both physically and functionally distinct from the residential area (of a commensurate, domestic scale) to the south. It is for these reasons, made clear by Southwark Council, that the boundary extension would span two distinct neighbourhoods and as such would not be appropriate for neighbourhood planning.

Undoubtedly the proposed boundary extension does exclude some key strategic sites that Southwark have previously ruled as being inappropriate for inclusion in the neighbourhood area e.g. Guys Hospital and London Bridge. However, the three sites owned by those for whom this representation is written, located to the north of Snowfields and south of St Thomas Street, are again included in the proposed boundary despite also being strategic sites (benefiting from strategic allocations) whose development potential has wide reaching implications far beyond Bermondsey. They should therefore, for the same reasons that London Bridge and Guy's Hospital's inclusion was deemed unacceptable, be excluded from the Bermondsey Neighbourhood Area.

#### *Conclusion*

The proposed boundary extension incorporates areas both to the north and south of Snowfields, and even to the north of the railway tracks from London Bridge Station. Southwark Council has previously identified Snowfields as a clear boundary between a distinct 'neighbourhood' to the south ('Bermondsey'), being predominantly residential and of a lesser density and scale and an area to the north (including St Thomas Street East), with a commercial function and greater building density and height. This distinction is also made clear in the adopted proposals map where the District Town Centre boundary follows Snowfields, reflecting then predominant commercial uses to the north and excluding the predominantly residential nature of the area to the south.

It is our view therefore that the proposed boundary extension, like the previously refused boundary proposals, incorporate areas, such as St Thomas Street East, that are beyond the identifiable boundaries of the 'Bermondsey' neighbourhood. The area to the north of Snowfields, including our client's site, is distinct in function and built characteristics meaning its inclusion within the neighbourhood area would be contrary to the considerations in Paragraph 33 of the NPPG. The proposed boundary extension should therefore be refused for the same reasons that the previous boundary proposals were refused.

Hi

I have been living and working in Bermondsey for many years. I would like to support the OBF - St Thomas Street extension. I have been to their evenings and talked to many of their members and like the ideas they have for the area. I also believe that the shard end of st thomas street is too windy and would not like to see more high rise causing a wind tunnel effect.

I walk my daughter to school along St Thomas street and currently it is pleasant, but this would not be so if there were to be a line of tall and imposing buildings causing more wind tunnelling effect and in terms of a relaxed community feeling area, it would make it more like the city and therefore is at odds with Bermondsey, which has a lovely provincial feel to it.

Team London Bridge welcomes this opportunity to inform decisions on the boundary of the Bermondsey Neighbourhood Area. We have been involved in the process of neighbourhood planning in Bermondsey from the beginning.

We work with the Bermondsey community and attend meetings of the Bermondsey Neighbourhood Forum. Our current Placemarks project is a joint initiative with the Bermondsey Street Area Partnership and Shad Thames Area Management Partnership and we have a close relationship with businesses along Bermondsey High Street. We recognise that the proposals relate only to the Bermondsey Neighbourhood Area and not the functioning of the neighbourhood forum, although we are aware that this will need to be reviewed by 2020. We are strong supporters of collaboration between residents, local organisations, landowners and business and would like to see representation from all sectors on the OBVN forum with a committee elected annually.

We have carefully considered the proposals to extend the boundary of the existing Bermondsey Neighbourhood Area northwards. The proposals would overlap with the area of the Business Improvement District managed by Team London Bridge. We have reviewed the proposals in the context of the operation of the Business Improvement District and the boundary considerations set out the Government's Planning Practice Guidance.

There are no absolutes in determining the precise boundary. We have faced similar considerations when deciding on the boundary of the Business Improvement District. The proposed new Neighbourhood Area fits well with some of the Government's boundary considerations and less well with others.

We recognise and respect the view of Old Bermondsey Village Neighbourhood Forum that the streets included in the additional area proposed *"fit better in character, urban grain and scale with the northern part of the area designated by the Council; they mainly consist of small independent businesses and residences with a high concentration of buildings of some historic or architectural interest."* Nevertheless, it is also true that the proposed new Neighbourhood Area would significantly increase the commercial uses within the neighbourhood area. This would directly involve a number of Team London Bridge's members. Were the principle of a more fluid relationship between the two areas to be established then it would be helpful to give consideration to the role of Team London Bridge in respect of the commercial uses along Bermondsey High Street. We would also be keen to see clear safeguards ensuring equal participation of business interests in the Forum as the commercial uses in the Neighbourhood Area increased.

The proposed new Neighbourhood Area also includes a number of larger residential estates (e.g. St Olave's) similar to those in the south of the existing Neighbourhood Area which the Forum has acknowledged it has found harder to engage in the neighbourhood planning process.

Major transport routes, such as the railway lines out of London Bridge Station, often form the boundary of neighbourhood areas. In this instance, we are keen to support initiatives which would improve linkages north and south of the length of the London Bridge railway through the tunnels and we recognise there may be opportunity in strengthening the connections to the east of Bermondsey street however the proposed boundary extension would create a new division of the railway line at Bermondsey street.

Our primary concern is the potential impact of the proposed Neighbourhood Area on the development and delivery of the London Bridge Plan. The London Bridge Plan sets out our strategic vision in partnership with Southwark Council for the London Bridge area. Its aims and projects have developed out of local public consultation with over 300 businesses and 400 individual comments, as well as taking into account existing and emerging local and strategic planning and economic strategies. The Plan was developed following a second BID extension to 2021 which was won in 2015. It is robust and well supported by the local community.

The proposed new Neighbourhood Area would only partially overlap with the area of the London Bridge

Plan. This would have a particular impact on some of the most important placeshaping initiatives, including the Low Line, St Thomas Street Boulevard, High Street London Bridge (Tooley Street) and the Green Grid. Each of these would be partially inside and partially outside the new Neighbourhood Area. The boundary would run down the middle of Tooley Street and along the northern edge of St Thomas Street. It would also include one building north of Tooley Street although there is little rationale provided for this peculiarity in the proposed boundary. We ask that the particular impact of the proposed new boundary on the delivery of the London Bridge Plan is carefully considered in determining the proposals. Moreover, the proposed London Bridge Area Vision in the New Southwark Plan has been based largely on the aims of the London Bridge Plan. We hope this has been written in such a way as to support and preserve the heritage features in the area – including a direct mention of placemarks - and question whether an extended OBVNF boundary would provide additional benefit.

Finally, we are aware that there are a number of development sites along St Thomas Street, and we are involved in this to create the Boulevard mentioned in the London Bridge Plan (a 'high street' in the NSP). This will be a very contemporary development, and we question whether this will sit well in the 'character' of Bermondsey Street. It is more likely to be in the character of the more commercial area of London Bridge. 3

We look forward to continuing collaboration with Old Bermondsey Village Neighbourhood Forum and Southwark Council

I support wholeheartedly the OBF's proposed extension as outlined in Appendix 3 of the Application submitted for the revised Neighbourhood Area by the Old Bermondsey Village Neighbourhood Forum to the council during September 2017 for the following reasons:

1. The extended area to the north has much in common with the existing area of the Neighbourhood Plan, being a mix of residential dwellings, independent shops and small businesses.
2. The unique vibe of Bermondsey Street and the surrounding area makes it a great place to live and/or work, and it is essential that this character is allowed to organically develop. Incorporating the extended area can only aid this process.
3. There are a number of buildings in the extended area of industrial and/or architectural merit and these should be given new life to the benefit of the existing business and residential community and those who come to live and/or work here in the future.
4. Too many parts of London have lost their identity through developers being more concerned with large profits for investors than listening to the existing communities living and working there. Local issues matter to local people, and disregarding them leads ultimately to a poorer quality of life.

Dear Sir/Madam,

I write following notification of the revised Neighbourhood Area applied for by the Old Bermondsey Village Neighbourhood Forum (OBF) under an application submitted to the council during September 2017.

Please note that the following comments represent the views of Transport for London (TfL) from a strategic transport perspective and as a transport provider *with operational infrastructure*. They do not cover TfL's interests as a property owner and these will be provided separately. These comments are made entirely on a 'without prejudice' basis and represent TfL's views on the two specific neighbourhood area applications.

#### **Proposed Extension Area**

TfL has no specific comments to make on the proposed extension area; however, it is noted that TfL has a number of assets and landholdings within this area. These include parts of the Transport for London Road Network (TLRN), London Underground infrastructure, bus stops and Cycle Hire docking stations. Although not within the area, there is also the proposed Cycle Super Highway 4 *which would run nearby and on which we consulted recently*.

#### **Consultation**

TfL would wish to be involved in the neighbourhood planning process when it impacts or could affect its transport operations and infrastructure or when significant transport policy issues are raised. We would therefore be grateful if you could continue to consult us as neighbourhood planning for Old Bermondsey Village is progressed. In addition TfL may have property interests in the neighbourhood area and thus we should be involved separately in this circumstance by contacting [REDACTED]

#### **Conclusion**

I trust this provides an understanding of TfL's current position on the proposed Neighbourhood Area extension application and our wider position on neighbourhood planning.

Please do not hesitate to contact me if you have any queries.

I live in SE1 and support the application for area extension by the Old Bermondsey Forum.

We write on behalf of our client, Zurich Assurance Ltd c/o Threadneedle Portfolio Services Ltd, in respect of the current consultation on a revised neighbourhood area boundary proposed by the Old Bermondsey Village Neighbourhood Forum (OBVNF).

Our client owns Becket House, which is located on the southern side of St Thomas Street. The site currently comprises a seven-storey office building, occupied by the UK Immigration Service. The site lies within the London Bridge Opportunity Area, an area identified for tall buildings in the Southwark Local Plan, the London Bridge BID, and is a site allocated for strategic development in the New Southwark Plan. On behalf of our client, we have been promoting the site for comprehensive redevelopment within emerging planning policy documents over the past ten years, together with exploring early proposals for the site through the council's preapplication process. We have also been discussing the proposals with the GLA and adjoining landowners for a number of years. The redevelopment of our client's site will form part of a strategic development area to the south of London Bridge, known as St Thomas Street East. This distinct character area is reinforced in Southwark's New Local Plan (site allocations NSP52 and NSP53). The revised neighbourhood area proposed by OBVNF would encompass St Thomas Street East

#### **Background to the Neighbourhood Plan Area**

The previous consultation on the Bermondsey Neighbourhood Area consulted on two boundaries, the Bermondsey Neighbourhood Forum (BVF) boundary and the Bermondsey Village Action Group (BVAG) boundary. These boundaries overlapped each other but both encompassed the area around London

Bridge Station, including our client's site on St Thomas Street. Southwark Council did not consider the neighbourhood areas proposed to be Bermondsey Neighbourhood Planning appropriate. The area proposed by BVF was not considered appropriate as the northern area, around London Bridge Station, has inherent differences in character, building heights, land use and density to the southern parts of the specified area and therefore the area did not form a coherent neighbourhood which would be appropriate for neighbourhood planning. The area proposed by BVAG was not considered to be appropriate as the area mainly comprised of strategic sites around London Bridge and the planning and development of these sites would have implications well beyond the neighbourhood area proposed. Southwark subsequently proposed an alternative Neighbourhood Area boundary (Area A) which extended north up to Snowfields. The Council specifically noted that Snowfields itself acts as a natural boundary and that the area to the north of Snowfields is different in character to the area to the south. We made representations to the Bermondsey Neighbourhood Area Consultation in March 2013 and supported many of the council's conclusions.

### **Representations**

We note that the Old Bermondsey Village Neighbourhood Forum (OBVNF) are seeking to extend the Neighbourhood Area to include the St Thomas Street East (the area to the north of Snowfields and to the south of St Thomas Street / London Bridge). This area was previously proposed by BVF and BVAG and was rejected by Southwark Council for the reasons noted above. We strongly believe that St Thomas Street East should remain outside the Neighbourhood Area. St Thomas Street East's character consist of a business area with taller building heights and large scale infrastructure. This contrasts to then character of the existing Neighbourhood Area (Area A) which is predominately residential and low rise buildings. There are some small businesses at the eastern end of Tooley Street referred to in OBVNF submission, but these are exceptional in this immediate area and certainly not characteristic of St Thomas Street.

As previously stated by Southwark Council, St Thomas Street East also contains am number of strategic sites. The two strategic sites (ref: NSP52 and NSP53) which are formed of three landownerships are identified as suitable for tall buildings and have an indicative development capacity for hundreds of new homes and thousands of square metres of new employment floorspace. These strategic sites and the scale of development will have a sphere of influence that extends well beyond the proposed Neighbourhood Area boundary. The landowners of these three sites have been working together to bring forward a comprehensive development proposal for the street and significant progress is being made in delivering St Thomas Street Boulevard, as outlined in The London Bridge Plan. These development proposals will further establish St Thomas Street East as a different character area in its own right.

Overall, the justification as to why Southwark Council previously excluded the area to the north of Snowfields and to the south of St Thomas Street previously still remains. St Thomas Street East is significantly different in character to the existing Neighbourhood Area (Area A) and comprises of a number of strategic sites which are of strategic importance to Southwark and also to the GLA. This area is appropriately covered by Team London Bridge and the BID. It would be inappropriate and could frustrate and delay development should a neighbourhood plan forum cover these strategic sites alongside their other local matters.

We look forward to hearing from you and if you have any questions then do not hesitate to contact us.