

## Matter 10 – Site Allocations

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### Issue 1

Whether the overall approach to site allocations is justified, effective and consistent with national policy and in general conformity with the London Plan.

#### 10.1

Is the 'must, should, may' approach sound? Is it clear as to the circumstances where planning permission would be granted, and will it be effective in securing the delivery of the site allocations?

The 'must, should, may' approach is unsound as the approach limits itself to use class, particularly in NSP 50 and 51. The approach to tall buildings in NSP 51 and 50 uses the term 'could' in relation to taller buildings in consideration of impacts on character and heritage – this is not 'must' 'should' or 'may'.

The circumstances where planning permission is granted in Southwark is unclear. The LPA is infamous for its inconsistencies in judging applications. The LPA sometimes demand that smaller developments adhere to a 25-degree thumb rule to protect sunlight to neighbouring windows however high-rise developments are invariably approved which result in complete loss of sunlight to neighbours.

#### 10.3

For each of the site allocations, can the Council provide an up-to-date position on what relevant planning permissions have been granted as of 31 March 2020 and whether, as of 1 April 2020 which of those permissions are under construction? What effect would any extant or implemented planning permission have on the allocation in terms of the amount of development approved and its coverage of the allocation area? Is each site allocation policy sufficiently clear as to when the sites are expected to come forward for development? If a site allocation is under construction, is it right for these to remain 'allocations' in the NSP? Would the allocation be viable and is it deliverable? To what extent would land ownership or the need for any land assembly affect the deliverability of the site? Are the respective criteria to guide the proposed development justified?

- The approval for development on Capital House site (Ref:18/AP/0900) set a dangerous precedent for high-rise in NSP50 and soon applications for further high-rises poured in – (Ref: 19/AP/0404, 20/AP/0944 and 18/AP/4171)
- No clarity of when any these developments will take place. Developers aim to keep the permission live by doing minimal work to prove commencement.
- Allocations are not viable and not deliverable (example 18/AP/0900 which was previously given consent in 2014). Planning applications are made to spike up the reality, not aimed to provide any benefits to the community. Ownership is therefore forever transient.

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## 10.4

Are the site allocation policies sufficiently clear as to whether tall and taller buildings will be acceptable?

Other London Boroughs such as Westminster has classified heights based on their context and explained the visual impact as well as appropriate locations based on each classification in 'Westminster Building Height Study 2019'.

The Newham Local Plan 2018 too sets out indicative building heights appropriate for each of its site allocations.

The NSP however does not give a clear definition for a tall building except in general terms as being 30m tall or substantially taller than the surroundings.

Tall buildings are not acceptable in NSP50 and 51 due to their close proximity to heritage assets and Bermondsey street conservation area. The site allocations were demarcated by the Council without any proper consultation undertaken with the general public.

A recent planning application for a tall building in NSP51 was refused permission at Planning Committee (18/AP/4171) – This demonstrates the way the council encourages developers to pursue tall buildings at pre-application meetings and through vague policy making. The developers were told at several public consultation workshops, forum meetings, by Historic England and various heritage campaign groups that their proposal was too tall for the area and poorly designed, yet the applicants steam rolled ahead (supported by the LPA who recommended it for approval) despite the proposal being contrary to the NPPF and draft Neighbourhood Plan.

It is to be noted that the Neighbourhood Forum had originally applied to include area covered by NSP50 and 51 however were forced upon an area which excluded them. The Council has always aspired to encourage tall buildings where they knew they would be unacceptable.

## 10.5

Can the Council identify where in the evidence base the planned net increase in B class employment space has been quantified for all of the site allocations?

No evidence base provided in context of:

- Proposed new permitted development rights which allows free conversion of B class to C3
- Low demand for office spaces during and post COVID
- Impact of Brexit on businesses

## 10.7

For each of the allocations that seeks to provide employment, is the requirement to increase the proportion of B class uses on allocations justified? Does this provide sufficient flexibility if there is insufficient demand or viability?

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On the contrary there is overwhelming evidence for lack of demand in office spaces throughout the capital in the present climate. The policy needs to be reconsulted to assess the impact of COVID and Brexit.

10.8

For each of the site allocations, what effects, if any, do the changes to the Use Classes Order (September 2020) have on those respective allocations where use classes are referenced?

Further to the Use Class Order 2020, the proposed addition permitted development right allowing free conversion from Class E to Class C3 has potentially very broad impacts. When taken into consideration with the new scheme of PD if brought into legislation, will reduce further the role of local authority's in the planning control process.

Whilst the proposed Class E to Class C3 right may lead to additional housing, local planning authorities are not currently able to charge CIL or secure s106 agreements when granting prior approval. There is a risk that significant conversions may not mitigate the impact of the development, thus putting further strain on local authority services, in addition to

- Increased traffic (deliveries round the clock) and visitors
- Increased pressure on existing healthcare, public transport, and open spaces
- Pressure on schools; among others

**Appendix 1 - Civic voice letter**

10.9

Are main modifications necessary to any of the site allocations for soundness?

Site allocation NSP50 – Community wide consultation aimed primarily at setting height restrictions

Site allocation NSP51 – Community wide consultation aimed primarily at setting height restrictions

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## Issue 11:

**Whether the London Bridge sites are justified, effective, consistent with national policy and in general conformity with the London Plan.**

### Relevant Policies NSP49-52

NSP51 – Land between St. Thomas Street, Fenning Street, Melior Place and Snowsfields

10.69

Should there be a single, more comprehensive allocation covering NSP50-51 and what would be the effect of doing so?

A master plan was proposed under the brand name 'St Thomas street east framework' combining NSP 50 and 51. The framework however quickly fell apart as one proposal for high-rise office was refused (Ref: 18/AP/4171) and another was deferred (ref: 19/AP/0404) at Planning Committee on the same day.

#### **Appendix 2 – Objection letters**

#### **Appendix 3 – St Thomas East framework 2.0 extract**

A comprehensive allocation is possible and would be useful if the Council were to carry out meaningful consultation to understand values and needs of the community. This would enable developers to understand the limits and set forth a unified design approach which would be beneficial to all in line with London Plan policy GG2 and true to the spirit of the Localism Act 2011.

**Appendix 1**  
**Civic Voice letter**

**Please refer to**

**Page 3 Q2.2**

**Page 5 Q3.1**

**Page 6, 7 Q5**



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By [email](#) and [online survey](#)

28<sup>th</sup> January 2021

Dear Sir/Madam,

## **RE: Response to Supporting housing delivery and public service infrastructure consultation**

Civic Voice is the national charity for the civic movement. We are campaigning for a more accessible, balanced, collaborative, and democratic system, as set out in our Manifesto. Since we set up in 2010, we have been joined by hundreds of volunteer-led, community based civic societies with over 76,000 individual members. Civic societies exist in over 70% of local authority areas and are some of the most numerous participants in the planning system.

### **How we developed our response**

Civic Voice welcomes the opportunity to comment on this consultation. Since the New Year, Civic Voice has been meaningfully engaging with its members through a variety of online regional briefings and roundtable discussions, written briefings, newsletters, and press releases, to gain views on the proposals from across the civic movement.

We started our consultation with members in mid January 2021, as we recognise that December is not the right time to consult with communities on major planning changes. Over the last two weeks, we held **7 online events** specifically on this consultation, engaging directly with **121 people** in total, covering **85 societies and community groups in all regions of England, and covering city, town, and rural areas**. Several civic societies also submitted further detailed written comments to Civic Voice and we expect to see many submitting their own responses to the consultation. These discussions and comments have shaped our final response.

### **Civic Voice key concerns**

#### New permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3)

Civic Voice and its members are acutely aware of the challenges facing the high street, but we question claims that these proposals will breathe new life into our high streets, town, and city centres. We fear further deregulation of planning through permitted development will prevent the proactive and positive management that our centres desperately need and simply enable change of use to more profitable uses, often residential, rather than enabling a greater range of uses to diversify and support our high streets and centres. In particular, we are concerned that the proposals to widen permitted development could:

- Be harmful to the diversity of our high streets, town, and city centres.
- Enable the creation of poor quality homes and living environments.
- Lead to the loss of historic character within our conservation areas through inappropriate development and unsympathetic alterations.

•  
For these reasons Civic Voice cannot support this policy and we have encouraged all Civic Societies to respond to this consultation.

#### New public service application process

We also strongly object to the proposed reduction in the statutory public consultation period for major public service infrastructure development to 14 days. Whilst an efficient and effective process is important to deliver critical infrastructure, we do not believe reducing the consultation period to 2 weeks is the right way to achieve this.

We understand the thinking behind the proposal and welcome greater emphasis on pre-application engagement in the consultation. However, this is guidance and Civic Voice's experience is that effective pre-application engagement with communities is not happening in practice. We cannot support the change to the statutory consultation period unless there are standards for effective, genuine, and meaningful engagement with the local community on major developments.

Our detailed response to the consultation is appended overleaf. Where we have not responded to a question this does not mean that we do not have a view, it is just that we are focusing solely on the key issues raised by communities during our own consultation process on the proposed changes.

We trust this response is useful. We are happy to assist and look forward to continuing our discussions with Ministers and Government officials on proposals as they develop.

Yours faithfully,



Ian Harvey

**Executive Director**

# Supporting housing delivery through a new national permitted development right for the change of use from the Commercial, Business and Service use class to residential

**\*\*Please note that this is a draft Civic Voice response, subject to Civic Voice Board sign off, so please bear this in mind when reading.**

**Q1 Do you agree that there should be no size limit on the buildings that could benefit from the new permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3)?**

Agree	
Disagree	X
Don't know	

Please give your reasons:

No. Civic Voice objects to this change to permitted development rights in principle. See answer to question 5 below.

**Q2.1 Do you agree that the right should not apply in areas of outstanding natural beauty, the Broads, National Parks, areas specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981, and World Heritage Sites?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

Yes. It should also not apply to Conservation Areas.

**Q2.2 Do you agree that the right should apply in conservation areas?**

Agree	
Disagree	X
Don't know	

Please give your reasons:

No. Civic Voice cannot support the proposed change to allow properties in Class E use within conservation areas, to change use to housing (C3 use) without the need for a planning application. Many of these buildings, often located within historic high streets, town, and city centres, contribute to the character of some of our most treasured and locally loved historic areas. Conservation areas have been designated locally because they are “areas of special architectural or historic interest, the character and appearance of which it is desirable to preserve or enhance” (s69 Planning (Listed Buildings and Conservation Areas) Act 1990). We are concerned that widening the current permitted development rights in conservation areas to

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allow such changes of use could undermine current protections and threaten the 'special interest' and character and appearance of conservation areas. Currently there are 491 conservation areas on the Heritage at Risk register and we believe if this proposal is implemented by Government, it could potentially lead to more conservation areas becoming 'at risk' in the future.

We do not consider conservation areas should be preserved in aspic and acknowledge the benefits of encouraging housing within historic high streets and centres to support their viability and diversity. However, we strongly believe this should come through a process of managed change, considered through the standard planning application process, not through permitted development. This route would be consistent with the proposals in the Planning White Paper for conservation areas to be classed as Protected Areas, which Civic Voice supported.

We acknowledge the proposal in the consultation to allow local authorities to consider the impact of the loss of the ground floor use to residential for permitted development prior approval applications in conservation areas, but we do not consider this provision to be sufficient to prevent inappropriate development in conservation areas. For example, would it prevent the loss of historic shopfronts and elevational detailing or inappropriate alterations associated with the change of use such as unsympathetic windows or materials?

**Q2.3 Do you agree that, in conservation areas only, the right should allow for prior approval of the impact of the loss of ground floor use to residential?**

Agree	
Disagree	X
Don't know	

Please give your reasons:

If this permitted development right is implemented by the government, prior approval of the impact of the loss of ground floor use to residential and 'active frontage' should be required in all cases, not just in conservation areas.

There is no doubt that our high streets, town, and city centres are currently undergoing serious change, due to our change in shopping habits, exacerbated by the Covid-19 pandemic. Some of this change might be permanent, some temporary, but in any case, it is likely that centres will need to diversify and the extent of primary retail areas on the 'high street' may need to shrink. However, Civic Voice considers these issues need to be tackled through a process of managed change, finding positive solutions to support the diversification and viability of the 'high street'.

As such, we consider the impact of loss of ground floor use to residential should be required for all prior approval applications, if the new PD right is introduced, to allow local planning authorities to consider the impact and to prevent a 'pepper pot' of opportunistic conversions throughout our high streets and centres. This could be damaging and lead to a fragmented 'high street'. A wholesale review of the high street, town or city centre would be a more appropriate way of managing this period of rapid and dramatic change.

**Q3.1 Do you agree that in managing the impact of the proposal, the matters set out in paragraph 21 of the consultation document should be considered in a prior approval?**

Agree	
Disagree	X

Don't know	
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Please give your reasons:

No. Civic Voice recognises that there are many responsible land and property owners and developers. However, the danger with deregulation of the planning system through widening permitted development rights is that it enables and can often lead to those less responsible and unscrupulous land and property owners and developers exploiting loopholes. We have evidence of this through the previous widening of PD rights allowing office to residential conversions, which the Government's own commissioned report, 'Research into the quality standard of homes delivered through change of use permitted development rights' (2020) concluded that permitted development rights create 'worse quality residential environments'. The risk is that this new PD right if introduced would go wider than the office to residential conversions, enabling a much greater range of uses to change and the impacts could, therefore, be greater.

It is impossible to legislate for every circumstance. Civic Voice considers a limited list of prior approval matters will not necessarily secure a high quality residential environment for the occupants or create the vibrant, diverse and planned centres our communities want. For this reason we cannot support this policy.

### Q3.2 Are there any other planning matters that should be considered?

Yes	X
No	
Don't know	

Please specify:

Civic Voice objects to the proposed policy. However, if the Government intends to implement the proposed new PD right, we consider the following prior approval matters should also be included:

- Impact of the loss of ground floor use and 'active frontage' to residential.
- Residential amenity of future occupiers of the property and neighbouring properties. We acknowledge that the proposed prior approval matters include, noise, natural light and fire safety but suggest this goes further to include: outlook from windows for habitable rooms not just light; privacy and overlooking; and external amenity space.
- Design of any changes to the external appearance of the building.
- Servicing to include provision of storage for waste, recycling, and bikes.

Civic Voice supports the proposal in Para. 13 that all homes would be required to meet the nationally described space standards. Will this be a prior approval matter? We would prefer to see the nationally described space standards set within Building Regulations as a requirement for all new housing.

### Q4.1 Do you agree that the proposed new permitted development right to change use from Commercial, Business and Service (Class E) to residential (C3) should attract a fee per dwellinghouse?

Agree	X
Disagree	

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Don't know	<input type="checkbox"/>
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Please give your reasons:

Yes. The prior approval process would still add administrative cost to the local authority.

**Q4.2 If you agree there should be a fee per dwelling house, should this be set at £96 per dwellinghouse?**

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>
Don't know	X

Please give your reasons:

We suspect this fee is low compared to the cost of processing prior approval applications, but local planning authorities and the Local Government Association are best placed to advise on the appropriate fee for such applications.

**Q5 Do you have any other comments on the proposed right for the change of use from Commercial, Business and Service use class to residential?**

Yes	X
No	<input type="checkbox"/>

Please specify:

Civic Voice strongly objects to the proposal in principle because of the harm that it could do to our high streets, town, and city centres; the creation of poor quality homes; and the loss of historic character of our conservation areas.

Harm to high streets, town, and city centres

We accept that our high streets, town, and city centres are currently facing acute challenges and they will inevitably need to adjust and, in some cases, contract in response to changes in shopping and leisure habits. However, Civic Voice believes this needs to be done in a planned and curated way by local communities through their local planning policies, not by allowing the market to decide in a random and potentially counterproductive manner. It is certainly desirable to bring more residential use into town centres, and this has long been an objective of urban renewal policies. But in areas where residential values often outweigh the value of other uses there is a danger that this change could permanently destroy the essential local function of town centres and local high streets, at a time when 'shopping local' has become increasingly important.

Civic Voice is acutely aware of the challenges facing the high street and the need to find positive solutions to tackle fundamental problems. However, we question claims that these proposals will breathe new life into our centres. It may, instead, simply enable change of use to more profitable uses, often residential, rather than enabling a greater range of uses to diversify and support our high streets, town, and city centres. We are particularly concerned that the proposed widening of PD rights will lead to opportunistic conversions rather a planned approach to diversification, leading to fragmentation of our centres. This could, in turn, undermine the viability of commercial activities on parts of the high street, contrary to the Government's objectives.

The changes to permitted development rights proposed in this consultation would effectively prevent local planning authorities from planning positively and creatively to facilitate change and

adaptation of town/city centres and local high streets. Civic Voice's view is that our communities need more 'high street' visions, masterplans, and area action plans to proactively manage this fundamental change to our town and city centres, not less. We fail to see how this would be possible if the proposed PD right is implemented by Government.

#### Poor quality homes

Civic Voice recognises that there are many responsible land and property owners and developers. However, the danger with deregulation of the planning system through widening permitted development rights is that it enables and can often lead to those less responsible and unscrupulous land and property owners and developers exploiting loopholes. We have evidence of this through the previous widening of PD rights allowing office to residential conversions, which the Government's own commissioned report, 'Research into the quality standard of homes delivered through change of use permitted development rights' (2020) concluded that permitted development rights create 'worse quality residential environments'. The risk is that this new PD right if introduced would go wider than the office to residential conversions enabling a much greater range of uses to change and the impacts could, therefore, be greater.

It is impossible to legislate for every circumstance. Civic Voice considers the limited list of prior approval matters set out in Para. 21 will not necessarily secure a high quality residential environment for the occupants and therefore, recommend that such changes of use are, instead, considered through the standard planning application route rather than prior approval.

We need to have an honest conversation about the quality of the new homes produced today and should be working harder to improve standards through the planning system, not encouraging lower standards through poor quality conversions through permitted development. Civic Voice supports the TCPA campaign for a Healthy Homes Act: <https://www.tcpa.org.uk/healthy-homes-act>. Evidence through the Place Alliance/CPRE report Housing Design Audit (2020): <http://placealliance.org.uk/research/national-housing-audit/> shows that the sector needs to do better and the Government's work on the forthcoming National Model Design Code and National Design Body is encouraging. However, we fear that widening permitted development as proposed in the consultation will undermine efforts to improve housing design quality overall.

#### Loss of historic character

Civic Voice is extremely concerned that unlike some of the recent changes to permitted development, this consultation proposes that the new right would apply in conservation areas. There are many unlisted or locally listed buildings that fall, but not exclusively, within conservation areas that might be able to change use to housing if the new PD right was introduced by the government. These properties in our historic high streets, town, and city centres, can contribute to the character of some of our most treasured and locally loved conservation areas. We are concerned that widening the current permitted development rights in conservation areas to allow such changes of use, without the need for a planning application, could undermine current protections and threaten the 'special interest' i.e. the reason why conservation areas have been designated in the first place. character and appearance of conservation areas.

We do not consider conservation areas should be preserved in aspic and acknowledge the benefits of encouraging housing within historic high streets and centres to support their viability and diversity. However, we strongly believe this should come through a process of managed change, considered through the standard planning application process, not through permitted development. This route would be consistent with the proposals in the Planning White Paper for conservation areas to be classed as Protected Areas, which Civic Voice supported.

We acknowledge the proposal in the consultation to allow local authorities to consider the impact of the loss of the ground floor use to residential for permitted development prior approval

applications in conservation areas, but we do not consider this provision to be sufficient to prevent inappropriate development in conservation areas, such as inappropriate alterations to the frontage of property associated with the change of use e.g. unsympathetic windows, materials or detailing.

**Q6.1 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could impact on businesses, communities, or local planning authorities?**

Yes	X
No	
Don't know	

If so, please give your reasons:

Yes. We consider it would have a negative impact on business, communities, and local planning authorities. A random and unmanaged fragmentation of high streets, town and city centres could have a negative impact on surrounding businesses and lead to a less attractive and viable town centre or local shopping parade. Communities could also suffer through loss of valuable local health, nursery, and indoor sports facilities. The local planning authority would lose its ability to plan positively and creatively for facilitating change and adaptation of town centres and high streets to respond to changing shopping and leisure habits. Changes to residential use would be irreversible, so any flexibility offered is only one way, leading to loss of potentially valuable mixed uses. However, it would of course benefit property owners who seek the highest value for their property.

It is unclear from the consultation whether communities would be able to comment on prior approval applications, and what level of publicity would be undertaken or timescales for consultation. In any case, the type and range of issues communities could meaningfully comment upon would be limited to the prior approval matters, which we do not consider to be sufficient. As such, we consider the proposed PD right would undermine the ability of communities to have a voice in the future of their area.

**Q6.2 Do you think that the proposed right for the change of use from the Commercial, Business and Service use class to residential could give rise to any impacts on people who share a protected characteristic?**

Yes	X
No	
Don't know	

If so, please give your reasons:

Yes, potentially. Local facilities and services have become more important for us all, due to the current Covid-19 pandemic, and this is most acute for people with a protected characteristic. Loss of local shops and services would have a negative impact on the elderly, people with poor mobility, those with disabilities and those on low incomes who are unable to afford to travel to town or city centres.

# Supporting public service infrastructure through the planning system

**Q11 Do you agree that the new public service application process, as set out in paragraphs 43 and 44 of the consultation document, should only apply to major development (which are not EIA developments)?**

Yes	
No	X

Please give your reasons:

No. Whilst Civic Voice supports the imperative to speed up the planning system for critical public service infrastructure such as major development for schools, colleges, hospitals, prisons, we object to the reduction of the statutory consultation period for these schemes from 21 to 14 days, as a means of speeding up the process. For this reason we cannot support the proposal.

**Q12 Do you agree the modified process should apply to hospitals, schools and further education colleges, and prisons, young offenders' institutions, and other criminal justice accommodation?**

Yes	X
No	

If not, please give your reasons as well as any suggested alternatives:

If introduced by the government, the proposed uses (hospitals, schools and further education colleges, and prisons, young offenders' institutions, and other criminal justice accommodation) seem appropriate.

However, this whole section appears to treat the planning process as if it were an undesirable burden on the providers of public infrastructure rather than as a means of engaging citizens in the way in which their community develops and its needs are met. We rebut this. The Government's aim should be to ensure that schools, colleges, hospitals, and prisons engage publicly and openly with the community at the earliest stage when they are considering expansion or relocation. These are major schemes of critical services, with which communities should be meaningfully engaged in the development. Civic Voice believes that if local communities and civic societies were genuinely and meaningfully engaged at an early stage in these schemes, obtaining full planning permission would be much quicker.

**Q13 Do you agree the determination period for applications falling within the scope of the modified process should be reduced to 10 weeks?**

Yes	
No	X

Please give your reasons:

No. These are complex applications, and the existing 13 week period is more appropriate.

**Q14 Do you agree the minimum consultation / publicity period should be reduced to 14 days?**

Yes	
No	X

Please give your reasons:

An efficient and effective process is important for critical public service infrastructure development e.g. hospitals however, it is concerning that the public consultation is proposed to be reduced to 14 days for major developments (which could be up to 5 hectares in size). We welcome renewed emphasis on effective pre-app engagement, but such engagement is not just internal confidential discussions between the applicant, statutory consultees, and the local authority. For major developments it must involve the local community.

We understand the government's ambitions and expectations that 'many of these developments will have already been subject to extensive prior engagement with the local community' (Para. 63) but Civic Voice's experience is that this is not happening. We cannot support the change to the consultation period unless there are standards for effective engagement with the local community on major developments. We would be happy to assist Government in developing standards for good, effective, and meaningful community engagement.

**Q15 Do you agree the Secretary of State should be notified when a valid planning application is first submitted to a local planning authority and when the authority anticipates making a decision? (We propose that this notification should take place no later than 8 weeks after the application is validated by the planning authority.)**

Yes	
No	X

Please give your reasons:

We suspect this would add additional bureaucracy to already overworked and understaffed local planning authorities. However, local planning authorities and the Local Government Association are best placed to advise on this.

**Q16 Do you agree that the policy in paragraph 94 of the NPPF should be extended to require local planning authorities to engage proactively to resolve key planning issues of other public service infrastructure projects before applications are submitted?**

Yes	X
No	

Please give your reasons:

Yes. However, the requirement to work proactively to resolve key issues before planning applications are submitted should also apply to those public service providers bringing forward

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the development. Proactive planning requires resources in people and skills, particularly in communicating meaningfully and effectively with local communities, and this needs to be reflected in enhanced budgets for local planning authorities.

**Q17.1 Do you have any comments on the other matters set out in the consultation document, including post-permission matters, guidance and planning fees?**

Yes	X
No	

Please specify:

Para. 67 on post permission consents is important. The experience from some of our civic societies is that on major developments it is frequent for changes to the approved application to be sought in advance of, or during, construction. These may be minor, and easily granted, but they may make significant changes which need proper public consultation. The local planning authority must not be blamed for consequent delay, and as well as monitoring local planning authorities' performance the government should monitor the performance of the body (often itself in the public sector) that is making the application, to see if delay is caused by its own inefficiencies or frequent changes of mind.

**Q17.2 Do you have any other suggestions on how these priority public service infrastructure projects should be prioritised within the planning system?**

Yes	X
No	

Please specify:

Local planning authorities in urban areas in England have had their budgets cut by 41% over the last ten years: <https://www.centreforcities.org/reader/cities-outlook-2019/a-decade-of-austerity/> (see Fig. 6) We consider the best way to prioritise all major development applications would be to invest in local government and improve capacity, technology and skills.

**Q18 Do you think that the proposed amendments to the planning applications process for public service infrastructure projects could give rise to any impacts on people who share a protected characteristic?**

Yes	X
No	

If so, please give your reasons:

It is difficult to say generally, but potentially, if the proposed consultation period is so short (and at 14 days, we believe it is) that local people with a protected characteristic find it difficult to understand and comment upon complex applications for important public service infrastructure.

## Consolidation and simplification of existing permitted development rights

**Q19.1 Do you agree with the broad approach to be applied to the review and update of existing permitted development rights in respect of categories 1, 2 and 3 outlined in paragraph 76 of the consultation document?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

Civic Voice supports the broad approach outlined in Para. 76, however we note the complexities and potential issues set out in Para. 78 and reserve the right to comment on the detail of proposed changes to the legislation when they are consulted upon. This area of planning legislation is complex and for community groups to understand the potential impacts of changes on their communities, it is important that the government consults upon the detail.

A key concern for Civic Voice is the potential broadening of PD rights for land or properties within conservation areas. In legislation, this land generally receives exemptions from PD rights and, therefore, greater protections, for valid reasons to 'preserve or enhance' the special architectural or historic interest of the conservation area. We would not support a review of the legislation leading to widening of the PD rights to include land and properties within conservation areas.

**Q20 Do you agree think that uses, such as betting shops and pay day loan shops, that are currently able to change use to a use now within the Commercial, Business and Service use class should be able to change use to any use within that class?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

Yes, subject to special protections for conservation areas, in particular, allowing local planning authorities to consider the design of any changes to the external appearance of the building. See our comments set out in response to question 2.2.

**Q21 Do you agree the broad approach to be applied in respect of category 4 outlined in paragraph 76 of the consultation document?**

Agree	X
Disagree	
Don't know	

Please give your reasons:

Yes, subject to our comments set out in response to question 19.1. Civic Voice reserves the right to comment on the detail of proposed changes to the legislation when they are consulted upon. This area of planning legislation is complex and for community groups to understand the potential impacts on their communities, it is important that the government consults upon the detail.

**Q22 Do you have any other comments about the consolidation and simplification of existing permitted development rights?**

Yes	
No	X

Please specify:

**Appendix 2**  
**Objections letters**

Mr Terence McLellan  
London Borough of Southwark  
Regeneration and Neighbourhoods  
Planning & Transport, Development management  
PO Box 64529  
London  
SE1P 5LX

Direct Dial: 020 7973 3774

Our ref: P01062337

18 April 2019

Dear Mr McLellan

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**40-44 BERMONDSEY STREET VINEGAR YARD WAREHOUSE 9-17 VINEGAR YARD AND LAND ADJACENT TO 1-7  
SNOWFIELDS SE1  
Application No. 19/AP/0404**

Thank you for your letter of 5 April 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Historic England Advice  
Summary**

In summary, whilst we welcome aspects of the proposals, we cannot support them due to the harm caused to Bermondsey Street Conservation Area by the proposed tall building above the historic warehouse at Vinegar Yard. We would welcome a revised design for a less intensive development within the conservation area that also retains the integrity of the warehouse building as a separate structure.

**Advice**

*Significance*

The significance of the heritage in this part of Bermondsey relates to Bermondsey Street Conservation Area, which includes the historic line of Bermondsey High Street with its relatively consistent historic development, but also the much more mixed area further west. The edge of the conservation area boundary here encompasses Vinegar Yard and the lone surviving (albeit damaged by WWII bombing) Victorian warehouse that illustrates the former industrial character of this part of Bermondsey. The building is a robust brick warehouse with typical features of the period such as timber loading bays and iron loading equipment. We agree with LB Southwark's assessment of the building as an 'unlisted building of merit' within the conservation area.

*Proposals*

The proposals include development within the conservation area and outside of it. Proposed within the conservation area is the redevelopment of the Vinegar Yard warehouse, retaining its principal facades but absorbing them into a new tall building.

*Policy context*

Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on planning authorities to consider the impact of proposals upon the character and appearance of conservation areas.

Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of 'sustainable development' where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced, and makes it clear at paragraph 193 that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. Any harm or loss should require clear and convincing justification and substantial harm or total loss should be exceptional. In the case of Grade II\* or Grade I listed or registered assets or World Heritage Sites, substantial harm or loss should be wholly exceptional (paragraph 194).

Where harm is caused to a heritage asset, the NPPF requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 196 of the NPPF requires that harm to be weighed against the public benefits of the proposals.

If the harm is substantial, or results in a total loss of significance, paragraph 195 states that local authorities should refuse consent unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh the harm or loss, or all four of the following criteria apply:

- The nature of the heritage asset prevents all reasonable uses of the site; and
- No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- The harm or loss is outweighed by the benefit of bringing the site back into use.

#### *Historic England position*

In our view the existing Victorian warehouse, despite war damage and post-war reconstruction, makes a positive contribution to the character and appearance of the conservation area through its scale, form and detailing, and the way it illustrates the historic industrial character of this part of Bermondsey. The redevelopment of the site with a tall building of a very different scale would cause harm to the significance of the relatively low scale conservation area through the great contrast in scale. Whilst we welcome the retention of the principal facades of the warehouse, we believe the 'skin deep' retention would lack authenticity and integrity, and the tall building rising above a partially retained Victorian warehouse would appear incongruous.

#### **Recommendation**

We consider that the issues outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 193 and 196 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

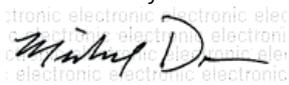
Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



**Michael Dunn**

Principal Inspector of Historic Buildings and Areas

E-mail: michael.dunn@HistoricEngland.org.uk



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18 April 2019

Dear Mr McLellan,

**Planning Application: 19/AP/0404 | 40-44 Bermondsey Street, Vinegar Yard  
Warehouse 9-17 Vinegar Yard and land adjacent to 1-7 Snowsfields SE1**

SAVE Britain's Heritage writes to object to this planning application. We consider this development would cause substantial harm to the character of the Bermondsey Street Conservation Area and to important undesignated heritage assets within the conservation area.

**Significance**

The site is partly within the Bermondsey Street Conservation Area, designated 1972, and is abutted by it on two sides. There are several grade II listed properties on Bermondsey Street, and the railway viaduct arches along St Thomas Street, facing the site, are also listed at grade II. We note the site is within a Central Activities Zone (CAZ) as designated by Southwark and the London Plan.

Individual buildings that make a positive contribution to the conservation area include the Vinegar Yard Leather Warehouse, within the site (and the proposed location of the 17-storey tower), and the Horseshoe Public House, a non-designated heritage asset of high value within the CA and directly adjoining the site. The Conservation Area Character Appraisal (2003) identifies *"a rich and varied character that at its heart reflects the street scale of its mediaeval origins, ...the historic street pattern has largely remained"*. In addition, we note the observation at 3.1.4. – *"The Conservation Area is distinctive for its many small warehouses; typically four storeys, often only three bays wide. Generally, the centre bay will be designed as a vertical "slot" of loading doors, with a swinging gantry at the top for hoisting goods. Often this is expressed as a gabled element... There is a consistency of other details, such as large squarely proportioned windows in the outer bays with arched brick or flat steel lintels, with paned steel or timber windows."*

In our view, Vinegar Yard Warehouse is a particularly apposite example of local character, which also possesses heritage significance in accordance with Historic England guidance

retaining architectural, aesthetic and historic merit through strong association with the development of the area. We believe the successful retention, repair and reuse of the building could be achieved with sympathetic additions that do not harm the heritage assets.

### **Impact**

Our principal concern is the inclusion of a 17-storey tower in the conservation area, which appears wholly out of character in the historic context of the Bermondsey Street Conservation Area, and the decision to construct it atop the vacant warehouse, destroying both the surviving interior of the building, and rendering the heritage value void.

The developments along St Thomas Street and their cumulative impact – spread over several separate planning applications – could, in our view, be controlled through the diligent application of established policy guidelines. Without this oversight there are significant and growing concerns, particularly regarding tall buildings at locations so clearly characterised by the historic precedent of scale and height. For example, the setting of the Horseshoe Public House would be adversely impacted by this and adjacent developments. Furthermore, in this application, the expectation that at the eastern end of the CAZ the height of developments is scaled down toward Bermondsey Street is palpably not met.

In this instance the proposed design of a glass tower emerging from, and overbearing, the shell of the Vinegar Yard Warehouse reduces the retained elevations to mere decoration. We profoundly disagree with the applicant's description of the scheme as producing "*limited harm*" and the assertion that the proposal "*will on balance enhance the character and appearance of the CA*". We suggest that heritage assets within conservation areas demand more sympathetic treatment, with any additions subordinate to the architectural value inherent in existing buildings.

### **Planning Policy**

SAVE considers that there are compelling reasons to refuse this application supported by local and national planning policy. This planning application affects several listed buildings and a conservation area, and consequently any harm caused must be justified in light of the requirements of the Planning Act 1990, the NPPF (2018) and Southwark Council's own guidance.

National planning policy usefully details the role of heritage assets, the enhancement of local character and distinctiveness, and decision making when a high degree of harm to heritage assets is proposed (paragraphs 189-202). Local authorities are also required to consider significance and setting, and to ensure that harmful impact of proposals is mitigated, and paragraphs 193 to 196 offer clear guidance in decision making when a designated heritage asset is either substantially or less than substantial harmed by a proposed development, and paragraph 194 and 197 of the NPPF also apply. We also note the section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which demands that "*special attention shall be paid to the desirability of preserving or enhancing the character or appearance*" of the conservation area in determining planning applications.

We consider that the proposed development fails to meet these expectations, particularly as it relates to the conservation area. The proposed public benefits do not outweigh the harm caused, and indeed could be delivered by a proposal that is significantly less harmful to surrounding heritage assets.

In addition to our remarks above regarding the importance of guidance and masterplanning of the St Thomas Street area of the CAZ, it is our view that the proposed development fails to conform to Southwark's own strategic policies, particularly Strategic Policy 12, which expects development to, *"conserve or enhance the significance of Southwark's heritage assets, their settings and wider historic environment, including conservation areas..."* and make sure, *"that the height and design of development conserves and enhances strategic views and is appropriate to its context, the historic environment and important local views."*

### **Conclusion**

SAVE considers this proposal is contrary to local and national planning policy and strongly recommends that this application be refused. The proposals would cause harm to the character of the Bermondsey Street Conservation Area. A tall building in the Conservation Area, and one that causes near total loss of significance to a key non-designated asset within the CA, would set an unfortunate precedent for the protection of heritage in Southwark and London, and risk erasing the special character of this part of London.

I trust these comments are useful to you. Please contact me at this office should you need further comment, and please keep me informed about the progress of this planning application.

Yours sincerely,



Thomas Bender  
Conservation Adviser

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**THE VICTORIAN SOCIETY**  
The champion for Victorian and Edwardian architecture

Southwark Council  
Planning division  
Development management (5th floor – hub 2)  
PO Box 64529  
London  
SE1P 5LX

Your reference: 19/AP/0404  
Our reference: 150997

2<sup>nd</sup> May 2019

planningstatconsultees@southwark.gov.uk

Dear Mr McLennan

**RE: proposal for the demolition of existing buildings at 40-44 Bermondsey Street including partial demolition, rebuilding and refurbishment of existing Vinegar Yard Warehouse and erection of new buildings, Building 1 of part 5, part 10 storeys, and Building 2 of 17 storeys. Part of the site is included in the Bermondsey Conservation Area.**

We were notified of this application by a member of the public. We **object** to the proposal, which was discussed at our Southern Buildings Committee, and have the following comments to make.

### **Significance and Harm**

The Bermondsey Street Conservation Area is characterised by its low-rise buildings, London stock brickwork, and its mix of medieval scale and industrial buildings usually in the form of small four storey warehouses. The Leather Warehouse in Vinegar Yard is one of these buildings, built to store hops in response to the increased presence of the brewing trade in Bermondsey from the early nineteenth century. Although the 1878 OS map shows several other hop warehouses and distilleries in the area, many of these have since disappeared, and the Leather Warehouse has come to represent a vestige of the trade which had such a large impact on Bermondsey in the nineteenth century. Extensive repair was carried out after bomb damage in the Second World War, but the features which speak to the past use of the building are still recognisable, and it still clearly contributes to the historic industrial atmosphere of the area. The removal of the roof, gutting of the interior, and demolition of the south wall in order to construct a 17 storey block within it demonstrates a complete indifference to the fabric and significance of the building which the recessed fifth level (which claims to distinguish between old and new) would do nothing to prevent. There is no justification for repurposing the Leather Warehouse as a subservient prop for another building, rendering it almost unrecognisable as a warehouse, when it could be repaired and reused and so retain its own significance. Given the importance of these smaller industrial buildings to Bermondsey, and the loss of many during the war and through subsequent

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development, it is even more important to protect what remains and not set a precedent for further damage.

Importantly, the harm which both proposed buildings would have on the Bermondsey Street Conservation Area would be significant. The current proposal suggests that because of its proximity to the London Bridge Area, high-rise development on the site would be acceptable and allow for a transition towards larger buildings such as the Shard. However, the proposed height of 17 storeys for Building 2 would be inappropriate in the context, overshadowing the surrounding buildings in a conservation area largely characterised by three and four storey buildings. The nearby Glasshouse Art Studios, and Arthur's Mission, grouped with the Leather Warehouse and noted for their positive contribution, would be similarly overwhelmed, and the key vista up Melior Street to the Horseshoe Inn would be significantly disrupted. Building 1 would also have an adverse effect on Bermondsey Street much of which is included within the conservation area, even if the site in question is not. The current buildings, 40 and 42-44, are sympathetic to the character of the street in general, which the conservation area appraisal mentions retains the feel of a village high street, especially to the north. Their brick façade is in keeping with other buildings in the street, and their height reinforces the historic building line which characterises the street and conservation area. The proposed Building 1 would stand above the buildings next to and opposite it, so disrupting this historic building line, whilst the proposed use of glass rather than brick would further create an extreme contrast with other buildings in the area and have a negative impact on the street, and wider conservation area. The design for the Snowfields Piazza would moreover be unsuitable in an area which is recognisable by its narrow streets and building plots, as would the proposed design for White Lion Court, which resembles an avenue more than the alley which it claims to reinstate.

## **Policy**

Additionally, Policy E.4.3 of the Unitary Development Plan states that planning permission in the conservation area will not normally be granted except where certain conditions are met. These include the stipulation that "proposals should pay special regard to historic building lines, scale, height, and massing, traditional patterns of frontages, vertical or horizontal emphasis, plot widths and detailed design." Moreover, it states that "a proposal for a site adjacent to or outside a Conservation Area will be unacceptable if it would have a significant adverse impact on the character and appearance of the Conservation Area" (Bermondsey Street Conservation area appraisal, p.3). The Conservation Area appraisal goes on to reinforce this point of height by specifically mentioning that in the conversion of the small to medium warehouses in the area, "heights of four and five storeys and not less than three" should be maintained (Bermondsey Street conservation area appraisal, p. 52).

Building 1 alone would be harmful to the setting of the conservation area by its scale which shows a complete disregard for the above guidelines, but the effect that Building 2 would have on the area would be far more damaging. A building standing more than four times taller than that of the average building in the conservation area would have an overwhelming effect, stealing attention away from the historic buildings which have defined the character of the area for over a century. The characteristic low-rise nature of the conservation area would moreover mean that even the buildings on its outer perimeter would have their views dominated by both buildings. On this scale, the proposed materials, already at odds with the character of the conservation area, would be magnified and contribute to the detrimental effect both buildings would have.

The combined effect of these factors would lead to the irretrievable loss of significance in the area which would amount to substantial harm. Under paragraph 195 of the NPPF, this can only be justified if:

- "a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.”

None of these conditions are met in this case and the justification for the substantial harm to the conservation area is therefore non-existent.

### **Conclusion**

The current proposal would not only be very damaging to the Leather Warehouse but would lead substantial harm to the Bermondsey Street Conservation Area. Granting planning permission for this proposal would set a dangerous precedent which would allow the significance and characteristics of conservation areas to be disregarded despite their status as designated heritage assets, and the protection which this should afford them. We therefore urge you to deny consent for this application.

I would be grateful if you could inform me of your decisions in due course.

Yours sincerely,

Olivia Stockdale

**Conservation Adviser**

Mr Terence McLellan  
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6 September 2019

Dear Mr McLellan,

**Proposed Major Re-Development at Bermondsey Street / Vinegar Yard, SE1 (the 'Project')**

I am writing to you in my capacity as the School Principal of The Wine & Spirit Education Trust (the 'WSET') based at 39-45 Bermondsey Street, SE1, and which is directly opposite to the Project.

I have a number of serious concerns regarding the Project and, following a discussion with your planning team, understand that the Planning Committee will be considering the Project in full at its meeting likely to be in December 2019 and that you are accepting representations up to the date of this meeting. Please accept this letter and the issues set out below, along with any follow up information provided, on a confidential basis.

**Background to WSET**

WSET was founded as a charitable trust in 1969 to serve the growing educational needs of the UK wine and spirits industry which, at the time, primarily spanned import, distribution and retail. Our founders represented the cornerstones of the UK wine and spirits trade, and representatives from each of these organisations continue to serve on our Board of Trustees.

As recognition grew for WSET qualifications we realised there was a demand beyond the UK for quality education in wines and spirits and, in 1977, WSET expanded access to qualifications abroad.

Today, WSET is a global market leader with qualifications available in over 75 countries in more than 15 languages, through a network of more than 880 course providers. Annual candidate numbers have now exceeded 108,000. WSET has won the Queen's Award for Enterprise, and we celebrate our 50<sup>th</sup> year in 2019 with several important and high-profile events.

WSET's place in Bermondsey Street carries huge significance, with the move of our headquarters into the area in 2005 due to the area's historical connection with the wines and spirits trade. There is a rich history of prominent wine companies based in Bermondsey Street such as Goedhuis, O W Loeb and Michael Druitt Wines, and other bottling facilities under the arches including Mayor Swarder, J T Davies & Sons, and Christopher & Co.

### **WSET School London**

A key part of our headquarters in Bermondsey Street is the WSET School London, which is the globally recognised flagship provider of wines, spirits and sake courses offering qualifications, tastings and events at all levels for professionals and enthusiasts alike.

WSET School London is an educational hub for the world of wines, spirits and sake. Our goal is to inspire and empower professionals and enthusiasts by providing them with the best possible learning experiences. Our global reputation as a centre of excellence has become synonymous with Bermondsey Street, promoting the area to students from all over the world. We attract 5,000 people to Bermondsey Street each year to learn, taste, participate and enjoy this unique experience at our teaching facility.

The School offers Awards across Levels 1 to 3 in wines, spirits and sake, and a Level 4 Diploma in Wine. We are accredited by the British Accreditation Council (BAC) for Independent Further and Higher Education as a short course provider. BAC is internationally recognised and is the UK's principal accrediting body in the independent further and higher education sector.

### **Impact of the Project**

The Project is a major re-development and will be occurring directly opposite the WSET School. It will have an enormous impact on all aspects of the School and its teaching, including light, noise, vibration, access and the ability of the School to continue to provide leading facilities and teaching for its students.

Taking these points in turn, first, our right to light will be significantly affected by the scale and sheer size of the Project. Aside from the wider implication of loss of light, our classrooms are positioned to benefit from the natural light as much as possible, as this forms a key aspect of assessing wine quality. The Project application has not taken into account the effect it will have on our natural light and hence on the ability of the School to continue to offer this important aspect of its teaching and courses.

Second, I have significant concerns on the impact of the Project from a noise, dust and vibration perspective. The right to quiet enjoyment of the School will be severely impacted and the students will find it harder to hear, concentrate and develop the range of knowledge and subtle skills required in our courses. The dust will impact teaching, noise will affect examinations, and vibration

will cause glasses to shake. We provide classes Monday to Friday between 9am and 9pm and on Saturday between 9am to 4.30pm and hence the noise, dust and vibration that will be generated from the works will have a significant effect on our ability to run these classes, as well as on our students, the working environment of our staff and the reception area, and may result in us being unable to deliver the courses in whole or in part.

Third, with our building being located directly opposite the Project, it will also have significant implications on the safety of our thousands of visiting students and 75 staff. During the Project works, there will be impact on access to our automatic doors front entrance as well as our tenant's business on the ground floor. As well as access to the building for our students, staff and tenant's clients, it will have implications on how we can service our building, this being solely from the front of the property.

Overall, WSET considers that the Project application has not considered the unique use of our building, WSET's longstanding heritage in Bermondsey Street, and the major disruption on School activity and therefore the implications which it will have on WSET and its activities. We are very concerned that the impact will be sufficiently great to affect the viability of our School operations.

Given the seriousness of this matter, I would like to request a meeting at our School with you and any relevant members of the Planning Committee to better explain the nature of our operations and the fundamental impact which the Project will have on these, not least as the School plans its academic courses one year in advance.

I look forward to hearing from you with your observations and a proposal for a meeting date.

Your sincerely,

A handwritten signature in black ink that reads "Richard Harding". The signature is written in a cursive, slightly slanted style.

**Richard Harding**  
**School Principal**

## **Appendix 3**

**St Thomas East framework 2.0 extract**

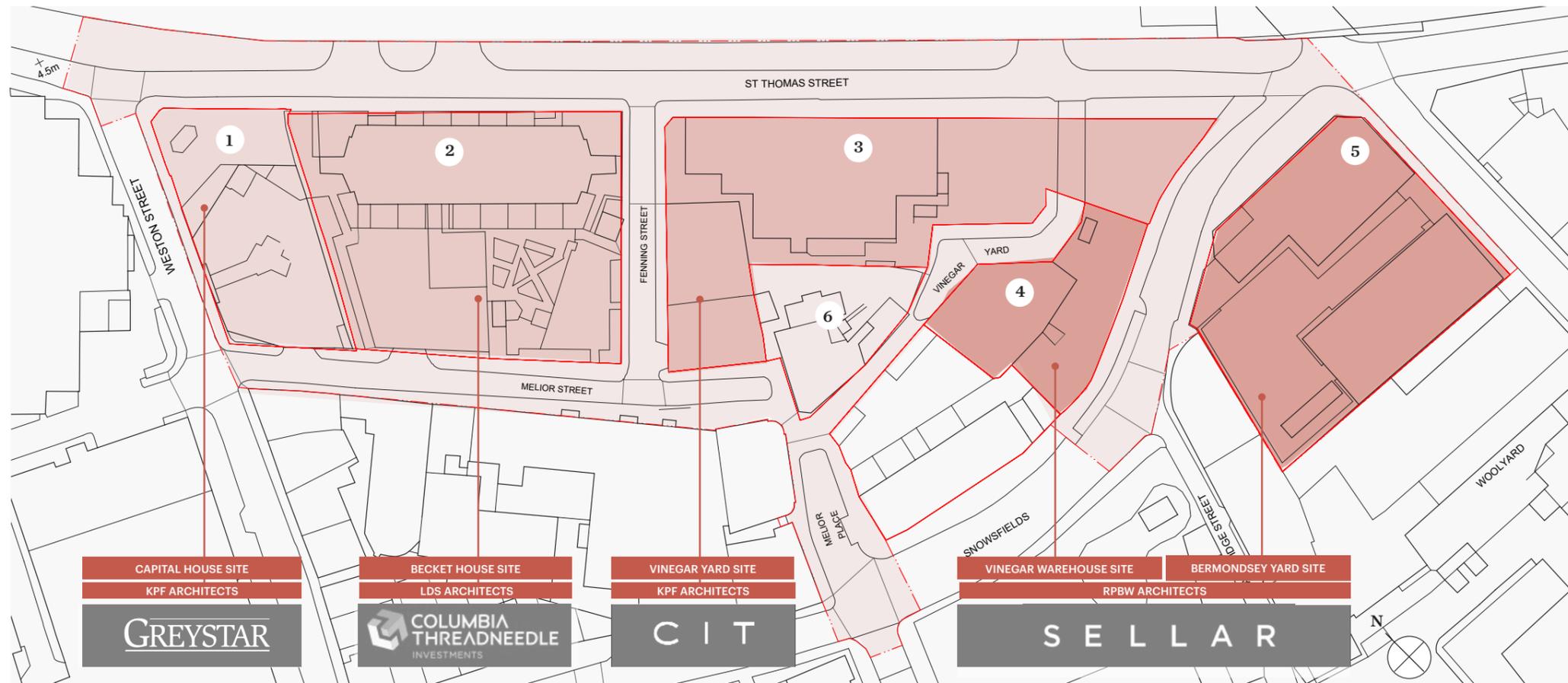
# Introduction



The St Thomas Street East (STSE) Draft Development Framework is STSE Landowners Group's commitment to the local area and to the LB Southwark; a set of principles that will guide and shape all the developments. It is being developed by the four major landowners (Greystar, Columbia Threadneedle, CIT and Sellar) to provide a joined up approach to physical, economic and social regeneration in the area.

Version 1.0 of the Design Framework was developed in the context of our understanding of political and community aspirations, planning policy, history and heritage, as well as the physical constraints of the area. This version of the vision was subject to public consultation, which involved joint exhibition by the four landowners, site specific exhibitions, other events and one-to-one meetings with local stakeholders including LB Southwark. The feedback from this consultation exercise has been carefully reviewed.

Version 2.0 of the Design Framework sets out how the landowners have listened and responded to this feedback. The framework is a living document and will continue to evolve and develop; the next step is to develop a joined up approach to the detailed landscape planning for the four schemes along St. Thomas Street East.



# Key Changes in Response to Feedback



Framework 2.0 responds to feedback received during consultation on version 1.0. We have summarised the key changes below and in the diagram opposite. These address the detailed list of issues raised with the landowners, summarised on the next page.

1. Improved east-west walking route. We have changed the east-west route to make it more direct and further enhance the setting of the Horseshoe Inn
2. Strengthen the north-south walking route to improve access from London Bridge station through to Old Bermondsey
3. Created better views of The Horseshoe Inn from all angles by pulling back development from it
4. Increased the size of the new Vinegar Yard public space
5. Clearly defined arrival points at each end of St Thomas Street East to define this part of The Low Line
6. Enlarged area of Melior Gardens
7. Brought active ground floor uses at this key arrival space
8. Enhanced the entrance to the east-west route from Bermondsey Street
9. Commissioned a Landscape Strategy for the Framework to ensure a consistent approach across all four sites, led by Bradley-Hole Schoenaich Landscape and Djao-Rakitine landscape architecture practices
10. Commissioned a Retail & Workspace Strategy for the Framework to maximise the cultural and employment benefits to the area and support local creative communities.

# Design Framework 2.0: Ground Floor Strategy



\* Indicative landscape for illustration purposes only. Landscape proposal to be developed in Framework 3.0

# Massing Strategy



Following the design intent established in Framework 1.0, St. Thomas Street East building heights have been composed following the below “washing line” diagram, drawn from the Shard down to Bermondsey Street. This concept is supported by the New Southwark Plan and also came out of a joint responsive approach to the immediate context as well as the aim to break with a “monolithic” appearance of the area as a whole.

Please refer to each individual planning application for further detail.

