

15 June 2020

- 1. Introduction**
- 2. Demolition**
- 3. Contrast in scale**

- 5. Environmental Impacts**
- 6. Policy Context**

1. Introduction

OBNF

Old Bermondsey Neighbourhood Forum

Draft Neighbourhood Plan

"Promoting and improving the social, economic and environmental well-being of the Old Bermondsey Neighbourhood Area"



Introduction

The Old Bermondsey Neighbourhood Forum (OBNF) aims to generate planning policies with the involvement of local people that build on their existing identities, ensuring that new developments do not turn their backs on the areas' history, architectural wealth or previous generations of residents.

By producing a Neighbourhood Plan the Forum aims to highlight the importance of the built environment in our designated area and promote its preservation and enhancement. The Group is dedicated to achieving this objective, whilst actively seeking to ensure that local people gain a real voice in the planning process.

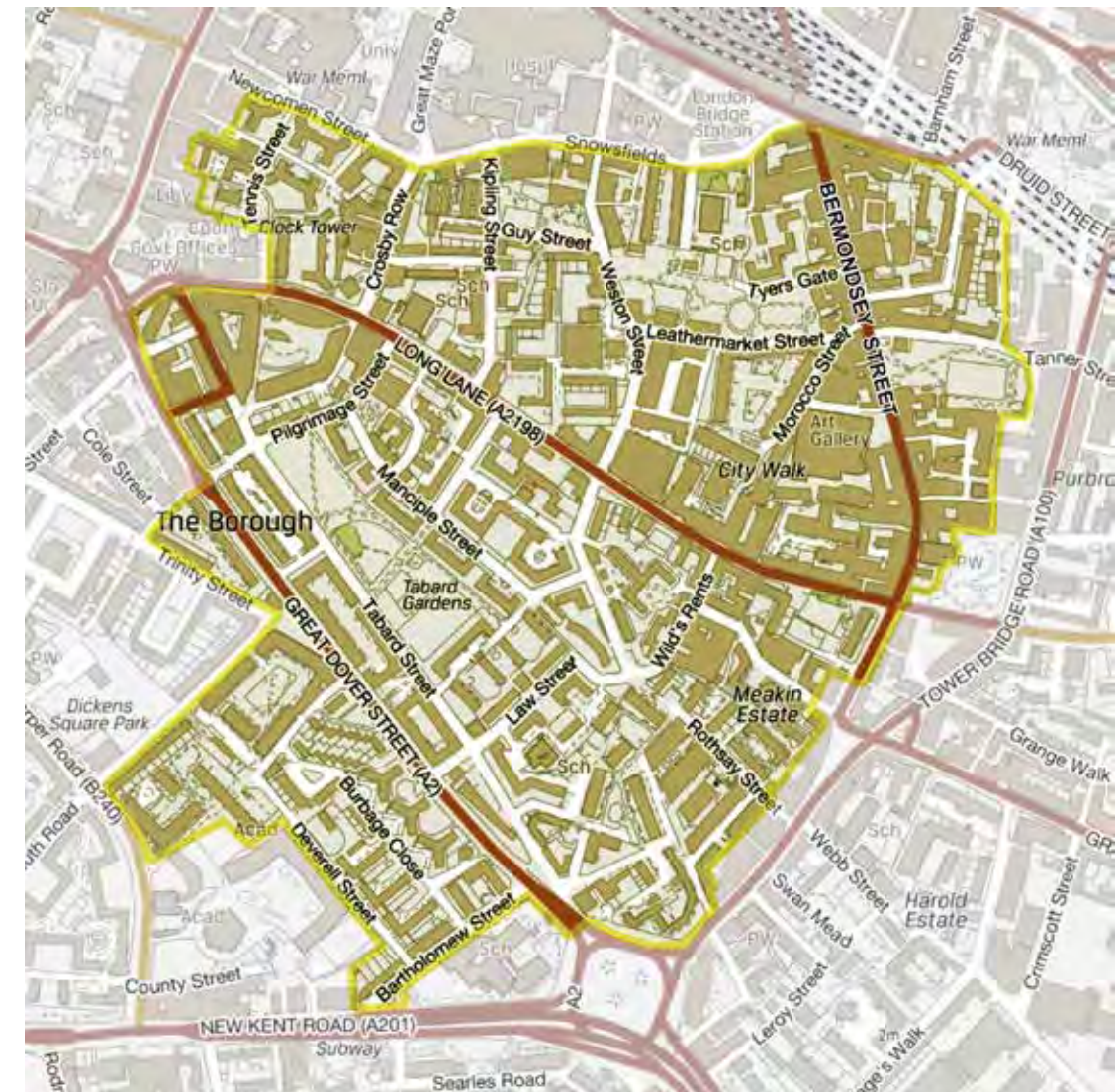


Fig. 1 Neighbourhood Area Map

Table of Contents

Chapter 1 Character and Heritage	6
1.1 Tall Buildings	6
1.2 Heritage Sensitive Design	7
1.3 Housing Estates	8
1.4 Local List	9
1.5 Signage	10
1.6 Historic Shop Fronts and style guide	10
1.7 Conservation Area Boundary	11
Chapter 2 Housing and Development	12
2.1 Social Housing	12
2.2 Design Principles	12
2.3 Council Land or Property	13
2.4 Noise	13
2.5 Energy Efficiency in New Housing	14
Chapter 3 Local Services	15
3.1 Schools	15
3.2 Nurseries	16
3.3 Libraries / Leisure facilities	16
3.4 Community spaces	16
3.5 Youth facilities	17
3.6 Older People	17
Chapter 4 Delivery	18
4.1 CIL Spending	18
4.2 Local Community Consultation	18
Chapter 5 Environment and Open spaces	19
5.1 Green spaces	19
5.2 Biodiversity	19
5.3 Trees	19
5.4 Water	19
Chapter 6 Transport	20
6.1 Pedestrian Priority	20
6.2 Servicing	20
6.3 Parking	21
Chapter 7 Local Economy	22
7.1 Mixed Use High Streets	22
7.2 Control of night time economy uses	22
7.3 Council-owned ancillary to residential land	22
7.4 Independent retail	23
7.5 Small businesses and start-ups	23
7.6 Affordable business space	23
7.7 Meanwhile Use	24

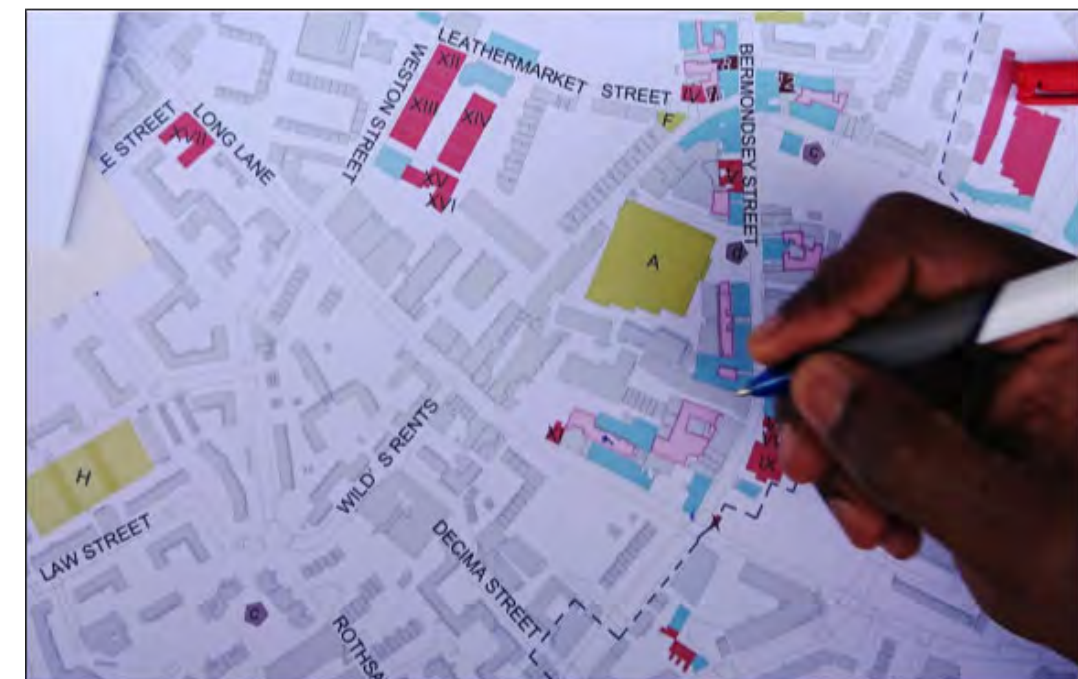


Fig. 2 Engagement at the Bermondsey Street Festival September 2019

1.4 Local List

Objective: To protect locally important buildings and places.

Policy CH5: The following buildings and places will be included in Southwark's Local List

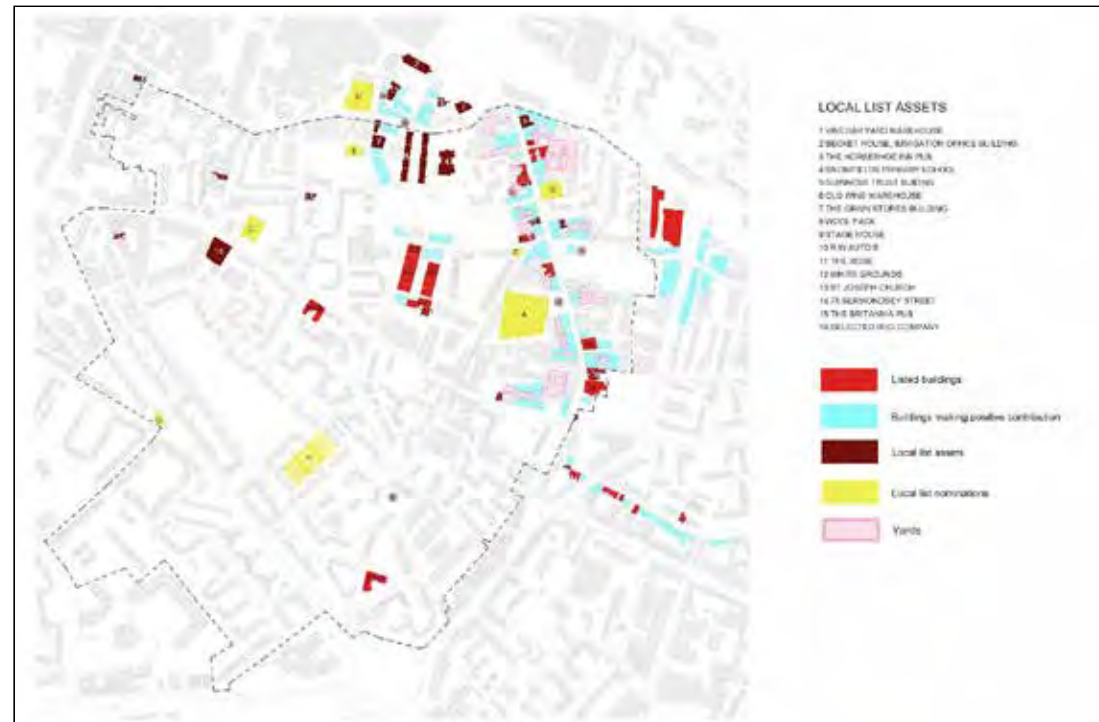


Fig. 5 Local list map

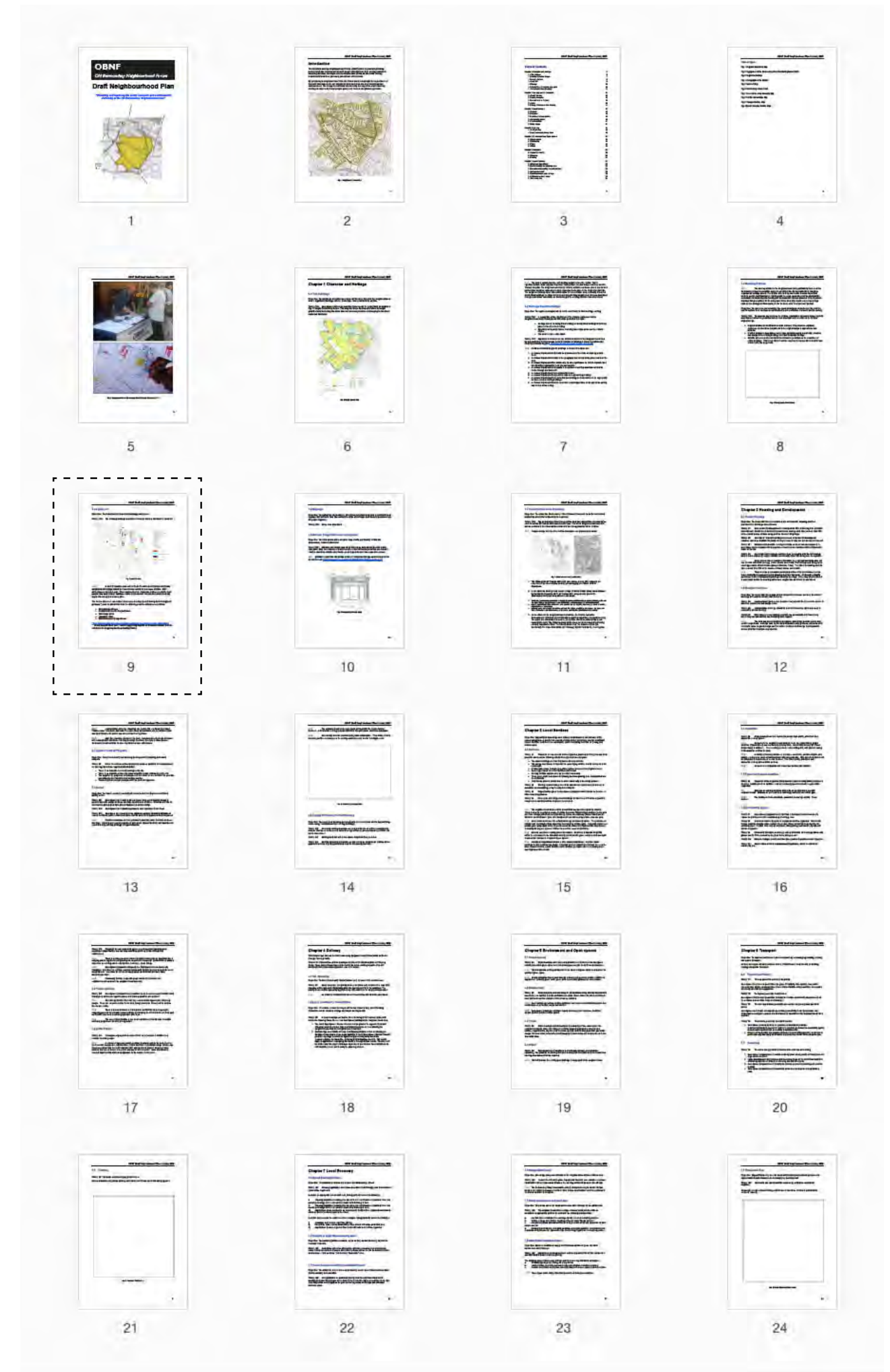
1.4.1 A local list contains elements of the built environment that are not already *designated as heritage assets** but nonetheless contribute to a sense of place, local distinctiveness and civic pride. These features/assets, help make a place special for local people; they carry history, traditions, stories and memories into the present day and add depth of meaning to a modern place.

The Forum discusses nominations at our open meetings and (following Historic England's guidance**) look for at least two from the following selection criteria to be satisfied:

- Historical significance
- Architectural / aesthetic significance
- Townscape value
- Landmark status
- Social / community significance

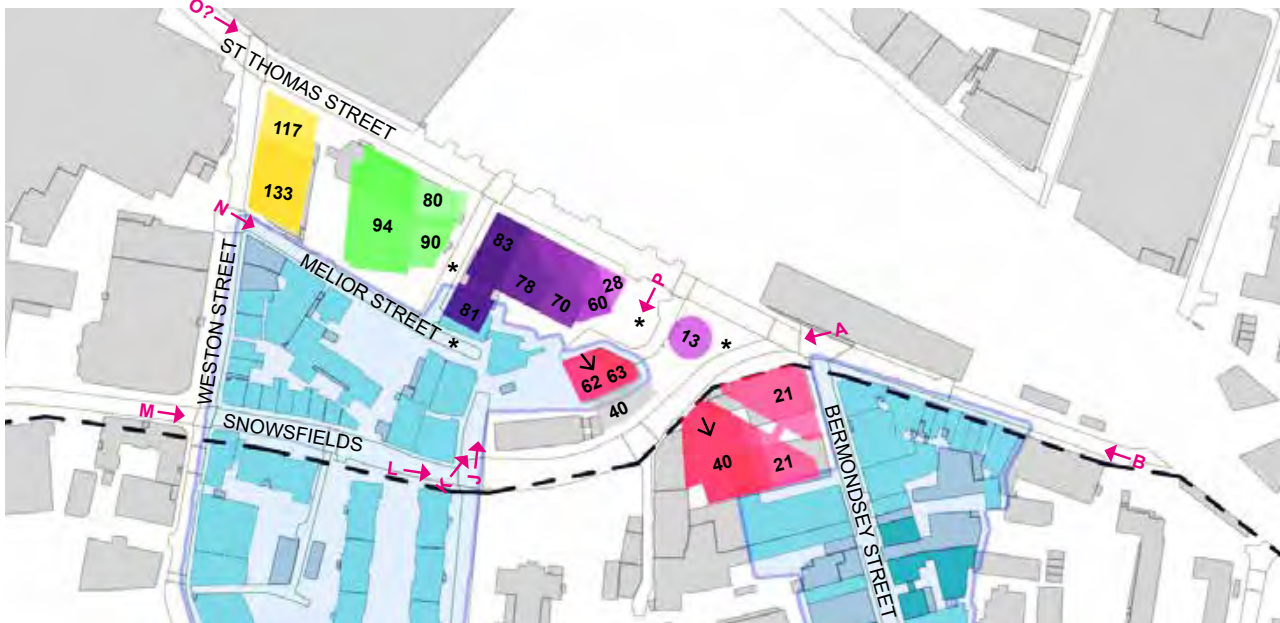
* <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment#designated>

** Historic England Advice Note 7 *Local Heritage Listing* explains the relationship between selection criteria and the weight of protection potentially afforded.



ST THOMAS STREET SITE BREIFING
Sunday 19th January 2020

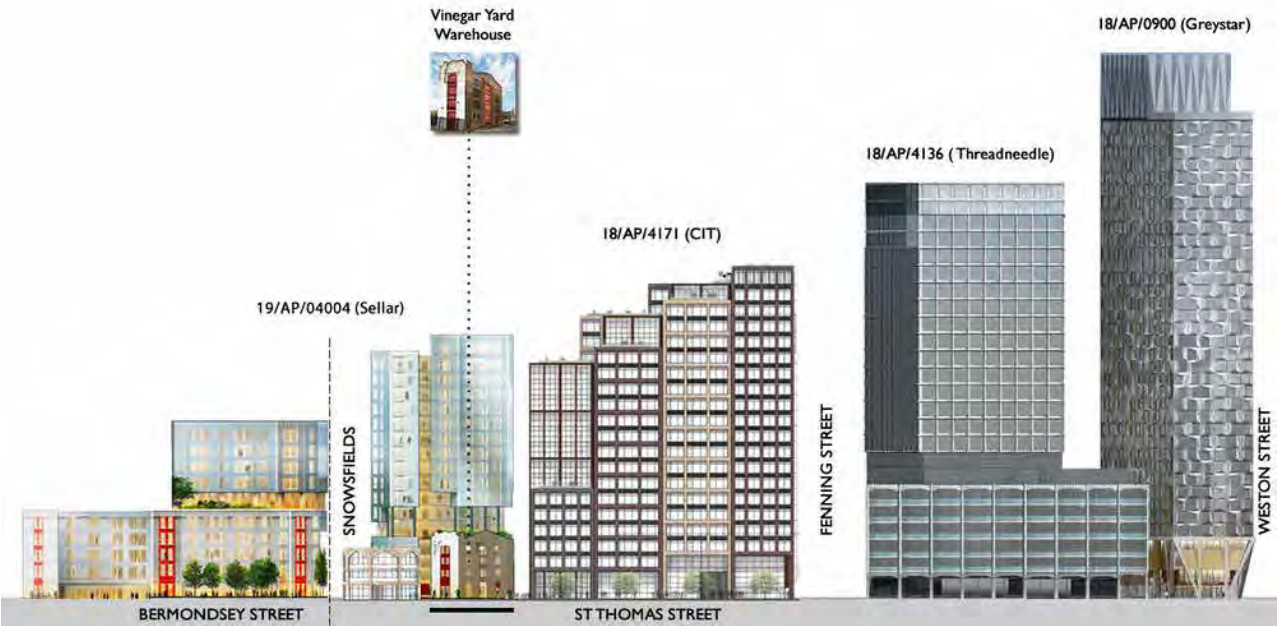
HEIGHT AND MASSING (From South)



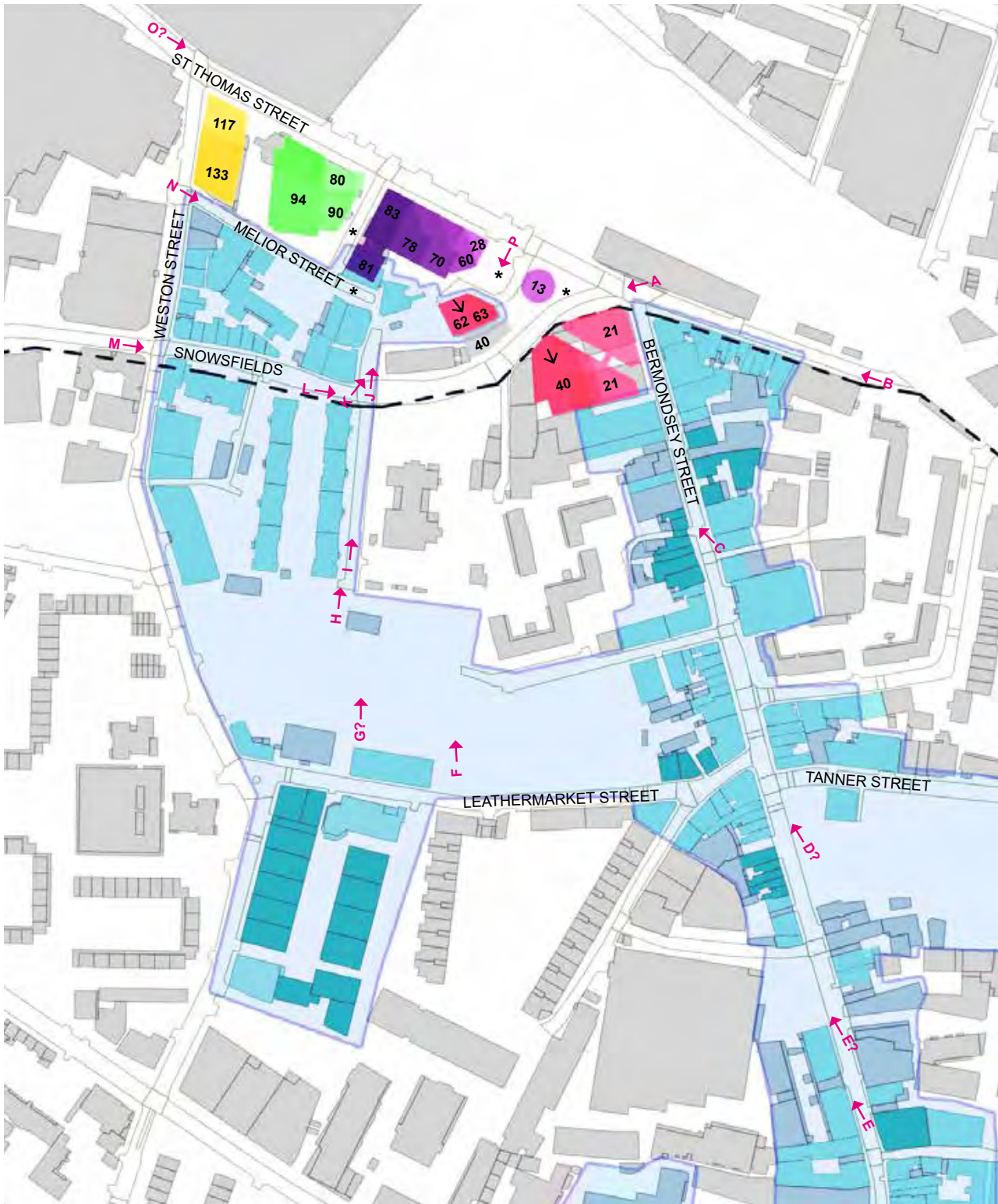
KEY

- | | | |
|--------------------------------|--|-------------------------------|
| Site 1 - 18/AP/0900 - Greystar | Conservation Area | Selected Street Views |
| Site 2 - (Forthcoming) - Edge | Listed Buildings | Selected Sky Views |
| Site 3 - 18/AP/4171 - CIT | Buildings Making Positive Contribution | Proposed Building Heights (m) |
| Site 4 - 19/AP/0404 - Sellar | Neighbourhood Area | Key Proposed Public Space |

HEIGHT AND MASSING (From North)



SITE BRIEF MAP



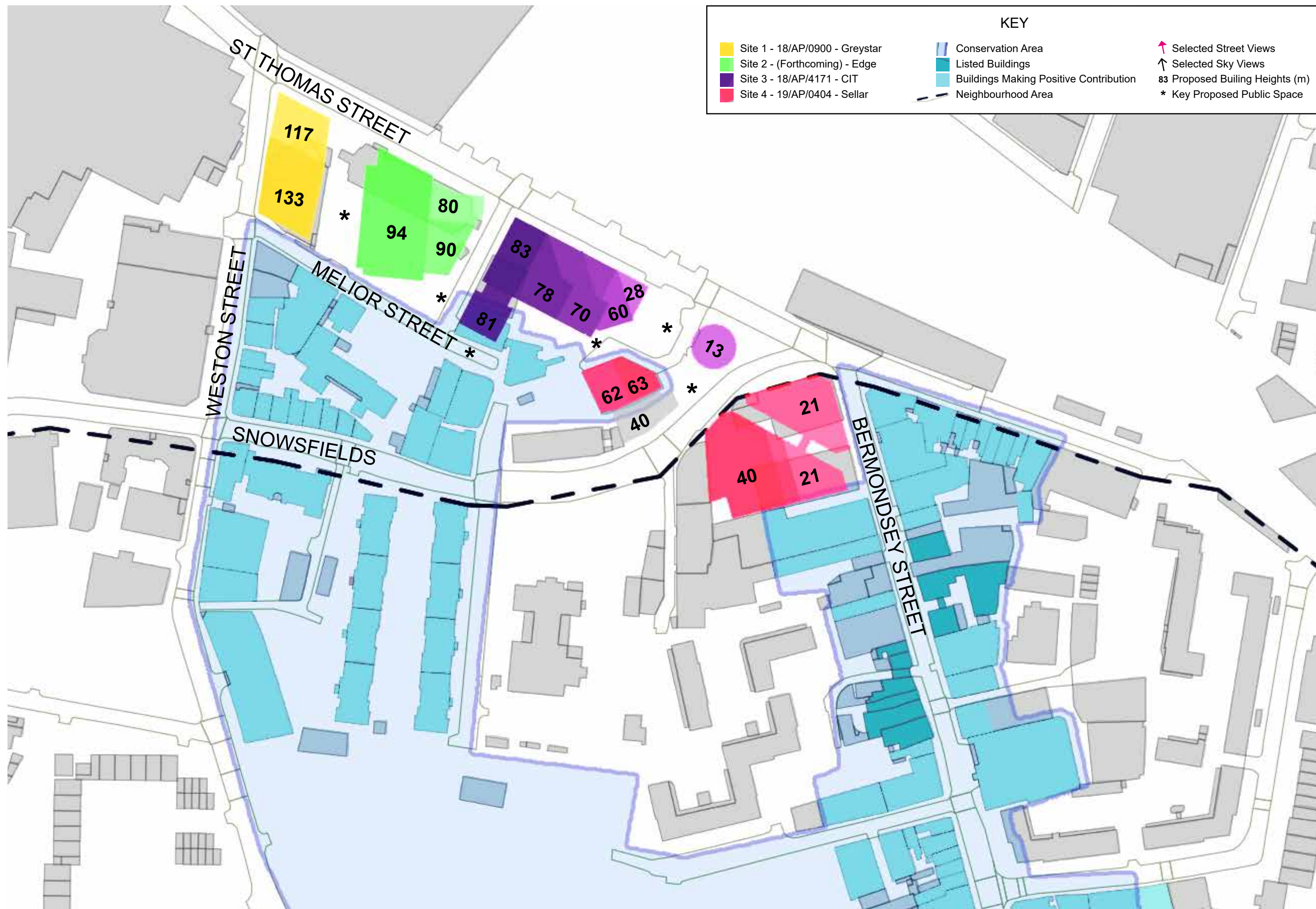
- KEY
- Site 1 - 18/AP/0900 - Greystar
 - Site 2 - (Forthcoming) - Edge
 - Site 3 - 18/AP/4171 - CIT
 - Site 4 - 19/AP/0404 - Sellar
 - Conservation Area
 - Listed Buildings
 - Buildings Making Positive Contribution
 - Neighbourhood Area
 - Selected Street Views
 - Selected Sky Views
 - 21 Proposed Building Heights (m)
 - * Key Proposed Public Space

SKY VIEWS - 20m



STREET VIEW - J





Points of Objection	Summary of Objection	Conflicting Policy	Further detail
Negative impact on Heritage Assets	Harm to conservation area	NPPF p196 Harm to a designated asset must be weighed against public benefits, with great weight given to the asset's conservation whatever the level of harm.	Loss of an important building highlighted in the Bermondsey Street Conservation Area's original Designation. The proposal will reduce the significance of the conservation area, which jeopardises its designation. No evidence provided regarding public benefits
		NSP policy P17 Conservation areas Development relating to conservation areas will only be granted where: 1.1 The development conserves and enhances the significance of conservation areas, taking into account their local character, appearance and positive characteristics published in Conservation Area Appraisals and Conservation Area Management Plans; and 1.2 The development conserves and enhances the significance of a conservation area's setting, including views to and from the conservation area; and 2 The demolition of buildings or structures that make a positive contribution to the historic character and appearance of a conservation area will not be generally permitted. Any replacement buildings or structures must conserve and enhance the conservation area's historic character and distinctiveness.	Re. P17 1.1 the proposal neither conserves or enhances significance and character, appearance and positive characteristics of the conservation area; the Warehouse was highlighted as an important contributor to the above in the Conservation Area Appraisal. Re. point 2 of P17 clearly states that demolition of buildings or structures that make a positive contribution to the conservation area will "not generally be permitted". Permitting this proposal would set a dangerous precedent to demolish within a Conservation Area in the future. Most of the structure is being demolished with part of the facades only retained as a token gesture – this does not constitute the retention of the building.
		NSP P19 Conservation areas 1. Development relating to conservation areas will only be granted where: 1. The development conserves and enhances the significance of conservation areas, taking into account their local character, appearance and positive characteristics published in Conservation Area Appraisals and Conservation Area Management Plans; and 2. The development conserves and enhances the significance of a conservation area's setting, including views to and from the conservation area. 2. The demolition of buildings or structures that make a positive contribution to the historic character and appearance of a conservation area will not be generally permitted. Any replacement buildings or structures must conserve and enhance the conservation area's historic character and distinctiveness.	(Similarly as above)
		NSP P20 Conservation of the historic environment and natural heritage Development must: 1. Conserve and enhance the significance of the following heritage assets and their settings: 1.Scheduled monuments; and 2.Sites of archaeological interest; and 3.Protected London squares; and 4.Registered parks and gardens; and 5.Trees within the curtilage of a listed building; and 6.Trees that contribute to the historic character or appearance of conservation areas; and 7.Trees that are subject to a Tree Preservation Order (TPO); and 8. Ancient hedgerows; and 9. Buildings and land with Article 4 (1) directions inside and outside conservation areas; and 10. Unlisted buildings of townscape merit; and 11. Undesignated heritage assets including Second World War Stretcher Fences; and 12. Foreshore and river structures. 2. Enable the viable use of the heritage asset that is consistent with it's on-going and long term conservation; and 3. Provide robust justification for any harm to the significance of the heritage asset that results from the development.	(Similarly as above)

		NSP Site Allocation Policy NSP53 "Development proposals should seek to retain and enhance where possible the townscape setting provided by key heritage assets including the unlisted leather warehouse on Snowfields Street, the Horseshoe Inn located on Vinegar Yard and the Grade II listed Railway Arches. Development proposals should complement local character and distinctiveness. The urban grain and street layout of the surrounding area should be retained." New London Plan (NLP) 7.1.7 "...Development that affects heritage assets and their settings should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form." NLP 7.1.8 Where there is evidence of deliberate neglect of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset will be disregarded when making a decision on a development proposal."	Retention of only the facade of the Vinegar Yard Warehouse and the driving of a 17 storey steel and glass tower through the rest of the footprint lacks integrity and authenticity to the building's original use. Heritage must also concern use (and the developer should make effort to put the building to use in a way that is consistent with it's ongoing and long-term conservation [see above NSP 20] – straightforward restoration for simple affordable workspace is completely viable here where as instead the building is being left to deteriorate). The development clearly does not complement local character and distinctiveness.
		NLP HC1 Heritage conservation and growth C: Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.	The cumulative and strategic impact of allowing for the needless demolition and new building of this scale and unsympathetic design to be developed within the conservation area will not only harm the conservation area and jeopardise its designation, it will also set a dangerous precedent for building at this mass and scale within a conservation area which Southwark will struggle to "actively manage" as required by the New London Plan.
2. Harm to conservation area setting	Proposal negatively impacts the setting of a designated conservation area	NPPF p194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.	Clear, convincing justification is not provided
		NSP P17 1.2 and NLP 7.1.7 (above)	The proposal neither conserves or enhances the conservation area's setting.
	Proposal also significantly harms the setting of Grade 2 listed heritage assets	NPPF p190 Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.	Grade 2 listed St Thomas St/Crucifix Lane railway arches, 49-55 Bermondsey St, 59, 61 and 63 Bermondsey Street, 68-76 Bermondsey Street and 78 Bermondsey Street.
	Demolition of Vinegar Yard Warehouse will erode the area's character	NPPF p196 Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.	Harm is not weighed against public benefits
3. Scale, Massing, Height	Unacceptable height	The Bermondsey Street Conservation Area is characterised by its smaller scale and the "clear change of character... evident in its quieter, smaller scale" from London Bridge and Guy's Hospital (as noted in the <u>Conservation Area Appraisal, paragraph 3.1.1</u>). It is "distinctive for its many small warehouses" (3.1.4) and "reflects the street scale of its medieval origins" (3.1.2). The construction of such tall buildings in and adjacent to the conservation area noted for its contrast to London Bridge and lower building heights / scale, is clearly "not sympathetic in terms of scale, materials, details and form" (New London Plan 7.1.7 - and similarly against NSP P19 and P20 and NPPF 194,196 (all above)) with no mitigation or justification by the required evidence of substantial public benefits.	These points of objection are shared by Historic England, SAVE, and the Victorian Society and it is of grave concern that the council did not take on or forward this expert advice at Stage 1 GLA referral. It is a straightforward case that developing a 17 storey building within this conservation area will harm the conservation area and the setting of nearby heritage assets. The buildings are simply much too high.
4. Environmental Issues	Wind, light and disruption	Details to be added	Details to be added
Inadequate consultation process and poor design	St Thomas Street East Framework consultation processes strategically and consistently excluded consideration of height and massing. Local opinion / engagemnet has been circumvented and cumulative consideration of design and impact has been promised but not attempted in reality nagating any possibility of sustainable	Southwark Council Statement of Community Involvement NPPF Chapter 12 Achieving well-designed places (paras 127-132 in particular) London Plan GG2 para 1.2.7 in particular D1 and D2 (various). New Southwark Plan Strategic Policy SP2 Regeneration that works for all, P12, P13, P16 and P25	Details to be added

Historic England Objection to 19/AP/0404 (Summary) - APRIL 2019

“ We cannot support the proposals 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. ”

Historic England Objection to 19/AP/0404 (Main Body Extract) - NOVEMBER 2019

Thank you for consulting us on 6 November 2019 on the amendments to the above application. Our advice remains the same therefore please refer to our response to the original application.

Mr [REDACTED]
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 [REDACTED]

**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 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 impose 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

“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.”

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

Direct Dial: 020 7973 3762

Our ref: P01074336

7 June 2019

Dear Mr [REDACTED]

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

**LAND BOUNDED BY ST THOMAS STREET, FENNING STREET, VINEGAR YARD
AND SNOWFIELDS INCLUDING NOS. 1-7 FENNING STREET AND NO. 9
FENNING STREET, SE1 3Q
Application No. 18/AP/4171**

Thank you for your letter of 20 May 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

The application site lies just east of London Bridge station. The majority of the site is undesignated and contains no heritage assets, but the south west corner of the site on Fenning Street is included in the Bermondsey Street Conservation Area.

The Bermondsey Street Conservation Area is centred on Bermondsey Street, an evocative and characterful area of eighteenth, nineteenth and early twentieth century houses, warehouses and workshops based around a medieval street pattern. The conservation area is relatively large, extending to cover various streets and buildings leading off Bermondsey Street which also reflect the rich layered industrial heritage of the area. The two-storey warehouse within the site, 9 Fenning Street, dates from before 1916, and though simple and somewhat altered is an appealing example of a characteristic building type in the conservation area. The building forms its own small spur of the conservation area, and is shown as a positive contributor in the Conservation Area Appraisal. It contributes to the intimate space around the Horseshoe Inn pub identified in the appraisal, as is particularly demonstrated in the view looking down Melior Place to the pub, 'a key vista to a local landmark' (Bermondsey Street CAA, page 33).

This application is to demolish the buildings on the site, including the early twentieth



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by the organisation can be requested for release under this legislation.

century warehouse which is part of the Bermondsey Street Conservation Area. A new office-led mixed-use building would be erected, 20 storeys at its highest point (86.7m AOD). The tallest element would be at the west of the site, and the building would step down towards the east, with a public square sited between it and a three-storey pavilion. This would introduce taller elements into views which presently remain relatively low-scale.

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 statutory duties is found in the National Planning Policy Framework (NPPF) 2019. Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. It makes clear that harm can be caused to a heritage asset through development in its setting, and that any harm or loss to heritage assets, including listed buildings, parks and gardens and conservation areas, requires clear and convincing justification (para.194). Any harm caused by a scheme should be weighed against any public benefits (para.196), with great weight given to the asset's conservation whatever the degree of harm. Conflict between an asset's conservation and any aspect of a proposal should be avoided or minimised (para.190).

The new Local Plan for Southwark is not yet adopted, but is in the later stages of consultation and development and indicates your Authority's emerging approach to this site, allocated as NSP53. The summary of this site makes clear the importance of considering the impacts of any new development on heritage, character and townscape.

Historic England's position and recommendation

In accordance with our published guidance on setting, we encourage a plan-led approach to development, and we acknowledge that this area has been identified for regeneration and increased densities in the current and draft local plans.

The loss of an entire positive contributor to the conservation area will cause harm. The warehouse at 9 Fenning Street is a characteristic conservation area building, sitting well with its neighbours. It has seen some alteration and is suited for conversion, and given it sits on a protruding corner of the site could be tied into a wider development, easing the transition between larger-scale development and the lower-scale historic area.

The visualisations provided with the applications documents make clear that the development will have some impact on the Bermondsey Street Conservation Area, by introducing a much larger element at the termination of some attractive views. Views 24 and 25 are taken from within the Conservation Area, and show the large scale this development would introduce, dominating these views and particularly affecting the intimate character looking north up Melior Place.



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The applicants do acknowledge the adverse impact of these proposals on the Bermondsey Street Conservation Area, but state that the public benefits of the proposals will outweigh this harm. However, it does not appear to be clear why the demolition of the corner warehouse is required to deliver these benefits. As required by the NPPF, harmful aspects of a proposal must be fully justified and limited, to preserve and enhance the character of conservation areas.

The overall harm caused by this development could be reduced if the corner warehouse was incorporated into the development. Retaining this positive contributor to the conservation area would maintain the patina, intimate scale and historic character around the Horseshoe Inn, setting back and visually softening the large urban office development, and reducing its impact. We recommend that your Authority seeks amendments to the proposal to retain the corner warehouse building.

Recommendation

Historic England has concerns regarding the application on heritage grounds. 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

Kathy Clark

Inspector of Historic Buildings and Areas
E-mail: Kathy.Clark@HistoricEngland.org.uk



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Historic England Objection to 18/AP/4171 (Extract)

- JUNE 2019

***“The loss of an entire positive contributor to the conservation area will cause harm. The warehouse at 9 Fenning Street is a characteristic conservation area building, sitting well with its neighbours. It has seen some alteration and is suited for conversion, and given it sits on a protruding corner of the site could be tied into a wider development, easing the transition between larger-scale development and the lower-scale historic area.*”**

The visualisations provided with the applications documents make clear that the development will have some impact on the Bermondsey Street Conservation Area, by introducing a much larger element at the termination of some attractive views. Views 24 and 25 are taken from within the Conservation Area, and show the large scale this development would introduce, dominating these views and particularly affecting the intimate character looking north up Melior Place.

The applicants do acknowledge the adverse impact of these proposals on the Bermondsey Street Conservation Area, but state that the public benefits of the proposals will outweigh this harm. However, it does not appear to be clear why the demolition of the corner warehouse is required to deliver these benefits. As required by the NPPF, harmful aspects of a proposal must be fully justified and limited, to preserve and enhance the character of conservation areas. The overall harm

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Olivia Stockdale
Conservation Adviser
Direct line 020 8747 5893
olivia@victoriansociety.org.uk



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

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

2nd 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

Patron
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Chair
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Sir David Cannadine
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Griff Rhys Jones
Fiona MacCarthy OBE

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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

Victorian Society Objection to 19/AP/0404 (Extract)

- MAY 2019

“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.

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Olivia Stockdale
Conservation Adviser
Direct line 020 8747 5893
olivia@victoriansociety.org.uk



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

Your reference: 18/AP/4171
Our reference: 152116

30th July 2019

planningstatconsultees@southwark.gov.uk

Dear Mr [REDACTED]

RE: Land bounded by St. Thomas Street, Fenning Street, Vinegar Yard and Snowfields including Nos. 1-7 Fenning Street and No. 9 Fenning Street; redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height.

We object to this proposal and offer the following comments.

Significance and harm

The proposal for the demolition of the early twentieth century warehouse and the construction of a group of buildings reaching up to 20 storeys would be damaging to the Bermondsey Street Conservation Area.

The early 20th century warehouse is a characteristic building within a conservation area “distinctive for its many small warehouses” (Bermondsey Street Conservation Area Appraisal 3.1.4). The proposal to demolish the building would therefore cause harm to the conservation area. The proximity of the conservation area to London Bridge means that the formerly industrial area has attracted offices, however many of these businesses occupy carefully converted warehouse buildings, and thus allow Bermondsey Street Conservation Area to maintain its historic industrial character. We would expect this approach to be taken in regard to this warehouse, and other warehouses in the area which allow Bermondsey’s history to remain legible.

The conservation area appraisal notes that “at its heart”, the Bermondsey Street Conservation Area “reflects the street scale of its medieval origins” (3.1.2). The area has an incredibly rich history stretching back over centuries, and whilst it has been developed, the scale is something which is fundamental to its character. The proposed 20 storey building to the south west of the site would tower over the conservation area, whilst its neighbouring buildings would have a detrimental effect on the conservation area’s setting. The conservation area appraisal notes that there is a “clear change of character [from London Bridge]... evident in its quieter, smaller scale” (Bermondsey Street Conservation Area Appraisal 3.1.1), yet the construction of such tall buildings

inside and just outside the boundary of the conservation area would obscure this change. The planning statement notes that the proposed “stepping down in massing presents a clear transition of decreasing height from west to east that preserves the primacy of the Shard and reflects the proximity of the Site to the Bermondsey Street Conservation Area” (Planning Statement, p. 10). However, this approach would destroy the legibility of the clear change between the two areas. It should moreover be noted that this fails to acknowledge that part of the site is actually within the conservation area, and a height of 20 storeys cannot be said to reflect the character of that area.

The nearby Horseshoe Inn and the leather warehouse in Vinegar Yard, buildings which are noted to contribute to the conservation area, would also be overshadowed. This would have a further detrimental affect as the Horseshoe Inn is noted as being a “visual focus viewed from Snowfields via Melior Place to the South” (3.4.7). Yet the large building will draw the focus away from the pub, and its significance in its setting would be reduced.

Policy

The site is located within an Opportunity Area and is in close proximity to London Bridge. However, its partial inclusion within the Bermondsey Street Conservation Area, a designated heritage asset, should ensure it a layer of protection under chapter 16 of the NPPF.

Under paragraph 196 of the NPPF, the harm caused to a designated heritage asset must be weighed against the potential public benefits which would come from the proposal. The public benefits in this case would need to be considerable given the scale of harm which would be caused by the loss of a characteristic feature, such as this warehouse, and the construction of such tall buildings in and adjacent to the conservation area noted for its contrast to London Bridge and lower building heights, it has not been demonstrated that these provisions have been met however. The proposal is noted to have a number of benefits including development on brownfield land which is currently under-utilised for employment, public realm enhancements, improvements to permeability through the site, the creation of sustainable buildings and the provision of affordable workspace. However, these benefits could be bought about by a more sympathetic regeneration of the site and conversion of the warehouse. An alternative, low rise and sympathetic development would not be able to deliver the same floor space, but it would not cause the same level of significant harm to the conservation area.

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).

Finally, we note that Policy 7.8 of the London Plan sates that a development affecting heritage assets and their setting should be sympathetic to “form, scale, materials, and architectural detail”. This proposal is clearly not sympathetic to the scale of the heritage asset in question.

Conclusion

Patron HRH The Duke of Gloucester KG, GCVO	Vice Presidents Sir David Cannadine The Lord Howarth of Newport CBE	1 Priory Gardens, London W4 1TT Telephone 020 8941 1010 admin@victoriansociety.org.uk victoriansociety.org.uk
President Griff Rhys Jones	Sir Simon Jenkins	
Chair Professor Hilary Grainger	Fiona MacCarthy OBE	

The proposal for the demolition of the warehouse and the construction of several buildings, one of which is within the conservation area, would be harmful to the conservation area. We would consider the greatest risk however to be the precedent which would be set, and which would demonstrate a complete disregard to the conservation area. If the council allow buildings characteristic of the conservation area to be demolished and other buildings completely at odds with the general character to be constructed, in years to come, the significance of the Bermondsey Street Conservation Area would be lost, and its designation threatened. It is the council's duty to make sure that their heritage assets are protected, and we therefore urge you to refuse consent for this application.

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

Yours sincerely,

Olivia Stockdale

Conservation Adviser

Victorian Society Objection to 18/AP/4171 (Extract)

- JULY 2019

“The conservation area appraisal notes that “at its heart”, the Bermondsey Street Conservation Area “reflects the street scale of its medieval origins” (3.1.2). The area has an incredibly rich history stretching back over centuries, and whilst it has been developed, the scale is something which is fundamental to its character. The proposed 20 storey building to the south west of the site would tower over the

conservation area, whilst its neighbouring buildings would have a detrimental effect on the conservation area's setting. The conservation area appraisal notes that there is a "clear change of character [from London Bridge]... evident in its quieter, smaller scale" (Bermondsey Street Conservation Area Appraisal 3.1.1), yet the construction of such tall buildings inside and just outside the boundary of the conservation area would obscure this change. The planning statement notes that the proposed "stepping

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██████████
Southwark Council
PO Box 64529
London SE1P 5LX

By email: ██████████ [southwark.gov.uk](mailto:██████████@southwark.gov.uk)

18 April 2019

Dear Mr ██████████

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

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Registered Charity 269129

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 substantially 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.

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www.savebritainsheritage.org
Registered Charity 269129



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,



Conservation Adviser

SAVE Objection to 18/AP/4171 (Extract)

- JULY 2019

“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...”

...

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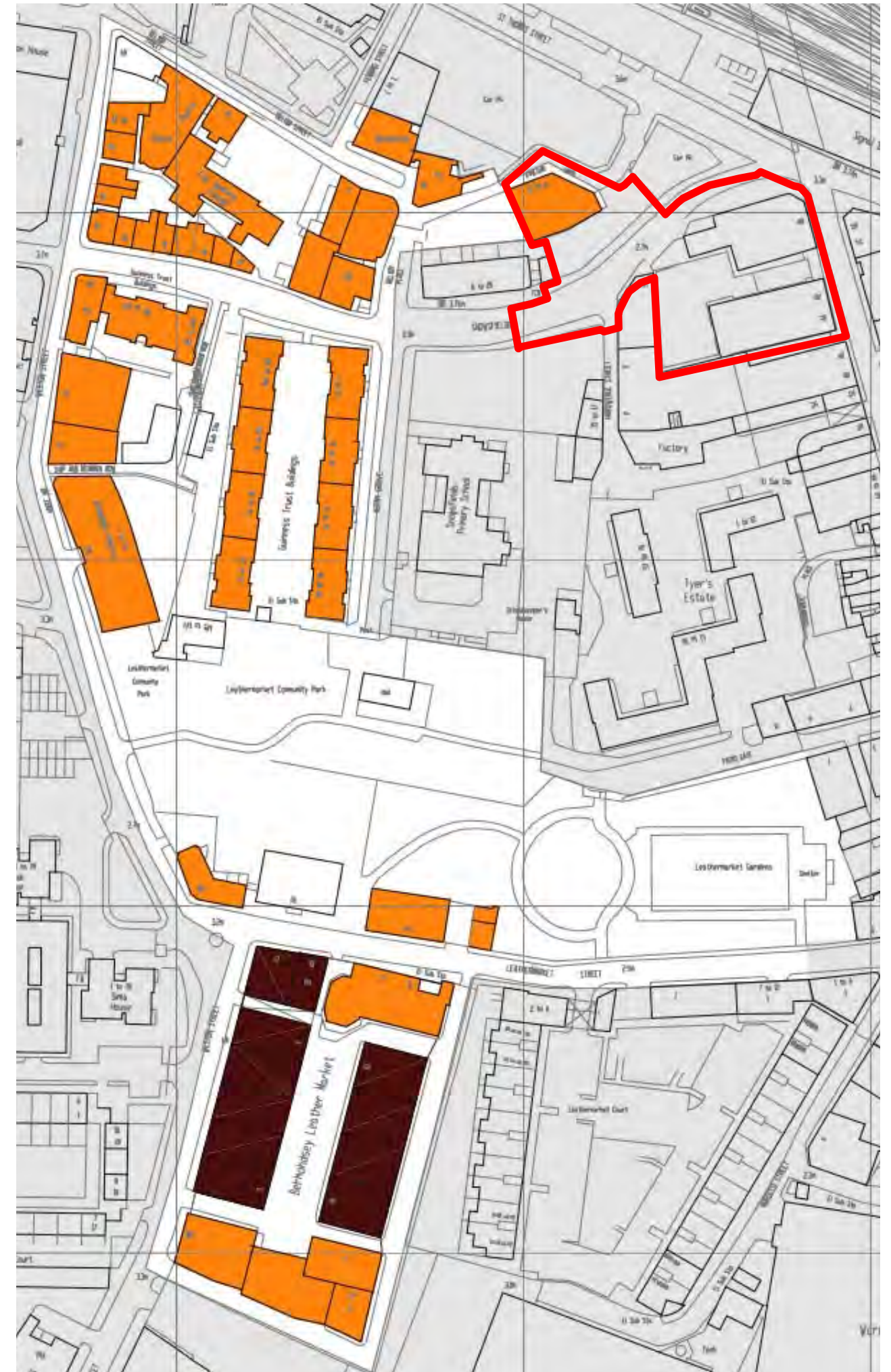
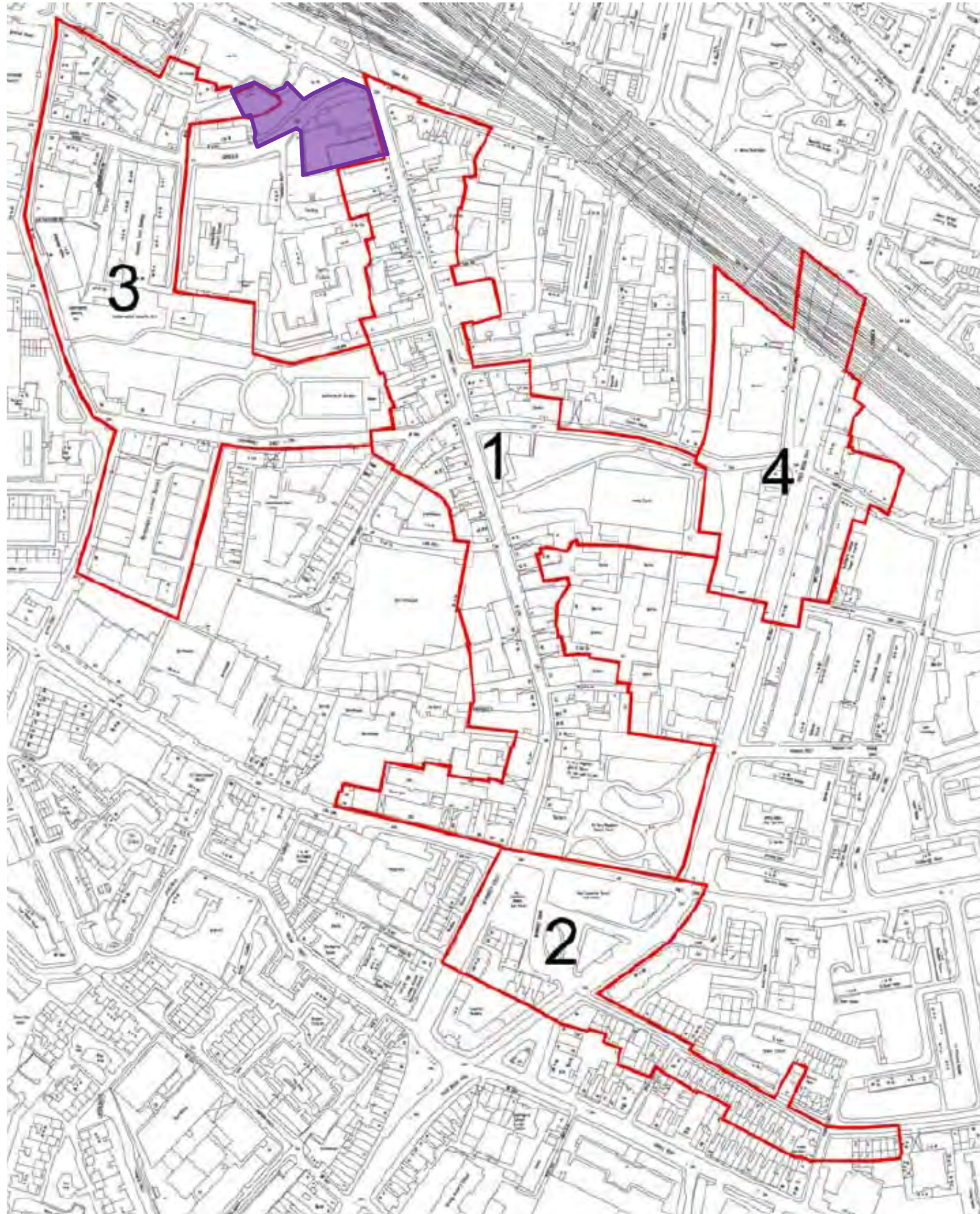
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2. Demolition







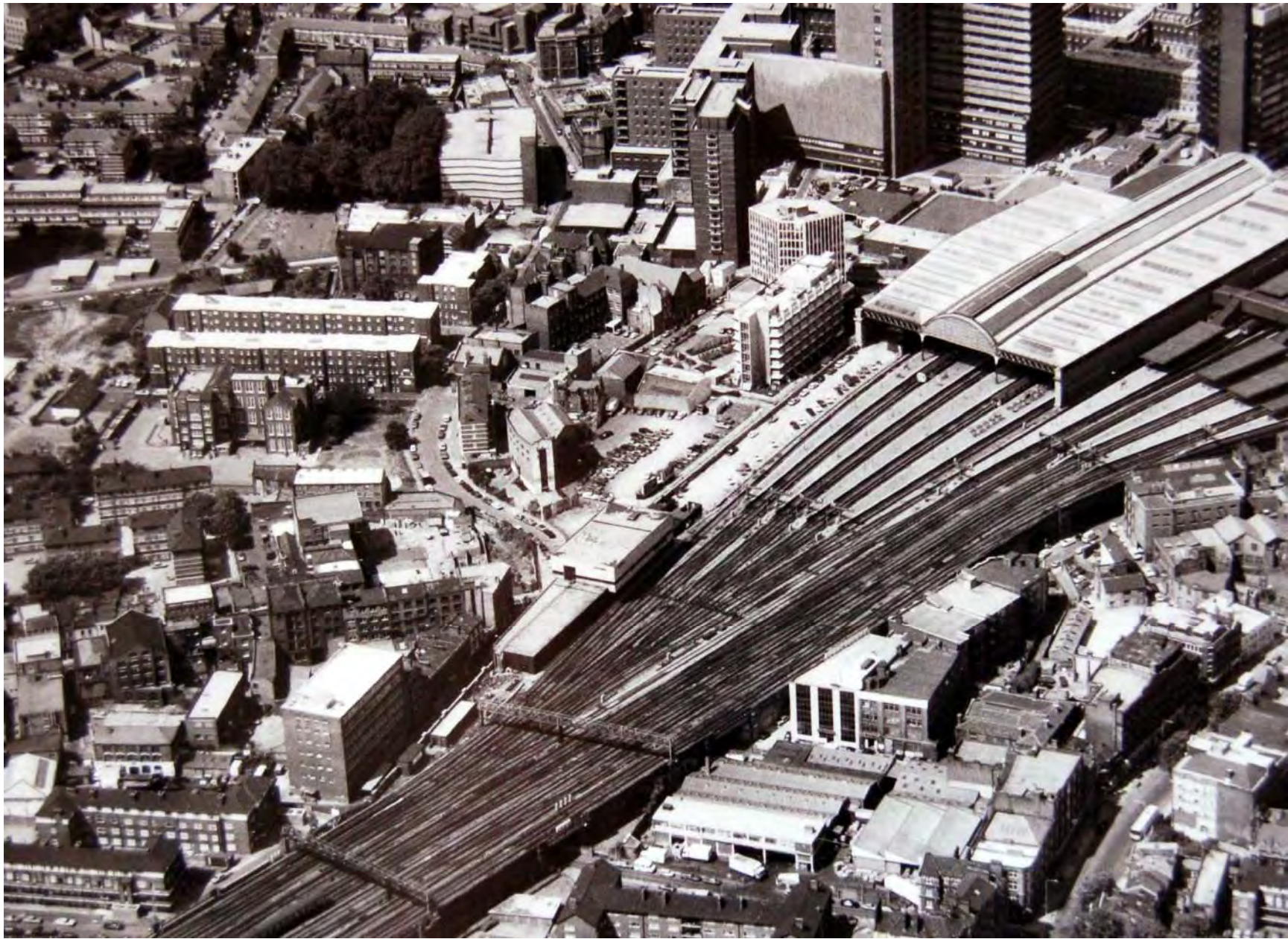


Figure 33. 1986: Aerial view showing Vinegar Yard warehouse (© Southwark Archives)



Figure 8. North elevation 'B'



Figure 9. Bay of the north-east elevation 'C'



Figure 10. Bays of the north-east elevation 'C'



Figure 11. End bay of the north-east elevation 'D'



3. INTERIORS – FIRST, SECOND AND THIRD FLOOR



Figure 18a. First floor (Ettwein Bridges Architects, 2018)



Figure 19. First floor (Ettwein Bridges Architects, 2018)



Figure 20. Second floor (Ettwein Bridges Architects, 2018)



Figure 21. Second floor (Ettwein Bridges Architects, 2018)



Figure 22. Second floor (Ettwein Bridges Architects, 2018)



Figure 23. Second floor (Ettwein Bridges Architects, 2018)

SCHEDULE OF FEATURES & FITTINGS BY FLOOR

1. COLUMNS



Figure 1. COLUMN TYPE 1 - Typical original cast iron column to basement, ground, first and second floors.



Figure 2Figure 13. COLUMN TYPE 2 – 1940s rolled steel column to Third floor, supporting steel trussed.

2. DOORS



Figure 3. DOOR TYPE 1 - Typical original hatch rank timber boarded doors. DB1, DG3 & D2-2.



Figure 4. DOOR TYPE 2 - Typical modern hatch rank timber boarded doors. DG2.



Figure 5. DOOR TYPE 3 - Typical original hatch rank timber boarded concertina doors. D1-1, D1-2, D2-2, D3-2 & D3-1.



Figure 6. DOOR TYPE 4 - Typical original arched head hatched rank timber boarded concertina doors. D3-1 & D3-2.



Figure 7. DOOR TYPE 5 – Single leaf timber front door. DG1. Modern, mid C20.



Figure 8. DOOR TYPE 6 – Inward opening double door to stair. DB1



Figure 9. DOOR TYPE 7 - Typical modern internal flush doors. DB3, DB4, D1-3 TO D1-11, D2-3 + D2-4 & D3-3.

4. STAIRS



Figure 25. STAIR TYPE 1 – Original from basement to ground.



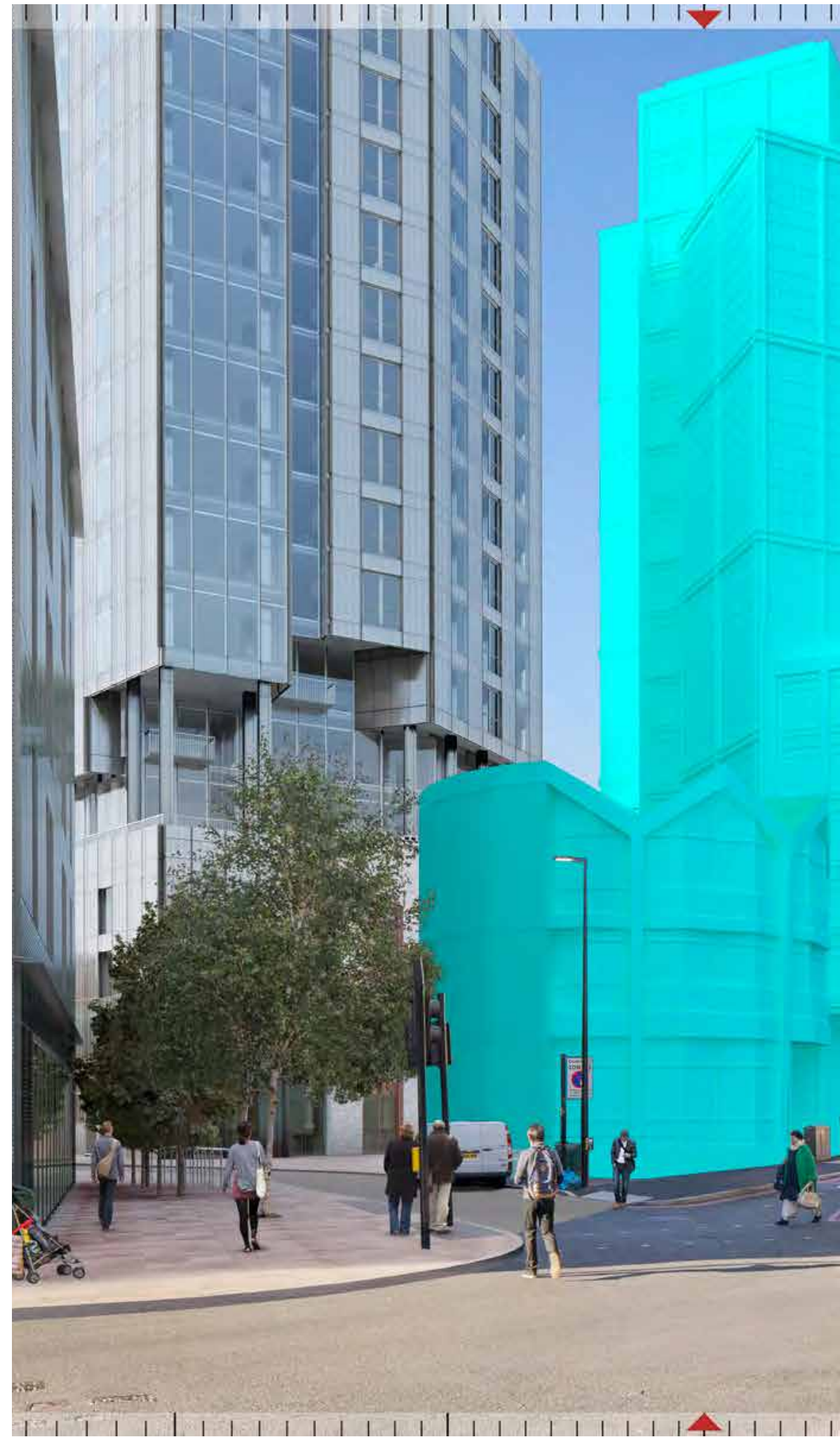
Figure 26. STAIR TYPE 1 – Original from ground floor to first floor. All enclosures modern.



Figure 27. STAIR TYPE 1 – Original from first floor to second floor.

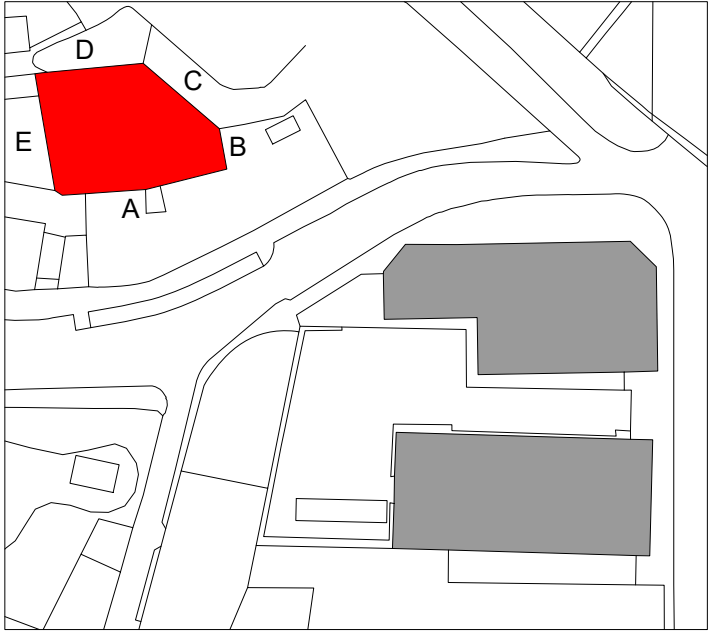


Figure 28. STAIR TYPE 1 – Original from second floor to third floor. All enclosures modern. Stair type the same – condition varies floor to floor.

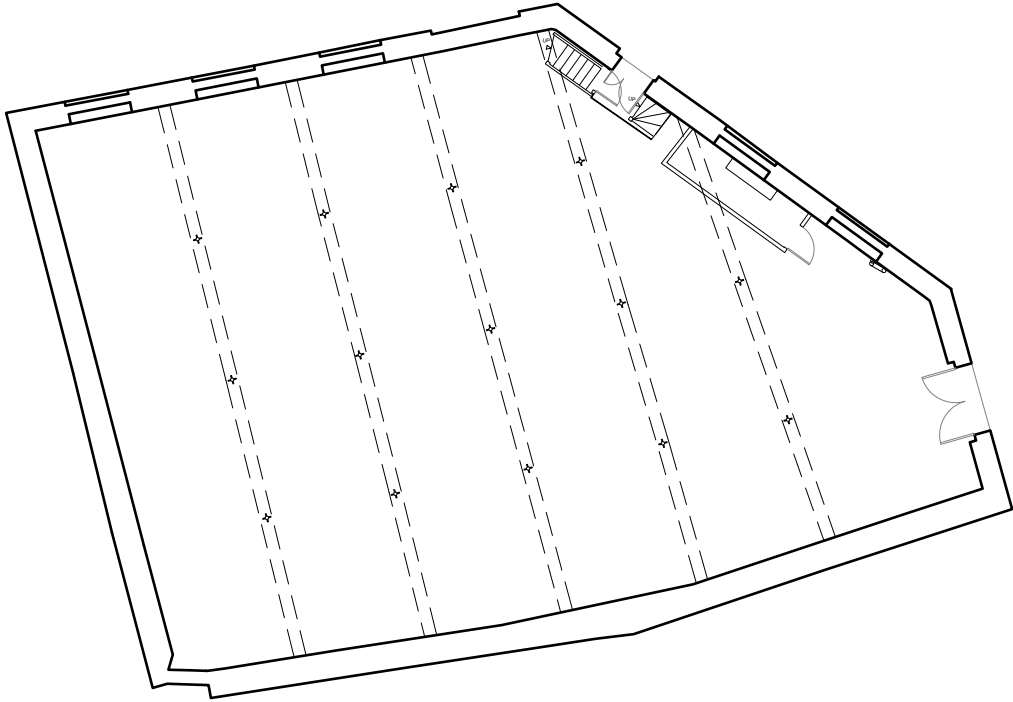




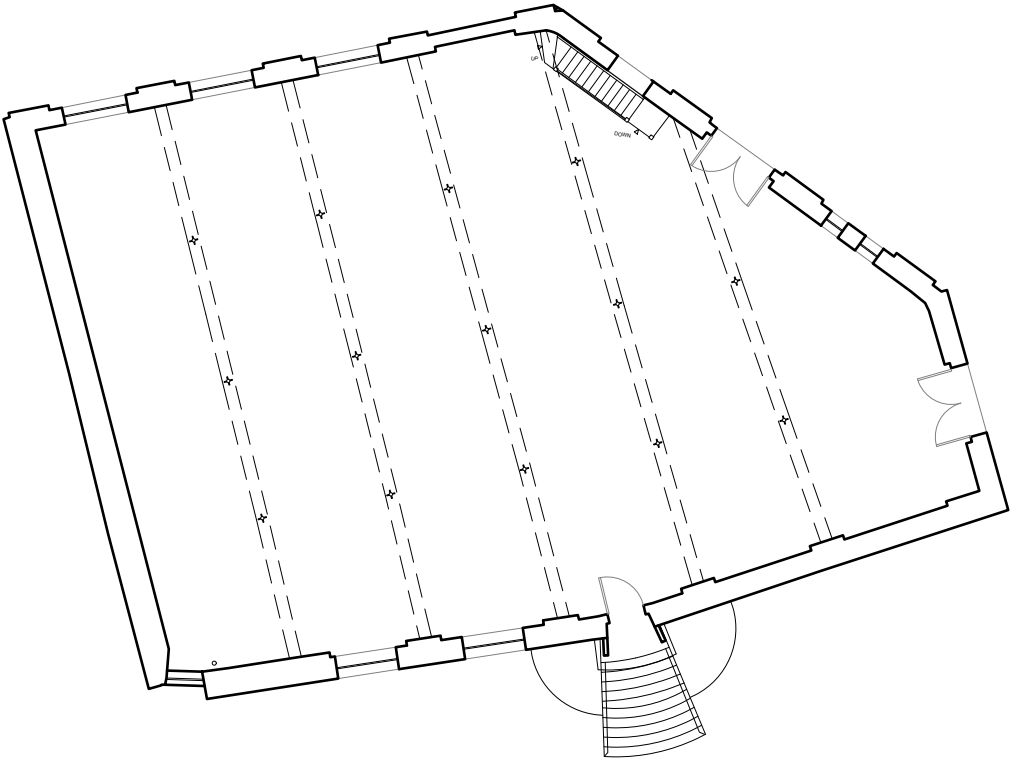




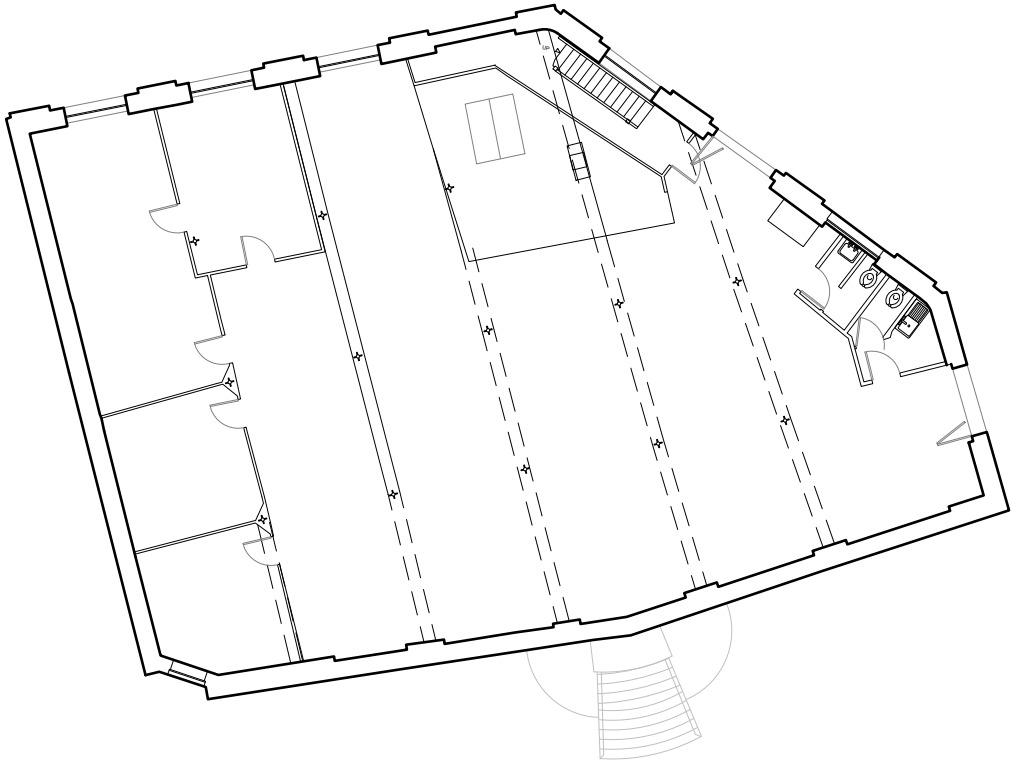
Key Plan
Scale 1:500



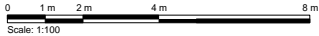
Basement Floor Plan
Scale 1:100



Ground Floor Plan
Scale 1:100



Level 1 Floor Plan
Scale 1:100



APPLICANT

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London SE1 3UD
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www.sellar.com

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Transportation | Fire | Security consultant

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FACADE ENGINEERING

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Eltwein Bridges Architects

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LANDSCAPE

Dja-Rakline Ltd

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http://www.djaorakline.com

Notes

1. The application redline only includes the following titles :
 - TGL150677 (40 Bermondsey Street)
 - TGL83184 (42-44 Bermondsey Street)
 - SGL282438 (9-17 Vinegar Yard)
 - LN98577 (land adjacent 1-7 Snowfields)

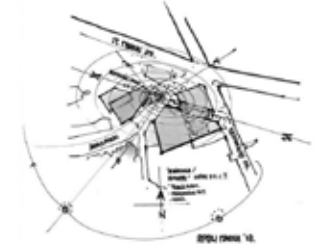
No adjacent titles are included within the application redline

2. All dimensions are in millimetres unless noted otherwise

3. All dimensions shall be verified on site before proceeding

4. The author shall be notified in writing of any discrepancies

Number	Description	Date
--------	-------------	------



PROJECT

Bermondsey / Snowfields

AUTHOR

Renzo Piano Building Workshop

TITLE

**Existing - 9-17 Vinegar Yard Basement
to Level 1 Floor Plan**

DATE

FEBRUARY 2019

SCALE

1:100

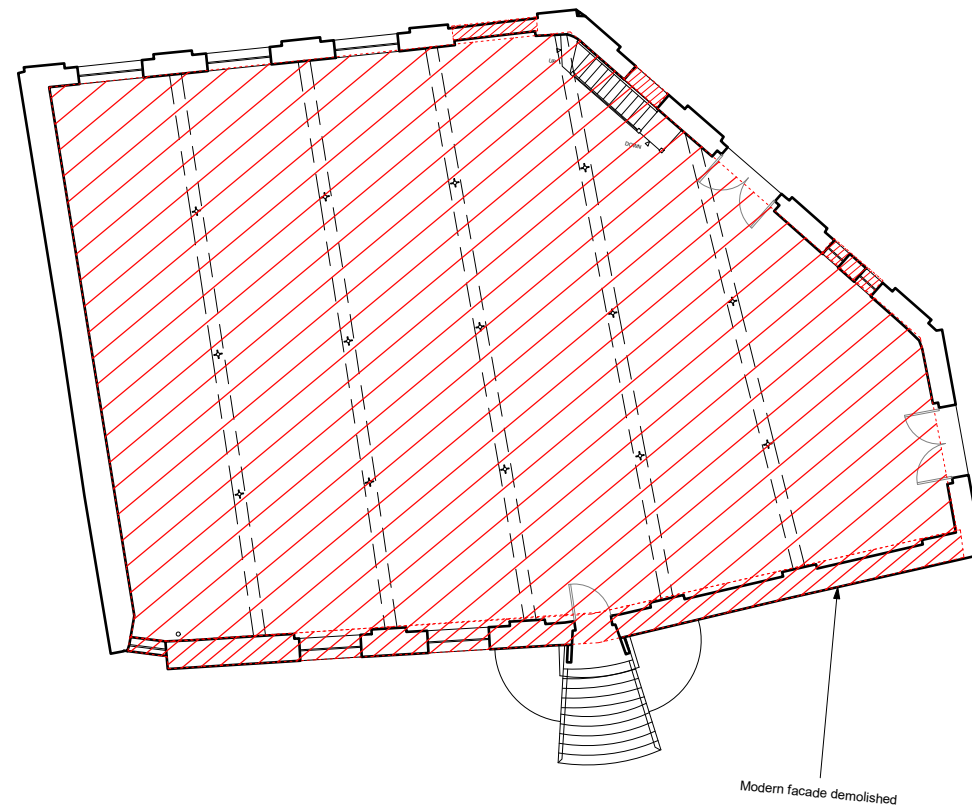
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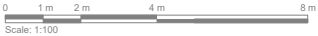
A1

SHEET NUMBER

REVISION

A-0321





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www.sellar.com

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Transportation | Fire | Security consultant

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London EC1R 0JH
T: +44 (0)20 7014 4400
www.thorntontomasetti.com

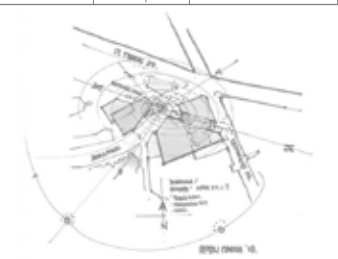
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RPS Group
140 London Wall
London EC2Y 5DN
T: +44 (0)20 7280 3300
www.rpsgroup.com

TOWNSCAPE & HERITAGE
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T: +44 (0)20 7837 1008
http://www.ebarch.com

LANDSCAPE
Djaoraktime Ltd
133 Shepherdess Walk
London N1 7QA
T: +44 (0)20 3689 6900
http://www.djaoraktime.com

- Notes
- The application redline only includes the following titles :
 - TGL150677 (40 Bermondsey Street)
 - TGL83184 (42-44 Bermondsey Street)
 - SOL282458 (9-17 Vinegar Yard)
 - LN98577 (land adjacent 1-7 Snowsfields)
 - No adjacent titles are included within the application redline
 - All dimensions are in millimetres unless noted otherwise
 - All dimensions shall be verified on site before proceeding
 - The author shall be notified in writing of any discrepancies

Number	Description	Date
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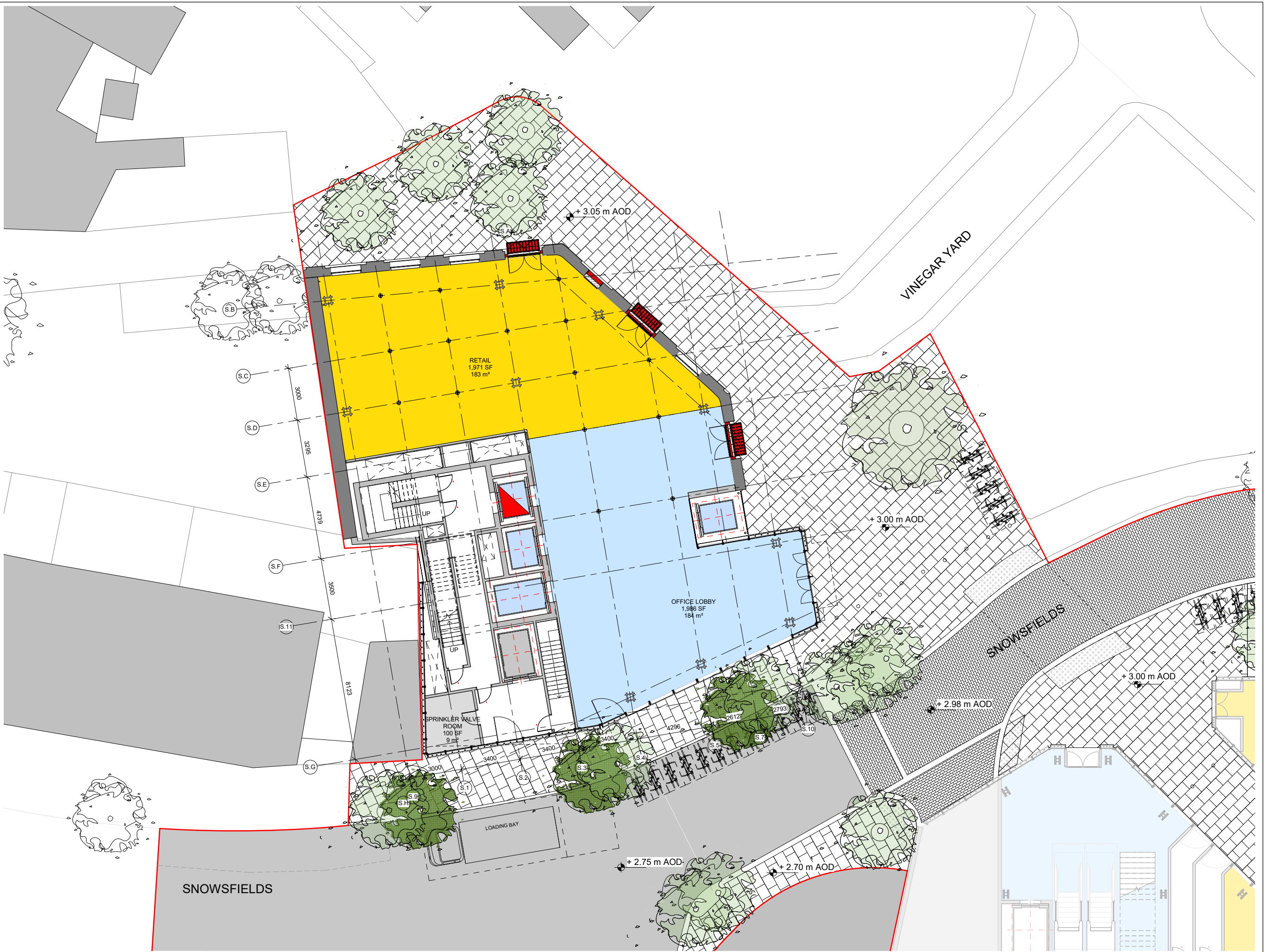
PROJECT
Bermondsey / Snowsfields

AUTHOR
Renzo Piano Building Workshop

TITLE
Snowsfields Ground Floor Plan

DATE	SCALE	FORMAT
SEPTEMBER 2019	1:100	A1
SHEET NUMBER	REVISION	

A-1103-A



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www.rpbw.com

ENGINEERING
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www.arup.com

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Thornton Tomasetti
3-11 Pine Street
London EC1R 0JH
T: +44 (0)20 7014 4400
www.thorntontomasetti.com

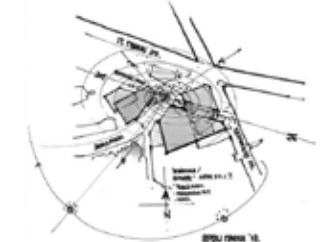
PLANNING CONSULTANT
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TOWNSCAPE & HERITAGE
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http://www.djaorakline.com

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Number	Description	Date
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PROJECT
Bermondsey / Snowsfields

AUTHOR
Renzo Piano Building Workshop

TITLE
Snowsfields Ground Floor Plan

DATE	SCALE	FORMAT
SEPTEMBER 2019	1:100	A1
SHEET NUMBER	REVISION	
A-1103-A		

H&S WARNING:



ASBESTOS PRESENT

- FLOORS UNSTABLE - ACCESS WITH PERMISSION ALLOWED ONLY IN DESIGNATED SAFE AREAS.

- SLIP, TRIP & FALL HAZARDS THROUGHOUT.



CAD file ref: J1188-PH Existing & Proposed Sections

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THIS DRAWING MAY ONLY BE SCALED FOR PLANNING APPLICATION PURPOSES.
ANY DIMENSIONS SHOWN MUST BE CHECKED ON SITE BEFORE CONSTRUCTION OR MANUFACTURE

SURVEY KEY

FL	FLOOR LEVEL
C	WINDOW CILL LEVEL
H	WINDOW HEAD LEVEL
HD	DOOR HEAD LEVEL
MH	MANHOLE
RAD	RADIATOR
SL	SOFFIT LEVEL
U/S	UNDERSIDE OF BEAM LEVEL
IL	INVERT LEVEL
TW	TOP OF WALL LEVEL

IDENTIFICATION KEY

	ORIGINAL
	C20

INFORMATION BASED ON RPS SURVEY 2010.09.03.

B	29/01/2019	Modification to FFL's to Ground, First & Second floors & modification of west wall to show modern C20 construction.
A	14/01/2019	Change drawing title. To team.
-	27/11/2018	DRAFT - To team for information.

REV	DATE	DESCRIPTION
-----	------	-------------

PROJECT
VINEGAR YARD WAREHOUSE
1-7 SNOWFIELDS, LONDON SE1 3SU
TITLE
HISTORIC PHASING
SECTION - A-A

DRAWING STATUS

ISSUE

DRAWN: XX | CHECKED: XX | SCALED: 1:50 @ A1

DATE 22/11/2018

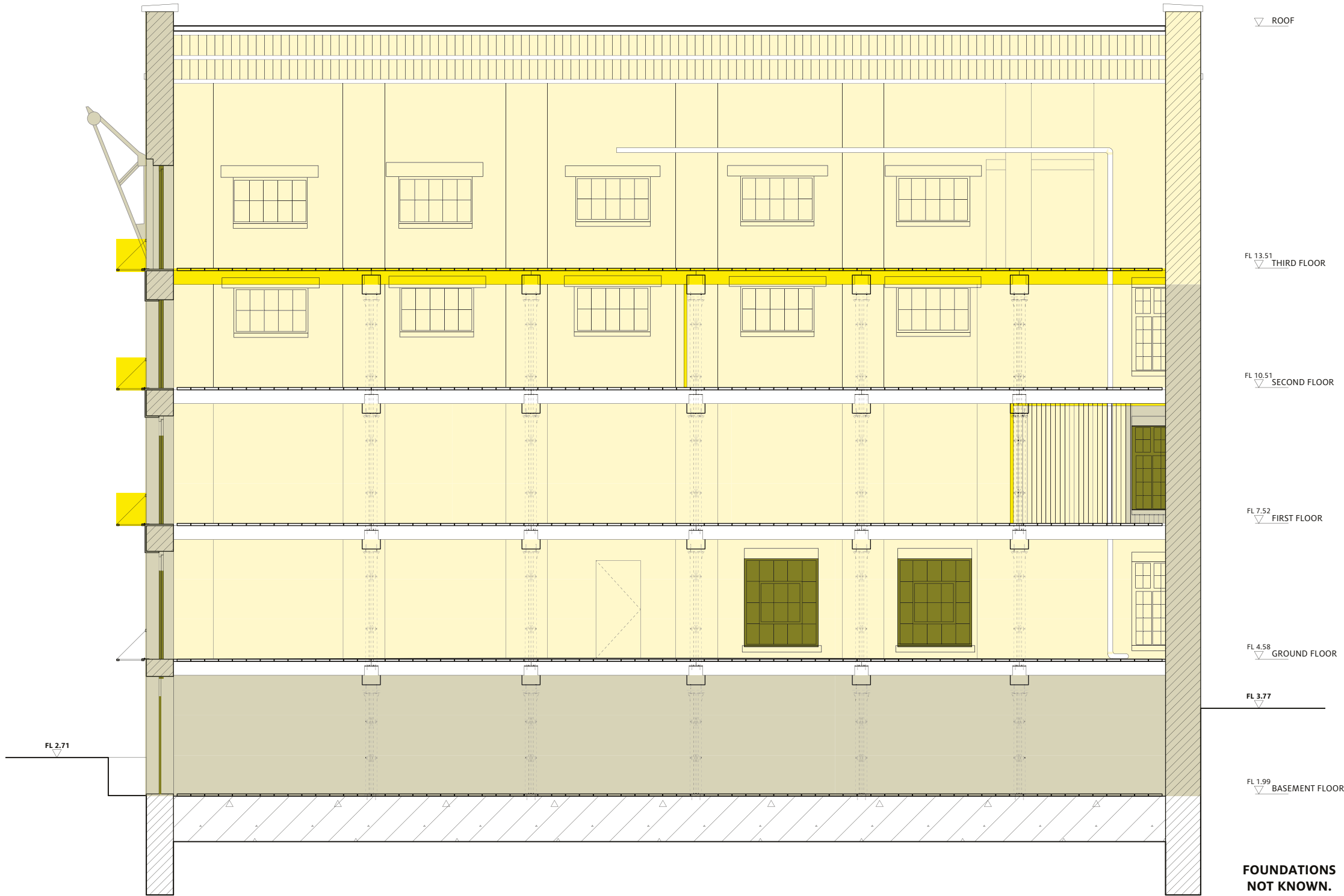
JOB	DRAWING NUMBER	REVISION
J922	AS 111	B

ETTWEIN BRIDGES

ARCHITECTS

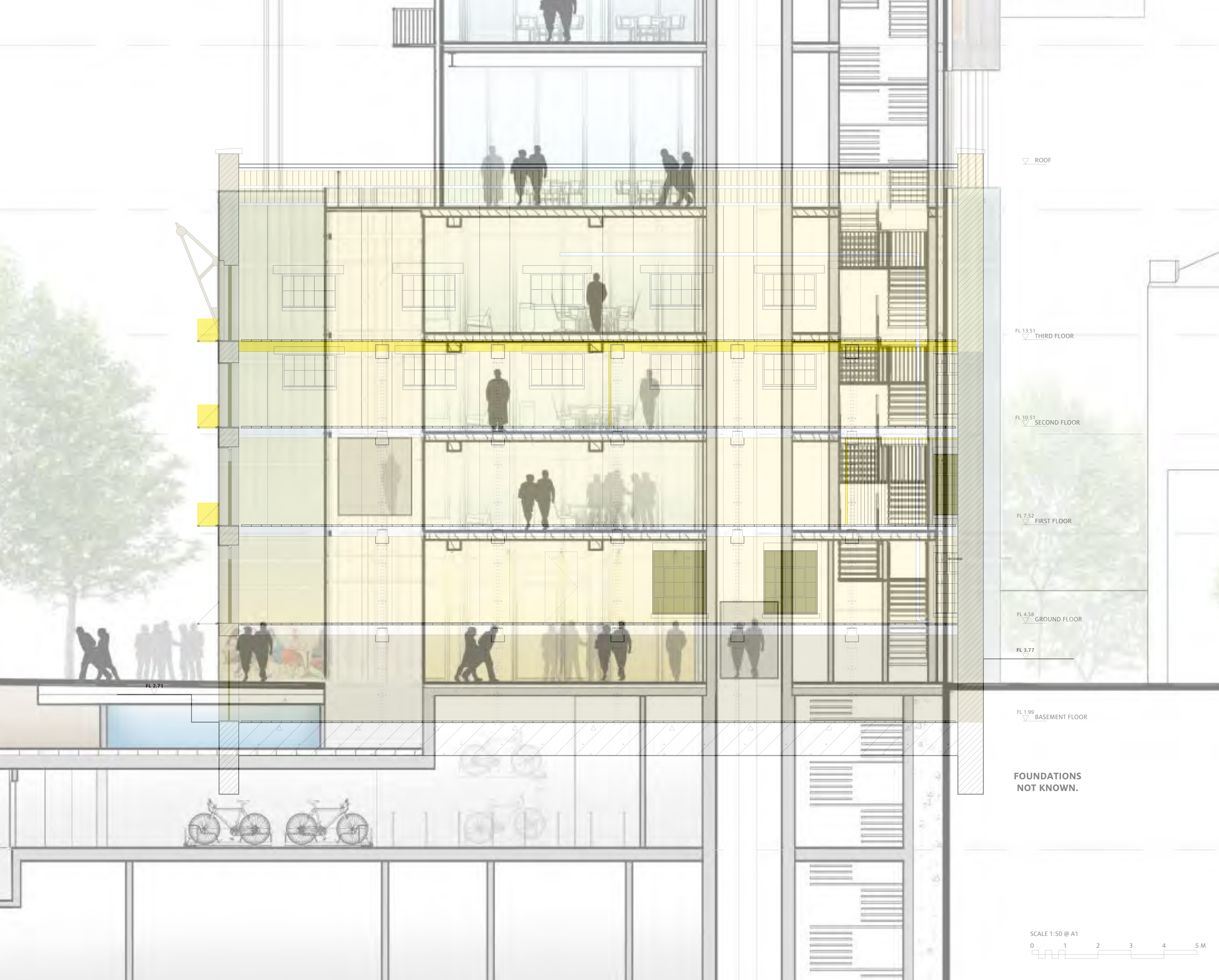
53 Rawstorne Street
London EC1V 7NQ
T: 020 7837 1008
F: 020 7837 4008

Registered in England and Wales. Partnership No. OC 383122



SCALE 1:50 @ A1





H&S WARNING:



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TW	TOP OF WALL LEVEL

IDENTIFICATION KEY

	ORIGINAL
	C20

INFORMATION BASED ON RPS
SURVEY 2010-09-03.

▽ ROOF

FL 13.51
▽ THIRD FLOOR

FL 10.51
▽ SECOND FLOOR

FL 7.52
▽ FIRST FLOOR

FL 4.58
▽ GROUND FLOOR

FL 3.77
▽

FL 1.99
▽ BASEMENT FLOOR

FOUNDATIONS
NOT KNOWN.

B	29/01/2019	Modification to FFL's to Ground, First & Second floors & modification of west wall to show modern C20 construction.
A	14/01/2019	Change drawing title. To team.
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REV	DATE	DESCRIPTION
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PROJECT
VINEGAR YARD WAREHOUSE
1-7 SNOWFIELDS, LONDON SE1 3SU
TITLE
HISTORIC PHASING
SECTION - A-A

DRAWING STATUS
ISSUE

DRAWN: XX | CHECKED: XX | SCALES: 1:50 @ A1
DATE: 22/11/2018

JOB	DRAWING NUMBER	REVISION
J922	AS 111	B

ETTWEIN BRIDGES
ARCHITECTS

53 Rawstorne Street
London EC1V 7NQ
T: 020 7837 1008
F: 020 7837 4008
Registered in England and Wales. Partnership No. OC 383122

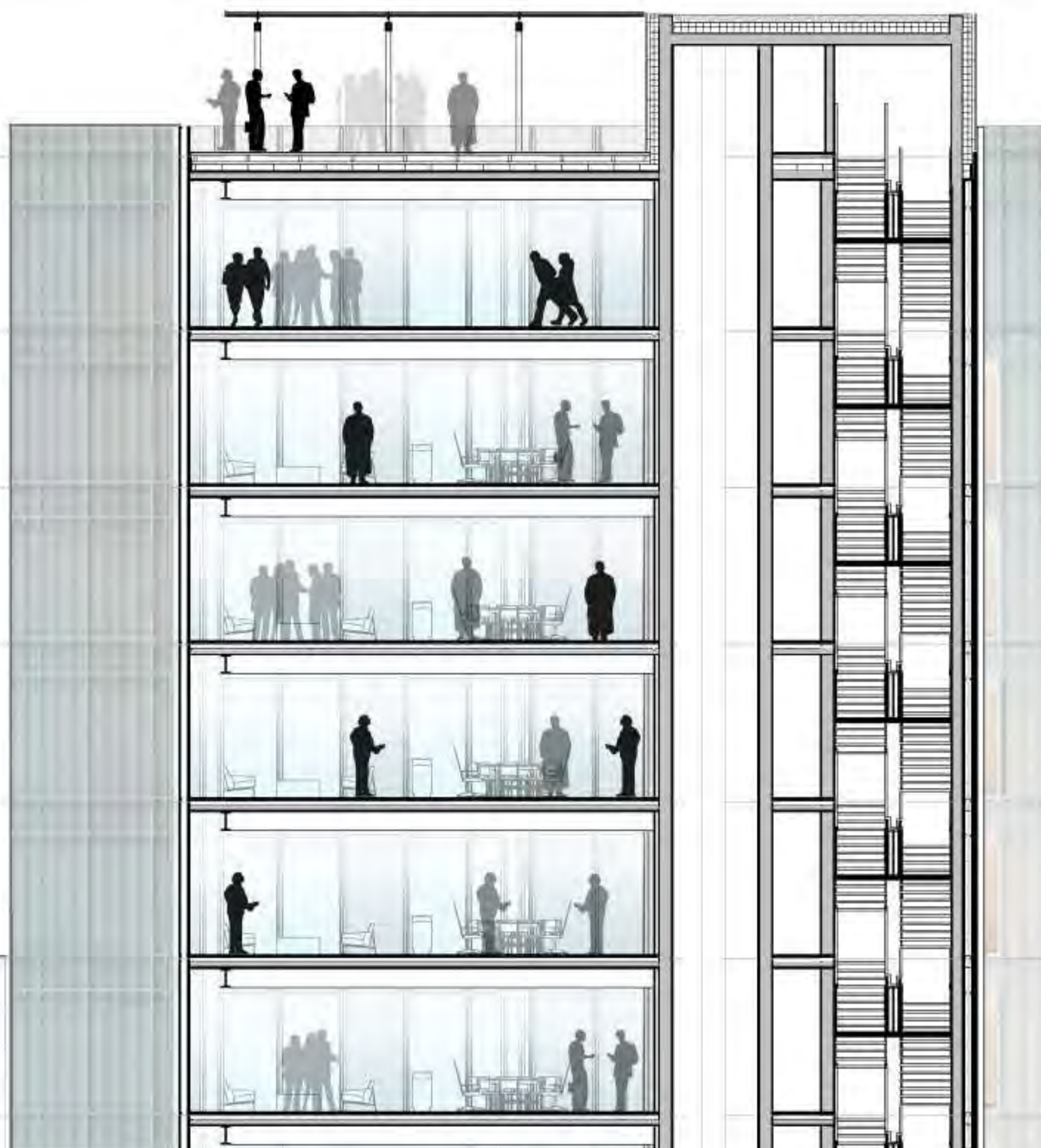
SCALE 1:50 @ A1







+67.00 m AOD



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Structures | MEP | Transport | Environmental | Vertical
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i. The application rectify only includes the following sites:

- TGL150677 (40 Berrymorey Street)
- TGL83154 (42-44 Berrymorey Street)
- SGR262438 (9-17 Vinegar Yard)
- LN88577 (and adjacent 1-7 Snowfield)

2. All dimensions are in millimetres unless noted otherwise.

Bermondsey / Snowsfields

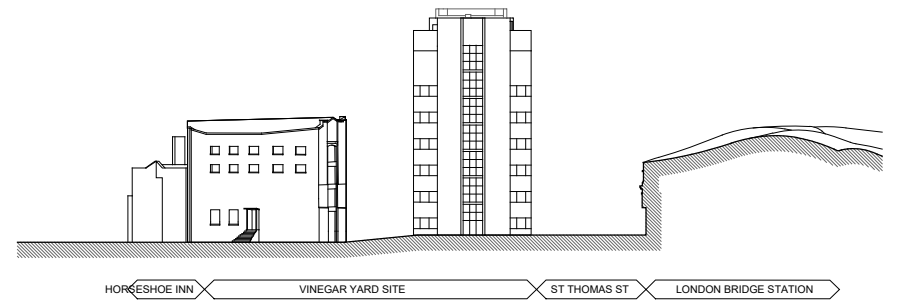
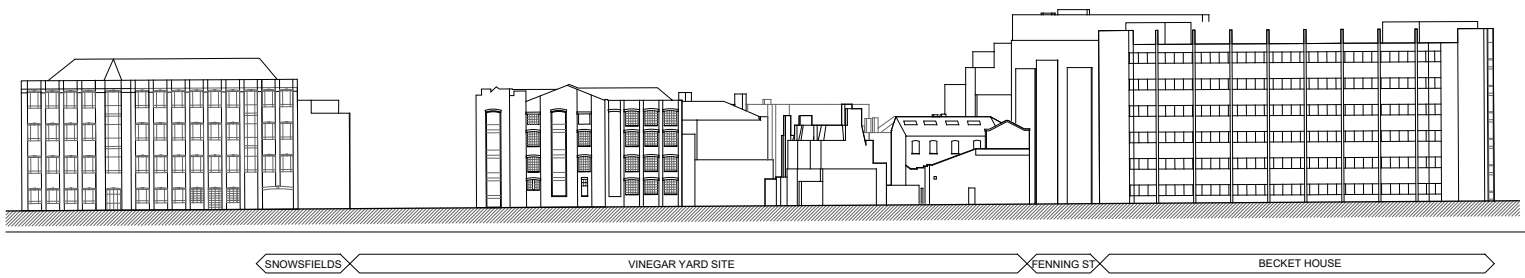
Renzo Piano Building Workshop

TITLE **Snowsfields East-West Section**

DATE	SCALE	FORWARD
SEPTEMBER 2019	1:200	A1

A-3003-A

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3. Contrast in scale







CHAPTER
-72- GROUND - SHAKEN - STIRRED

acorn
Office
To Let
020 7089 6555

SECURE
AVAIL
MO
EVA
020
www.mo

KBK

020 8138 6517

BURN



CHAPTER
-72- GROUND - SHAKEN - STIRRED

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www.mo

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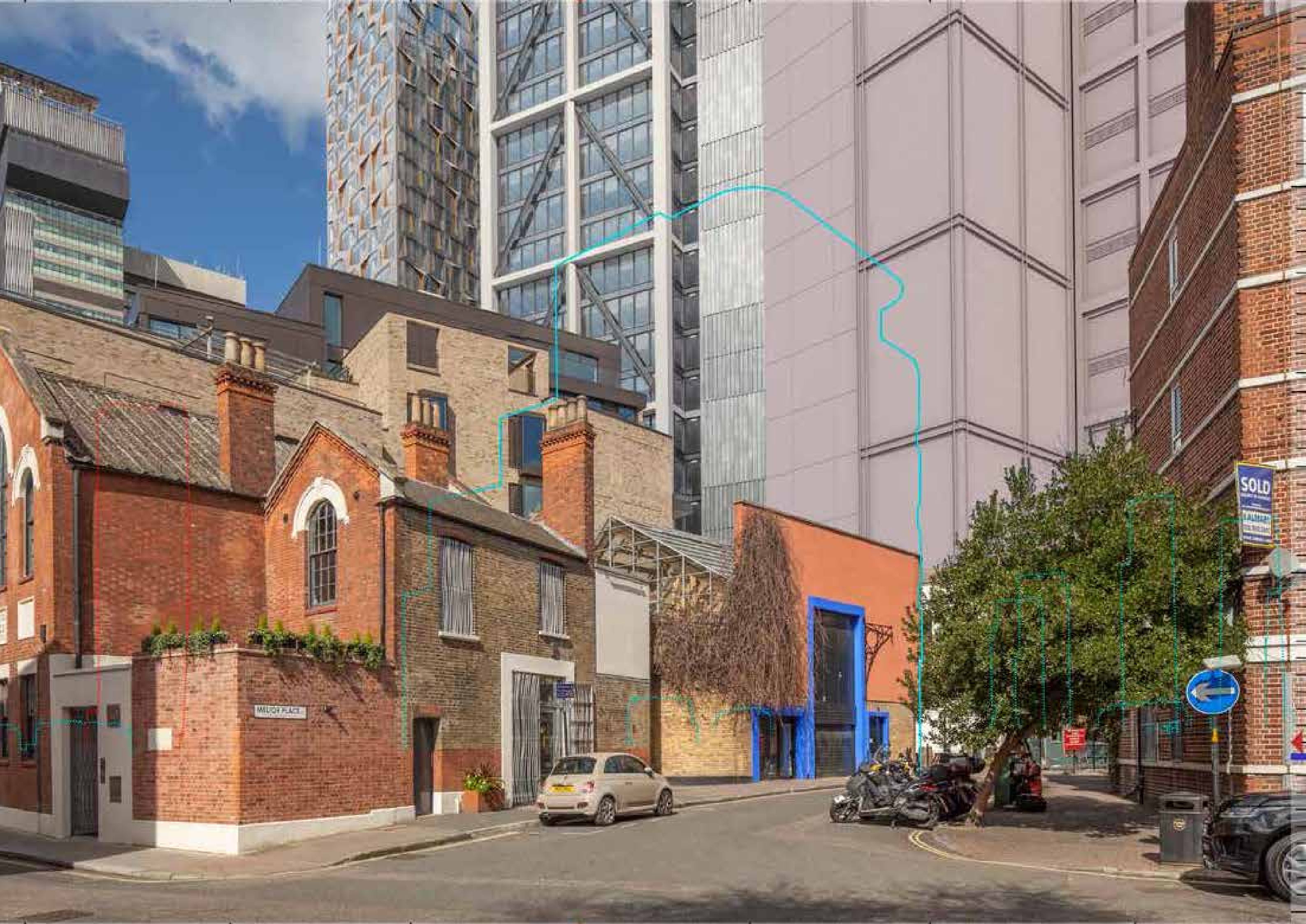


**Proposed
Development**





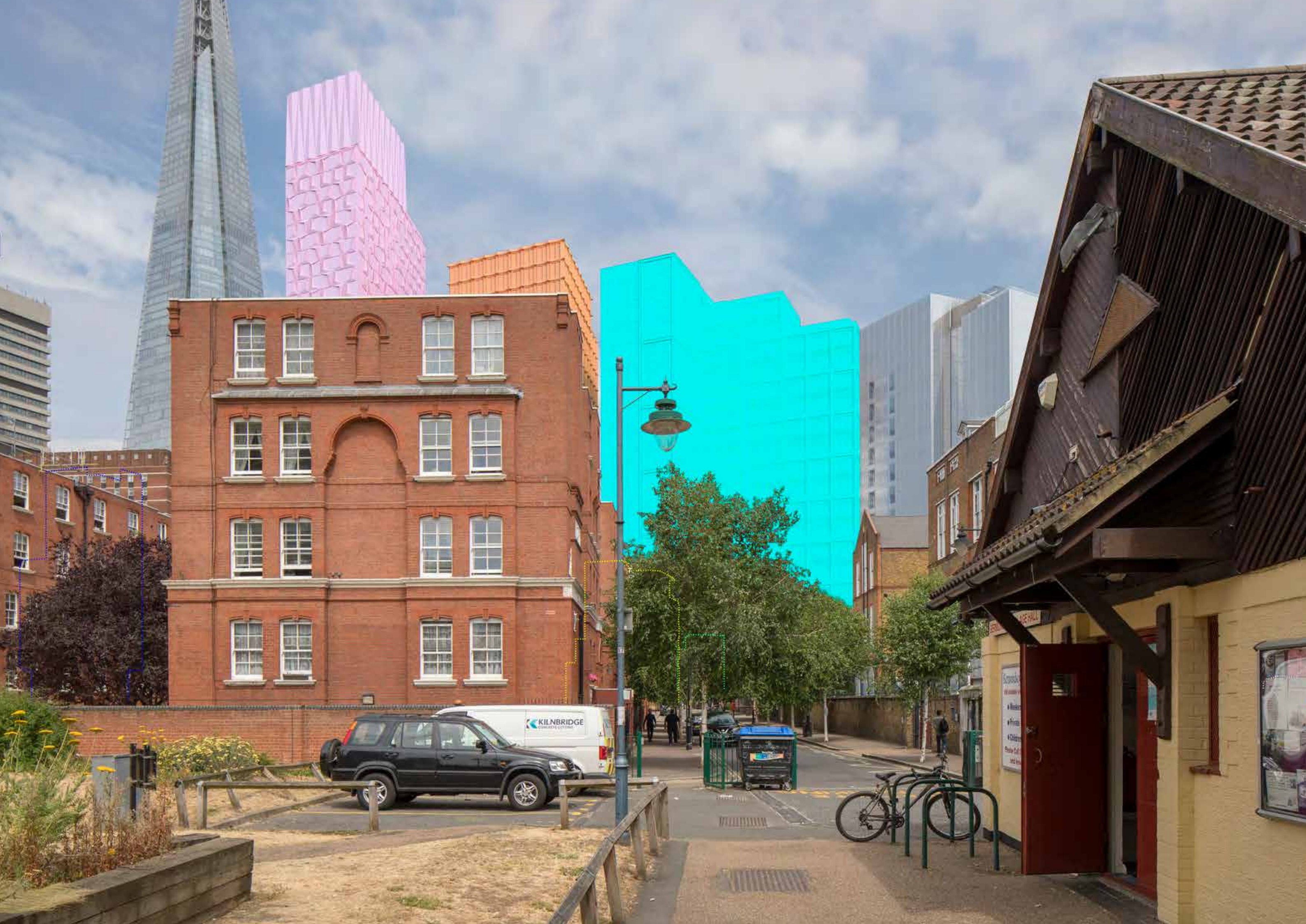
















PRIVATE
NO PARKING

VEOLIA
ENVIRONMENTAL
SERVICES

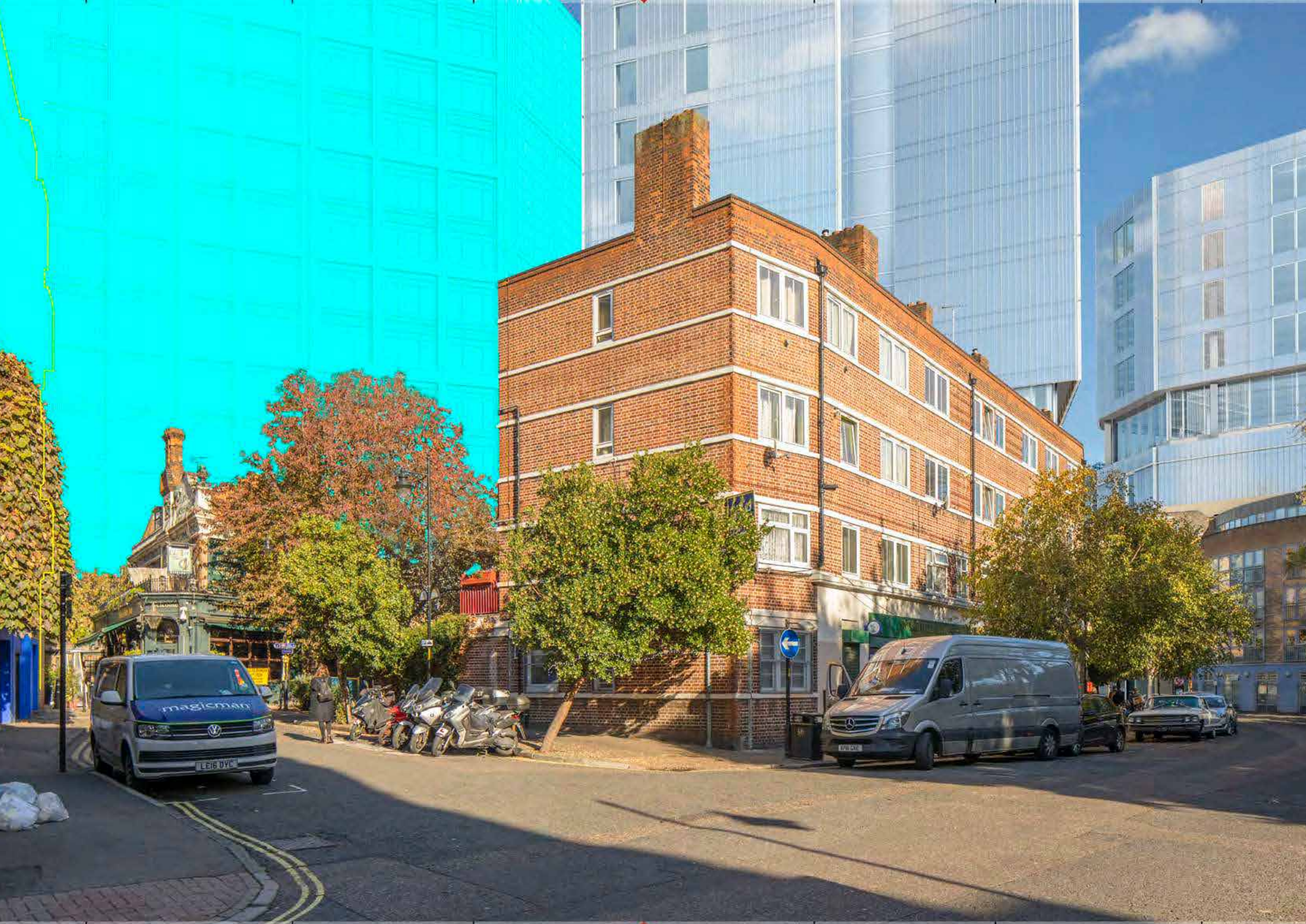
0845 6060 460

7733 BL









16 Mellor St
London, England

Google

Street View



Screenshot

Google

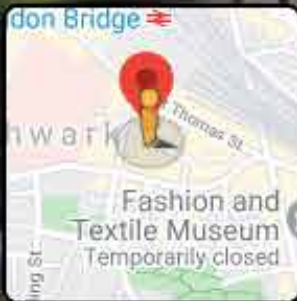


7 Mellor St

London, England

Google

Street View



Screenshot

Google

Image capture: Apr 2015 © 2020 Google United Kingdom Terms Report a problem

←

14 Mellor St

London, England

Google

Street View



Screenshot

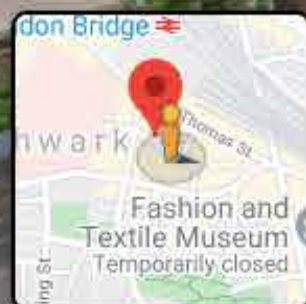
Google

26 Mellor St

London, England



Street View



Screenshot

Google

Image capture: Apr 2015 © 2020 Google United Kingdom Terms Report a problem

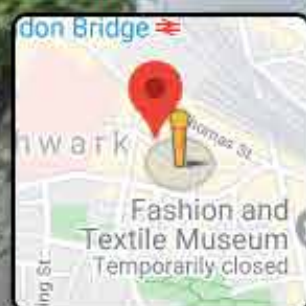


26 Mellor St

London, England



Street View



Screenshot

Google

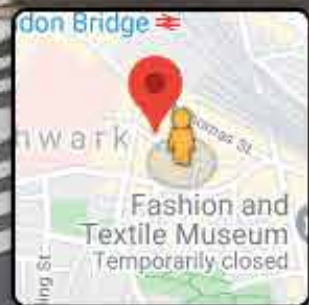
Image capture: Apr 2015 © 2020 Google United Kingdom Terms Report a problem

Mellor St

London, England



Street View



Screenshot

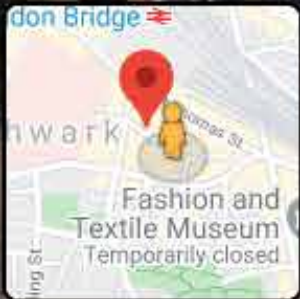
Google

Image capture: Sep 2017 © 2020 Google United Kingdom Terms Report a problem

Mellor St
London, England

Google

Street View



Screenshot

Google

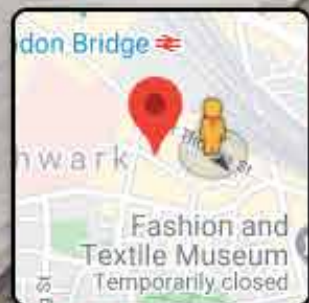
Image capture: Sep 2017 © 2020 Google United Kingdom Terms Report a problem

63 A200

London, England



Street View



Screenshot

Google

Image capture: May 2019 © 2020 Google United Kingdom Terms Report a problem





Borough High Street

Guy's Hospital

London Bridge Station

The City

Tower of London

Tower Bridge

EDGE London Bridge

St Thomas Street East Design Framework

View of site location, looking north





View of sit

Greystar/Capital House

Becket House

EDGE London Bridge

CIT/Vinegar Yar

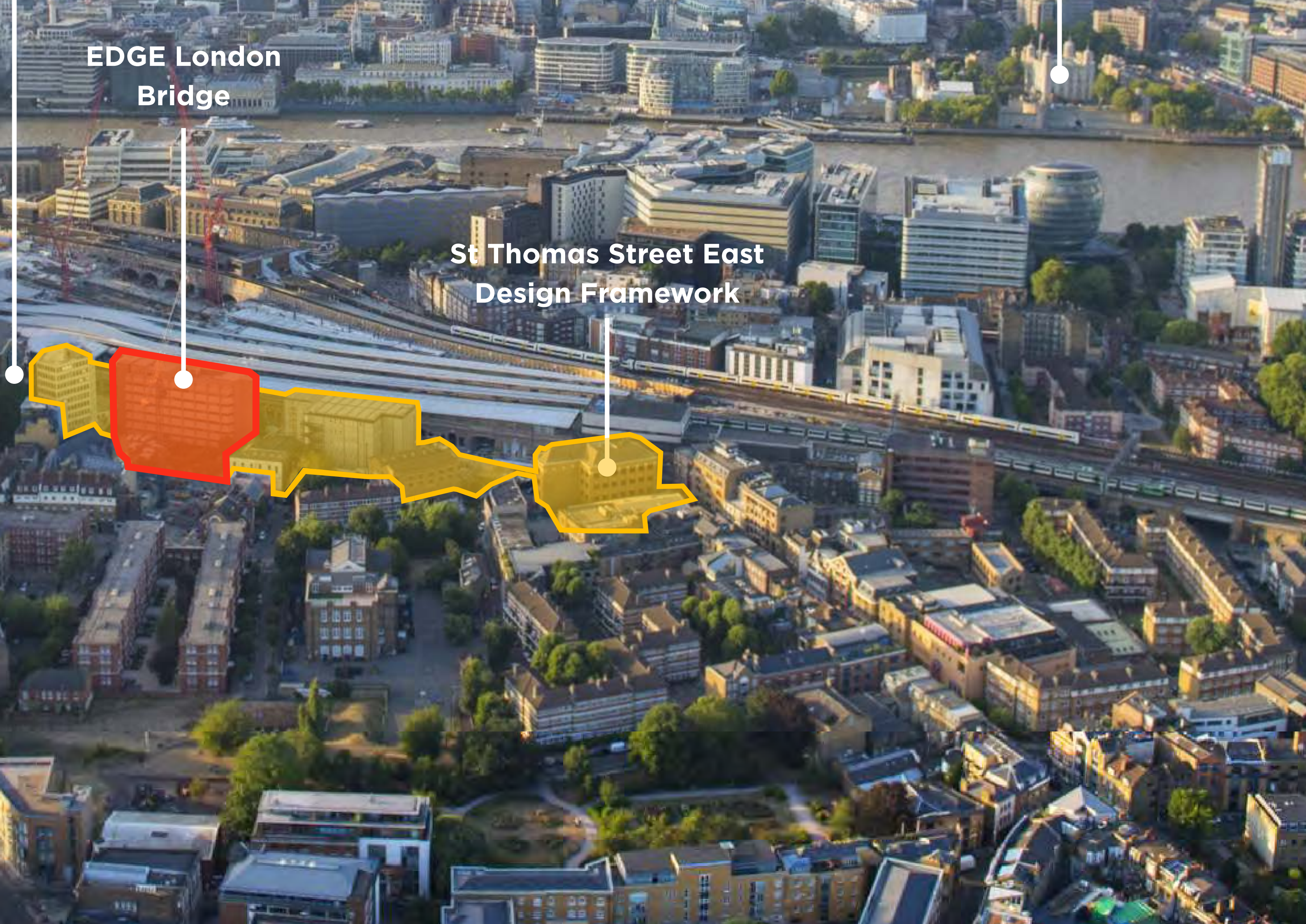
Sellar group/Leatherseller's Warehouse

er Bridge

Bermondsey Street

**EDGE London
Bridge**

**St Thomas Street East
Design Framework**





Bermondsey Street

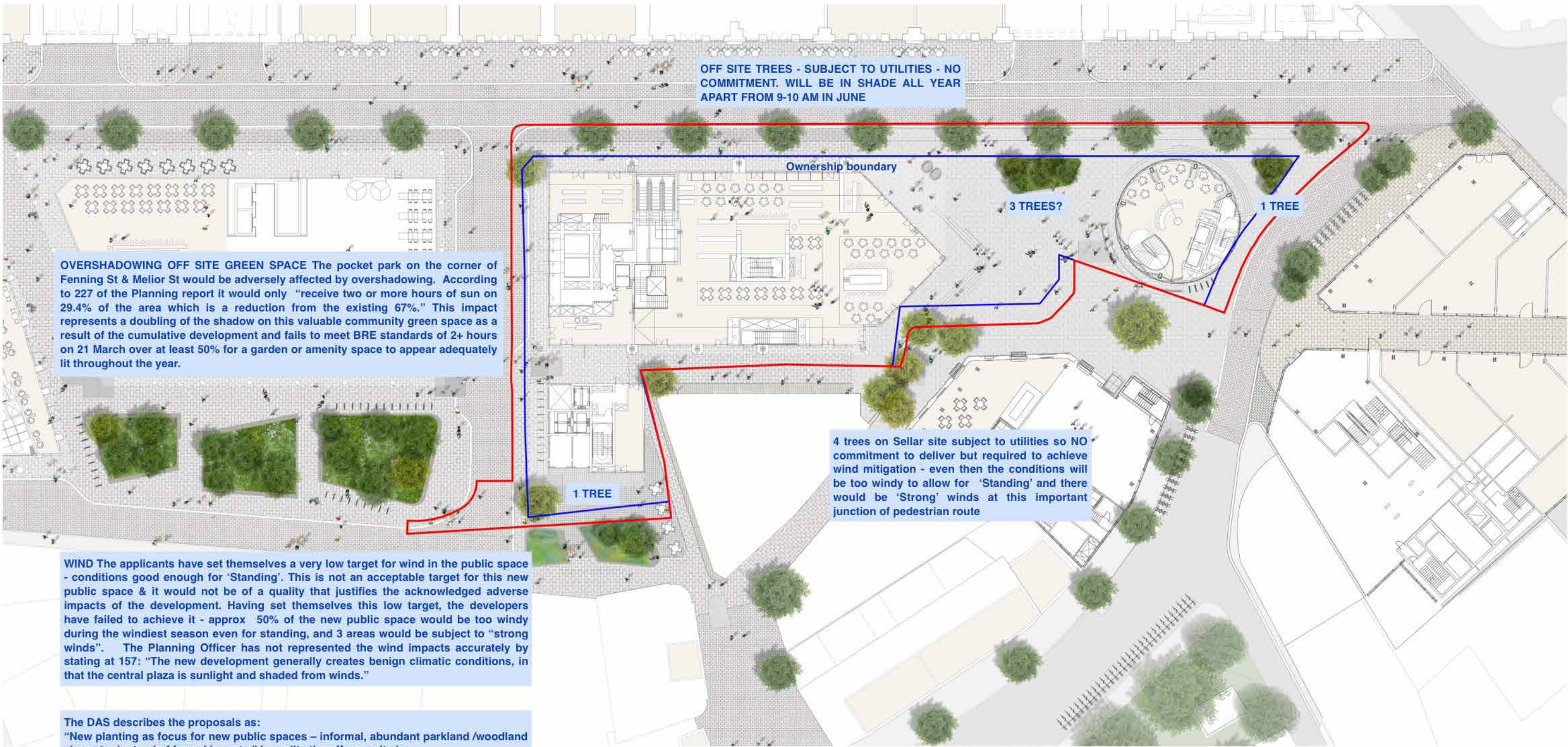
19/AP/0404

restoration of the warehouse
high quality public realm / public space
improved pedestrian connectivity
the provision of new jobs
new retail units
provision of affordable workspace

18/AP/4171

high quality architecture
new pedestrian linkages
/ improved connectivity
provision new retail opportunities
affordable workspace
a new music venue

VINEGAR YARD MASTERPLAN IN CONTEXT



WIND The applicants have set themselves a very low target for wind in the public space - conditions good enough for 'Standing'. This is not an acceptable target for this new public space & it would not be of a quality that justifies the acknowledged adverse impacts of the development. Having set themselves this low target, the developers have failed to achieve it - approx 50% of the new public space would be too windy during the windiest season even for standing, and 3 areas would be subject to "strong winds". The Planning Officer has not represented the wind impacts accurately by stating at 157: "The new development generally creates benign climatic conditions, in that the central plaza is sunlight and shaded from winds."

The DAS describes the proposals as:
"New planting as focus for new public spaces – informal, abundant parkland /woodland character instead of formal layouts." In reality the offer on site is:
4 trees in planters and approx. 20 sqm of planting, which equates to an area less than 2 parking bays. The other trees would be planted off site on Highways land, and only if the underground utilities on St Thomas St are re-located. If planted, they would be a few metres from the new building line which provides far too narrow a zone for healthy canopy & will be in shadow all day, year round with the exception of 9am to 10am in June. There should be room on the 3,000 sqm site to accommodate meaningful tree planting.

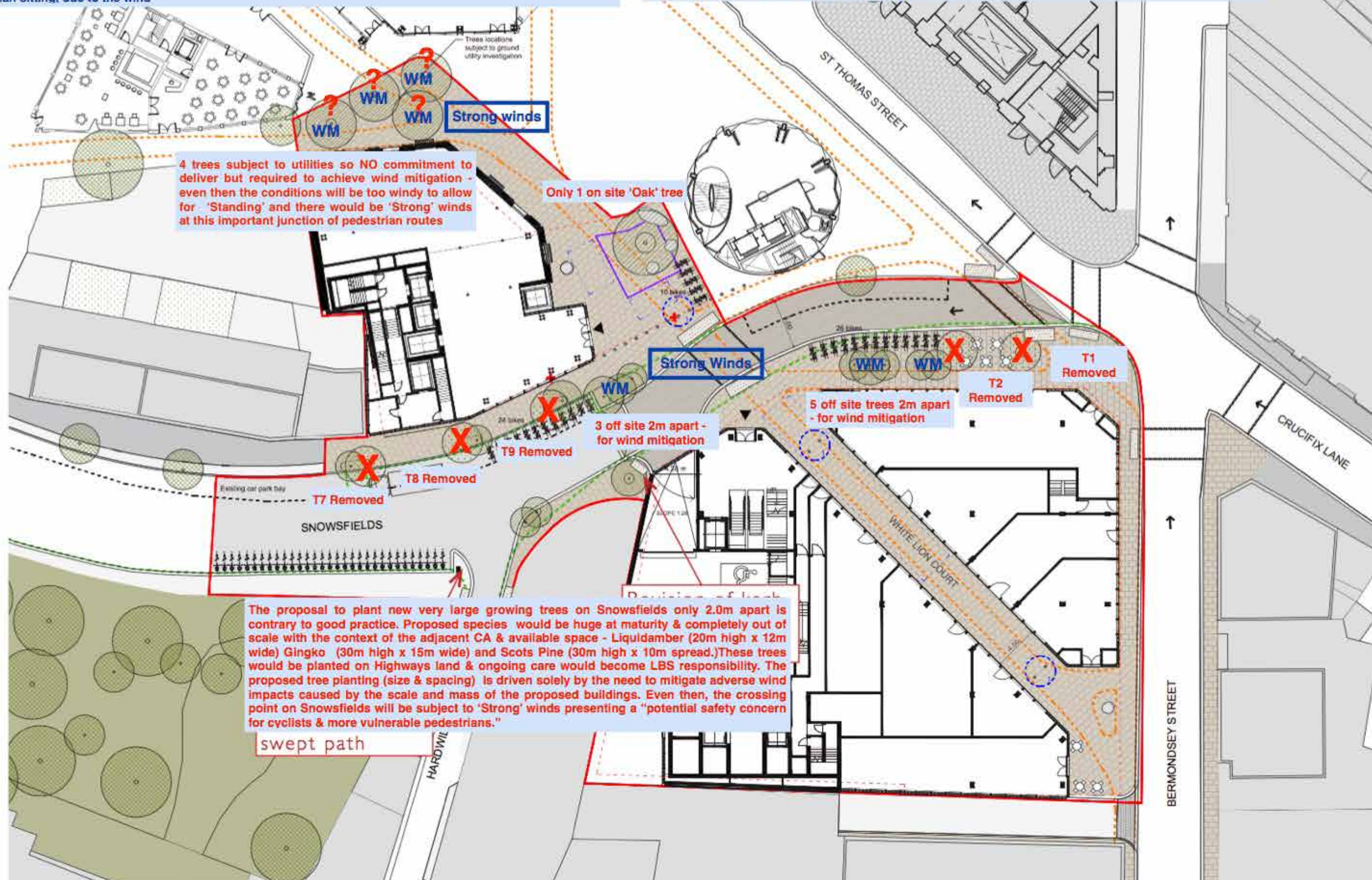
PUBLIC REALM PROPOSAL

TREES The Planning officer has not understood the content of the tree proposals. Planning report 181: "It includes the retention of a number of trees, including the large oak tree in Vinegar Yard, which will become a focal point for the forecourt area and for the view along the new passageway. It provides 5 replacement trees and 14 additional street trees, including onto St Thomas Street, where they will help soften the streetscape." Much of this is misleading or factually incorrect.

WIND The applicants have set themselves a very low target for wind in the public space - conditions good enough for 'Standing'. This is not an acceptable target for this new public space & it would not be of a quality that justifies the acknowledged impacts of the development. Having set themselves this low target, the developers have failed to achieve it - approx 50% of the new public space would be too windy during the windiest season even for standing, and 3 areas would be subject to "strong winds". The Planning Officer has not represented the wind impacts accurately by stating: 182 "The space is suitable for standing rather than sitting, due to the wind"

SHADING The Planning officer has not represented the shading correctly. Planning report 182: "The daylighting within the forecourt/plaza area is not unreasonable, with the area shown to be sunlit over the lunchtime period (12-3pm) during Spring and Autumn." The drawings show that this space would be in shade. The only area receiving sunlight at this time would be a small area to the south east of the warehouse. See dwg.MAR 1/04 which shows daylight at 1pm & 2pm, the time frame in the Officer's report. This time is the best case for the scheme. At all other times 80-100% of the public realm would be in shade.

JUSTIFICATION FOR IMPACTS The Planning Officer has not represented the public realm benefits to the CA accurately. 175: "A large part of the Vinegar Yard site will be landscaped with mature planting to create a local focus and contribute positively to new routes and connections." In reality there is only a commitment to plant 1 tree on site, important pedestrian connections will be very windy and 80-100% of the space will be in shade from September to March.



This plan shows the future scenario for landscaping integrating proposals of the neighbouring site and wider area which are being worked on jointly between the St Thomas Street Framework's developers and their landscape architects BHSLA and Djao-Rakine.

5. Environmental Impacts



Existing 01:00pm



Proposed 01:00pm

March 21st (GMT)



Existing 02:00pm



Proposed 02:00pm

Sources: Point 2 Surveyors
Point Cloud Survey
Site Photography

PLOWMAN CRAVEN - Point Cloud Site Surveys
40260-PCL-ZZ-XX-PC-G-0001-UAV-S1-P01-X530000-Y170000.rcs
Z_MAPPING LTD
Digital OS Extract

RPBW
Received: 121218
File Name: 181211_BRM_A_Building.rvt
181211_BRM_A_Snowsfields.rvt

Key:

- Grey shadows are those caused by buildings which are not on the site under development.
- Green shadows are those caused specifically by the existing buildings on the site.
- Blue shadows are those caused specifically by the proposed development.

Scheme Confirmed: -

Date : -

Project: Snowsfields

Drawn By: JF/MG

Scale: NTS

Date: JAN 19

Title: Transient Overshadowing
Cumulative Impact Assessment
Existing vs Proposed 121218

Dwg No: **MAR1/04**

Rel: 16

Point 2 Surveyors Ltd,
3rd Floor,
17 Slingsby Place,
London WC2E 9AB
0207 836 5828
www.point2surveyors.com

POINT
surveyors



Proposed 01:00pm



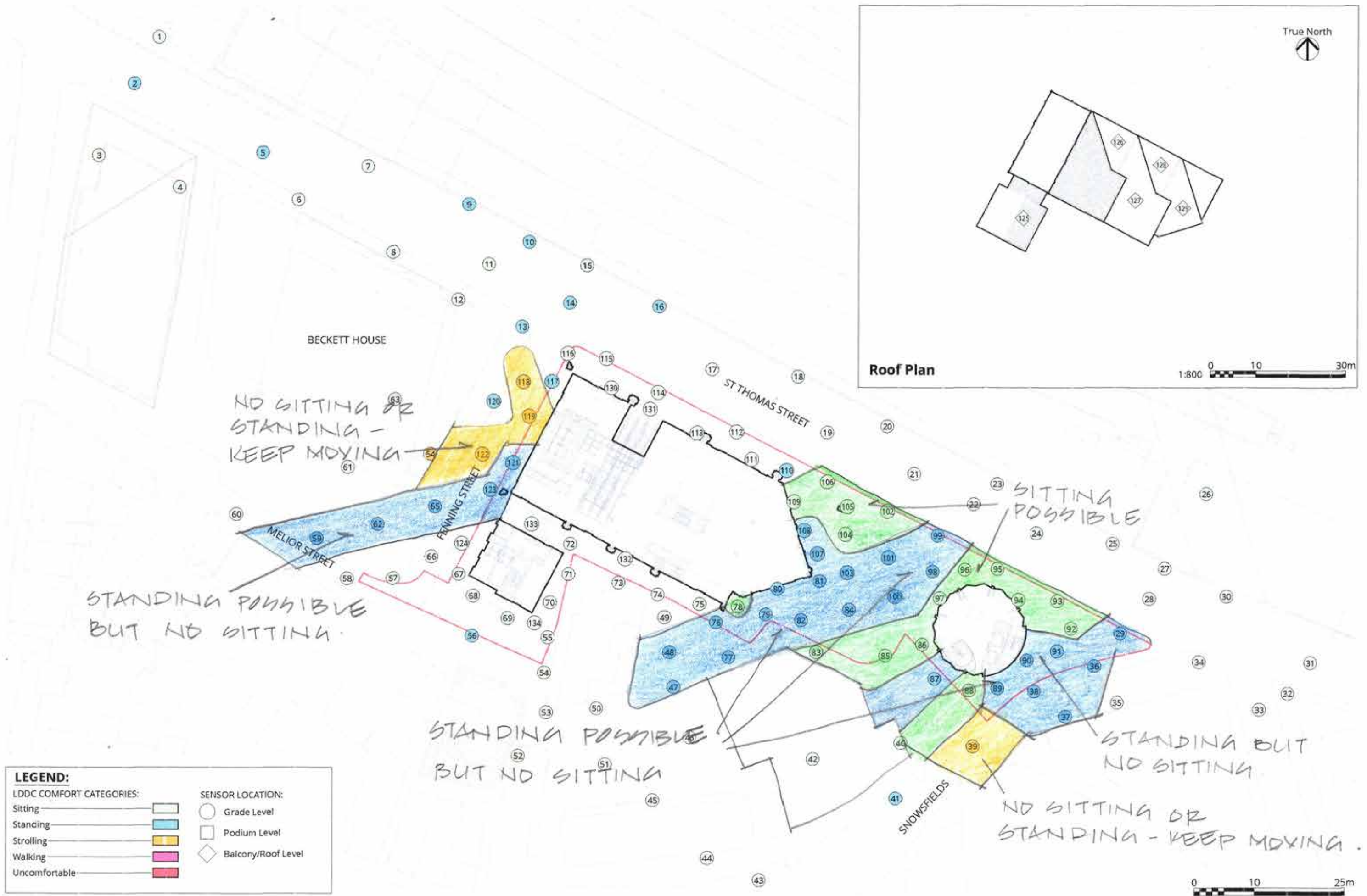
Proposed 02:00pm



Proposed 01:00pm



Proposed 02:00pm



Pedestrian Wind Comfort Conditions - Ground Floor

Configuration 5: Proposed Development with the Cumulative Surrounding Buildings and Beckett House
Summer Season

Vinegar Yard, London - UK



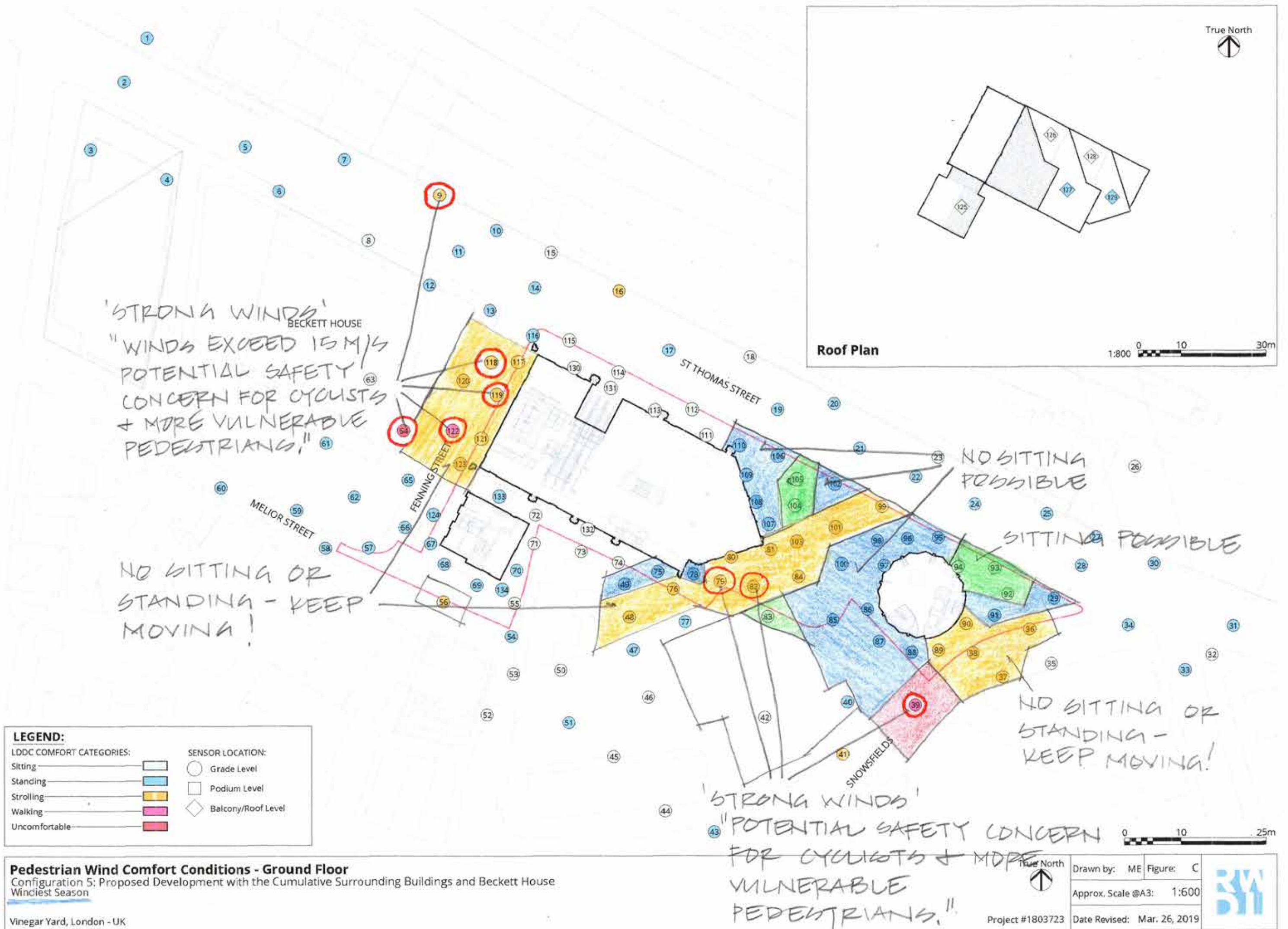
Drawn by: ME Figure: D

Approx. Scale @A3: 1:600

Date Revised: Mar. 26, 2019

Project #1803723







T8 Removed

T7 Removed

T6 Removed

T1 & T2
Removed

6. Policy Context

New Southwark Plan

Would you like us to provide our questions and points of objections in relation to up-to-date policy like the New Southwark Plan EIP Submission Version (the draft reports don't currently reference NSP policies directly)?

Covid 19 Situation

How have the viability assessments been adapted ?

How have the public spaces been adapted?

Mr [REDACTED]
London Borough of Southwark
Development Control
PO Box 64529
LONDON
SE1P 5LX

Our ref: SL/2019/119247/02-L01
Your ref: 18/AP/4171
Date: 27 November 2019

Dear Mr [REDACTED]

Redevelopment of the site to include the demolition of the existing buildings and the erection of a 5 to 19 storey building (plus ground and mezzanine) with a maximum height of 86.675M (AOD) and a 2 storey pavilion building (plus ground) with a maximum height of 16.680M (AOD) with 3 basement levels across the site providing a total of 30,292 SQM (GIA) of commercial floorspace comprising of use classes B1, A1, A2, A3, A4, D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works.

1-7 Fenning Street London SE1 3QR

Thank you for re-consulting us on the above application.

Environment agency response

The Environment Agency has **no objection** to the proposed development as submitted, **subject to the conditions** mentioned in our previous response SL/2019/119247/01 (dated 04 June 2019). For ease of reference, we have included our conditions in section 1 of this letter.

Flood Risk

The site is in Flood Zone 3 and is located within an area benefitting from flood defences. Whilst the site is protected by the River Thames tidal flood defences up to a 1 in 1000 (0.1%) chance in any year, our most recent flood modelling (December 2017) shows that the site is at risk if there was to be a breach in the defences.

The submitted Flood Risk Assessment (FRA) by akt II (19 December 2018) provides an accurate assessment of the tidal and fluvial flood risks associated with the proposed development.

Please note that our review is based solely on submitted documentation and reported actions, so no responsibility can be taken for the accuracy of any such information.

The Local Planning Authority should consider the submitted FRA when deciding this application in accordance with Paragraph 163 of the [National Planning Policy Framework](#) (NPPF).

Flood resistance and resilience

We recommend that flood resistant and resilient measures are incorporated in to the design and construction of the development proposals, where practical considerations allow, using guidance contained within the Department for Communities & Local Government (DCLG) document '[Improving the flood performance of new buildings: flood resilient construction](#)'.

If you have any questions, please contact the Kent & South London Sustainable Places team at kslplanning@environment-agency.gov.uk, quoting our reference number.

Decision notice request

The Environment Agency requires decision notice details for this planning application in order to report on our effectiveness in influencing the planning process. Please email kslplanning@environment-agency.gov.uk with any decision notice details.

Yours sincerely


Planning Advisor

Direct e-mail KSLPlanning@environment-agency.gov.uk

Section 1

Condition 1

Prior to the commencement of development approved by this planning permission (or such other date or stage in development as may be agreed in writing with the Local Planning Authority), the following components of a scheme to deal with the risks associated with contamination of the site shall each be submitted to and approved, in writing, by the local planning authority:

- 1) A preliminary risk assessment which has identified:
 - all previous uses
 - potential contaminants associated with those uses
 - a conceptual model of the site indicating sources, pathways and receptors
 - potentially unacceptable risks arising from contamination at the site.
- 2) A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
- 3) The results of the site investigation and detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
- 4) A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action. Any changes to these components require the express consent of the local planning authority. The scheme shall be implemented as approved.

Reason: For the protection of Controlled Waters. The site is located over a Secondary Aquifer and it is possible that the site may be affected by historic contamination.

Condition 2

If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until the developer has submitted, and obtained written approval from the Local Planning Authority for, a remediation strategy detailing how this unsuspected contamination shall be dealt with. The remediation strategy shall be implemented as approved, verified and reported to the satisfaction of the Local Planning Authority.

Reason: There is always the potential for unexpected contamination to be identified during development groundworks. We should be consulted should any contamination be identified that could present an unacceptable risk to Controlled Waters.

Condition 3

Prior to occupation of the development, a verification report demonstrating completion of the works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to and approved, in writing, by

the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan, if appropriate, and for the reporting of this to the local planning authority. Any long-term monitoring and maintenance plan shall be implemented as approved.

Reason: Should remediation be deemed necessary, the applicant should demonstrate that any remedial measures have been undertaken as agreed and the environmental risks have been satisfactorily managed so that the site is deemed suitable for use.

Condition 4

Whilst the principles and installation of sustainable drainage schemes are to be encouraged, no drainage systems for the infiltration of surface water drainage into the ground are permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to Controlled Waters. The development shall be carried out in accordance with the approval details.

Reason: Infiltrating water has the potential to cause remobilisation of contaminants present in shallow soil/made ground which could ultimately cause pollution of groundwater.

Condition 5

Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details.

Reason: The developer should be aware of the potential risks associated with the use of piling where contamination is an issue. Piling or other penetrative methods of foundation design on contaminated sites can potentially result in unacceptable risks to underlying groundwaters. We recommend that where soil contamination is present, a risk assessment is carried out in accordance with our guidance 'Piling into Contaminated Sites'. We will not permit piling activities on parts of a site where an unacceptable risk is posed to Controlled Waters.


Planning Advisor

Direct e-mail KSLPlanning@environment-agency.gov.uk

Environment Agency
3rd Floor, Seacole Building, 2 Marsham Street, London, SW1P 4DF
Telephone: 03708 506 506
Email: enquiries@environment-agency.gov.uk
Website: www.gov.uk/environment-agency

From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 20 November 2019 13:31
To: [REDACTED]
Subject: RE: Re-consultation on Planning Application 18/AP/4171

[REDACTED]

Thank you for your re-consultation.

I can confirm that London Underground Infrastructure Protection has no comment to make on this planning application.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards

[REDACTED]
Safeguarding Engineer (LU+DLR)
TfL Engineering
Email: locationenquiries@tube.tfl.gov.uk
Find out more about Infrastructure Protection - <https://youtu.be/0hGoJMTBOEg>

From: [REDACTED] [mailto:[REDACTED@southwark.gov.uk]]
Sent: 06 November 2019 11:56
Subject: Re-consultation on Planning Application 18/AP/4171
Importance: High

Dear Sir or Madam,

I am following up on the re-consultation letter regarding London Borough of Southwark planning application 18/AP/4171 sent by email on 16/10/2019 for the following:

Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing . The development would provide a total of 30,292 sqm (GIA) of commercial floorspace comprising of use classes A1/A2/A3/A4/B1/D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

A hard copy of the application documents is available for inspection by prior appointment at Southwark Council's offices, 160 Tooley Street, SE1 2QH (Monday to Friday 9am to 5pm) and is viewable online at the LBS Planning Portal: <https://planning.southwark.gov.uk/online-applications/applicationDetails>. Printed and electronic copies of the Environmental Statement and Non-Technical Summary are available to purchase from Trium Environmental Consulting LLP: 68 - 85 Tabernacle St, Old Street, London EC2A 4BD. For further information and prices, please contact Trium at hello@triumenv.co.uk or by calling 0203 887 7118. Re-consultation is being undertaken based on updated Environmental Impact Assessment information and design amendments to the scheme including: updated landscape design; drainage strategy and flood protection; relocated loading bay; increased planting on terraces; updated energy strategy; revision to building maintenance equipment; change to materiality of main building to brick with elements of pre cast concrete.

The relevant planning documents and drawings can be found at the following link:

<https://planning.southwark.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

Note the re-consultation period is set to expire on 15/11/2019 and whilst responses will be accepted after this date (and up until the point at which a recommendation is made on the application) we would urge you to submit your response as soon as possible.

Please ensure your response is sent to Planningstatconsultees@southwark.gov.uk before this period expires.

Kind regards,

■■■■■ ■■■■■ MA (Hons) MSc
Team Leader – Strategic Applications | Planning Division
Place and Wellbeing Department | London Borough of Southwark
160 Tooley Street | London SE1 2QH
(T): 0207 525 ■■■■■ | (E): ■■■■■■@southwark.gov.uk
www.southwark.gov.uk

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

Direct Dial: 020 7973 3762

Our ref: P01074336

7 June 2019

Dear Mr [REDACTED]

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

**LAND BOUNDED BY ST THOMAS STREET, FENNING STREET, VINEGAR YARD
AND SNOWFIELDS INCLUDING NOS. 1-7 FENNING STREET AND NO. 9
FENNING STREET, SE1 3Q
Application No. 18/AP/4171**

Thank you for your letter of 20 May 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

The application site lies just east of London Bridge station. The majority of the site is undesignated and contains no heritage assets, but the south west corner of the site on Fenning Street is included in the Bermondsey Street Conservation Area.

The Bermondsey Street Conservation Area is centred on Bermondsey Street, an evocative and characterful area of eighteenth, nineteenth and early twentieth century houses, warehouses and workshops based around a medieval street pattern. The conservation area is relatively large, extending to cover various streets and buildings leading off Bermondsey Street which also reflect the rich layered industrial heritage of the area. The two-storey warehouse within the site, 9 Fenning Street, dates from before 1916, and though simple and somewhat altered is an appealing example of a characteristic building type in the conservation area. The building forms its own small spur of the conservation area, and is shown as a positive contributor in the Conservation Area Appraisal. It contributes to the intimate space around the Horseshoe Inn pub identified in the appraisal, as is particularly demonstrated in the view looking down Melior Place to the pub, 'a key vista to a local landmark' (Bermondsey Street CAA, page 33).

This application is to demolish the buildings on the site, including the early twentieth



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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HistoricEngland.org.uk



century warehouse which is part of the Bermondsey Street Conservation Area. A new office-led mixed-use building would be erected, 20 storeys at its highest point (86.7m AOD). The tallest element would be at the west of the site, and the building would step down towards the east, with a public square sited between it and a three-storey pavilion. This would introduce taller elements into views which presently remain relatively low-scale.

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 statutory duties is found in the National Planning Policy Framework (NPPF) 2019. Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced. It makes clear that harm can be caused to a heritage asset through development in its setting, and that any harm or loss to heritage assets, including listed buildings, parks and gardens and conservation areas, requires clear and convincing justification (para.194). Any harm caused by a scheme should be weighed against any public benefits (para.196), with great weight given to the asset's conservation whatever the degree of harm. Conflict between an asset's conservation and any aspect of a proposal should be avoided or minimised (para.190).

The new Local Plan for Southwark is not yet adopted, but is in the later stages of consultation and development and indicates your Authority's emerging approach to this site, allocated as NSP53. The summary of this site makes clear the importance of considering the impacts of any new development on heritage, character and townscape.

Historic England's position and recommendation

In accordance with our published guidance on setting, we encourage a plan-led approach to development, and we acknowledge that this area has been identified for regeneration and increased densities in the current and draft local plans.

The loss of an entire positive contributor to the conservation area will cause harm. The warehouse at 9 Fenning Street is a characteristic conservation area building, sitting well with its neighbours. It has seen some alteration and is suited for conversion, and given it sits on a protruding corner of the site could be tied into a wider development, easing the transition between larger-scale development and the lower-scale historic area.

The visualisations provided with the applications documents make clear that the development will have some impact on the Bermondsey Street Conservation Area, by introducing a much larger element at the termination of some attractive views. Views 24 and 25 are taken from within the Conservation Area, and show the large scale this development would introduce, dominating these views and particularly affecting the intimate character looking north up Melior Place.



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HistoricEngland.org.uk



The applicants do acknowledge the adverse impact of these proposals on the Bermondsey Street Conservation Area, but state that the public benefits of the proposals will outweigh this harm. However, it does not appear to be clear why the demolition of the corner warehouse is required to deliver these benefits. As required by the NPPF, harmful aspects of a proposal must be fully justified and limited, to preserve and enhance the character of conservation areas.

The overall harm caused by this development could be reduced if the corner warehouse was incorporated into the development. Retaining this positive contributor to the conservation area would maintain the patina, intimate scale and historic character around the Horseshoe Inn, setting back and visually softening the large urban office development, and reducing its impact. We recommend that your Authority seeks amendments to the proposal to retain the corner warehouse building.

Recommendation

Historic England has concerns regarding the application on heritage grounds. 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

[Redacted Signature]
Inspector of Historic Buildings and Areas
E-mail: [Redacted]@HistoricEngland.org.uk

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

Direct Dial: 020 7973 3707

Our ref: P01074336

22 November 2019

Dear Mr [REDACTED]

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

**LAND BOUNDED BY ST THOMAS STREET, FENNING STREET, VINEGAR YARD
AND SNOWFIELDS INCLUDING NOS. 1-7 FENNING STREET AND NO. 9
FENNING STREET, SE1 3Q
Application No. 18/AP/4171**

Thank you for consulting us on the 6th November 2019 on the amendments to above the scheme. Our advice remains the same, therefore please see our original response attached.

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

[REDACTED]
Business Officer
E-mail: [REDACTED]@historicengland.org.uk



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Historic England



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Vinegar Yard 18/AP/4171

I strongly object to this proposal.

The proposed buildings are far too tall in the context of the Bermondsey Conservation Area and there are no public benefits that could possibly mitigate the impacts on the local community and the Conservation Area.

The ground level public realm has been put forward as a benefit but the proposals don't meet policy or good practice requirements for good quality public space. They will be:

- Largely in shade most of the year.
- Blighted by uncomfortable winds year round.
- Lacking meaningful and long term urban greening.

1.0 Policy and guidance in relation to wind and overshadowing.

1.1 London Plan Policy

*Policy 7.7 Location and Design of Tall and Large Buildings says that "Tall buildings... **should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference.***

1.2 BRE Guide 'Site layout planning for daylight & sunlight: a guide to good practice' recommends that for a garden or amenity to appear adequately sunlit throughout the year, **at least half of it should receive at least two hours of sunlight on 21 March** (Spring Equinox). It recommends that the availability of sunlight should be checked for all open spaces.

2.0 The CIT proposal for sunlight

2.1 Overshadowing of the public space

The combination of the proposed built development by Sellar and CIT is only shown in the Transient Overshadowing Cumulative Impact Assessment dated January 2019, Volume 6 of the Sellar ES. This shows that on 21 March the proposed events space will be in total shade from 7am to 7pm (sunset 6.16pm.) With the only exceptions being shafts of sunlight in just 10% of the space at 9am, 12am and 3pm, and 40% at 4pm.

At no point is 50% of the events space in sunlight.

At best 10-40% of the events space will be in sunlight for very short periods.

There will be 100% shade at lunchtime 1pm to 2pm, and 100% shade after work from 5pm onwards.

Summary of Transient Overshadowing Cumulative Impact Assessment Jan 2019

	21-Mar
7am	100% shade
8am	100% shade
9am	90% shade
10am	100% shade
11am	100% shade

12am	90% shade
1pm	100% shade
2pm	100% shade
3pm	90% shade
4pm	60% shade
5pm	100% shade
6pm	100% shade
7pm	100% shade
8pm	100% shade

The proposals fail to meet London Plan policy for Tall Buildings & BRE guidance for open space.

2.2 The CIT proposal for wind microclimate

The RWDI mapping in the ES clearly shows a zone running SW to NE through the centre of the new event space that is always going to be windy. This is the case for all the studies provided, both in the windy season and summer (see mark up)

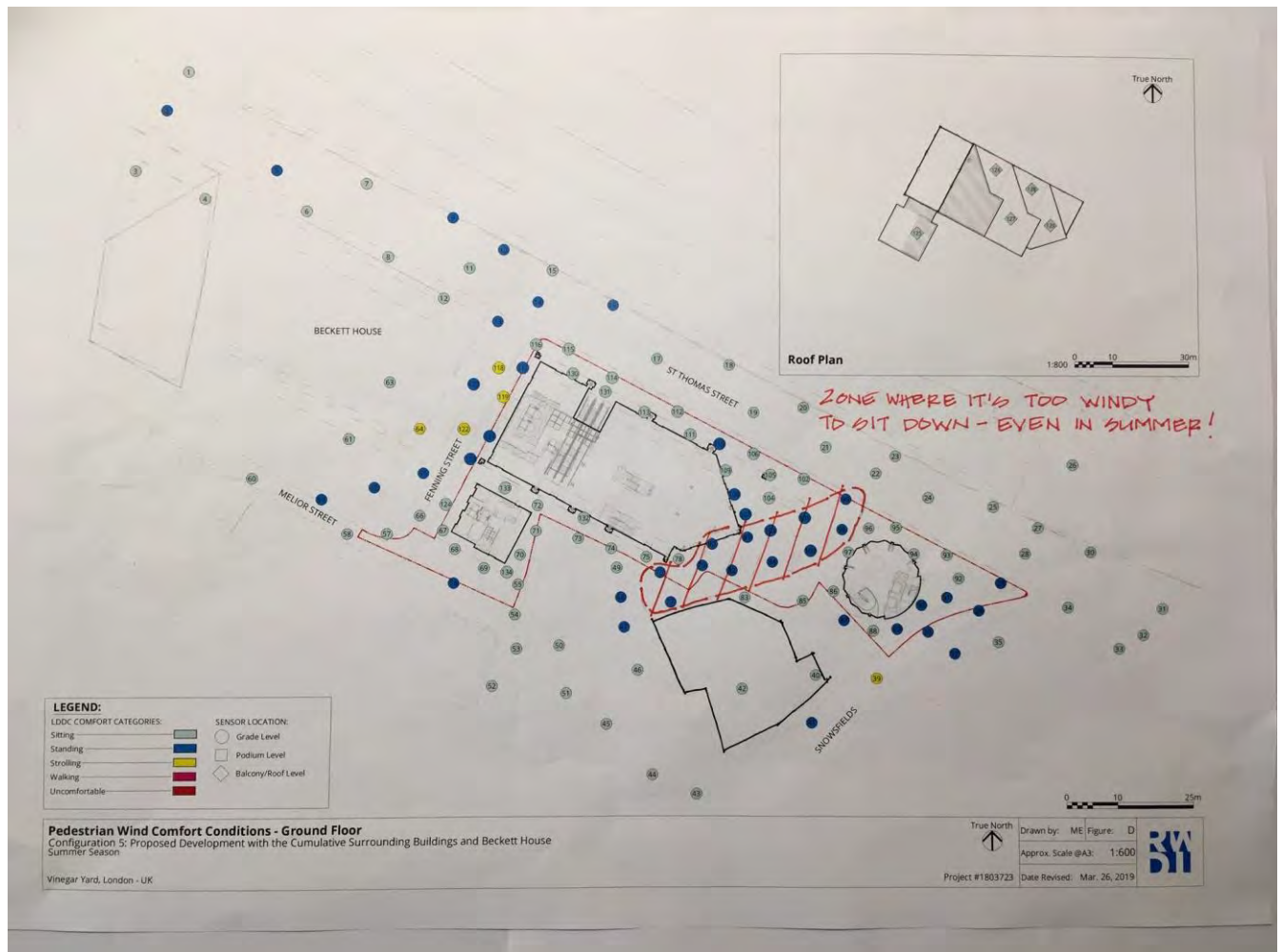
In the windy season it won't even be calm enough to stand still - people won't be comfortable unless they keep walking.

In the summer season it will be comfortable enough to stand still, but it won't be good enough to sit down.

This microclimate will discourage people to stay in the space whether it's for casual social interaction, eating lunch on the seating or engaging with the proposed events such as markets and performances which are proposed to animate the space.

The ES is highly misleading on the wind results which have been assessed in the ES as "negligible (not significant)" effects.

These are not negligible effects and it is highly misleading that the impacts are being misrepresented in the ES in this manner.



3.0 Design Review Panel recommendations

Extract from the DRP report October 2018

'The Panel also stressed the importance of understanding the environmental impacts of these proposals from the outset.... In order for the Masterplan to demonstrate its robustness, they asked the land-owners' group to ensure that, in addition to townscape studies, other technical studies including: sun- path analysis; microclimate, sunlight/daylight; wind; flooding; servicing and deliveries; as well as construction management; are commissioned early on in the process. These environmental studies should be used to inform the design and should help to influence the massing studies, avoiding harmful environmental consequences.'

Conclusion

'In conclusion... More work should be done especially in developing a strategic approach to landscape and the public realm as well as the environmental impact of the Masterplan.'

3.1 Development team response

The development team have not addressed these recommendations and have not demonstrated a robust Masterplan across all the sites that avoids harmful environmental consequences.

4.0 Policy and guidance in relation to Urban Greening

4.1 London Plan Policy in relation to London's response to Climate Change: *Policy 5.10 Urban Greening*

This encourages new planting in the public realm to contribute to the adaptation to, and reduction of, the effects of climate change. The Mayor seeks to increase the amount of surface area greened in the Central Activities Zone by at least five per cent by 2030. **Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.**

4.2 Sustainable Design and Construction SPG April 2014

Chapter 3 Adapting to Climate Change and Greening the City.

*"The Mayor has a target to increase the green cover in the CAZ by 5% on 2008 levels by 2030...**To facilitate the delivery of this target, developments should maximise the provision of green infrastructure within their developments...**"*

*To fully contribute to the Mayor's target, developers should **provide the urban greening measures on site.***

5.0 The CIT Proposal for Urban Greening

The proposals offer very little urban greening to benefit the public realm. This is contrary to policy and best practice to address climate change and provide attractive places for people, particularly where building density is high and the pressure on existing green space for the current community is already intense.

The DAS Landscape and public realm describes the proposals as:

'New planting as focus for new public spaces – informal, abundant parkland / woodland character instead of formal layouts.'

In reality the offer on site is:

4 trees and approx. 20 sqm of planting, which equates to an area less than 2 parking bays.

Because the developer is building 3 levels of basement to the full extent of the site, all the public realm will be over basement so the trees would have a short term value, limited to the life cycle of the buildings, circa 60 years.

The other trees on the proposals plan would be planted off site on Highways land, and only if the underground utilities on St Thomas St are re-located. If planted, they would be a few metres from the new building line which provides far too narrow a zone for healthy canopy. The Transient Shadow studies show that St Thomas St will be in shadow all day, year round with the exception of 9am to 10am in June. The photo of the trees alongside Guys show what very poor growing conditions this arrangement gives trees. This is not good practice and shouldn't be repeated along St Thomas St. There should be room on the 3,000 sqm site to accommodate meaningful tree planting.



Trees with very poor form alongside Guys Hospital - too close to built form and in very shaded conditions.

The developers need to come back with a proposal with reduced building heights, built form that doesn't create public realm blighted by wind and shadow, meaningful green infrastructure, and properly considered and detailed public realm that genuinely makes a contribution to the local area.

18 Nov 2019

(Objects)

Comment submitted date: Thu 23 Jul 2020

Dear Mr [REDACTED]

My wife and I would like to register our strong objections to this scheme.

We live at Apt 50 Taper Building, 175 Long Lane SE14GT.

We object most strongly to a scheme which includes a building of 20 storeys which will completely dominate the area and the environs of Bermondsey Street.

We also object to the proposal to do untold damage to the old warehouse in Vinegar Yard.

These proposals are completely out of keeping with the area and will irrevocably damage the local heritage.

(Objects)

Comment submitted date: Thu 23 Jul 2020

Good morning [REDACTED]

Thank you for alerting me to the re-consultation on these two planning applications:

19/AP/0404 Sellar

18/AP/4171 CIT.

On behalf of BermondseyStreet.London, I object to these modified applications. In our view, the modifications have not significantly diminished the potential harm from these schemes in terms of:

- o 19/AP/0404

- o Being an overbearing presence in the context for the Bermondsey Street Conservation Area

- o By failing to ensure that the narrow pavements in Bermondsey Street will be able to accommodate all the additional people moving around the area

- o 18/AP/4171

- o Offering a welcome new public space, but without proposing adequate wind mitigation measures.

- o It looks from the latest documents that trees for wind mitigation are not a fully committed part of the proposal - they are positioned over services (which it may later be decided not to move) on Highways space (which TfL may later decide to use for some other purpose eg a cycle route), over basements which will limit their root systems and therefore their potential stature and canopy, and in severe shade which will inhibit growth.

Our previous objections still stand, therefore. I attach them for convenience.

All best

(Objects)

Comment submitted date: Mon 29 Jun 2020

Whilst development of the area (for example, changing Becket House) is not a bad objective, the proposal submitted does not fit into the Conservation Area or overall feel of the neighbourhood. As long-term residents of the area, we object strenuously to the proposal.

- The area is marketed as a tourist destination, with both the Shard, London Bridge and Borough Market being some of the most renowned elements. All of these are underpinned by the historic heritage that has been maximised in the area through its low-rise architecture. A collection of high-rise skyscrapers is wholly at odds with this historic look and feel. Development on St Thomas St should be of lower-rise buildings, which would be sympathetic to and respectful of the local character and heritage assets of the area.

- The "monolithic scheme" as referenced in the report, may not sit directly on Bermondsey Street, but it is not possible to claim the proposal has no impact there given it will loom, like the Shard, over everything in the vicinity. Blocked light will have an impact on people's mental health and well-being. Claiming it has no impact seems to utterly disregard and devalue the local community who will literally live in the shadow of the building.

- The Shard is an iconic visual to the area and skyline - adding yet more high rises around it will detract from its unique visual appeal, and clutter the skyline. Tourists may not care, but the local community and wider London deserve not to have to be subjected to an eyesore of a congested view.

- Anyone who has passed along St Thomas St at any time of day or night, whether spring, summer, autumn or winter, will have felt the extreme wind tunnel effect generated by the Shard. We have seen people physically struggling to move because conditions can be so bad. Additional high-rises will exacerbate this problem - and if vehicles (of any kind) will be permitted along the roads, it is only a matter of time before someone is blown into the path of a bus or taxi, possibly fatally. And though most felt on St Thomas St, the wind effects are also felt around on the adjacent streets. Trees would take a long time to come to maturity in order to be somewhat effective - and in the high winds, likely to have branches that fall onto and injure pedestrians below. Proven, comprehensive evidence of wind mitigation measures, and an assessment of the impact to wind by the proposal, has not been presented in the proposal. The best wind mitigation factor to not exacerbate the existing problems will be to not have any additional high rises.

- The local streets are not suitable for a huge increase in population density in the area. Shops will need vehicles to transport goods; and whilst the station's proximity will encourage people to be vehicle-free, some people will ALWAYS wish/need to have a car and drive. Public transport proximity will not eradicate all vehicles from the roads, and the small streets cannot sustain any further driving or parking. The streets cannot cope at the moment with normal traffic, and given the request to drive not use public transport at the moment because of COVID-19, vehicles will continue to be present on the streets. Additional high-rises will burden even further the already overstretched roads in the area.

- As residents, we have felt and seen the impact of more and more people being squeezed into the area, either as residents or commuters, without matching benefits. The numbers of new schools, dentists, doctors, grocers etc. has not matched the increasing population of the area. "The amount and type of retail provision is considered to be acceptable and would help meet the needs of residents, workers and visitors in the area" as stated in the report does not provide enough detail as to what will be provided, especially for local residents. Whilst tourists and visitors are absolutely a bonus to this area, as COVID-19 has demonstrated, in situations where there is a dramatic decrease in visitors, it is residents who will sustain an area by continuing to shop and patronise services in the area. Facilities for residents should be prioritised over amenities for

commuters or tourists because whilst they are not around to sustain the area, residents will be.

- It is disingenuous for CIT to state that Melior St will have a "large garden yard", given the area sits outside of the CIT zone. What guarantee is there that Columbia Threadneedle will sustain CIT's claim to open green space? CIT should only be making promises about the area they have ownership over, whilst considering the impact their proposal (and the cumulative effect the proposal will have) on the neighbourhood at large.

(Objects)

Comment submitted date: Mon 29 Jun 2020

Objections:

1. Predominantly, the nuisance and damage to quality of life to surrounding residents caused by blocked light
2. Potential for wind tunnel expanding on that currently between the Shard/London Bridge Station and Guys Tower.
3. The nuisance and damage to quality of life of surrounding residents caused by noise from building works
4. The damage caused by excavations required for high rise foundations to local property structures, moving walls and flooring
4. Being out of character with the Bermondsey Street conservation area
5. A potential reintroduction of people sleeping rough in Leathermarket park as happened when the shard was built and London Bridge station was redeveloped

If the developments were kept low rise and narrower many of the above issues would not happen. Additionally, given the current pandemic rendering high rises difficult to access, low rise buildings are far more appropriate now and in the longer term.

(Objects)

Comment submitted date: Mon 29 Jun 2020

Bermondsey Street is of great historic significance and this will be very damaging

High/medium rise dense development is out of place and out of scale in this historic quarter. The shard is the exception that proves the rule

Post Covid the evidence would suggest uptake on central London office/commercial space will be down anything from 20 to 70 per cent. This could be a white elephant

The local streets bridges and facilities are overstretched. Public transport is good obviously but more cars are not needed in this area cycle parks and such dense development will inevitably create more traffic

(Objects)

Comment submitted date: Sun 28 Jun 2020

Thus development is totally out of keeping with the area. It's far too tall and will totally ruin the community feel of the area. The development does not have to be so high. Please do not allow this, the proposal needs to be rejected.

(Objects)

Comment submitted date: Sun 28 Jun 2020

I deem this development totally out of place within not only the conservation area but also the entire area. I therefore strongly object to its approval.

This part of London attracts numerous visitors: foreign and others by its charm and chosen by many to live in, due partly to its historic heritage, diversity of population, Bermondsey street and low rise developments in the surrounding areas plus its accessibility to Central London and the City.

In the City, numerous buildings have carried on being built during this pandemic at the cost of many lives, to house office spaces, many of which may remain empty for a long time Now this council, opposite side of the river, is recommending approval for this monolithic scheme (term used many a time in the report) which would overshadow parts of the conservation area albeit as stated not impacting Bermondsey Street and St Mary's Magdalen therefore making this another point to recommend its approval..... This is a rather twisted approach in regards to the local residents and children attending the nearby school, together with finding acceptable " the passageway between Bermondsey street and Snowsfields being in the shadow most of the time with wind conditions remaining sufficiently moderate and the forecourt/plaza having sunlight between 12-3pm during Spring & Autumn".

Developments along St Thomas Street of lower heights, sympathetic, respectful of the local character, the conservation area and those adjacent, would be very welcome at this present uncertain time. A rare moment in time to produce buildings of character, provide affordable residential premises, which would enhance the lives and working conditions of people, rather than make them be thwarted by "monolithic office structures projecting darkness.

The treatment of the Vinegar Yard Warehouse is utterly ludicrous: a rocket looming out of an old well proportioned construction... whilst it could be restored, extended, converted into a cultural and artistic hub providing training spaces, really affordable studios for artists, gallery, cinema, an open-air cinema, climbing wall etc... all affordable to the residents and workers of the area.

The impact of the construction traffic on the very close streets to the development(s) will make residing in the area a hellish place to be for many months, raise pollution levels, noise, vibrations.

The strong wind impact of the shard is not only felt in St Thomas Street but also in the adjoining and parallel streets, therefore the heights of the buildings proposed along that stretch would only make the problem more acute, difficult, unpleasant to walk in. Trees may be used as breakers but also fall unto passers-by in strong winds...

From the report:

"In order to protect the amenities of the area, it is suggested that a cap be placed on the amount of floor space that could be used for Class A4 and Class A5. This must be enforced.

"The amount and type of retail provision is considered to be acceptable and would help to meet the needs of residents, workers and visitors in the area". Could this be expanded?

(Objects)

Comment submitted date: Sun 28 Jun 2020

The community welfare is seriously at stake.

The overdevelopment and wind-tunnels as a result of The Shard is enough.

People flock to Bermondsey Street and it's surroundings for a reason; the village "feel" and community spirit.

The Vinegar Yard has established and secured a following and economic revenue that's been widely spread.

Another 'Highrise' is not the answer.

We suffered through 5 years of CONSTANT traffic on Crucifix Lane during the nighttime because of the building of The Shard. Noise pollution, environmental pollution and disturbance to the community. All of our complaints fell on deaf ears.

Please do not let the community go through this again.

Kindly,

(Objects)

Comment submitted date: Sun 28 Jun 2020

I strongly oppose this development for the above ticked reasons and more. The proposed development is far too high and will add an extreme wind tunnelling effect on the surroundings, compounding the at times unbearable wind tunnel below the Shard. The area simply does not need buildings of this style. The construction of this building will cause immense strain on the areas infrastructure and I cannot see in the proposal how the developers intend to avoid noise, disruption and traffic issues both during the build and after completion. The nature of the build itself will cause much harm to local residents lives. I object to the architecture of the proposal. 3 storeys of basement sounds like an awful lot of waste, noise and pollution from dirty grabber trucks, I lived through the development of the shard and redevelopment of London Bridge station and the trucks ran 7 days a week, 24 hours and day and caused absolute misery. While I understand the need and desire to develop this plot of land I do not believe this proposal is suitable at all and is in complete contrast to the character and heritage of the area.

(Objects)

Comment submitted date: Sat 27 Jun 2020

- Stepping up in height to Guys remains too severe - will result in wind tunnel on St Thomas Street and impact conservation area

- CIT promise Melior St will be a 'large garden yard', which I think is important if the redevelopment is to have any enjoyment to it as an area. Yet this sits outside the CIT area - how will the planners ensure this is not changed by Columbia Threadneedle at a later date

Comment submitted date: Sat 16 Nov 2019

As a long term local resident I object to the proposal on the following basis:

- The height of the larger buildings on the development due to wind tunnel and shadow effect on St Thomas' St. Anyone who has to walk to London Bridge station from Bermondsey Street every day already knows the wind tunnel effect between the Shard and Guys is ridiculous and to extend this along St Thomas' St would be a huge error. No complete evidence of wind effects from the total developments planned have been presented

- The height of the buildings in the proposal remains inappropriate for the area when viewed from and along Bermondsey Street which is a conservation area of low rise character. To lose the effect of being in an entirely low rise district when on Bermondsey St would destroy the character of the area

- The scale and in particular the height of the scheme significantly harms the setting of designated heritage assets in the areas being the railway arches and properties along Bermondsey Street

(Objects)

Comment submitted date: Fri 26 Jun 2020

My overriding objection to this planned development is the height of the buildings proposed. Not only would they be detrimental to the community and heritage characteristics of the area, but they would also detract from the splendid impact of the iconic Shard.

I support the view of the OBNF in objecting to this proposal.

And is there really going to be a demand for so much new office space in a changing world? To spoil this special area to be taken up by empty offices is surely undesirable.

(Objects)

Comment submitted date: Fri 26 Jun 2020

The proposed development is out of character with this unique part of London. It will be detrimental both to the aesthetic of the Shard and to the aesthetic and amenities of Snowfield and the Bermondsey Street area. It will cause detriment to the people living and working in this area. It is likely to make it even harder to access the hospital easily. It will cause long term environmental and social amenity harm. It should be rejected and replaced by a more human-centric and environmentally sympathetic proposal.

(Objects)

Comment submitted date: Fri 26 Jun 2020

Whilst i support development of the site i do object to the scale and density. at 20 storeys it will dwarf the buildings nearest to the site and bermondsey st. Southwark Council has pledged to build 11000 homes over the next 20 years. The demand will have outpaced the supply.

Where is the infrastructure eg doctors and dentists facilities nurseries youth facilities etc? SE1 will become a ghetto of high rise buildings and the poor will continue to be left behind. Have a moral conscience Southwark Council and decline the application in favour of rebalancing life's opportunities in favour of the disadvantaged.

(Objects)

Comment submitted date: Thu 25 Jun 2020

The proposal is detrimental to the community of Bermondsey and in particular to the historic nature of the neighbourhood.

(Objects)

Comment submitted date: Thu 25 Jun 2020

It will ruin the skyline to the Shard our well loved local landmark.

It's too high, and out of place in a conservation area.

It will cause wind issues.

It's basically out of proportion to its surroundings.

(Objects)

Comment submitted date: Tue 16 Jun 2020

I strongly object to the proposed development for the following reasons :

- This is one of a series of proposed developments along Thomas Street/Bermondsey Street, and both the individual impact of this specific planning application and the cumulative effect of the vast structures being proposed is highly negative. It will transform the current village-like heritage of the area into one epitomized by massive, sterile offices. The proposed structures need to be very significantly lower in height.
- Given the likely long-term impact of Covid-19 in terms of fewer people in offices in central London, this is not the time to approve a vast office structure. We are in danger of creating a white elephant that will be a blight on the local area. This planning application should be rejected, and the developers instructed to replace it with a much lower-rise proposal in conjunction with the other proposed developments along Thomas Street. We have an opportunity to re-imagine the commercial developments in a low-rise, post-Covid way. Just erecting large structures at this time of uncertainty about the future does not make sense.
- The proposal for three basement levels across the site is a particular concern. This is a large-scale civil construction activity and will cause considerable disruption and should be rejected.
- Thomas Street already suffers from a major wind-tunnelling effect and this development will greatly exasperate this problem.
- There are virtually no local benefits from this proposal. The application makes reference to some minor ones, but this is clearly an attempt to pay lip-service to this requirement.
- The scale and volume of construction work involved along Thomas Street is vast and will last for years. This is not acceptable, and no account has been taken of the disruption to local residents.

Comment submitted date: Fri 15 Nov 2019

- The height of the proposed development is far too high. It is excessive and out of character for a location so close to the conservation area. Such a scale is not even remotely acceptable for an area that is characterized by far lower buildings in that part of Thomas Street.
- It will further exacerbate the wind-tunnelling effect on Thomas Street.
- There is virtually no public benefit to such a large scale development, but there is significant damage in terms both of local heritage and to the community.

- The whole series of developments along Thomas Street is excessive and the local community and infra-structure cannot cope with such vast developments.

Comment submitted date: Tue 18 Jun 2019

This planning application is not supported. The main reasons for objection are as follows:

-A series of developments including a 20 floor tower is wholly out of character with the area around Bermondsey Street. The height of developments should be substantially reduced both to fit with Bermondsey Street and to match the ability of the area to support so many additional people.

-In consultations we were told that the developments along Thomas Street from Capital House to Bermondsey Street would visually be a substantial step down in height as one approached Bermondsey Street. This is clearly not the case as putting up a 20-floor structure close to Bermondsey Street is far too high and out of all proportion to the Street.

- This does not take account of the fact that the local area cannot support such a vast re-development and does not take account of the adverse impact on the heritage, community, and attractiveness of the area.

(Objects)

Comment submitted date: Mon 15 Jun 2020

The area needs more open spaces and nature and not anymore unaffordable and unnecessary office buildings considering people can simply work from home with social distancing the new normal for the foreseeable future. In addition, a 20 floor building will 1) reduce sunlight to the surrounding area and to commuters and 2) create wind tunnels 3) is not at all in keeping with the area. The area has already had sustained development disruption from The Shard (ongoing) and London Bridge Station and the noise and further disruption is just not necessary or wanted for the area. There is already overcrowding of the station (tube and train) during peak hour even on weekends. Construction for years will exacerbate this issue. These new buildings simply are not in keeping with the aesthetic of the area and actually we need to keep what we have there (Vinegar Yard) and get rid of Beckett House so the community has more open air space and nature (more plants, less buildings).

(Objects)

Comment submitted date: Thu 28 Nov 2019

This will mean loss of heritage loss of community space and over development of the area

(Objects)

Comment submitted date: Wed 27 Nov 2019

How dare you ruin this lovely part of Bermondsey with this monstrosity that is so out of character with the area

(Objects)

Comment submitted date: Mon 18 Nov 2019

Due to limited characters available on the website this is a condensed version of our objection the full objection has been emailed to Mr [REDACTED]

Harmful effects on Heritage- See full version

Excessive Height- See full version

Wind tunnelling effects- See full version

Disruption during and after construction

The disruption which would be caused during and after the construction of the developments would put an enormous amount of stress on the area. This type of scheme is of a scale which would take years to complete and people living and working within the area will be very seriously affected. The scale of the impact has not been properly ventilated and local people have no idea of the level of disruption entailed in several very high buildings with deep basements all being built at once in a very confined area served only by small streets. An additional 75 vehicles, most of which will be grabber lorries or heavy-duty construction vehicles, accessing the site per day, for 6 days a week over a period of 5 years, is an enormous level of disruption on the area. Collectively the St Thomas St overdevelopment will drive away the many people who don't want to live and work around a massive construction site for years from the area, adversely effecting the local economy for several years. Once complete the development would bring thousands more people into the area, putting intolerable pressure on already overcrowded tube stations and narrow streets for servicing. No proposal exists to enhance the infrastructure of the area which will clearly be unable to cope.

No convincing construction or servicing plans have been made available for comment and we would urge the council not to grant permission for a development of this scale which would affect people who live and work in the area on an equally massive scale, without definitive servicing and construction management plans in place which have been properly analysed, stress tested, shown to be credible, workable and achievable.

Bogus public benefits

We are aware that in an attempt to justify the enormous adverse effects on local character and heritage the Council will attempt to claim public benefits for this scheme that do not genuinely exist, and certainly cannot outweigh the harm to heritage. In particular we firmly remind the Council that 'public benefits' must by planning law be net benefits. i.e. public benefits to be weighed against harm to heritage assets must be evaluated by offsetting the public benefits with public disbenefits. Thus disbenefits of public disruption from construction and servicing of such alien developments in the local area, wind-tunnelling, overloading of local infrastructure, overshadowing and claustrophobic enclosure must first be weighed against the dubious benefits claimed for the proposed scheme. Only net public benefits can then be used to justify heritage harm.

Further, public benefits cannot include mere production of new floorspace. That is an automatic

effect of any development and does not necessitate any disrespect for heritage. Heritage-sensitive schemes are equally capable of any general benefits arising from redevelopment and regeneration and thus these factor in themselves cannot constitute public benefits to be weighed under national planning policy.

In order to meet NPPF policy when justifying the heritage harm entailed in this application the Council must provide a detailed 'balance sheet' that offers a fully reasoned identification and assessment of the heritage benefits said to be available from approval of the scheme. This must be offset by the disbenefits, such as, but not limited to, those listed above. Only then can the 'net public benefits' be weighed against the harm to heritage.

'Public benefits' are by definition matters in relation to which public opinion is essential to an objective and rational evaluation. In view of the dubious claims being made for public benefits in local presentations of this scheme the Council could and should seek genuine local opinion on a properly presented and particularised schedule of such benefits. It is not for the Council without regard to such local opinion to declare that local people should be ready to sacrifice their heritage for superior 'benefits' that the Council concludes they just don't properly understand.

Having regard to the proper application of national heritage policy we do not believe there is any possibility of the heritage harm we (and Historic England, SAVE, the Victorian Society and others) have identified being genuinely outweighed by any public benefits available from this scheme. It is simply driven by a greed for enormous profits that can arise only from a scheme that disregards local amenity.

For all the reasons set out above we strongly object to this application.

(Objects)

Comment submitted date: Mon 18 Nov 2019

Please see full letter sent to [REDACTED] [REDACTED] as online platform has limited characters.

We are a specialist building restoration company. We have worked on many heritage buildings in the local area over three decades. As a local business based within close proximity of this proposal we strongly object due to the unfavourable affects that it would have on the local area, and our business in particular, for many years to come.

Disruption during and after construction

The disruption which would be caused during the construction stage of this development is on an enormous scale and for a long period of time. Added pressure on the local infrastructure would undoubtedly affect our own servicing in a negative way. The narrow medieval streets are already overcrowded and an additional 75 vehicles, most of which will be grabber lorries or heavy-duty construction vehicles, accessing the site per day, for 6 days a week over a period of 5 years, is an enormous level of disruption on the area! Such disruption will adversely impact the smooth running of our business along with other local businesses within the area. If granted, after completion the daily disruption will remain at a much increased level on account of the servicing that such a large-scale development would require. And this is only one of four proposed to be built simultaneously.

Excessive Height

This 20-storey high rise tower block within the conservation area is contrary to the NLP policy and section 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and has no place within the Bermondsey conservation area.

Destruction of Local Heritage

The proposal harms the setting of designated heritage assets. In particular it is in close proximity to several Grade 2 listed buildings. The notable, ornate, 1860s St Thomas St/Crucifix Lane railway arches by Charles Henry Driver, would be completely overshadowed by this architecturally bankrupt, pre-fabricated tower block. Its arrogance and greed contrast with other grade 2 listed assets exhibiting fine craftsmanship within close proximity e.g. at 49-57, 59, 61, 63, 68-76 and 78 Bermondsey Street.

Additionally, the destruction of the two-storey warehouse which dates before 1916 located within the site, is an unnecessary insult to the conservation area, in disregard of the NPPF paragraph 196 and NLP policy 7.1 and is unacceptable.

Extreme Wind tunnelling

St Thomas St currently suffers from extreme wind tunnelling effects. Additional tall buildings erected on the street will obviously increase these effects given the existing small scale of the area.

Heritage Harm & Public Benefits- See Full Letter.

Having regard to the proper application of national heritage policy we do not believe there is any possibility of the heritage harm we (and Historic England, SAVE, the Victorian Society and others) have identified being genuinely outweighed by any public benefits available from this scheme. It is simply driven by a greed for enormous profits that can arise only from a scheme that disregards local amenity.

For all the reasons set out above we strongly object to this application.

(Objects)

Comment submitted date: Sun 17 Nov 2019

These are my reasons for objection to the CIT development:

1. Harm to the historic environment: It will create a destruction of the historic environment and Bermondsey St conservation area.

These proposals radically change the long-established principles applying to planning applications in and around conservation areas:

They are on a scale not previously considered remotely acceptable in the immediately adjacent area to the proposed development. This is completely at odds with what the Bermondsey St conservation area was created to conserve and significantly harms its character and views both from outside and within it.

2. Transport facilities inadequate for the proposed developments: The London Bridge underground station already struggles and is inadequate currently and there are queues going round the block at peak times and this will be much further exacerbated if the developments are to go ahead.

3. Wind tunnelling and over shadowing: ST Thomas Street is already recognised by pedestrians as being a wind tunnel - you don't need a computer model to recognise that lining St Thomas St with four new towers will turn it into a wind tunnel even further. There is no complete analysis of the extent of the increased wind effect of the further developments because the last of the four high-rises, Becket House, has not yet been unveiled. Equally obvious is that the railway arches will be cast into permanent shadow and robbed of their potential to make St Thomas St the inviting public realm it should be.

4. Disruption during and after construction:

In construction: The CIT scheme requires hugely disruptive construction processes. These include a three floor basement proposed across the whole CIT site, two floors in the tower block replacing the vinegar warehouse and one in the Bermondsey St buildings. This takes them far below the water table and means several thousand 30-tonne grabber lorries coming and going from the sites to remove hundreds of thousands of tonnes of spoil from the excavations. Neither the Council nor the Developers will be drawn on this matter either. They will try to get away with claiming that it can all be sorted out after they get permission in a 'construction management plan'. When they finally tell us what it entails they will at the same time tell us it is too late to challenge the planning consent that made it inevitable.

Servicing the completed developments : The whole St Thomas St proposed development will produce a ten-fold increase in floorspace across the sites taken together. CIT claim Fenning, Melior and Weston Streets present a perfectly viable means of supplying the entire series of developments. This they claimed would be via two lorry bays in Fenning St that would bring in supplies 'consolidated outside the M25' using exclusively electric vehicles. However, there are no details of this proposed plan. Less still is there any evidence that all the landowners have signed up to it.

5. Cultural facilities (a 'music venue'): false justification: CIT were unable to identify any viable commercial model or any example of what this claim would amount to in practice. It quickly becomes obvious that they know little and care less about the practicalities of operating a live music venue.

(Objects)

Comment submitted date: Sun 17 Nov 2019

I see no solid justification for the need of such a high building on this site. The area is ill-equipped to deal with the huge numbers of people already - just try getting on a tube at rush hour at London Bridge - this does not help.

It will also steal any sunlight for people walking along St Thomas Street - one of the few places you can get that life affirming amenity. Sunlight stolen by a large office block which will bring no joy to anyone.

I see no 'local benefits' to this scheme and it does not bring anything of any value to the community. A music venue on the site may be well intentioned but seems false - also the noise levels that were on the street when CABLE was still open a decade or so ago are testament to the

fact this is unlikely to be of benefits to nearby resident with it located so close to Bermondsey Street rather than the train station.

St Thomas Street is already a wind tunnel. This will add more of the same. Right now St Thomas Street is actually a remarkably pleasant street to walk down - UNTIL you hit the area around the Shard. It goes from open space with sunlight to a closed off wind tunnel. These developments will just bring more of the same and there appears not to be much compelling to address the impact in any of the proposals.

I do not see any justification - aside from profit for the developers - for allowing this symbol of planning law inadequacy going ahead that will bring any real benefit to anyone who lives or works in the area and so I must ask, if the council are seriously considering this - why?

I understand the need for development and regeneration - but it doesn't always have to be on the greediest scale possible. We don't need a TRUMP TOWER mindset in Southwark, we need people who can preserve the amazing heritage of the area and re-generate the buildings in a sympathetic way that will bring pleasure to everyone.

It also feels like local voices and considerations for this plan have never been taken into account. there is a viable commercial alternative proposed but it does not appear to have been taken seriously by developers nor council.

This sadly does the opposite which is why I object to the current proposals.

(Objects)

Comment submitted date: Sat 16 Nov 2019

The quality and character of the Victorian era buildings and area in general is threatened by this proposed development. The erosion of the post industrial feel of the area (one of the last remaining areas left in central London that has maintained its character) would make the Bermondsey street much less appealing as an area in London as it would be indistinguishable from downtown areas of American cities.

Added to that the huge scale of the building project would create large scale pollution which should be entirely avoidable. The sheer quantity of HGVs will damage the road surfaces in the local area - given the already poor maintenance of road surfaces in London this is likely to cause considerable damage.

(Objects)

Comment submitted date: Sat 16 Nov 2019

I strongly oppose and object to the above development proposal. The development falls just outside a conservation area, but will have catastrophic effect on the long established principles and purpose of a protected, historic area. The scale of the proposed development is far outside of any previously acceptable limits and takes no due care or consideration of its surroundings, character, heritage, context etc. The development intends to destroy an important and much loved local landmark, the Vinegar yard warehouse and offers in its place 17 stories of glass towering over the area. The effect on other surrounding heritage assets such as the listed railway arches will also be detrimental and has been flagged and highly problematic by heritage England and the

Victorian society, I agree.

The claim of local public benefits is bogus at best and I cannot see how such development benefits anyone but the developer. We do not need any more retail units in the area and there is enough office space, so what is the point of the development? Business which have moved into newly refurbished arches along st.thomas street have struggled at best and closed at worst proving the need for more is questionable.

I feel the claims of the developments to be fuel efficient and to provide jobs cannot be substantiated and can see no proof in the proposals otherwise.

The environmental implications of adding high rise to this area is deeply worrying. I struggle to reach London Bridge station on a windy day due to wind tunnelling effect if the shard and in general this creates a deeply unpleasant environment for anyone who has to pass through. Adding multiple high rise to the street will make this a serious problem and I do not believe that it is being taken at all seriously.

This area is serviced by small, old, roads. There are one ways and dead ends, few clean routes in or out of the area. How on earth does the development proposal suggest it will plan for and manage the serious issue of service during and after construction? Local residents like myself have suffered disruption for years and years due to the shard and the re-development of London Bridge station. I cannot see a plan or consideration in the proposal of how true development will deal with these major issues. Post construction how do the developers propose to service the units? By helicopter? Lorries cannot pass through the area easily and as it stands the loading bay at the shard is a constant mare.

In summary, I urge the council to consider the lives of its local people and the character and heritage of the area as a priority and not a side issue when considering the above developments viability. Do we really need more towers? Or do we need careful, considerate development with clear economic, environmental and social benefits. I would say the latter.

(Objects)

Comment submitted date: Sat 16 Nov 2019

This proposal is outrageous and is not considering its surrounding area at all.

To point briefly, the design is a:

- Damaging the heritage and value of what the area is known for. It pays no attention to what exists on site currently. Hence it disrespects the historic environment and Bermondsey street conservation area.
- There will be disruption during and after construction to people living around the area as well as those who are travelling.
- The high rise structure is not clear on the public benefits. It does not improve the area at all and does not add anything to the space.

Although I don't live in the area, it's concerning to how designs like this are destroying the historic environment and it also does not organically fit within the area. The community should get a say and should be heard in regards to their opinions and ideas they possibly have for the development.

(Objects)

Comment submitted date: Sat 16 Nov 2019

The design proposals from both CIT and Sellar seek to destroy the character and community of the local residential area south of the railway. They are objectionable for many striking reasons.

- Their proposed height is wholly inappropriate. It will block out light for the entirety of St Thomas Street and exacerbate its the wind tunnel. It is fundamentally out of character with an area composed of 2,3,4 storey buildings.
- The Sellar scheme makes a mockery of conserving the vinegar yard warehouse. With a 17 corporate tower block over its head it strikes me more as monument of Sellars triumph over the Bermondsey st conservation area than any real "detailed and sensitive consideration" for the victorian warehouse.
- The projects will bring on, following the construction of the shard and the LB station redevelopment, yet again another noisy and obstructive construction process for which local resident will be counting down the years for completion.
- The invitation to more McDonalds, Neros and Starbucks does in no way soften the blow of destroying loyal heritage, nor do any of the other unsubstantiated decoy attempts to repair the damage that these proposals will cause.

As a local architect and resident for 20 years I find the proposals very offensive and saddening.

(Objects)

Comment submitted date: Sat 16 Nov 2019

The development is of a scale completely at odds with the area (particularly the Bermondsey Street conservation area) and such tall buildings make a mockery of respecting the heritage that there for all to see in this part of London. These towering buildings will dwarf the wonderful old buildings that make up the unique character of this area. This character has proved very popular and even a draw for businesses and nightlife in the area. Ruining this with disproportionately large glass towers and destroying the heritage appeal of the area would be counter productive and deter creative businesses and people that have thus far added to the allure of London Bridge/ Bermondsey Street.

The tall buildings would create wind-tunnelling effect. We have already experienced this with the erection of the Shard and other taller buildings to the north and south of Bermondsey Street over the last 10 years.

Living immediately adjacent to the development we would experience horrendous living conditions during the construction for years to come.

There is aggressive basement building proposed (that too so close to the river) which would envisage lorries extracting soil every day in large numbers on what are very narrow old roads. No amount planning can avoid the absolute disruption to the lives of the residents. The noise, dust, pollution traffic that would result will impact on our daily lives and have a detrimental effect on our family life and mental and physical well being. That the residents should be treated with such contempt is truly a travesty.

These vast increases in space and density of use have to be serviced. The plans so far are sketchy to say the least and not remotely realistic or workable.

The public benefits that it is claimed will accrue are at best vague. They are just generic claims that have been put in to satisfy some condition. All development is good and the bigger the better is not true, at least not for communities and the public at large, though this adage may hold true for big developers. Jobs can be created by sustainable development that enhances an area and adds to the community well being in the public space. We do not need high-density,

unsustainable and speculative tall buildings to fulfil these public benefits.

I most strenuously object to the proposal.

(Objects)

Comment submitted date: Fri 15 Nov 2019

Here are some obvious points to why the design proposal is absurd in the case of respecting its surrounding area/buildings, as well as disregarding the local heritage and value of the area.

- The density within the design proposal and the extreme overbearing height of the building, has evidently not considered its surrounding buildings and environment. It brutally invades on the the organic flow within the area of Bermondsey St/Vinegar Yard. This damages the surrounding historic environment that, being designers and architects, they should be preserving, rather than demolishing!

- It brings upon an extreme change and look to the area, not necessarily for the greatest perspective. There was also no adequate consultation which as designers, they should have considered, as these proposals affect current neighbouring residents and businesses within the area.

- It's most certainly not worth it, if these proposals of the St/Vinegar Yard are driven by excessive profit at the expense of the historic environment. The historical value and significance matters most and with London's general development, especially within Bermondsey/London Bridge, heritage of the areas are losing its essence because of extreme and brutal design proposals that don't consider the historic richness of existing buildings and areas.

- Cultural facilities (a 'music venue'). This is the CIT offering but again they could not identify any viable commercial model or any example of what this claim would amount to in practice. It quickly becomes obvious that they know little and care less about the practicalities of operating a live music venue.

Even excluding the Greystar and Becket House contributions the CIT and Sellar schemes require hugely disruptive construction processes. These include a three floor basement proposed across the whole CIT site, two floors in the tower block replacing the vinegar warehouse and one in the Bermondsey St buildings. This takes them far below the water table and means several thousand 30-tonne grabber lorries coming and going from the sites to remove hundreds of thousands of tonnes of spoil from the excavations. Neither the Council nor the Developers will be drawn on this matter either. They will try to get away with claiming that it can all be sorted out after they get permission in a 'construction management plan'. When they finally tell us what it entails they will at the same time tell us it is too late to challenge the planning consent that made it inevitable.

Designs that are especially part of a conservation area should allow the community to have more involvement, coming up with a feasible alternative to respect the local heritage and conservation area of Bermondsey St/Vinegar Yard and London Bridge.

As an Architecture student at the Bartlett UCL, I am worried, and totally against these design proposals for the Bermondsey St/Vinegar Yard. I believe that it is an utter shame that the design proposals lack any consideration towards the historical environment, which is the key reason as to why I ardently detest the design development for the area. I really hope that this e-mail conveys my sincere disconcertment of the design and that some action is taken.

(Objects)

Comment submitted date: Fri 15 Nov 2019

I strongly object to this proposal and cannot believe that it has been submitted like this to Southwark Council in the first place. The proposed amendments from the developers do not make any difference.

The excessive height of the buildings compromises the context for the conservation area. The proposed public space is too small and may not be usable due to wind (known problem around tall buildings) and lack of planting since the trees referred to in the applications will only be planted if no services underground and sites on the public roadway can be available. St Thomas Street will be in constant shade and this building along with the other proposed buildings next to each other would be too densely built.

Comment submitted date: Sat 22 Jun 2019

I strongly object to this planning application on the basis of height, mass, architectural design and being out of character for a building next to the Bermondsey Street conservation area.

Southwark Council is about to approve another high rise building that is out of proportion with the surrounding area. The building is simply too tall and will damage the setting of the conservation area. It will be another building overshadowing St Thomas Street and the arches. The design does not fit within the surrounding buildings either and it is very disappointing that Southwark Council officers let it through to this stage.

Although I welcome the proposed piazza I am concerned that the wind effects and mitigation have not been well thought through. There is a significant risk it would turn out to be a very cold and unfriendly piazza. I cannot see any improvement to the public realm other than another high rise office building being proposed that is out of character with the area.

To summarize this is unfortunately another example of Southwark Council approving almost anything on St Thomas Street that is being proposed by developers. This building does not enhance the public realm in any way, it just provides more office space in an already very congested area. Nothing speaks against some increase in building height across St Thomas Street, but all the currently proposed buildings (including this one) are out of proportion to the character of the Bermondsey Street Conservation Area. Instead of enhancing the public realm with buildings that fit into the surrounding area, Southwark Council seems to be looking after developer's interests for high rise buildings as this example shows again.

(Objects)

Comment submitted date: Fri 15 Nov 2019

I strongly object to this proposal.

The proposed buildings are far too tall in the context of the Bermondsey Conservation Area & there are no public benefits that could possibly mitigate the impacts on the local community and the Conservation Area.

The ground level public realm has been put forward as a benefit but the proposals don't meet policy or good practice requirements for good quality public space. They will be:

- Largely in shade most of the year.
- Blighted by uncomfortable winds year round.
- Lacking meaningful & long term urban greening.

1.0 Policy & guidance in relation to wind and overshadowing.

1.1 London Plan Policy

Policy 7.7 Location and Design of Tall & Large Buildings Planning decisions

'Tall buildings..should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation & telecommunication interference.'

1.2 BRE Report 'Site layout planning for daylight & sunlight: a guide to good practice'.

The BRE Guide recommends that for a garden or amenity space to appear adequately sunlit throughout the year, at least half of it should receive at least two hours of sunlight on 21 March.

2.0 The CIT proposal for sunlight

2.1 Overshadowing of the public space

The combination of the proposed built development by Sellar & CIT is only shown in the Transient Overshadowing Cumulative Impact Assessment dated January 2019, Volume 6 of the Sellar ES. This shows that on 21 March the proposed events space will be in total shade from 7am to 7pm (sunset 6.16pm.) With the only exceptions being shafts of sunlight in just 10% of the space at 9am, 12am & 3pm, & 40% at 4pm.

At no point is 50% of the events space in sunlight.

At best 10-40% of the events space will be in sunlight for very short periods.

There will be 100% shade at lunchtime 1pm to 2pm, & 100% shade after work from 5pm onwards.

Assessment on 21-Mar

7am 100% shade

8am 100% shade

9am 90% shade

10am 100% shade

11am 100% shade

12am 90% shade

1pm 100% shade

2pm 100% shade

3pm 90% shade

4pm 60% shade

5pm 100% shade

6pm 100% shade

7pm 100% shade

The proposals fail to meet London Plan policy for Tall Buildings & BRE guidance for open space.

2.2 The CIT proposal for wind microclimate

The RWDI mapping in the ES clearly shows a very large zone running SW to NE through the centre of the new event space that is always going to be windy. This is the case for all the studies provided, both in the windy season & summer.

In the windy season it won't even be calm enough to stand still - people won't be comfortable unless they keep walking.

In the summer season it will be comfortable enough to stand still, but it won't be good enough to sit down.

This microclimate will discourage people to stay in the space whether it's for casual social interaction, eating lunch on the seating or engaging with the proposed events such as markets and performances which are proposed to animate the space.

The ES is highly misleading on the wind results which have been assessed in the ES as "negligible (not significant)" effects.

These are not negligible effects and the proposals fail to meet London Plan Policy.

3.0 Policy and guidance in relation to Urban Greening

3.1 London Plan Policy in relation to London's response to Climate Change:

Policy 5.10 Urban Greening

This encourages new planting in the public realm to contribute to the adaptation to, and reduction of, the effects of climate change. The Mayor seeks to increase the amount of surface area greened in the Central Activities Zone by at least five per cent by 2030. Major development proposals within the Central Activities Zone should demonstrate how green infrastructure has been incorporated.

3.2 Sustainable Design and Construction SPG April 2014

Chapter 3 Adapting to Climate Change and Greening the City.

'The Mayor has a target to increase the green cover in the CAZ by 5% on 2008 levels by 2030...To facilitate the delivery of this target, developments should maximise the provision of green infrastructure within their developments...'

'To fully contribute to the Mayor's target, developers should provide the urban greening measures on site..'

4.0 The CIT Proposal for Urban Greening

The proposals fail to meet policy as they offer very little urban greening to benefit the public realm. The DAS describes the proposals as: 'New planting as focus for new public spaces - informal, abundant parkland /woodland character instead of formal layouts.'

In reality the offer on site is:

4 trees in planters & approx. 20 sqm of planting, which equates to an area less than 2 parking bays.

The other trees on the proposals plan would be planted off site on Highways land, but only if the underground utilities on St Thomas St are re-located.

The developers should provide a proposal with reduced building heights, built form that doesn't create public realm blighted by wind & shadow, & meaningful green infrastructure.

Comment submitted date: Fri 21 Jun 2019

I strongly object to this proposal.

The proposed buildings are far too tall in the context of the Bermondsey Conservation Area and there are no public realm benefits that could possibly be put forward as an attempt to mitigate impacts on the local community.

The results of the wind study that has been submitted as part of the ES find that the new area of public space intended to host activities and events (presumably year round) will have an unacceptable microclimate for anything that doesn't involve walking through the space i.e. standing still will not be comfortable, nor will strolling around market stalls, sitting to view a performance/event, meeting friends, watching children play, or just pausing to socialise.... etc..all the types of activities that are described and illustrated as diagrams and photos in the DAS will not be possible.

This is the case for both the summer season and the windiest season.

Clearly, this means that the space fails to meet microclimate standards for a public space that is intended to be activated by events and activities, and provide a place for social interaction so it fails to meet policy in terms of justification for tall buildings.

The ES is highly misleading on the wind results which have been assessed in the ES as "negligible (not significant) effect.

These are not negligible effects and it is highly misleading that the impacts are being misrepresented in the ES in this manner.

Why is there no cumulative wind impact study?

This application can't be properly assessed without a study that addresses ALL the proposed buildings on St Thomas St

The developer is not only proposing very tall buildings, but also a basement to the full extent of their ownership. The very few trees proposed in an extremely mean public realm 'offer' won't be planted in the ground, but will be in planters in reduced soil volumes so the lifespan of the trees will be limited to the lifespan of the building - typically 60 years. There are no guarantees that the trees shown on St Thomas' St will be delivered - they are labelled as 'subject to services review'.

This huge development will have a very significant impact on the microclimate and environment of the local area but it doesn't even provide the green infrastructure and long term legacy canopy cover that is needed now to address poor air quality, stormwater attenuation, reduction of the heat island effect etc... This is a failure.

The developers need to be told to come back with a proposal with reduced building heights and meaningful green infrastructure and public realm that genuinely makes a contribution to the local area.

(Objects)

Comment submitted date: Fri 15 Nov 2019

As a resident of the block of flats near to the proposed area, I strongly object the current plan. the proposed height is totally out of character for the Bermondsey Street conservation area.

The proposed plan would also cause an incredibly disproportionately high traffic volume for the size of the area, with no explanation on how the HGVs would be able to move around daily without causing massive disruption to the many residents in the area. Pollution would also increase massively for years to come, in an area which already has high levels as reported in the past.

The area has already a high number of reports of noise and nuisance from several business already present. The new plan of a music venue would add even more a strain on the area.

St Thomas Street is already hugely affected by wind because of other tall buildings, this one will very likely make things even worse. At times is already difficult to walk against the wind, I cannot even imagine what it would be for the elderly and the patients of Guy Hospital.

The developers do not give satisfactory information on how they will make a positive impact on the existing community, and some of the information in the plan are evidently flawed and unreasonable.

The council should consider the many existing residents in the area, listen to the many feedback provided here and aim at a more reasonable plan, such a 6 story building rather than this monstrosity overshadowing the whole area.

(Objects)

Comment submitted date: Fri 15 Nov 2019

I am at a loss to understand how a proposal like this can get this far in the context of Bermondsey Street. It is clearly overdevelopment, bringing large buildings, more in keeping with the Shard and More London into a mainly residential area.

I've written the same comments on a similar proposal - both are totally unsympathetic to the feel of the area.

(Objects)

Comment submitted date: Fri 15 Nov 2019

The scheme sit uneasy with the historic London Bridge railway arches. These btw would be be cast in permanent shade!

St Thomas Street would be come a wind tunnel. Walk along the Shard & Guy's and you can these days not hold up an umbrella.

Destroys the Bermondsey Conservation area of which this building site is a part of.

The Vinegar Yard warehouse must be saved and preserved! We don't want to loose our local heritage! It would have been much better if someone would have had the vision to do something with this building, rather than just axe it because it is less profitable! Look at Coal Drop Yard, Kings Cross!! It can be done!!

As yet, besides the obligatory bloomy promises of affordable workspaces - it is still quite unclear what the benefits for the public and residents are. This late in the process - that tells you something!

Cultural facilities - a 'music venue'. CIT's plan for a live music venue doesn't have a viable commercial model.

Retail facilities: we should sacrifice local heritage for a few more chain shops and restaurants. Bermondsey Street and London Bridge Station area is already packed with restaurants. And there are enough Next, Boots etc here already.

Wow - fly the green flag: Fuel-cell driven energy efficiency... meaning what exactly?! We have not heard anything back from CIT about what that means! Why not?!

(Objects)

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(Objects)

Comment submitted date: Fri 15 Nov 2019

I want to tick every box. These buildings or rather structures would be hugely damaging to the Historic environment, which is appreciated worldwide.

Living and working in the area for the last 40 years, I have seen some sensitive (some not) developments and in recent times a vigorous growth. The structure(s) that proposed has no consideration for the environment, the increase of the wind tunnel effect and the general degrading of the area for the sake of investment.

It's a monstrous creation overshadowing the well being of a lively area.

I could be more specific, but I realise there is a deadline and I don't get paid for this, unlike the wordsmiths employed to cover over the real gaps in building proposals.

(Objects)

Comment submitted date: Fri 15 Nov 2019

1. Damage to the historic environment and Bermondsey street conservation area.
2. Not clear on public benefits
3. Disruption during and after construction to people living around the area.
4. Construction work and HGV vehicles causing an increase in pollution

(Objects)

Comment submitted date: Fri 15 Nov 2019

Harm to the historic environment

(a) Damage to the historic environment and Bermondsey St conservation area.

These proposals radically change the long-established principles applying to planning applications in and around conservation areas:

They are on a scale not previously considered remotely acceptable inside a conservation area (Sellar) or immediately adjacent to it (both Sellar and CIT).

The Sellar scheme involves the destruction of the Vinegar Yard warehouse

Both schemes significantly harm the setting of designated heritage assets

(b) Bogus 'public benefits'

Affordable workspace for artists/makers. This is the trite claim they reach for on autopilot. It is the commercial schemes' equivalent of social housing, but not remotely so developed as a Southwark policy. There is a draft policy in the unadopted New Southwark Plan but it is hopelessly vague - to the point of being meaningless. Southwark Studios (an elusive operation put forward by CIT and the Council to implement and manage the studios) were not prepared to explain either what they offer or what their relationship is with either the Developers or the Council. They responded to a studio inquiry with a message that they would not have any studios 'until we reopen in a few years'. This kind of claim for 'public benefits' is completely worthless and cannot justify any heritage loss whatsoever.

Cultural facilities (a 'music venue'). This is the CIT offering but again they could not identify any viable commercial model or any example of what this claim would amount to in practice. It quickly becomes obvious that they know little and care less about the practicalities of operating a live music venue.

Retail facilities. They're scraping the barrel by the time they get onto claiming that we should sacrifice local heritage for a few more chain shops and restaurants. But nothing is too brazen for them.

Fuel-cell driven energy efficiency. This was another kite being flown by CIT. But when pushed to explain the technical details again they fell apart. In fact they couldn't even explain what it meant. They were going to furnish us with the interesting details and point us to some precedents. But two weeks later we have received nothing.

Jobs. Presently this is the best the Council can do to claim public benefits. They have a problem in that policy doesn't allow them to claim that pay-offs to them from the developers amount to a public benefit. Jobs flow from any viable commercial development, so claiming that more offices is a public benefit to justify heritage loss will be straining the limits of their 'planning judgment'. Inappropriately planners are given a wide discretion on how they construe public benefits to outweigh heritage. But they will be vulnerable to challenge if they rely on speculative office development for this. Just as many jobs (in a better environment) can be created from the restoration of a historic building as by demolishing it. Our own fully commercially viable offer to restore the vinegar warehouse would ensure the revival of the floorspace in a way that would genuinely attract creative industries - not put them off like Sellar's glass tower that they and the Council want to replace it with.

Wind tunnelling and overshadowing

Disruption during and after construction

(Objects)

Comment submitted date: Thu 14 Nov 2019

This development will mean 5 years of disruption to the local area with huge numbers of HGVs, noise, pollution and will ruin the local neighbourhood. We will lose tourist and local traffic which will have a severe impact on the local businesses. It will also destroy a beautiful historic building and there is no evidence based on the half empty Shard) that there is a need for all this additional space.

This is a conservation area, and the development is hugely destructive to the local area.

(Objects)

Comment submitted date: Thu 14 Nov 2019

CIT 18/AP/4171 - Objection .

I am mindful that the definition of a Conservation Area by Southwark Council is -

" Conservation areas are protected by law due to their special or historic architectural character and appearance . It's our role to ensure that character and appearance of conservation areas is preserved and enhanced through the planning process ".

This emphatically states an obligation to ensure that any future proposed development both inside and adjacent to the designated conservation area must be strongly empathetic in character and appearance to that of the Conservation Area .

The essence and focal point of the Conservation Area is Bermondsey Street , it is a typical historic shopping street , building frontages continuously at the back of pavement , two/three/four story high buildings each side of the street with narrow frontages of varying architectural character and appearance .

It is noted that the South West corner of this development site is in the designated Conservation Area and the whole site is directly adjacent to the Bermondsey Street Conservation Area to the South

The following are my 8 primary objections -

[1] - The Massing Strategy of the Proposed Development - The density of building at one end of the site is very high and at the other very low. This characteristic is not compatible with historic urban form of the directly adjacent Conservation Area.

Suggestion - Develop the site with an even development pattern and with a maximum height of no more than 6 stories plus a recessed top story , this will be compatible with urban form of the Conservation Area.

[2] - The Height of the Proposed Building - The proposed main building height of 20 stories is far too high and will overwhelm the Conservation Area.

Suggestion - Any proposed building height should be no greater than 6 stories with a further story recessed and the buildings of this height should be over the full site footprint except for the Vinegar Yard passage [see item 4] and the existing warehouse on the South West corner of the site [see item 7].

[3] - The Proposed Pavilion - The architectural character of the 3 storey octagonal pavilion at the

East end of the site which has the appearance of an oversized sea side ice cream parlour is incompatible with the urban character of the Conservation Area.

Suggestion - Eliminate the proposed pavilion from the scheme.

[4] - The Area of Pedestrian Paving - The ambiguous area of pedestrian paving on the East side of the site is unacceptable and out of character with the Conservation Area.

Suggestion - reduce the paving area to 6 metres wide to create a pedestrian passage aligned with the proposed passage of the adjacent other development site by Sellar. The development potential of this site would be enhanced if the Vinegar Yard passage was moved 20 metres to the West, the site to the East of the proposed relocated Vinegar Yard pedestrian passage would be a reasonable sized development site.

[5] - The Proposed Pedestrian Passage - The proposed very narrow passage on the Southern boundary of the site between Fenning Street and Vinegar Yard is an unnecessary feature. This passage way will encourage anti-social behaviour and be a health and safety risk at night.

Suggestion - Eliminate this pedestrian passage.

[6] - The Overwhelmed Horseshoe Inn - This delightful pub, 1900 architectural style pub 3 stories high and is located in the designated Conservation Area in juxtaposition to the proposed 20 storey building. The proposed 20 storey building swamps the pub and this is a totally unacceptable situation.

Suggestion - Reduce the height of the proposed development to 6 stories with a further set back top storey.

[7] - The Melior Street Frontage. The existing 2 story warehouse No 9 Fenning Street is on the back of pavement of both Melior Street and Fenning Street and is on the designated Conservation Area. This warehouse provides excellent urban setting for the Horseshoe Inn, however the proposal is to demolish this warehouse, then increase the side walk pavement width from the existing 1.5 metres to 7 metres with the proposed 20 storey facade at the back of this much wider proposed pavement. The proposed paving width and the very tall building looming over the Horseshoe Inn creates an awful situation not acceptable, it damages the Conservation Area.

Suggestion - Retain the 2 storey warehouse No 9 Fenning Street located on the designated Conservation Area for studio type space as an item of the Planning Gain.

[8] - The Amount of Retail Floor Area - A pertinent consideration is the balance of the proposed retail provision of this development and the retail provision in Bermondsey Street, to ensure the retail provision in Bermondsey Street is not placed in a detrimental position.

Suggestion - Reduce the proposed retail floor space of this development.

(Objects)

Comment submitted date: Thu 14 Nov 2019

I object to this proposal.

It is clearly disproportionate to the conservation area of Bermondsey Street. The proposed

development will harm the historic environment and conservation area.

Most importantly - a community led alternative has been proposed, which would allow a redevelopment in harmony with character of the surrounding conservation area.

(Objects)

Comment submitted date: Thu 14 Nov 2019

As an employer on Bermondsey Street, I absolute object to this proposal.

It is clearly (at 20 stories) completely disproportionate to the thriving conservation area. There is already a wind tunnel created by the Shard and other building on Thomas street, this will only affect this even more.

It will damage the historic environment and conservation area. Importantly, access and infrastructure to the area is already poor - what happens in the event of an emergency?

(Objects)

Comment submitted date: Thu 14 Nov 2019

Harm to the historic environment

False justification - Catastrophic precedent

(a) Damage to the historic environment and Bermondsey St conservation area.

These proposals radically change the long-established principles applying to planning applications in and around conservation areas:

They are on a scale not previously considered remotely acceptable inside a conservation area (Sellar) or immediately adjacent to it (both Sellar and CIT). This is completely at odds with what the Bermondsey St conservation area was created to conserve and significantly harms its character and views both from outside and within it.

The Sellar scheme involves the destruction of the Vinegar Yard warehouse, apart from a token part-preservation of the exterior walls, with the complete loss of its original identity by forcing a 17-floor glass tower block through and it and overhead.

Both schemes significantly harm the setting of designated heritage assets: the grade 2 listed St Thomas St/Crucifix Lane railway arches, 49-55 Bermondsey St, 59, 61 and 63 Bermondsey Street, 68-76 Bermondsey Street and 78 Bermondsey Street.

(b) Bogus 'public benefits'

Any meaningful 'consultation' would allow local people to learn what benefits it is alleged they will enjoy in exchange for the loss of their local heritage. No such openness has been forthcoming. Sellar has refused to respond on this point, as have the Council. CIT at least offered us a few examples of the straws that their scheme will be clutching at:

Affordable workspace for artists/makers. This is the trite claim they reach for on autopilot. It is the commercial schemes' equivalent of social housing, but not remotely so developed as a Southwark policy. There is a draft policy in the unadopted New Southwark Plan but it is hopelessly vague - to the point of being meaningless. Southwark Studios (an elusive operation put forward by CIT and the Council to implement and manage the studios) were not prepared to explain either what they offer or what their relationship is with either the Developers or the Council. They responded to a studio inquiry with a message that they would not have any studios 'until we reopen in a few years'. This kind of claim for 'public benefits' is completely worthless

and cannot justify any heritage loss whatsoever.

Cultural facilities (a 'music venue'). This is the CIT offering but again they could not identify any viable commercial model or any example of what this claim would amount to in practice. It quickly becomes obvious that they know little and care less about the practicalities of operating a live music venue.

Retail facilities. They're scraping the barrel by the time they get onto claiming that we should sacrifice local heritage for a few more chain shops and restaurants. But nothing is too brazen for them.

Fuel-cell driven energy efficiency. This was another kite being flown by CIT. But when pushed to explain the technical details again they fell apart. In fact they couldn't even explain what it meant. They were going to furnish us with the interesting details and point us to some precedents. But two weeks later we have received nothing.

Jobs. Presently this is the best the Council can do to claim public benefits. They have a problem in that policy doesn't allow them to claim that pay-offs to them from the developers amount to a public benefit. Jobs flow from any viable commercial development, so claiming that more offices is a public benefit to justify heritage loss will be straining the limits of their 'planning judgment'. Inappropriately planners are given a wide discretion on how they construe public benefits to outweigh heritage. But they will be vulnerable to challenge if they rely on speculative office development for this. Just as many jobs (in a better environment) can be created from the restoration of a historic building as by demolishing it. Our own fully commercially viable offer to restore the vinegar warehouse would ensure the revival of the floorspace in a way that would genuinely attract creative industries - not put them off like Sellar's glass tower that they and the Council want to replace it with.

Wind tunnelling and overshadowing

You don't need a computer model to recognise that lining St Thomas St with four new towers will turn it into a wind tunnel - it already is. There is no complete analysis of the extent of the increased wind effect of the further developments because the last of the four high-rises, Becket House, has not yet been unveiled. Equally obvious is that the railway arches will be cast into permanent shadow and robbed of their potential to make St Thomas St the inviting public realm it should be.

Disruption during and after construction

In construction Even excluding the Greystar and Becket House contributions the CIT and Sellar schemes require hugely disruptive construction processes. These include a three floor basement proposed across the whole CIT site, two floors in the tower block replacing the vinegar warehouse and one in the Bermondsey St buildings. This takes them far below the water table and means several thousand 30-tonne grabber lorries coming and going from the sites to remove hundreds of thousands of tonnes of spoil from the excavations. Neither the Council nor the Developers will be drawn on this matter either. They will try to get away with claiming that it can all be sorted out after they get permission in a 'construction management plan'. When they finally tell us what it entails they will at the same time tell us it is too late to challenge the planning consent that made it inevitable.

Servicing the completed developments The whole St Thomas St jamboree will produce a ten-fold increase in floorspace across the sites taken together. CIT claim Fenning, Melior and Weston Streets present a perfectly viable means of supplying the entire series of developments. This they claimed would be via two lorry bays in Fenning St that would bring in supplies 'consolidated outside the M25' using exclusively electric vehicles. However, there are no details of this fanciful plan. Less still is there any evidence that all the landowners have signed up to it.

(Objects)

Comment submitted date: Wed 13 Nov 2019

Strongly opposed to this planning application. This application for development is on land directly adjacent to the Bermondsey Street Conservation Area. Its scale is massive in this context, with negative impacts on views within/out of the conservation area, and on its special character. If completed, the development would negatively impact on the setting of designated heritage assets (including the listed St Thomas Street/Crucifix Lane railway arches, and 49/55, 59, 61, 63, 68-76, and 78 Bermondsey Street).

Set against this harm, none of the contended planning gains from the scheme - such as affordable workspace for artists, vague talk of cultural and retail facilities, fuel cell energy provision, jobs etc - convince. These benefits are indeed very vague and the danger is that they will be misconstrued in the planning process.

This scheme is only part of the linked high-rise rebuilding of the St Thomas Street "corridor", and it will contribute its fair share of long-term local damage: 'wind tunneling', overshadowing of local buildings, disruption during construction, higher traffic levels upon completion.

(Objects)

Comment submitted date: Sat 09 Nov 2019

I strongly object to this plan. We have already seen the approval of Greystar's development against the community's wishes. I hope this will make the planning committee slow down and give closer attention to the real impact of these developments.

-- the design is not in keeping with the characterful area. The glass frontages seem cheap and thoughtless.

-- the height of the buildings will have a negative impact on me as a neighbour and many others around- real environmental impact with wind, light and privacy. Also locking in smaller residential buildings more in keeping with the area.

-- shop frontages and retail space, this has been offered as community benefit but will in fact damage the local community and independent shops we enjoy on Bermondsey Street and Snowfields. The glass frontages make it look like Canary Wharf rather than historic old Southwark.

-- I worry about the impact to myself and my property during construction- Southwark council have an obligation to take measures to reduce pollution. This proposal alone, let alone alongside the others in St Thomas Street East will endanger our health and wellbeing.

--when the pre-fab buildings on this site were removed we experienced damage to our walls including cracking. A building of this height, requiring such deep foundations will have very real impact on our building. Nothing has been considered about this.

-- and finally but most importantly, after declaring a climate emergency, Southwark council should be doing everything to encourage climate positive development. This development has real potential to lead the way in creating carbon neutral developments, creating greener, healthier spaces for the local community. It's really disappointing that Southwark is not putting this declaration into action.

(Objects)

Comment submitted date: Sat 09 Nov 2019

The CIT scheme significantly harms the setting of designated heritage assets: the grade 2 listed St Thomas St/Crucifix Lane railway arches.

(b) 'Bogus public benefits'

There has been no meaningful 'consultation' which would allow local people to learn what benefits it is alleged they will enjoy in exchange for the loss of their local heritage. CIT at least offered a few examples of their scheme such as: Affordable workspace for artists/makers by an organisation called Southwark Studios. On investigation Southwark Studios were not prepared to explain either what they offer or what their relationship is with either the Developers or the Council. They responded to a studio inquiry with a message that they would not have any studios 'until we reopen in a few years'. This kind of claim for 'public benefits' is completely worthless and cannot justify any heritage loss whatsoever.

Cultural facilities (a 'music venue'). This is the CIT offering but again they could not identify any viable commercial model or any example of what this claim would amount to in practice.

Retail facilities. There is no justifiable reason to sacrifice local heritage for a few more chain shops and restaurants, as has been seen with the destruction of the South Eastern Railway building on Tooley Street.

Fuel-cell driven energy efficiency.

This was another example by CIT. But when asked to explain what it meant to a local action group, of which I attended, they couldn't. And to date nothing has been received.

On Jobs. Presently this is the best the Council can do to claim public benefits. Jobs flow from any viable commercial development, but claiming that more offices is a public benefit to justify heritage loss is straining the limits of 'good planning judgment'. Just as many jobs (in a better environment) can be created from the restoration of a historic building as by demolishing it.

Wind tunnelling and overshadowing: Lining St Thomas St with four new towers will turn it into a wind tunnel - it already is. There is no complete analysis of the extent of the increased wind effect of the further developments because the last of the four high-rises, Becket House, has not yet been unveiled. Equally obvious is that the railway arches will be cast into permanent shadow and robbed of their potential to make St Thomas St the inviting public realm it should be.

Disruption during and after construction. In construction, even excluding the Greystar and Becket House contributions, the CIT scheme requires hugely disruptive construction processes. These include a three floor basement proposed across the whole CIT site. This takes them far below the water table and means several thousand 30-tonne grabber lorries coming and going from the sites to remove hundreds of thousands of tonnes of spoil from the excavations. Neither the Council nor the Developers will be drawn on this matter either.

Servicing the completed developments: The whole St Thomas St development will produce a ten-fold increase in floorspace across the sites taken together. CIT claim Fenning, Melior and Weston Streets present a perfectly viable means of supplying the entire series of developments. This they claimed would be via two lorry bays in Fenning St that would bring in supplies 'consolidated outside the M25' using exclusively electric vehicles. However, there are no details of this plan. Less still is there any evidence that all the landowners have signed up to it.

(Objects)

Comment submitted date: Sat 09 Nov 2019

As someone with family in the area who is currently looking to move back into it I am incredibly disappointed to see Southwark council even considering an application like this.

The proposed building is hideous and totally not in keeping with the character of the area. Bermondsey St is meant to be a conservation area. The many years of construction will be hugely

disruptive and harmful to family life for many years. Furthermore, the inevitable wind-tunnel effects and over shadowing will just reduce the general quality of life of any resident. Any claims of public benefits are laughable - more chain restaurants is not what the area needs. The 'music venue' suggested without any reference to how this will operate in practice again shows absolutely no consideration for residents' needs.

I strongly object to this application and if it goes ahead will not be proceeding to move into the area.

(Objects)

Comment submitted date: Sat 09 Nov 2019

As a resident on Leathermarket street and having moved to this area for it's distinct character, we wholeheartedly object to this development.

Firstly it goes against the climate emergency declared by Southwark Council on the 16th April 2019.

It is completely against the principles and will damage the Bermondsey St conversation area.

This excessive development will destroy the identity of this unique area of Southwark and make it into a characterless commercial space of prefab glass. In this age of awakening around climate change and environment destruction we should be looking at making more green spaces.

There is an absolute lack of vertical gardens or any green features (just token planter pots).

The construction itself will totally destroy the area and a 3 storey basement will require a continuous chain of dump trucks on roads that are completely not prepared for. This will significantly impact local trade and have a negative impact on the students and hospital area.

Including risk of accidents.

The skyline from Leathermarket gardens will be completely destroyed and all the buildings in the surrounds will be dwarfed facing panes of prefab and glass.

Constructing these featureless towers does not constitute planning, school children could come up with better options. The lack of affordable housing points towards blind greed apathy for everything this beautiful area stands for.

(Objects)

Comment submitted date: Fri 08 Nov 2019

I strongly object to the proposal for the following main reasons.

This proposal would result in damage to the historic environment and Bermondsey St conservation area. It radically change the long-established principles applying to planning applications in and around conservation areas.

It is on a scale not remotely acceptable inside a conservation area or immediately adjacent to it.

This is completely at odds with what the Bermondsey St conservation area was created to conserve and significantly harms its character and views both from outside and within it.

The scheme also destroys the identity of the Shard by neighbouring it with poor designs which interrupt views of this iconic and important modern work.

(Objects)

Comment submitted date: Fri 08 Nov 2019

As an employer on Bermondsey Street (near St Thomas Street junction), I absolute object to this proposal.

It is clearly (at 20 stories) completely disproportionate to the thriving conservation area. It will dwarf other buildings and create a wind tunnel. It will damage the historic environment and conservation area. Importantly, access to the area is already poor - what happens in the event of an emergency?

No-one who cares about the residents or neighbours of the area would ever consider this.

(Objects)

Comment submitted date: Fri 08 Nov 2019

I live on Bermondsey Street. I object to the development as it is totally disproportionate in size and scope to the other buildings on Bermondsey Street and so is completely at odds with the aims of the Bermondsey Street conservation area. Further the existing tall buildings on St Thomas Street have already turned parts of it into a wind trap and this will make that effect much worse. In addition this development will also lead to St Thomas Street being completely overshadowed and devoid of natural light. Finally the proposed construction will cause considerable disruption to vehicular and pedestrian traffic both during construction and afterwards. for instance there is already heavy pedestrian traffic in the area which can make it difficult to get around and this will make matters much worse.

(Objects)

Comment submitted date: Fri 08 Nov 2019

Developments must be in keeping with the heritage of their surrounding areas. These developments along St Thomas St do not seek to retain buildings of historic heritage and are far too high and dense for this historic neighbourhood.

They will negatively impact the Bermondsey St conservation area, provide no/limited open public space and will overwhelm the local skyline.

I am supportive of the sites being redeveloped as long as they are undertaken more sympathetically.

(Objects)

Comment submitted date: Tue 05 Nov 2019

As a local resident, I strongly oppose this development.

It is simply not possible to justify the case for a 20 storey building in this area (with an excessive 3 storey basement, for which I have serious concerns about stability of neighbouring buildings), particularly given the conservation status of the local area which implies strict planning criteria. People who have chosen to purchase property and live in this area have done so on the expectation that this conservation area status be upheld, and not for their windows to be directly blocked with characterless tower blocks.

As a local resident, this building will directly impact the light and privacy of my home, and force the local community to endure more years of development noise, disruption and pollution when we've only just had traffic access allowed back to the area following the extended London Bridge development.

I would also expect the council to review this planning permission alongside the other tower blocks which are being proposed along St Thomas Street. The combination of all of these developments is very clearly not in the interest of current residents (the objections in the public comments for both developments currently under reconsultation in this area all demonstrate how opposed the existing community is to such over-development, with a clear focus on the unnecessary heights being proposed), when the area is already restricted in terms of local services. For example, even routine rubbish collections are already severely lacking for the existing residents along Bermondsey Street - let alone with the addition of a 20 storey building.

It is also unclear as to why the council is re-consulting on this proposal, given that the changes to the previous plans are so minor ('increased planting on terraces', for example, clearly does nothing to remedy the negative impacts on privacy and light for existing residential buildings, nor the clear wind tunnel effect from such a large building alongside the Shard). There should be material revisions to current proposals (importantly with caps on the number of storeys allowed for such buildings, given that they are adjacent to a protected area), before they are reconsidered.

(Objects)

Comment submitted date: Tue 05 Nov 2019

I oppose this development.

The key concerns I have are:

- The development is far too high at 20 storeys and there has been no meaningful alteration to that in the previous versions. A limit should be placed on buildings in the area of 7-10 floors maximum.
- The area around St Thomas St has seen almost decade of redevelopment works from the Shard to London Bridge station. While this have brought some benefits to the area, residents have had to endure the impacts these works have had (noise, dust, traffic, visual) for a long period. These works extend that period even longer.
- The areas simply does not need further commercial space. Much of the London Bridge station development remains vacant despite claims it would be occupied by 2018. More vacant space or just as bad, chain establishments will not to be desirable.

(Objects)

Comment submitted date: Tue 05 Nov 2019

As an owner of a business on Bermondsey St. I am deeply concerned about the noise nuisance & pollution affects the development work will create. In addition to this, I suspect it will further add to the wind tunnel situation that already exists on the street and which is extremely unpleasant as

it stands.

Overall, I strongly object to the development.

(Objects)

Comment submitted date: Tue 05 Nov 2019

This development is completely out of character and scale with the heritage of the area as acknowledged by experts including English Heritage.

The height will destroy the beauty of the Shard's outline view.

The height and scale will reduce St Thomas St to a dark windy canyon and deter cycling and walking as well as deter outside activity in the businesses in the arches.

The design is very ugly.

(Objects)

Comment submitted date: Mon 04 Nov 2019

This is out of keeping with the character of area, and is an over development.

(Objects)

Comment submitted date: Mon 04 Nov 2019

Dear Sirs

I strongly object to the proposal regarding Land Bounded By St Thomas Street Fenning Street Vinegar Yard And Snowfields for the following reasons.

Damage to the historic environment and Bermondsey St conservation area.

These proposals are out of step with the long-established principles applying to planning applications in and around conservation areas:

- They are on a scale not previously considered acceptable inside a conservation area or immediately adjacent to it. This proposal is at odds with what the Bermondsey St conservation area was created to conserve and significantly harms its character and views both from outside and within it.
- the scheme harms the setting of designated heritage assets: the grade 2 listed St Thomas St/Crucifix Lane railway arches, 49-55 Bermondsey St, 59, 61 and 63 Bermondsey Street, 68-76 Bermondsey Street and 78 Bermondsey Street.

Bogus 'public benefits'

It is not clear at all what public benefit will ensure from this development. In fact, the reverse seems to be the case: there will be public detriment from reduced environmental harmony, increased traffic and increased pollution. In New York, glass buildings are no longer being built in recognition of the climate change damage they cause. The proposed development shows no regard for the climate change damage that will be caused.

- The developers say there will be affordable workspace for artists/makers. This is not clear in the

proposals. . Southwark Studios have not been prepared to what they offer or what their relationship is with either the Developers or the Council. They responded to a studio inquiry with a message that they would not have any studios 'until we reopen in a few years'. This kind of claim for 'public benefits' is completely worthless and cannot justify any heritage loss whatsoever.

- Cultural facilities (a 'music venue'). This is the CIT offering but again they could not identify any viable commercial model or any example of what this would amount to in practice. It is not at all clear that they understand or have thought through the practicalities of operating a live music venue.

- Retail facilities. It is not clear there is still need for more retail facilities. The current retail facilities in the area are closing all the time

- Fuel-cell driven energy efficiency. CIT have failed to explain the technical - or any other - details of this.

- Jobs. It is not clear why more offices are a 'public benefit' sufficient to justify heritage loss. Just as many jobs (in a better environment) can be created from the restoration of a historic building as by demolishing it.

Wind tunnelling and overshadowing

- There is already wind tunnel effect on St Thomas Street as a result of the Shard. It will become extremely unpleasant if the tunnelling extends down the length of the street. This will make it very unpleasant to walk down the street which will make visitors and others less likely to use the street, thus imperilling the businesses in Bermondsey Street because people will not want to walk from London Bridge along St Thomas Street to reach Bermondsey Street. This will significantly and adversely affect the thriving business and social community in Bermondsey Street.

Something the Council should be trying to protect. Equally obvious is that the railway arches will be cast into permanent shadow and robbed of their potential to make St Thomas St the inviting public realm it should be.

Construction destruction: the redevelopment would entail massive excavation works putting the water table at risk and damaging the environment. This is unnecessary and should not be permitted.

Ongoing servicing would be disruptive: the access to/from the site for ongoing servicing of these massive properties is wholly inadequate and serving them will cause permanent congestion, pollution and lack of amenity for the humans who will be trying to live and be in nearby places. The noise pollution for nearby residents as lorries go back & forth would be extremely unpleasant.

None of this is needed as alternative human-friendly alternative proposals are available and could be approved instead.

(Objects)

Comment submitted date: Mon 04 Nov 2019

The Vinegar Yard warehouse building should be kept as it is and restored, adding 17 floors of a modern building inside it just doesn't look right. Also, the Neutral comments made on 29th July refers to the plan for 'St Thomas St Boulevard'. A boulevard is described as a wide, open road running through a city. The plans as shown will create a canyon in St Thomas St not a boulevard. The wind tunnel already created along St Thomas St by the Shard (everyone who walks along that road has experienced this and it can be difficult to walk against some days, even when the

winds are not high elsewhere) will only be exacerbated by more tall buildings along St Thomas St.

(Objects)

Comment submitted date: Mon 04 Nov 2019

Harm to the historic environment

False justification - Catastrophic precedent

(a) Damage to the historic environment and Bermondsey St conservation area.

These proposals radically change the long-established principles applying to planning applications in and around conservation areas:

They are on a scale not previously considered remotely acceptable inside a conservation area (Sellar) or immediately adjacent to it (both Sellar and CIT). This is completely at odds with what the Bermondsey St conservation area was created to conserve and significantly harms its character and views both from outside and within it.

The Sellar scheme involves the destruction of the Vinegar Yard warehouse, apart from a token part-preservation of the exterior walls, with the complete loss of its original identity by forcing a 17-floor glass tower block through and it and overhead.

Both schemes significantly harm the setting of designated heritage assets: the grade 2 listed St Thomas St/Crucifix Lane railway arches, 49-55 Bermondsey St, 59, 61 and 63 Bermondsey Street, 68-76 Bermondsey Street and 78 Bermondsey Street.

(Objects)

Comment submitted date: Mon 04 Nov 2019

Such a huge tower at the limit of the conservation area of Bermondsey street would profoundly alter and threaten the character of our neighbourhood.

It would be a great pity to lose the original Vinegar Yard warehouse. This atmospheric building is a beautiful testimony to the historic past of the area. Rather than gutting it and dwarfing it by sticking a huge tower of offices on it, it would be better to rehabilitate the building and turn it into a space that is more welcoming to the many creative businesses of the neighbourhood.

These huge office blocks will bring even more people to the neighbourhood, more chain shops, putting pressure on our unique community and life here in Bermondsey street.

The area is already under demographic pressure from existing people living and working here.

Anyone trying to take the tube at rush hour from London Bridge will know what I refer to!

At the moment the gales of wind we experience when walking on St Tomas st towards the station are already very violent. Adding more high rises will only make the problem worse. Making it a windy, hostile corridor with no sun light. The current flee market on Vinegar Yard is a great place for the local community and workers to gather after work and enjoy some sun in the summer.

Building some low buildings, with open spaces in the middle would be a much better use of private and public funds !

(Objects)

Comment submitted date: Mon 04 Nov 2019

I object to building of high rise buildings ref no18/AP/4171 on the Fenning street site. Although i dont live in this area i frequent it a lot as i love the atmosphere and the old buildings etc around here.

(Objects)

Comment submitted date: Mon 04 Nov 2019

Harm to the historic environment
False justification - Catastrophic precedent

(a) Damage to the historic environment and Bermondsey St conservation area.
These proposals radically change the long-established principles applying to planning applications in and around conservation areas:

They are on a scale not previously considered remotely acceptable inside a conservation area (Sellar) or immediately adjacent to it (both Sellar and CIT). This is completely at odds with what the Bermondsey St conservation area was created to conserve and significantly harms its character and views both from outside and within it.

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(b) Bogus 'public benefits'

Any meaningful 'consultation' would allow local people to learn what benefits it is alleged they will enjoy in exchange for the loss of their local heritage. No such openness has been forthcoming. Sellar has refused to respond on this point, as have the Council. CIT at least offered us a few examples of the straws that their scheme will be clutching at:

Affordable workspace for artists/makers. This is the trite claim they reach for on autopilot. It is the commercial schemes' equivalent of social housing, but not remotely so developed as a Southwark policy. There is a draft policy in the unadopted New Southwark Plan but it is hopelessly vague - to the point of being meaningless. Southwark Studios (an elusive operation put forward by CIT and the Council to implement and manage the studios) were not prepared to explain either what they offer or what their relationship is with either the Developers or the Council. They responded to a studio inquiry with a message that they would not have any studios 'until we reopen in a few years'. This kind of claim for 'public benefits' is completely worthless and cannot justify any heritage loss whatsoever.

Cultural facilities (a 'music venue'). This is the CIT offering but again they could not identify any viable commercial model or any example of what this claim would amount to in practice. It quickly becomes obvious that they know little and care less about the practicalities of operating a live music venue.

Retail facilities. They're scraping the barrel by the time they get onto claiming that we should sacrifice local heritage for a few more chain shops and restaurants. But nothing is too brazen for them.

Fuel-cell driven energy efficiency. This was another kite being flown by CIT. But when pushed to explain the technical details again they fell apart. In fact they couldn't even explain what it meant. They were going to furnish us with the interesting details and point us to some precedents. But two weeks later we have received nothing.

Jobs. Presently this is the best the Council can do to claim public benefits. They have a problem in that policy doesn't allow them to claim that pay-offs to them from the developers amount to a public benefit. Jobs flow from any viable commercial development, so claiming that more offices is a public benefit to justify heritage loss will be straining the limits of their 'planning judgment'. Inappropriately planners are given a wide discretion on how they construe public benefits to outweigh heritage. But they will be vulnerable to challenge if they rely on speculative office development for this. Just as many jobs (in a better environment) can be created from the restoration of a historic building as by demolishing it. Our own fully commercially viable offer to restore the vinegar warehouse would ensure the revival of the floorspace in a way that would genuinely attract creative industries - not put them off like Sellar's glass tower that they and the Council want to replace it with.

Wind tunnelling and overshadowing

You don't need a computer model to recognise that lining St Thomas St with four new towers will turn it into a wind tunnel - it already is. There is no complete analysis of the extent of the increased wind effect of the further developments because the last of the four high-rises, Becket House, has not yet been unveiled. Equally obvious is that the railway arches will be cast into permanent shadow and robbed of their potential to make St Thomas St the inviting public realm it should be.

(Objects)

Comment submitted date: Mon 04 Nov 2019

This is the usual commercial development that seeks to pay lip service to the adjoining areas conservation status and to public benefits, but in practice will ignore all of these once approved. The Councils enforcement of conditions has always been very limited to nonexistent. We are still living with this with the ApartHotel at the bottom of Bermondsey St.

(Objects)

Comment submitted date: Mon 04 Nov 2019

The buildings proposed would be far too high and completely out of character. This is especially true the the vinegar yard warehouse, an iconic building being completely destroyed by putting a 17 story building on top of it.

(Objects)

Comment submitted date: Mon 04 Nov 2019

Objection given the area lacks public open space and does not have 20 storey buildings apart from council flats further away and the Shard. Another such building will block light, increase

traffic (people and people with cars) and create wind tunnels in the area (already have such issues on Bermondsey Square). More public open space is needed like Vinegar Yard as it is now. The construction of such a building just is not needed in this area which is already at capacity. It is also ULEZ - the cars / parking is only going to increase air / noise pollution. The construction itself will take a toll on the area given years of construction already from Shard and from London Bridge Station. The main thing to emphasise is - no destruction of pre-existing buildings and no more multi-level new construction for any purpose given the area is already at over capacity and let's be honest here, if residential completely unaffordable for local residents. The shop spaces if any will remain empty due to price of rent. Any social housing if any is also generally not welcome by potential investors.

(Objects)

Comment submitted date: Mon 04 Nov 2019

In addition to the ticked boxes above - the total disregard of the Old Vinegar Yard building - completely overshadowed and subsumed by this monstrous glass block. This is supposed to be a conservation area where we protect what little is left of old Bermondsey.

(Objects)

Comment submitted date: Thu 31 Oct 2019

This is yet another tall building to overshadow the charm of this historic area of mixed housing and small business.

I have reviewed the wind consultation documents which I would disagree with from personal experience. If the area along St Thomas Street, Fenning Street and Snowsfields is allowed to be overdeveloped in this way then walking in the local area will become a breathtakingly difficult experience. The current applications in this area will have a cumulative negative effect on the residents and any visitors attempting to explore on foot. The height of all the buildings should be reviewed and the total negative effect measured as if all the plans are passed and not on an individual application basis.

(Objects)

Comment submitted date: Wed 30 Oct 2019

The neighborhood has been suffering severely from over development with the height of the proposed buildings too high to fit in the historic Bermondsey street. The population density of the area is already too high and this will decrease further the quality of life of local residents and visitors alike due to over crowding and proximity to one of London's busiest transport link.

The construction and the routine service of the proposed high rises will increase lorry traffic, exacerbates the air pollution problem. The increase in traffic will choke both the London Bridge, and the Tower Bridge Road, as well as Long Lane, impede the ambulance services to and from the Guy Hospital, and harm the health of the children in nearby school schools.

It will continue to diminish the unique character of the neighborhood, diminish the standing of cherished monuments such as the Tower Bridge and the Southwark Cathedral.

The plan should be revised further to reduce the height and density of the proposed buildings.

(Objects)

Comment submitted date: Wed 30 Oct 2019

This development is too large and creates a hazard for the area. The streets can not accommodate the needed emergency services to combat a disaster such as a fire. This would put all the surrounding buildings and schools in imminent danger. There are developments in the area that are already posing problems with the amount of students that will be living nearby. The delivery and garbage service trucks needed for a 20 story building will mean the surrounding small streets will constantly be obstructed causing danger and massive inconvenience to the surrounding families.

(Objects)

Comment submitted date: Wed 30 Oct 2019

I strongly object to this planning application on the basis of height, scale, mass, architectural design and being out of character for a building next to the Bermondsey Street conservation area. this will significantly change the character of the area and make it look like any other part of the City north of the river. The plans should be scaled down significantly and be more appropriate. It is not for the Council to help the developers makes ungainly and huge profits by over-scaling the development before they leave and move onto their next venture leaving the neighbourhood changed forever and unnecessarily.

There are better ways for the Council to deliver on the Local Plan.

(Objects)

Comment submitted date: Tue 29 Oct 2019

I object.

Only a person whose eyes are fixed entirely on the money this scheme generates some could overlook the fact that this is an obvious skyscraper, whose height and scale is completely incongruous to the character of the neighbourhood.

I would implore Southwark Council to break with tradition and act at the behest of its constituents.

(Objects)

Comment submitted date: Mon 28 Oct 2019

Living less than 50 yards from proposed site strongly object to height of development,blocking out light and the license of a performance venue,noise nuisance,with the trouble we already have with the nouse of the pop up vinegar yard bar and food a new performance venue is not welcomed at all,I have to awake at 5am for work and have no need to be listening to somebody else's noise in the late hours of the night

(Neutral)

Comment submitted date: Mon 30 Sep 2019

We were hoping for the developer to reach out to his immediate residential neighbour which he hasn't done. Our initial concerns relate to the overhang on Melior Street, the details and qualities of the adjoining landscape and the impact of the security and lighting proposals for the residential part of the neighbourhood. We therefore maintain our right to object until the proposal has been explained in a meeting with us.

(Objects)

Comment submitted date: Wed 31 Jul 2019

I strongly object the plan. The proposed size is way out of the proportion of the neighbourhood and will cause unmanageable crowding and destroying the local character. The area bound by Long Lane, Tower Bridge Road, and Borough High street should be protected for the historic character. The streets are narrow and already the existing residents are suffering from increased traffic, noises, crowding, blocking of views/lights.

(Neutral)

Comment submitted date: Mon 29 Jul 2019

Team London Bridge (TLB) is the Business Improvement District (BID) representing approximately 400 businesses in the area between London Bridge to the west, Tower Bridge to the east, and south towards Bermondsey. TLB has a strong remit from businesses since 2015 to deliver the London Bridge Plan. Our mission is to ensure London Bridge excels as a leading place for global commerce and continues to develop as a pioneering local centre for enterprise, culture and entertainment.

TLB has welcomed the opportunity to inform development of the Vinegar Yard proposals. We made representations on the site through consultation on the New Southwark Plan (NSP) and in responding to the St Thomas Street East Framework and the earlier public consultation. We have considered the planning application in the context of new and emerging development plan policy in both the New Southwark Plan and London Plan and consistency with our London Bridge Plan. While cognisant of the existing development plan we believe these revised plans provide the most relevant planning policies for considering the site.

A shared vision: The Vinegar Yard site is highly significant, especially for its contribution to the potential of a St Thomas Street Boulevard, as set out in the London Bridge Plan.

We have welcomed the development of a shared approach through the St Thomas Street East Framework for the otherwise separate major developments planned for the area. The latest plans for Vinegar Yard do not fully meet the expectations of the latest iteration of the Framework 3.0 and the Design and Access Statement does not provide an analysis of the plans in respect of the Framework or any justification for departures. We have also identified a number of areas where the Framework itself needs to be strengthened. In order to properly consider the plans we believe it necessary for an assessment of their compatibility with Framework 3.0, developed since

submission of the planning application, to be provided.

Team London Bridge detailed comments to the application can be found at www.teamlondonbridge.co.uk/documents

Key points relate to:

- Delivering the St Thomas Street Boulevard vision
- The uses strategy, including cultural offer, maker space and retail uses
- Public realm and pedestrian flows
- Environment and greening
- Transport and servicing

We look forward to continuing to work with the landowners and prospective developers of the main sites along and around St Thomas Street to help deliver shared ambitions for this critical part of the London Bridge area.

(Objects)

Comment submitted date: Sun 23 Jun 2019

Strongly object to a 20 storey building with additional 3 basement levels. The size and height of this proposed development is clearly excessive, will block the views of current properties (causing further loss of light and privacy), and is not in keeping with the architecture of the local Bermondsey Street conservation area.

Also, following an extensive period of disruption with the redevelopment of London Bridge station, a development of this size would clearly entail another long period of disruption to local residents. It is also hard to see how this is needed, given there are many retail units which remain empty within the London Bridge development itself - which would suggest the proposed plans would be an overdevelopment of the local area.

A more reasonable approach to redevelop the old warehouse, whilst retaining its character and facade, would be more acceptable; but there absolutely is no justification for a 20 storey tower block over the borders of a clearly marked conservation area.

(Objects)

Comment submitted date: Sat 22 Jun 2019

I write on behalf of BermondseyStreet.London (formerly the Bermondsey Street Area Partnership), the local association for the Bermondsey Street area. Our members are local residents and businesses and we work together as volunteers to make our area as good as it can be for all who live here, work here or come to visit.

We welcome the public open space proposed in this application. Our area was assessed in 2014 by Greenspace Information for Greater London as falling significantly short of the standard park provision. Our area had 0.25ha of park provision per 1000 people, as compared with a standard of 0.72 ha per 1000. Since then the number of people living, working and visiting the area has grown, and so the shortage is even more acute now. Additional open space has the potential to be a great public amenity.

However, we believe that in the current proposals there is a high probability that the space will be too windy to use, due to the tall buildings proposed on the south (Sellar) and west sides (this CIT proposal). We remain unconvinced that the wind assessment fully takes into account the cumulative impact of the proposed tall buildings around the open space or that the wind mitigation measures proposed will be adequate. If the space is too windy to be comfortable then it will detract from, not add to public amenity, and the 10000 additional workers in the area will increase the pressure on existing parks and gardens. We therefore object to the height of the proposed development. We believe it is too tall.

We object to the height also on the grounds that it will materially damage the setting of the Bermondsey Street conservation area particularly in the way that it will loom over The Horseshoe Inn on Melior Place. The Horseshoe Inn is recognised in the conservation area assessment as making a notable contribution to the character of the area. At present, it looks substantial from the south against the open backdrop behind. By contrast, this proposed development would loom over it in an overpowering way, making it look cramped and uncomfortable.

(Objects)

Comment submitted date: Thu 20 Jun 2019

I strongly object to the high rise development which is completely out of keeping with the immediate area.

(Objects)

Comment submitted date: Wed 19 Jun 2019

I object to this planning application. As a local resident, I feel more consideration should be given to disturbance to people living in the area. Design of exits, passages and open spaces should be

made to reduce noise for residents, especially late at night when bars and restaurants close.

Snowsfields is a majority residential street and therefore footfall should be made to divert it straight to London Bridge station.

I also believe the warehouse conversion is a huge shame and losses a lot of the character of the Victorian warehouses in the neighbourhood. The height of the proposal is excessive and will tower above any neighbouring buildings and will crush the local environment. Historic England, SAVE Britain's Heritage, and the Victorian Society have also opposed this style renovation of a beautiful historic building, their professionalisms should be listened to before it is too late.

The proposed pedestrian passage along the Southern boundary of the site running between Fenning Street and The proposed pedestrian passage along the Southern boundary of the site running between Fenning Street and Winegar Yard will be a health and safety hazard at particularly at night. This pedestrian way is very narrow, only 2.5m wide and has no benefit to the local community.

The proposed quantity of flexible retail space [classes A1 to A5] should be considerably reduced to ensure that trading in Bermondsey Street is not compromised. Bermondsey Street must be supported and seen as the focal point to ensure that Bermondsey Street is constantly viable.

Overall the development doesn't seem to appreciate the environment or the local community. Too much emphasis is on commercial and night time economies. What benefit will this have for the local community, and what safeguards will be put in place to protect our peace.

(Objects)

Comment submitted date: Mon 17 Jun 2019

I live in Long Lane and object to this proposal in the strongest terms. A 20 storey building on St Thomas Street would be completely out of character with the immediate neighbourhood and will dwarf Bermondsey Street, Snowsfield and Vinegar Yard. It will also result in even taller buildings being proposed for other sites adjacent destroying the human scale of the area.

(Objects)

Comment submitted date: Tue 04 Jun 2019

I strongly object to this application. This area is a characterful neighbourhood and as such the warehouses and low level housing that comprise the majority of the buildings should remain the standard to which new planning applications should be made. A 20 story building would be totally out of character and would be a blight on this area. It would directly impact the availability and access to natural light of the existing properties in Bermondsey Street and surrounds. Also

the amount of extra traffic that this new development would bring would substantially increase the number of cars, trucks on the already busy streets and put further pressure on limited parking infrastructure.

(Objects)

Comment submitted date: Tue 28 May 2019

I strongly object to this planning application. The scale and height of the proposed buildings will interrupt the skyline and block the view of the Shard from multiple aspects along Bermondsey Street.

It is out of proportion to build a twenty storey structure on St. Thomas Street and will only prove to be an eyesore. It would be more in keeping with the neighbourhood if it was not allowed to be more than 6 storeys high. A building of the currently proposed scale cannot be good for the area or the environment, the basement would also be extremely damaging to the environment. The village like atmosphere here will be compromised, this proposed building will cram people in like rats into a tiny area. Disgusting, once again, a proposal just to make money and to hell with those who live in or just want to enjoy the area.

(Objects)

Comment submitted date: Tue 28 May 2019

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It is out of proportion to build a twenty storey structure on St. Thomas Street and will only prove to be an eyesore. It would be more in keeping with the neighbourhood if it was not allowed to be more than 6 storeys high. A building of the currently proposed scale cannot be good for the area or the environment.

Letters of Support

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

Comment submitted date: Thu 23 Jul 2020

Support letter received

(Supports)

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(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council, I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

Generally speaking, art created in any city or town attracts people and money. Bermondsey St started out with individual artists which attracted all manner of people, but it also had the added unfortunate result of pushing the rents up and making it unaffordable for the artists. This is why creating a space for artists to work is so important. The UK is internationally renowned for the art it produces. It is the strong arm of soft power. Let's do the same for Southwark.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

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(Supports)

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(Supports)

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(Supports)

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Dear Southwark Council

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(Supports)

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(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

Artists are such an important part of shaping and critiquing culture and society, and to have affordable artist studios in the heart of London is a must.

I do hope this proposal gets the green light to go ahead, and that this scheme will provide a diverse and inclusive space for artists to develop their work.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

Artists communities always bring up the living quality of an area, it is a wonderful way to improve your life.

Developers know this which is why they purchase buildings and move artists in to develop the community before they then take buildings and market them on the increased profits artists have brought in..

Please work actively to ensure artists can also develop long term.

In these new times ahead of us its a chance for blue sky thinking on empty office space in particular.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council, I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street

(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

My current studio was closed down due to planning permission going ahead in the Peak Freans Biscuit Factory. The factory is due to be demolished and 100s of small businesses like myself where served notice to quit.

Some have closed down and some have moved on due to COVID, I've had to temporarily close but I'm keen to find another studio as soon as possible so that my small business can reopen.

This scheme sounds wonderful and I'm very interested.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Neutral)

Comment submitted date: Thu 23 Jul 2020

Dear [REDACTED]

I noted the above planning application, which concerns creative workspace and cultural infrastructure. I would be interested in discussing the proposal with you, particularly in understanding the nature of the proposed creative workspace and its synergy with the local artistic community and London's wider creative workspace crisis and the draft new London Plan.

Could we set up a call perhaps in the first instance?

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street

(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

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(Supports)

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(Supports)

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(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

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(Supports)

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(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I work 9-5 for a very famous Young British artist, 6days a week, whom I have worked for four years now, I have gratitude for this opportunity and experience. But my intention to move to London 6 years ago was engineered for me to dive into my own studio development. In order to meet the magnitude of London rent prices and studio rent, I have to work this much. Which is very counterproductive, as I only get to spend late evenings in the studio in pitch black, but pay a lot for this. I've never had savings in my life because I invest it all into my studio rent and materials. Glasgow and Edinburgh have one of the most thriving art scenes in England because their studios remain cheap, affordable and noncrippiling...thus allowing artists to be adventure with their approach and employment. Aslong as London rent remains high, creatives and studios will perish and move elsewhere. Hence the resurgence of Margate, it all boils down to affordability.

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

I have been working as an artist in London since the 1980's and I am really worried about the lack of affordable spaces that are available for workshops and studios. The creative industries are just as important as housing and office space and the art are what make london am inclusive and creative city that you need to support.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

To me, affordable means no more than £150/month inclusive of bills, for a space big enough for a desk, some shelves, and a few meters of wall space. This could be a shared space with a few other artists, but hot desking is not enough.

I have many connections to Southwark as a citizen and as an artist, and I am passionate about this borough being a welcoming, supportive and constructive place for artists to establish their

practices.

Being a creative practitioner of any kind can be isolating and extremely challenging to build a sustainable career out of. Affordable, safe studio spaces that have heating and hot water, and a community of other artists, are essential for an artist particularly when starting out.

Yours sincerely,

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

Kindest Regards

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

I must however add that pricing should be a top level consideration in order to bring a diverse array of creatives, but also that there should be a focus on getting BAME / POC into this space. We must draw attention to this community because they are often overlooked.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

Right now people need art and creativity in their lives more than ever

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

I am an artist living and working Southwark, and it is become increasingly difficult to do both of these.

(Supports)

Comment submitted date: Thu 23 Jul 2020

I am happy to confirm that I believe this development will be good for the future of SE1. As a local resident I believe that this will be good use of an underused site and increase employment opportunities for locals

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I am a professional artist, I specialise in portraiture and have done for nearly 30 years, I live in Bermondsey. I have had a studio in and around Southwark for 15 years at the Art Academy in Southwark. Southwark Council has been very supportive of the Art Academy. I will have to move soon from your building in the old Southwark Library Walworth Road because you intend to redevelop it. The possibility of me moving into the proposed space at Vinegar Yard instead would really be a dream come true. This space sounds amazing!

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

Please feel free to count me in, let me know if there is anything I can do!

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

Comment submitted date: Thu 23 Jul 2020

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proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

Comment submitted date: Thu 23 Jul 2020

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(Supports)

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(Supports)

Comment submitted date: Thu 23 Jul 2020

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proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear [REDACTED] [REDACTED]

Hope you're well in these crazy times. I'm emailing as I've been renting an art studio at the Biscuit Factory for over two years and was served an eviction notice in March in the lockdown. It's really disappointing the building is being demolished with no art studios being added to the new development or any help for all the artists and creatives who have been in the building for years.

After graduating from Chelsea College of Arts in 2013 I rented a studio through ACAVA at Grange Walk for 18 months which was also demolished again with no respect or provision for art studios.

It's incredibly difficult and frustrating trying to find another studio, especially in the pandemic, plus the costs of storage and moving, all the whilst trying to continue a career in the arts. I believe provision for studios and the artists should have been included in the plans for the new building at Bermondsey, and likewise at other sites, especially when 'Culture is at Risk'.

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street and all the other sites too.

I wish I could find another affordable art studio in Southwark or South of the river but haven't been able to as yet,

Best Wishes,

[REDACTED]

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

As a potter myself it is very difficult to find studio space. Everywhere is being redeveloped or is prohibitively expensive.

I am currently looking for a new studio and struggling to find somewhere.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Thu 23 Jul 2020

Dear Southwark Council,

I would like to let you know my support for the inclusion of truly affordable artist studios, as proposed by the local affordable workspace provider Southwark Studios, within the redevelopment of Vinegar Yard on Bermondsey Street.

(Supports)

Comment submitted date: Mon 29 Jun 2020

Highly supportive of this development, that provides much needed commercial space and will be an extremely positive addition to the local area and skyline. Will help provide balance to the hospital and Shard too, and the approved Capital House development.

(Supports)

Comment submitted date: Mon 22 Jun 2020

Southwark Studios and our creative community support this application and the pioneering addition of long-term truly affordable workspace. We have over 500 local residents on our waiting list due to the chronic shortage of workspace for creative people in the borough. This

development will deliver the largest new artists studio complex in London, secured on terms that will ensure the studios are affordable for creative practitioners. The agreement Southwark Studios has with the developers to manage the affordable workspace goes well beyond Southwark's own emerging policy by securing suitable terms that keep the studios viable and affordable for 30 years. We urge the Council to grant the application and deliver a huge boost to the local creative community.

(Supports)

Comment submitted date: Tue 04 Feb 2020

I support the proposal. I think it looks great and in keeping with the warehousey feel of the area. Excited by the addition of independent food and retail.

(Supports)

Comment submitted date: Fri 31 Jan 2020

This is a key site to link London Bridge to the Bermondsey village and this does it in a managed way that supports both communities. The materials proposed are exciting and I am in full support.

(Supports)

Comment submitted date: Fri 31 Jan 2020

This is a key site to link London Bridge to the Bermondsey village and this does it in a managed way that supports both communities. The materials proposed are exciting and I am in full support.

(Supports)

Comment submitted date: Thu 30 Jan 2020

The current site use down there is exciting and i really hope for more like it within the area. I like how its a great mix of independent food, retail, artists, creatives. I have looked at what is proposed and I think it looks like a great design and will be a positive for the area.

(Supports)

Comment submitted date: Tue 28 Jan 2020

I am in support of this development as I think the building looks great and provides some much needed employment opportunities for the area. It will bring life to St Thomas Street and get people to use Bermondsey Street again. I am already loving the Vinegar Yards vibe!

Mr [REDACTED]
Chief Executives Department
Planning Division
Development Management (5th Floor- Hub 2)
PO Box 64529
SE1P 5LX

The London Fire Commissioner is the
fire and rescue authority for London

Date 14 June 2019
Our Ref 91/161899
Your Ref 19/AP/4171

Dear Sir,

RECORD OF CONSULTATION/ADVICE GIVEN

Town & Country Planning Act 1990 (As Amended)

Premises: Land bound by St Thomas Street, Vinegar Yard and Snowfields, including Nos 1-7 Fenning Street and No.9 Fenning Street, SE1 3QR.

Scope: Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing. The development would provide a total of 30,292 sqm (GIA) of commercial floor space comprising of use classes A1/A2/A3/A4/B1/D2 and sui generis (Performance Venue), cycle parking, servicing, refuse and plant areas, public realm (soft and hard landscaping) and highway improvements and all other associated works.

With reference to your recent request for comments on the above application, I confirm the comments given are as follows:-

An undertaking should be given that, access for fire appliances as required by Part B5 of the current Building Regulations Approved Document and adequate water supplies for fire fighting purposes, will be provided.

This is without prejudice to any requirements or recommendations that may be made by the Authority under the Regulatory Reform (Fire Safety) Order 2005/Petroleum (Consolidation) Act 1928, the local authority or the Health and Safety Executive.

Any queries regarding this letter should be addressed to the person named below. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,

for Assistant Commissioner (Fire Safety)
Directorate of Operations

Reply to [REDACTED]
Direct T [REDACTED]
E [REDACTED]@london-fire.gov.uk

The London Fire Brigade promotes the installation of sprinkler suppression systems, as there is clear evidence that they are effective in suppressing and extinguishing fires; they can help reduce the numbers of deaths and injuries from fire, and the risk to firefighters.

From: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Sent: 20 November 2019 13:31
To: [REDACTED]
Subject: RE: Re-consultation on Planning Application 18/AP/4171

[REDACTED]

Thank you for your re-consultation.

I can confirm that London Underground Infrastructure Protection has no comment to make on this planning application.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards

Shahina Inayathusein MAPM MIAM
Safeguarding Engineer (LU+DLR)
TfL Engineering
Email: locationenquiries@tube.tfl.gov.uk
Find out more about Infrastructure Protection - <https://youtu.be/0hGoJMTBOEg>

From: [REDACTED] [mailto:[REDACTED@southwark.gov.uk]]
Sent: 06 November 2019 11:56
Subject: Re-consultation on Planning Application 18/AP/4171
Importance: High

Dear Sir or Madam,

I am following up on the re-consultation letter regarding London Borough of Southwark planning application 18/AP/4171 sent by email on 16/10/2019 for the following:

Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing . The development would provide a total of 30,292 sqm (GIA) of commercial floorspace comprising of use classes A1/A2/A3/A4/B1/D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

A hard copy of the application documents is available for inspection by prior appointment at Southwark Council's offices, 160 Tooley Street, SE1 2QH (Monday to Friday 9am to 5pm) and is viewable online at the LBS Planning Portal: <https://planning.southwark.gov.uk/online-applications/applicationDetails>. Printed and electronic copies of the Environmental Statement and Non-Technical Summary are available to purchase from Trium Environmental Consulting LLP: 68 - 85 Tabernacle St, Old Street, London EC2A 4BD. For further information and prices, please contact Trium at hello@triumenv.co.uk or by calling 0203 887 7118. Re-consultation is being undertaken based on updated Environmental Impact Assessment information and design amendments to the scheme including: updated landscape design; drainage strategy and flood protection; relocated loading bay; increased planting on terraces; updated energy strategy; revision to building maintenance equipment; change to materiality of main building to brick with elements of pre cast concrete.

The relevant planning documents and drawings can be found at the following link:

<https://planning.southwark.gov.uk/online-applications/simpleSearchResults.do?action=firstPage>

Note the re-consultation period is set to expire on 15/11/2019 and whilst responses will be accepted after this date (and up until the point at which a recommendation is made on the application) we would urge you to submit your response as soon as possible.

Please ensure your response is sent to Planningstatconsultees@southwark.gov.uk before this period expires.

Kind regards,

■■■■■ ■■■■■ MA (Hons) MSc
Team Leader – Strategic Applications | Planning Division
Place and Wellbeing Department | London Borough of Southwark
160 Tooley Street | London SE1 2QH
(T): 0207 525 ■■■■■ | (E): ■■■■■■ [southwark.gov.uk](mailto:■■■■■■@southwark.gov.uk)
www.southwark.gov.uk



**METROPOLITAN
POLICE**

Working together for a safer London

TERRITORIAL POLICING

██████████
Southwark Council
Chief executive's department
Planning division
Development management (5th floor - hub 2)
PO Box 64529
LONDON
SE1P 5LX

DOCO – SE Office

Bromley Police Station
High Street
Bromley
BR1 1ER
Telephone: 0208 2848889
Facsimile:
Email: alan.denyer@met.police.uk
Your ref: 18/AP/4171

Our ref: SE3629

Date: 10th June 2019

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

Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing . The development would provide a total of 30,292 sqm (GIA) of commercial floorspace comprising of use classes A1/A2/A3/A4/B1/D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works.

Dear ██████████

Thank you for the opportunity to consult on the above scheme.

I can confirm that I have held a meeting with the design team dealing with this development in which the principles of Secured by Design were discussed. It is encouraging to see that the designers have considered Secured by Design and continued liaison with a designing out crime officer will enhance this. I'm also encouraged to see that the developer listened to the concerns that were raised during that meeting and have implemented changes to mitigate against these.

The activation of the frontage of the development will assist with natural surveillance opportunities for the street, as well as activating the walkways and pedestrian areas around the development. Activity by pedestrians and opportunities for surveillance are excellent crime prevention tools.

The ground floor footprint has also been designed in such a way that there are no alcoves or secluded areas that are often crime and ASB generators. This, again, is extremely positive in relation to crime prevention.

I have examined the crime figures for the area immediately around the proposed development between May 2018 and April 2019. There is a summary of my findings along with a map of the area within Appendix 1. It is clear that the area suffers from theft, Anti-Social Behaviour as well as violence and sexual offences. The following measures, were discussed with the design team in order to minimise crime and ASB.

The area around the development is to be landscaped as part of the planned re development. I recommend that any seating areas be designed in such a way to discourage rough sleeping and use by street drinkers, this is a common occurrence in this area. This could be by having a stepped seat with different heights, angled seating areas or rails to separate a bench into individual seats for example. Planted areas should be well lit and not planted too densely as weapons are often stashed in dense planting. The bottom of tree canopies should be maintained to be no lower than 2m and ground planting should not be allowed to grow any higher than 1m to ensure good lines of sight across the development are maintained. Lighting in public realm areas should be designed to comply with public realm lighting standard BS 5489:2013.

The buildings have been designed so that the different uses and users of the spaces are separated. This is extremely important to create ownership of spaces by the relevant users. There should be no crossover of uses if possible, this can often cause a conflict in basement areas which can be complex. Careful management of these areas is essential as opportunities to bypass security measures are often found in basement areas.

The basement area of this development is considerable in size and is complex as it is designed over three floors. There must be continued engagement with a DOCO throughout this development if planning permission is granted. There must not be opportunities for crime caused by an ability to bypass security by, perhaps, utilising means of escapes or fire exits which lead from one part of the building to another. This will be a key factor in ensuring this development is as crime free as possible.

In relation to the office space. Users should only be able to access the floor in which they work. There should not be the ability to travel freely around the building. This can be achieved with an access controlled lobby on each floor or via a fob controlled lift. The stair cores should also be secured with fobs to prevent access to every floor whilst still providing a means of escape. Where there are terraces or roof garden, these should only be accessible to the office that adjoins these, unless there is a means of securing the office on that floor whilst still providing access to the terrace or garden.

This development benefits from a lobby and reception area that will be staffed during office opening hours. There may well, however, be building users and visitors that attend this development outside of these hours. There must be a separate means of vetting visitors to the offices outside of staffed hours. There should also be the ability to close down the building after office hours to ensure that it remains secure at night. The addition of the gates to the escalators serving the development will greatly assist with this and are an excellent addition to the design.

Incorporation of measures to prevent crime in the future are important, especially considering the guidance within NPPF Section 8 and 12 which state:-

Section 8:

"Planning policies and decisions should aim to achieve healthy, inclusive and safe places which are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...".

Section 12:

"Planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."

I would request that the benefits of certified products be pointed out to applicants and that the Local Authority encourages assessment for this application. For a complete explanation of certified products please refer to the Secured by Design guidance documents which can be found on the website. www.securedbydesign.com.

I feel that should this application proceed, it is possible for it to achieve the security requirements of Secured by Design with the guidance of SBD Commercial Developments 2015 as well as recommendations from the SE Designing Out Crime office and the correct tested, accredited and third party certificated products. The adoption of these standards will help to reduce the opportunity for crime, creating a safer, more secure and sustainable environment. As already highlighted contact with a Designing Out Crime officer from the S.E. office is vital for the schemes' success in terms of security.

This development is suitable to achieve Secured By Design accreditation, and in order to assist the development with achieving Secured By Design standards, I would ask that the following condition be applied if planning permission is granted:

1. SBD Measures.

The development hereby permitted shall incorporate security measures to minimise the risk of crime and to meet the specific security needs of the development in accordance with the principles and objectives of Secured by Design. Details of these measures shall be submitted to and approved in writing by the local planning authority prior to commencement of the development and shall be implemented in accordance with the approved details prior to occupation.

2. Secured by Design Certification.

Prior to occupation a satisfactory Secured by Design inspection must take place. The resulting Secured by Design certificate shall be submitted to and approved by the local planning authority.

I trust these comments are of assistance

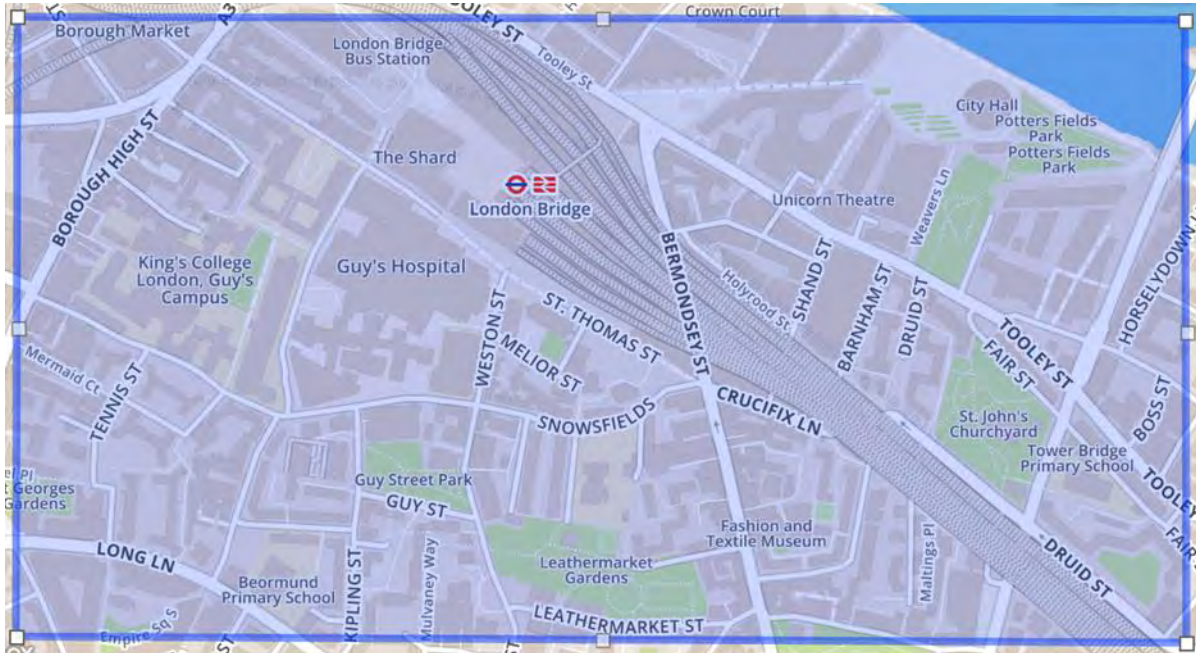
Yours Sincerely,

 - Designing Out Crime Officer

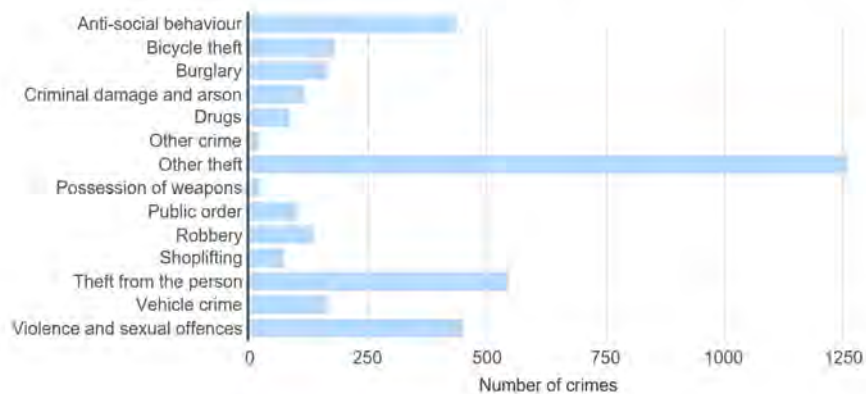
SE DOCO Team - Metropolitan Police Service

Appendix 1

Crime analysis and map taken from www.police.uk



Comparison of crime types in this area between May 2018 and April 2019



Crime type ↕	Total ↕	Percentage ↕
Anti-social behaviour	437	11.61%
Bicycle theft	179	4.76%
Burglary	165	4.38%
Criminal damage and arson	117	3.11%
Drugs	87	2.31%
Other crime	21	0.56%
Other theft	1259	33.46%
Possession of weapons	25	0.66%
Public order	103	2.74%
Robbery	134	3.56%
Shoplifting	75	1.99%
Theft from the person	547	14.54%
Vehicle crime	164	4.36%
Violence and sexual offences	450	11.96%

Date: 10 June 2019
Our ref: 283155
Your ref: 18/AP/4171



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BY EMAIL ONLY

Planningstatconsultees@southwark.gov.uk

Dear [REDACTED],

Planning consultation: Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing . The development would provide a total of 30,292 sqm (GIA) of commercial floorspace comprising of use classes A1/A2/A3/A4/B1/D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works. The application is accompanied by an Environmental Statement submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. A hard copy of the application documents is available for inspection by prior appointment at Southwark Council's offices, 160 Tooley Street, SE1 2QH (Monday to Friday 9am to 5pm) and is viewable online at the LBS Planning Portal: <https://planning.southwark.gov.uk/online-applications/applicationDetails> Printed and electronic copies of the Environmental Statement and Non-Technical Summary are available to purchase from Trium Environmental Consulting LLP: 68 - 85 Tabernacle St, Old Street, London EC2A 4BD. For further information and prices, please contact Trium at hello@triumenv.co.uk or by calling 0203 887 7118.

Location: Land bounded by St Thomas Street, Fenning Street, Vinegar Yard & Snowfields including nos. 1-7 Fenning Street & No. 9 Fenning Street, SE1 3QR

Thank you for your consultation on the above, dated and received by Natural England on 20 May 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest

Based on the plans submitted, Natural England considers that the proposed development will not have likely significant effects on statutorily protected sites and has no objection to the proposed development.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on “Development in or likely to affect a Site of Special Scientific Interest” (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website.

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

A black rectangular box redacting the signature of the sender.

Consultations Team

Annex A – Additional advice

Natural England offers the following additional advice:

Landscape

Paragraph 170 of the National Planning Policy Framework (NPPF) highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland or dry stone walls) could be incorporated into the development in order to respect and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape & Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Landscape Institute Guidelines for Landscape and Visual Impact Assessment](#) for further guidance.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 170 and 171). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in [GOV.UK guidance](#).

Agricultural Land Classification information is available on the [Magic](#) website on the [Data.Gov.uk](#) website. If you consider the proposal has significant implications for further loss of 'best and most versatile' agricultural land, we would be pleased to discuss the matter further.

Guidance on soil protection is available in the Defra *[Construction Code of Practice for the Sustainable Use of Soils on Construction Sites](#)*, and we recommend its use in the design and construction of development, including any planning conditions. Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Protected Species

Natural England has produced [standing advice](#)¹ to help planning authorities understand the impact of particular developments on protected species. We advise you to refer to this advice. Natural England will only provide bespoke advice on protected species where they form part of a SSSI or in exceptional circumstances.

Local sites and priority habitats and species

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local records centre, wildlife trust, geoconservation groups or recording societies.

Priority habitats and Species are of particular importance for nature conservation and included in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006.

¹ <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

Most priority habitats will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. List of priority habitats and species can be found [here](#)². Natural England does not routinely hold species data, such data should be collected when impacts on priority habitats or species are considered likely. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found [here](#).

Ancient woodland, ancient and veteran trees

You should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 175 of the NPPF. Natural England maintains the Ancient Woodland [Inventory](#) which can help identify ancient woodland. Natural England and the Forestry Commission have produced [standing advice](#) for planning authorities in relation to ancient woodland and ancient and veteran trees. It should be taken into account by planning authorities when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a SSSI or in exceptional circumstances.

Environmental enhancement

Development provides opportunities to secure net gains for biodiversity and wider environmental gains, as outlined in the NPPF (paragraphs 8, 72, 102, 118, 170, 171, 174 and 175). We advise you to follow the mitigation hierarchy as set out in paragraph 175 of the NPPF and firstly consider what existing environmental features on and around the site can be retained or enhanced or what new features could be incorporated into the development proposal. Where onsite measures are not possible, you should consider off site measures. Opportunities for enhancement might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof to new buildings.

You could also consider how the proposed development can contribute to the wider environment and help implement elements of any Landscape, Green Infrastructure or Biodiversity Strategy in place in your area. For example:

- Links to existing greenspace and/or opportunities to enhance and improve access.
- Identifying opportunities for new greenspace and managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips)
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network or using the opportunity of new development to extend the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

Access and Recreation

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths together with the creation of new footpaths and bridleways should be considered. Links to other green networks and, where appropriate, urban fringe areas should also be explored to help promote the creation of wider green infrastructure. Relevant aspects of local authority green infrastructure strategies should be delivered where appropriate.

²<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

Rights of Way, Access land, Coastal access and National Trails

Paragraphs 98 and 170 of the NPPF highlights the important of public rights of way and access.

Development should consider potential impacts on access land, common land, rights of way, coastal access routes and coastal margin in the vicinity of the development and the scope to mitigate any adverse impacts. Consideration should also be given to the potential impacts on any nearby National Trails, including the England Coast Path. The National Trails website www.nationaltrail.co.uk provides information including contact details for the National Trail Officer.

Biodiversity duty

Your authority has a [duty](#) to have regard to conserving biodiversity as part of your decision making. Conserving biodiversity can also include restoration or enhancement to a population or habitat. Further information is available [here](#).



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

F.A.O. ■■■■ ■■■■

**LAND BOUNDED BY ST THOMAS STREET, FENNING STREET, VINEGAR YARD AND
SNOWFIELDS INCLUDING NOS. 1-7 FENNING STREET AND NO.9 FENNING STREET, SE1
3QR
APPLICATION REFERENCE – 18/AP/04171**

I write in respect of the above planning application and to confirm Network Rail's full support of the application submitted for full planning permission for an office-led mixed-use development on land bounded by St Thomas Street, Fenning Street, Vinegar Yard and Snowfields. The application is registered under reference number 18/AP/04171.

The proposed development is situated within a highly sustainable location and the proposals will ensure delivery of a high-quality development on land currently under-utilised for employment. The site also has a draft allocation within the emerging Southwark Local Plan, and the proposals are consistent with the objectives of Southwark Council.

Following on from the redevelopment of London Bridge Station It is considered that the proposed development will form a vital part of the regeneration of the area to the south, off St Thomas Street. The proposal will be compatible with the safe and efficient operation of the station and it is considered that there will be no significant impacts on the railway arising from the proposed development.

Employment floorspace

The proposals will deliver a significant amount of high quality, modern and flexible commercial floorspace. This will lead to the creation of between approximately 2,000-3,000 new full-time jobs and approximately 1,700 construction jobs.

Open space

The proposed development includes the creation of high quality public open space and associated landscaping improvements. This will help to create more of a destination and a place where people want to spend time. It will also improve pedestrian connectivity in the surrounding area, particularly between St Thomas Street and towards Snowfields and Melior Street.

Design & views

The appearance of the proposals reflects the existing character and context of the surrounding area. The building materials are reminiscent of the historic warehouses which are situated in this part of London and retain an 'industrial' architectural language. The design of the new buildings is therefore considered appropriate in this location.

The height and massing of the proposed development will complement the existing tall buildings which are situated within Bank, Borough and London Bridge. They are sensitively designed to ensure there is no detrimental impact on the local townscape and wider conservation area.

Transport

The proposed development will be car-free and office workers will be encouraged to use sustainable modes of transport to travel to work. The site is in close proximity to London Bridge station and there are dedicated cycle lanes on the surrounding road network. A car-free development will ensure there is no negative impact on existing vehicle capacity on surrounding roads and will also assist with controlling levels of air pollution in this part of London.

The proposed servicing and delivery strategy for the offices has been agreed with the local highways authority and intends to ensure the number of deliveries generated through operations at the site are reduced.

Local amenity

The proposals have been sensitively designed to ensure that the scheme does not negatively impact on the amenity of nearby existing residents.

Construction period

The application is supported by a Construction Management Plan (CMP) pro-forma which sets out the protection and control measures that will be put into place to manage all potential environmental risks generated through the construction phase of the development. The construction working hours, hours for deliveries and servicing and site traffic management will be agreed with Southwark Council as part of the planning determination process. Therefore, this procedure will mitigate any potential detrimental impact on surrounding residents during the construction period.

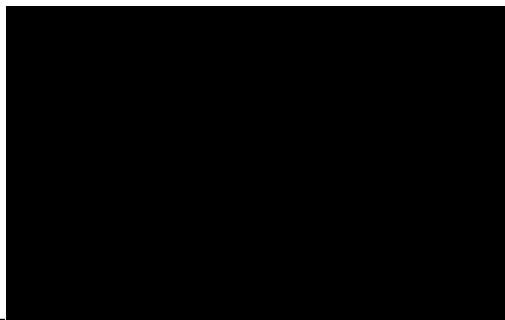
Sustainable construction

The proposed development also provides environmental benefits, including the reduction of surface water run-off and the adoption of energy saving techniques. These have the potential to result in significant carbon savings and to improve the environmental quality of the area.

Summary

In summary, the proposals will optimise the development potential of an under-utilised employment site which Southwark Council have earmarked for comprehensive redevelopment. The scheme will create a high-quality office-led mixed-use development which will provide a multitude of benefits to the local area. We therefore support the proposed scheme and encourage the London Borough of Southwark to approve this application.

If you have any questions on any of the above or require anything further, please let me know.



1

OLD BERMONDSEY
OBNF
NEIGHBOURHOOD FORUM
WWW.OLDBERMONDSEYFORUM.ORG

SIMON BEVAN

Mr Simon Bevan
Director of Planning
Southwark Planning
PO Box 64529
SE1P 5LX

16th November 2019

Dear Mr Bevan,

**Re: Land Bounded By St Thomas Street Fenning Street Vinegar Yard And Snowfields
Including Nos. 1-7 Fenning Street And No. 9 Fenning Street SE1 3QR
Planning Application Reference I8/AP/4171**

The Old Bermondsey Neighbourhood Forum has discussed the above application at a number of our meetings and the views of our members and the local public are set out herein.

Background/Process

Though discussions between the council and developers have been happening in private for years this application was presented recently in the St Thomas Street East Framework exhibitions which systematically concealed the height and massing of the proposals from the public who were asked to comment on a ground floor masterplan alone. Many of the claims made by the resulting consultation reports are completely contrary to actual local opinion - particularly in regard to height/massing. The site allocations policies NSP52 and 53 similarly go against local opinion as evidenced in consultations made by the Forum and submitted in many representations on the NSP - which also detail how deeply unsound they are in terms of their poor evidence base. In any case the recent approval of I8/AP/0900 at two times the density suggested by the site allocations policies (unless no development is to occur on the site of Beckett House) shows that they are not adhered to at the point of decision making. Claims by the developers that the proposals follow local policy are thus doubly devoid of meaning.

Heritage Impact

The Bermondsey conservation area is a designated heritage asset. Harm can be caused to a heritage asset through development in its setting, and any harm or loss to heritage assets. Any harm requires clear and convincing justification (para 194 NPPF). The proposal will reduce the significance of the

conservation area, which jeopardises its designation. This is contrary to the council's duty to protect heritage assets.

Demolition

The demolition of the warehouse at 9 Fenning Street will harm the conservation area by losing a building that is characteristic of that area.

Under paragraph 196 of the NPPF harm to a designated asset must be weighed against public benefits, with great weight given to the asset's conservation whatever the level of harm. No sufficient evidence has been provided of why the demolition of the warehouse is necessary to achieve the claimed public benefits.

Scale

The Bermondsey Street Conservation Area is characterised by its smaller scale and the “clear change of character... evident in its quieter, smaller scale” from London Bridge and Guy's Hospital (as noted in the Conservation Area Appraisal, paragraph 3.1.1). It is “distinctive for its many small warehouses” (Conservation Area Appraisal 3.1.4) and “reflects the street scale of its medieval origins” (3.1.2). Because the development affects a heritage asset, it must be sympathetic to “form, scale, materials, and architectural detail.” (Policy 7.8 of the London Plan). This proposal is clearly not sympathetic to the scale of the heritage asset in question. Harm will clearly be caused by the proposed height and massing to this Conservation Area, which is specifically characterised by its small scale. The construction of such tall buildings in and adjacent to the conservation area noted for its contrast to London Bridge and lower building heights, has not been justified by the required evidence of substantial public benefits.

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.” None of these conditions have been met by the proposals.

Environmental Impact

The recent EIA updates have not resulted in any significant/meaningful changes to designs. Neither do they constitute proper consideration of the cumulative effects of the four developments as was variously promised by the council at the outset and variously since.

Wind

St Thomas Street is already windy due to the effect of the Shard - this is an experience common to people in the locality. The application's environmental statement admits there will be levels of wind caused by the proposed massing that will make it uncomfortable to be seated outside in key locations of the 'new' public space being provided off/for St Thomas Street. This is clearly

unacceptable and the detrimental effect of the proposal upon its host context has been occluded by the applicant's reports with impracticable mitigation measures - as was the case with 18/AP/0900.

Overshadowing

Key areas of the public space will have insufficient levels of sunlight due to the excessive height and massing. To quote the BRE guidelines: 'Overshadowing: Sunshine in gardens and open spaces: We investigate whether buildings shade existing or proposed open spaces. Here the BRE guidelines recommend that at least half of the garden or open space can receive at least two hours sunlight on March 21.' The proposed open space fails to meet this by being in shade at all times other than at 9am, 12am, 3pm & 4pm when it is in 80-90% in shade. Again this issue is misrepresented in the report - while it is quite clear from the sections that the proposals severely overbear on the context.

Disruption during and after construction

Over a construction period of 5 years, heavy goods vehicles (HGVs) are expected to cross the local area 60 times a day on average - roughly one every 8 minutes of the working day - for 5 years (for this site of the four alone). The extreme negative impact of this on the locality in terms of noise, pollution and road safety will be compounded by the huge amount of pumping required at excavation stage for the 3 storey basement deep below the water table across the whole site.

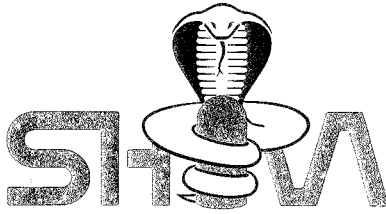
The four STSE schemes will produce a ten-fold increase in floorspace across the sites taken together. CIT claim Fenning, Melior and Weston Streets present a viable means of supplying the entire series of developments - via two lorry bays in Fenning St that will bring in supplies 'consolidated outside the M25' using exclusively electric vehicles. No details have been provided however as to how this will work in reality - with no evidence of proper coordination across all four sites.

Public benefits

The developers were asked for clarity on public benefits and replied as follows: "...A summary of the management and characterisation plan for the scheme will be published once discussions with partners is complete, along with details of how this can be secured, where appropriate. A summary of the proposals and key benefits will also be made available in due course, once discussions with partners are complete. Commercial arrangements with partners are confidential at this stage and we are not in a position to share them at this time." This is typical of the present situation where the alleged public benefits ('Affordable Workspace', 'Cultural facilities', 'Retail facilities', 'Fuel-cell driven energy efficiency' and 'Jobs') have not been properly consulted upon, are unclear and cannot reasonably justify any of the severe heritage loss or environmental impact imposed on the locality.

Yours sincerely,

A black rectangular redaction box covering the signature area.



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[REDACTED]
Department of Place and Wellbeing
Planning Division
Development management (5th floor – hub 2)
PO Box 64529
London
SE1P 5LX

15 November 2019

RE. Planning Application Reference Number 18/AP/4171.

18/AP/4171 | Redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height (maximum height of 86.675m AOD) and a 3 storey pavilion building (maximum height of 16.680m AOD) with 3 basement levels across the site providing . The development would provide a total of 30,292 sqm (GIA) of commercial floorspace comprising of use classes A1/A2/A3/A4/B1/D2 and sui generis (performance venue), cycle parking, servicing, refuse and plant areas, public realm (including soft and hard landscaping) and highway improvements and all other associated works.

As the landlord of Globe House at 37 Bermondsey St and the complex known as The Tanneries at 47-57 Bermondsey Street we strongly oppose this development due to the adverse effects it would have on the amenity of the local area and consequently ourselves, our residential and commercial tenants. This would in turn negatively affect our business.

Disruption during and after construction

The disruption which would be caused during and after the construction of the developments would put an enormous amount of stress on the area. This type of scheme is of a scale which would take years to complete and people living and working within the area will be very seriously affected. The scale of the impact has not been properly ventilated and local people have no idea of the level of disruption entailed in several very high buildings with deep basements all being built at once in a very confined area served only by small streets. An additional 75 vehicles, most of which will be grabber lorries or heavy-duty construction vehicles, accessing the site per day, for 6 days a week over a period of 5 years, is an enormous level of disruption on the area. Collectively the St Thomas St overdevelopment will drive away the many people who don't want to live and work around a massive construction site for years from the area, adversely affecting the local economy for several years. Once complete the development would bring thousands more people into the area, putting intolerable

pressure on already overcrowded tube stations and narrow streets for servicing. No proposal exists to enhance the infrastructure of the area which will clearly be unable to cope.

No convincing construction or servicing plans have been made available for comment and we would urge the council not to grant permission for a development of this scale which would affect people who live and work in the area on an equally massive scale, without definitive servicing and construction management plans in place which have been properly analysed, stress tested, shown to be credible, workable and achievable.

Excessive Height

A 20-storey high rise tower block within the conservation area is contrary to policy. The whole principle of high-rise in, and immediately adjacent to, a low rise conservation area is contrary to national planning policy and duly opposed by Historic England and other conservation bodies. There is no policy support for high-rise in St Thomas St generally. The NLP requires boroughs to identify locations which are appropriate for tall buildings and heights should be identified in a development plan. Southwark Council have not complied with the NLP in this respect. The draft New Southwark Plan includes only 'site allocations' which have not been consulted upon. Neither, obviously, have they been adopted. The draft site allocations are hopelessly vague and cannot be cited as policy underpinning for the extreme high-density proposals being encouraged by the Council for St Thomas St. The development is of a scale which is completely inappropriate and out of character with the area. A scale which has never been previously considered as remotely acceptable inside a conservation area, significantly harming the character and views.

Harmful effects on Heritage

The proposal is damaging to heritage, harming the setting of designated heritage assets. In particular it is in close proximity to several Grade 2 listed buildings. The notable, 1860s St Thomas St/Crucifix Lane railway arches by Charles Henry Driver, would be worst affected being completely overshadowed by this pre-fabricated tower block. Other affected Grade 2 listed assets within close proximity are our Shiva building at 49-55 Bermondsey St, 59, 61 and 63 Bermondsey Street, 68-76 Bermondsey Street and 78 Bermondsey Street.

Additionally, NLP policy 7.1 has been completely ignored with regards to this development. As the policy acknowledges "many heritage assets make a significant contribution to local character which should be sustained and enhanced." The destruction of the two-storey warehouse which dates before 1916 located within the site, is an insult to the conservation area, in disregard of the NPPF paragraph 196. It is also contrary to section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This type of heritage destruction would set a horrifying precedent for future developments in the area. If it were approved there would be no sound basis for resisting proposals to build tower blocks through any undesignated building in the conservation area.

Ultimately the development has no regard for local heritage, which is a vital part of this area's character. It has no place in this medieval street setting, completely inappropriately bringing the sky scraper filled city into what is presently an area of entirely different character. The economy as well as the built environment of the Bermondsey St area is characterised by smaller, independent businesses in creative and tech industries. They are here because they don't want to be in More London or the City. If the City and More London is brought to them they will go elsewhere.



Wind tunnelling effects

We already suffer from wind tunnelling effects on a daily basis as a result of the Shard. It is obvious that these effects will increase significantly if further tall buildings are erected all along St Thomas Street. There has been no detailed analysis of the increase in wind tunnelling that these developments combined with their neighbours' proposals would pose. Therefore, planning permission should not be granted until the full effects of the wind tunnelling have been properly determined with a comprehensive modelling exercise put honestly before local people for consideration.

Bogus public benefits

We are aware that in an attempt to justify the enormous adverse effects on local character and heritage the Council will attempt to claim public benefits for this scheme that do not genuinely exist, and certainly cannot outweigh the harm to heritage. In particular we firmly remind the Council that 'public benefits' must by planning law be net benefits. i.e. public benefits to be weighed against harm to heritage assets must be evaluated by offsetting the public benefits with public disbenefits. Thus disbenefits of public disruption from construction and servicing of such alien developments in the local area, wind-tunnelling, overloading of local infrastructure, overshadowing and claustrophobic enclosure must first be weighed against the dubious benefits claimed for the proposed scheme. Only net public benefits can then be used to justify heritage harm.

Further, public benefits cannot include mere production of new floorspace. That is an automatic effect of any development and does not necessitate **any** disrespect for heritage. Heritage-sensitive schemes are equally capable of any general benefits arising from redevelopment and regeneration and thus these factor in themselves cannot constitute public benefits to be weighed under national planning policy.

In order to meet NPPF policy when justifying the heritage harm entailed in this application the Council must provide a detailed 'balance sheet' that offers a fully reasoned identification and assessment of the heritage benefits said to be available from approval of the scheme. This must be offset by the disbenefits, such as, but not limited to, those listed above. Only then can the 'net public benefits' be weighed against the harm to heritage.

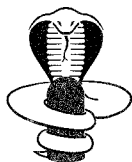
'Public benefits' are by definition matters in relation to which public opinion is essential to an objective and rational evaluation. In view of the dubious claims being made for public benefits in local presentations of this scheme the Council could and should seek genuine local opinion on a properly presented and particularised schedule of such benefits. It is not for the Council without regard to such local opinion to declare that local people should be ready to sacrifice their heritage for superior 'benefits' that the Council concludes they just don't properly understand.

Having regard to the proper application of national heritage policy we do not believe there is any possibility of the heritage harm we (and Historic England, SAVE, the Victorian Society and others) have identified being genuinely outweighed by any public benefits available from this scheme. It is simply driven by a greed for enormous profits that can arise only from a scheme that disregards local amenity.

For all the reasons set out above we strongly object to this application.



Yours Sincerely



From: [REDACTED]
[REDACTED] 07 June 2019 17:05
To: [REDACTED]
Subject: 3rd Party Planning Application - 18/AP/4171

London Borough of Southwark
5th Floor, HUB 2
160 Tooley Street
London
SE1 2QH

Our DTS Ref: 61718
Your Ref: 18/AP/4171

31 May 2019

Dear Sir/Madam

Re: 9, FENNING STREET, LONDON, SE1 3QR

Waste Comments

Thames Water would advise that with regard to the combined water network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

The proposed development is located within 15m of a strategic sewer. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Water Comments

Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water have contacted the developer in an attempt to agree a position on water networks but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. No properties shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to

support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (telephone 0203 577 9998) prior to the planning application approval.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water.
Email: developer.services@thameswater.co.uk

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water.
Email: developer.services@thameswater.co.uk

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ
Tel:020 3577 9998
Email: devcon.team@thameswater.co.uk

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The Hive
1 Melior Place
London
SE1 3SZ

6 November 2019

Team London Bridge response to amended plans for Vinegar Yard redevelopment:

Planning application reference 18/AP/4171

1. Team London Bridge (TLB) is the Business Improvement District (BID) representing approximately 400 businesses in the area between London Bridge to the west, Tower Bridge to the east, and south towards Bermondsey.
2. These representations supplement those submitted in July 2019 and respond to the reconsultation notice issued by Southwark Council in October 2019. They also address the consequences for the development that flow from the declaration of a climate emergency by both the UK Parliament and Southwark Council.
3. We make the following additional comments on the amended plans:
 - Landscape design – We welcome inclusion of a significant new section on landscape and the public realm in the Design and Access Statement. This confirms the validity of our concerns about the balance of hard and soft landscaping throughout the scheme which fails to take the opportunity to provide abundant planting and enhance biodiversity. We also look for clearer commitments to the delivery of street trees on land which it is now confirmed lies outside the ownership of the applicant. The whole scheme is dependent on a landscape strategy for the St Thomas Street East Framework Area which has not yet been forthcoming. We ask that this is developed prior to determination of the plans. The landscape and planting should be informed by the need to secure biodiversity net gain and to address the urban heat island effect.
 - Terrace planting – We welcome the amended plans which make provision for more planting on the terraces. This will make a positive impact and will benefit the overall appearance of the scheme as well as the experience of being on the terraces. The additional planting is restricted to each terrace and we believe there is an untapped opportunity to extend this approach to provide vertical planting that could link the terraces visually and functionally (NB James von Klemperer, President of KPF talked at a recent conference about the addition of vertical greening in one of their London designs, presumably neighbouring Capital house).
 - Change to materiality – We note the intention to make more widespread use of brick on the main facades. We encourage use of materials which support a high quality contemporary design that is both fit for the scale of the proposed development and the need for it to feel of human scale along the key routes. The choice of materials should also be informed by the need to minimise the scheme's embodied carbon.

- Sustainability – We note the BREEAM commitments and the intention to meet all the requirements of both the Southwark Plan and London Plan. This is necessary to secure planning consent but it does not address the opportunity of this significant new development to respond to the circumstances now demanded by the declared climate emergency. The future tenants of the development will expect higher standards and the scheme should be based on more ambitious targets. Team London Bridge is working with developers across the St Thomas Street East Framework Area supported by Useful Projects to deliver this more ambitious approach which will inform decisions all the way through to completion of the scheme, including the choice of materials and the approach to landscaping and planting.

4. We welcome the continuing opportunity to inform this significant development in London Bridge. The revised proposals contain some welcome elements but do not yet address some of the strategic issues raised in our July representations or respond appropriately to the declared climate emergency.

Yours faithfully

A large black rectangular redaction box covering the signature of the Chief Executive.

Chief Executive
Team London Bridge

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: 18/AP/4171
Our reference: 152116

30th July 2019

planningstatconsultees@southwark.gov.uk

Dear Mr [REDACTED]

RE: Land bounded by St. Thomas Street, Fenning Street, Vinegar Yard and Snowfields including Nos. 1-7 Fenning Street and No. 9 Fenning Street; redevelopment of the site to include the demolition of the existing buildings and the erection of a building up to 20 storeys in height.

We object to this proposal and offer the following comments.

Significance and harm

The proposal for the demolition of the early twentieth century warehouse and the construction of a group of buildings reaching up to 20 storeys would be damaging to the Bermondsey Street Conservation Area.

The early 20th century warehouse is a characteristic building within a conservation area “distinctive for its many small warehouses” (Bermondsey Street Conservation Area Appraisal 3.1.4). The proposal to demolish the building would therefore cause harm to the conservation area. The proximity of the conservation area to London Bridge means that the formerly industrial area has attracted offices, however many of these businesses occupy carefully converted warehouse buildings, and thus allow Bermondsey Street Conservation Area to maintain its historic industrial character. We would expect this approach to be taken in regard to this warehouse, and other warehouses in the area which allow Bermondsey’s history to remain legible.

The conservation area appraisal notes that “at its heart”, the Bermondsey Street Conservation Area “reflects the street scale of its medieval origins” (3.1.2). The area has an incredibly rich history stretching back over centuries, and whilst it has been developed, the scale is something which is fundamental to its character. The proposed 20 storey building to the south west of the site would tower over the conservation area, whilst its neighbouring buildings would have a detrimental effect on the conservation area’s setting. The conservation area appraisal notes that there is a “clear change of character [from London Bridge]... evident in its quieter, smaller scale” (Bermondsey Street Conservation Area Appraisal 3.1.1), yet the construction of such tall buildings

Patron
HRH The Duke of Gloucester KG, GCVO
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Vice Presidents
Sir David Cannadine
The Lord Howarth of Newport CBE
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Fiona MacCarthy OBE

1 Priory Gardens, London W4 1TT
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inside and just outside the boundary of the conservation area would obscure this change. The planning statement notes that the proposed “stepping down in massing presents a clear transition of decreasing height from west to east that preserves the primacy of the Shard and reflects the proximity of the Site to the Bermondsey Street Conservation Area” (Planning Statement, p. 10). However, this approach would destroy the legibility of the clear change between the two areas. It should moreover be noted that this fails to acknowledge that part of the site is actually within the conservation area, and a height of 20 storeys cannot be said to reflect the character of that area.

The nearby Horseshoe Inn and the leather warehouse in Vinegar Yard, buildings which are noted to contribute to the conservation area, would also be overshadowed. This would have a further detrimental affect as the Horseshoe Inn is noted as being a “visual focus viewed from Snowfields via Melior Place to the South” (3.4.7). Yet the large building will draw the focus away from the pub, and its significance in its setting would be reduced.

Policy

The site is located within an Opportunity Area and is in close proximity to London Bridge. However, its partial inclusion within the Bermondsey Street Conservation Area, a designated heritage asset, should ensure it a layer of protection under chapter 16 of the NPPF.

Under paragraph 196 of the NPPF, the harm caused to a designated heritage asset must be weighed against the potential public benefits which would come from the proposal. The public benefits in this case would need to be considerable given the scale of harm which would be caused by the loss of a characteristic feature, such as this warehouse, and the construction of such tall buildings in and adjacent to the conservation area noted for its contrast to London Bridge and lower building heights, it has not been demonstrated that these provisions have been met however. The proposal is noted to have a number of benefits including development on brownfield land which is currently under-utilised for employment, public realm enhancements, improvements to permeability through the site, the creation of sustainable buildings and the provision of affordable workspace. However, these benefits could be bought about by a more sympathetic regeneration of the site and conversion of the warehouse. An alternative, low rise and sympathetic development would not be able to deliver the same floor space, but it would not cause the same level of significant harm to the conservation area.

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).

Finally, we note that Policy 7.8 of the London Plan states that a development affecting heritage assets and their setting should be sympathetic to “form, scale, materials, and architectural detail”. This proposal is clearly not sympathetic to the scale of the heritage asset in question.

Conclusion

The proposal for the demolition of the warehouse and the construction of several buildings, one of which is within the conservation area, would be harmful to the conservation area. We would consider the greatest risk however to be the precedent which would be set, and which would demonstrate a complete disregard to the conservation area. If the council allow buildings characteristic of the conservation area to be demolished and other buildings completely at odds with the general character to be constructed, in years to come, the significance of the Bermondsey Street Conservation Area would be lost, and its designation threatened. It is the council's duty to make sure that their heritage assets are protected, and we therefore urge you to refuse consent for this application.

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

Yours sincerely,

A solid black rectangular box used to redact the signature of the Conservation Adviser.

Conservation Adviser

Mr [REDACTED]
Planning Case Officer
London Borough of Southwark
PO Box 64529
London
SE1P 5LX

WSET School London

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E wset@wsetglobal.com

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By post and by email to [REDACTED] [southwark.gov.uk](mailto:[REDACTED@southwark.gov.uk])

6 September 2019

Dear Mr [REDACTED]

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 50th 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 Sworder, 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.

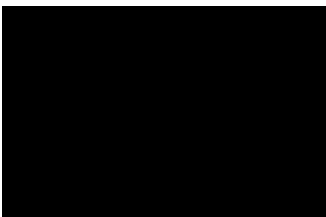
Third, with our building being located directly opposite the Project, it will also have significant implications on the safety of our thousands of visiting students and 75 staff. During the Project works, there will be impact on access to our automatic doors front entrance as well as our tenant's business 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 large black rectangular box used to redact the signature of the School Principal.

School Principal