APPENDIX G

Comments received and officer responses on applications to formally designate the Bankside Neighbourhood Area and Bankside Neighbourhood Forum for the purposes of Neighbourhood Planning

	Bankside Neighbourhood Plan									
	Obj Ref	Agent Ref	Stage	Details of representation	Date received	Officer Response to Representation				
84	1018		Neighbourhood Area application	I hope you are well and you had a great Easter Holiday! I have been abroad with limited internet access hence my late reply. Nonetheless, I did manage to have a look at the Bankside Neighbourhood Development Area boundary consultation map and letter. From my end, we are happy with the most up-to-date eastern boundary as it does not affect our proposed area.		Support noted.				
85	1017		Neighbourhood Area application	I am an employee of a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this nor been invited to help them develop a neighbourhood plan for the area		Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.				
82	1014		Area application	Tim tells me that other Bankside neighbourhood plan members have written to you regarding the boundaries for the Bankside NP, which is due to be decided by Cllr Colley. I write specifically about the West boundary as this is the area I live in. As you probably know, I originally questioned the boundaries for the proposed neighbourhood plan, as I was concerned that it didn't the include the area adjacent to and west of Blackfriars Road. However, it was made clear very early on that this area was always intended to be part of the plan. Clearly I would not have joined the group as a resident representative if it did not cover the area I lived in. I am therefore a little surprised to see that the South Bank Employers Group have even proposed to include this area in their neighbourhood plan given that (1) Blackfriars Road has always been part of the current Bankside	03/04/2013	Support noted.				

	Bankside Neighbourhood Plan							
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				plan; (2) we have discussed Blackfriars Road numerous times in our meetings; and (3) we have a specific section on Blackfriars Road in the plan. Separate from the issues of working across two borough boundaries, those of us resident in this area are conscious that we are experiencing an extensive plan for redevelopment on Blackfriars Road, including a massive increase in the number of residents. It is particularly important that we have a plan that takes into account the hyper local issues that are/will affect us. I wrote the section in the plan on Blackfriars Road after hearing the views of over 30 local people (who had a surprisingly similar list of concerns). I don't see anything in the proposal by SBEG that in any way includes these concerns (or even a proposal of how they might be included) and I would be quite worried that changing the boundaries would delay for a considerable time any plan being in place. The only change I would wish to see is the southern extension (as I have raised several times and won't cover here). I really can't see any other justification for changing the boundary at this point and certainly not to be moved to a different borough and a plan that hasn't even started. If we were going to do that and to start all over again, then I would instead propose we set up a Blackfriars Road specific plan.				
80	1013			Apologies for the delay in commenting. I support the boundaries as outlined.	10/04/2013	Support noted.		
79	1012		Area application	I work in the creative industries from my studio in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. In addition I live locally. I have just been made aware of an application to designate this area as a part of the Bankside Neighbourhood area. It seems an incredible oversight and an appalling lack of communication, that I have not been consulted by the Bankside Neighbourhood Forum on this. Nor have I been invited to help them develop a Neighbourhood Plan for the area! I believe the area where I work and live - as described above - is part of the South Bank Neighbourhood and I will actively be engaging	09/04/2013	Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.		

				Bankside Neighbourhood Plan		
	Obj Ref	Agent Ref	Stage	Details of representation	Date received	Officer Response to Representation
				with the South Bank Neighbourhood Forum to help them develop a plan reflecting the importance of cross-borough collaboration. This is significantly evidenced in the work over the last 20 years of the South Bank Forum.		
77	1011		Area application	I operate a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum.		Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
76	1010		Area application	I operate a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum.		Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
67	1009		Area	I live at Windmill House SE1 8LX in the South Bank area and have done so for 8 years. I have been made aware of preparations to develop a neighbourhood plan on the part of groups in both Bankside and the South Bank. Although there is not yet a formal application for the designation of the South Bank neighbourhood plan area, I understand that this is imminent and the intention is that the SouthBank plan will cover the South Bank and Waterloo area, to Blackfriars Road. I am writing to declare my	08/04/2013	Comments noted. The proposed boundaries for the Bankside Neighbourhood Area largely reflect those proposed by Bankside Neighbourhood Forum in November 2012, although some minor amendments have been

				Bankside Neighbourhood Plan		
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				support for the South Bank plan on the basis that: • Blackfriars Rail Bridge has always marked the boundary between the South Bank to the west and Bankside to the east. This is important in terms of local identity and is reflected in the work of the South Bank Forum, South Bank Partnership, South Bank Employers' Group and many community organisations over the past 20 years. I consider myself to reside in the South Bank/Waterloo area rather than Bankside. • I understand a compromise solution is proposed by the South Bank group that draws the boundary at Blackfriars Road. I support this as a practical solution to enable all the groups to collaborate on the development of Blackfriars Road, which is of vital importance locally. • I understand that the Bankside group should have consulted widely on the neighbourhood plan boundary before applying to the council to have it designated. This is particularly important at the edges of the proposed area since those working or residing in that area may not identify with the neighbourhood plan area, content, or been invited to join the Neighbourhood Forum. In the coming months I hope to participate in developing a plan for the South Bank neighbourhood, including the area west of Blackfriars Road. I would have serious reservations about a Neighbourhood Plan which does not recognise that the area west of Blackfriars Road is the South Bank rather than Bankside. It is important that no decision is taken to designate the Bankside area until both the Bankside and South Bank plans can be considered together, on their comparative merits. I hope that you will take these comments into account since I am a resident of the community affected.		made to reflect comments made during consultation. Further detail is set out in the IDM Report. Southwark Council will work with any neighbourhood forums in the South Bank area that become established bodies for the purposes of neighbourhood planning and whose proposals could have an impact in Southwark.
63	1008		Area	I operate a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South		Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood

	Bankside Neighbourhood Plan								
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				Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum.		planning.			
62	1007		Neighbourhood Area application	Objection to proposed Eastern boundary of the Bankside neighbourhood development area While I very much welcome in principle the proposed establishment of the Bankside neighbourhood development area, I am emailing because I have an objection to the Eastern boundary of the area as currently proposed (ie. the green boundary). I also object to the Eastern part of the red boundary. Whilst I understand and to a certain extent agree with your arguments in favour of a unified approach to both sides of Borough High St, I believe the current proposals would cause problems for the area to the East of Borough High St, and therefore a fairer and better altogether solution would be to put the boundary down the middle of Borough High St. The problems I envisage are: 1. The buildings and sites on the E side of Borough high St (BHSt), and how they are used, have a great effect on the streets behind them in the mostly residential areas to the E of BHSt. Separating the two into two different planning regimes would leave residents and other stakeholders with little influence over planning policy in their immediate surroundings. This is contrary to the whole underlying motivation behind the Localism agenda and therefore should not happen. Although this is a danger at any boundary, it needs to be minimised and done in a fair way, which I believe is not happening under the current proposals. As an example, take the block where I live, Betsham house on Newcomen St. The green line almost encircles my block, leaving it isolated and surrounded on 3 sides by a different planning neighbourhood where my block's residents would not have any formal involvement. Immediately adjacent sites eg. Nags Head Yard which cause huge problems for the residents of my block would be in a different area. The red line is not so bad but still has similar problems. The reason why I think a boundary down the middle of BHSt are important to residents (and others) in the whole surrounding area, both to the East and the West.	10/04/2013	Comments noted. It is proposed to include both sides of Borough High Street in the Bankside Neighbourhood Area, as proposed by Bankside Neighbourhood Forum. However, the extent of the eastern boundary is limited for the most part to the buildings and yards immediately adjoining the eastern side of Borough High Street. The main hospital campus has therefore been excluded from the neighbourhood area. All eventual neighbourhood plans will need to be broadly consistent with boroughwide planning policies and the council will encourage ongoing cooperation between any neighbourhood forums that share a boundary.			

	Bankside Neighbourhood Plan							
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				Neighbourhoods on both sides need to be involved in planning policy and strategic issues. I hope a central boundary would encourage co-operation and discussion between both of the neighbourhoods which it affects; indeed I believe this is the only way that important roads like this can be dealt with successfully. There need not be any disjointed planning, as long as there is co-operation. 2. If the Eastern side of BHSt is incorporated into the Bankside neighbourhood as shown by the green or red lines, there is a danger of leaving an area to the East of that, ie. South of Newcomen St and Snowsfields, which is almost entirely council estates eg. the Tabard, Leathermarket JMB etc. There would be little chance of this area benefitting from sharing much CIL, because most large developments are likely to be on the main roads and not on the estates which almost entirely fill the area already. It would remain the 'hinterland' between regeneration areas and better-off places that it has been for the last 30 years that I have lived here. Access to CIL is again one of the underpinning principles of Localism; I believe that Localism can only succeed where communities have some prospect of resources to implement their chosen priorities. 3. (Applies to red line only) I think the many 'folds' in red line will cause immense problems where yards and their adjacent buildings are in separate areas. Not only is it nonsense now (in my opinion), but it will be worse in the future when the building footprints may change and you may get buildings with several boundary changes within a single building! I hope you will be able to incorporate my points into the discussions about the boundary. Please continue to keep me informed of any developments in the Bankside area as well as in my own area				
60	1006		Area	re Neighbourhood plans for Southwark strip of Waterloo I have recently become aware of neighbourhood plans for the South Bank and Bankside and am very pleased that proposals are in hand locally for taking advantage of this opportunity. However it is unfortunate that there seems to be no provision in the Government proposals for allowing for the fact that Local Authority boundaries have sometimes been drawn in odd places such as that which wanders through the side streets between Southwark	09/04/2013	Comments noted. The council is required to consider the "neighbourhood" as proposed by the Bankside Neighbourhood Forum. We will work with South Bank Neighbourhood Forum on neighbourhood plans if they are		

Bankside Neighbourhood Plan								
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			and Lambeth in SEI. Residents naturally have to refer to their Local Authorities for some things yet this is not the same as "neighbourhood" which is created by such factors as natural barriers (eg major roads with traffic to the Thames Bridges), local shopping and travel routes. In 1971 I became the first paid community worker in Waterloo, funded by Lambeth but employed by Blackfriars Settlement. Appointed because there was so little community activity in Waterloo. The natural boundary to Waterloo on the east was Blackfriars Rd and the generation of community activity fitted well. In fact a youth group I organised for Southwark boys living west of Blackfriars Rd, could not cross Blackfriars Rd because they believed they would be attacked on the other side as it was the territory of other boys, so I found them a base which was on the right side of the road. That it was in Lambeth did not matter. Other developments took place within the above definition of Waterloo eg Colombo Street Sports and Community Centre was initiated by people from the Lambeth side of Hatfields. No one gave a thought to the fact that it was on the Southwark side of Hatfields. Achieving Coin St was a combined effort. Waterloo wide community organisations eg Waterloo Action Centre, Association of Waterloo Groups, Waterloo Community Development Group had and have Blackfriars Rd as there eastern boundary. Since being the community activities. The South Bank Employers Group has for many years brought people together in the Waterloo area to Blackfriars Rd, or possibly stretching to Blackfriars Bridge. There have been many related developments eg the Waterloo Community Regeneration Trust (an SRB programme) with these boundaries for Christchurch are an exception to the normal pattern with the Church on one side of the road and much of the parish on the other. This is presumably because the parish boundaries pre-date the motorised traffic and even Blackfriars bridge. I am not aware in my association with		designated as a Neighbourhood Forum for the purpose of preparing a plan and if their proposals could give rise to impacts in Southwark.			

				Bankside Neighbourhood Plan		
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				thought of as Bankside. Although the issue is difficult I am therefore, on balance, strongly of the view that for neighbourhood purposes the sensible barrier would be Blackfriars Rd. Thank you for considering my views. I had not seen anything about the proposal until recently Living at Whittlesey St I am quite close to the borough boundary myself. Very few people seem to know about the proposal but I appreciate that SBEG are organising a cross borough meeting shortly		
58	1005		Area application	I operate a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum.	09/04/2013	Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
57	1004	-	Area application	I operate a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross- borough collaboration as evidenced in the work over the last 20 years of the South Bank forum.	09/04/2013	Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
55	1003		Area application	I operate a business in the South Bank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as part of the Bankside neighbourhood area. I have not been consulted by the Bankside	09/04/2013	Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank

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				neighbourhood forum on this nor been invited to help develop a neighbourhood plan for the area. I believe the area described above is a part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross collaboration evidenced in the work over the last 20 years of South Bank Forum		Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
54	1002		Area application	Dear [Councillor] Adele [Morris] thank you for the info re the Neighbourhood plan. I am way until the middle of next week and can look at it properly and respond then. As you can imagine I will be supporting the boundary and will be keen to be involved	10/04/2013	Support noted.
53	1001		Area application	I operate a business in the South Bank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum		Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
52	1000		Area application	I operate a business in the South Bank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum		Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
51	999		Neighbourhood	I operate a business in the South Bank, in the area between Blackfriars	09/04/2013	Noted. We have made Bankside

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				Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum		Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
49	998		Area application	I operate a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum	09/04/2013	Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
48			Area	This letter is to inform you that Colombo Street Community and Sports at 34-68 Colombo Street, SE1 8DP has not been consulted either by letter, email, phone or in-person by the Bankside group regarding the proposal to designate the area west of Blackfriars Road as Bankside. For information Colombo is a Sports and Community Centre offers a budget gym, indoor and outdoor sports facilities; we have a gym membership of around 1400 users plus a range of community groups, casual users plus children, young people and adults accessing our community sports activities on a regular basis. Many members are local residents and staff of local businesses. Please confirm that you have received this letter and I look forward to receiving information from your regarding this matter.		Noted. We have made Bankside Neighbourhood Forum aware of this response.
47	996		Neighbourhood	I operate a business in the South Bank, in the area between Blackfriars	09/04/2013	Noted. We have made Bankside

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			Area application	Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this nor been invited to help develop a neighbourhood plan for the area. I believe the area described above is a part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross collaboration evidenced in the work over the last 20 years of South Bank Forum		Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
46	995		Area application	I operate a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum.		Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
45	994		Area application	I operate a business in the Southbank, in the area between Blackfriars Road and the Southwark Borough Boundary. I have been made aware of an application to designate this area as a part of the Bankside neighbourhood area. I have not been consulted by the Bankside neighbourhood forum on this, nor been invited to help them develop a neighbourhood plan for the area. I believe the area described above is part of the South Bank neighbourhood and I will be engaging with the South Bank neighbourhood forum to help them develop a plan reflecting the importance of cross-borough collaboration as evidenced in the work over the last 20 years of the South Bank forum.		Noted. We have made Bankside Neighbourhood Forum aware of this response. Southwark Council will work with South Bank Neighbourhood Forum if it becomes an established body for the purposes of neighbourhood planning.
44	993			I am the parish Priest at Christ Church of England Church in Blackfriars Road and have been there eight years. There has been a church on the	01/03/2013	Support noted.

				Bankside Neighbourhood Plan		
	Obj Ref	Agent Ref	Stage	Details of representation	Date received	Officer Response to Representation
			application	site of Christ Church since 1670, the present church being the third on the site and built in 1960. It has consistently sought to engage with the local area and serve the population of the area. I was therefore delighted to be invited to join the Neighbourhood Plan Forum in September 2011. Our church congregations come from a wide range of ethnic backgrounds and we host Nigerian, Ghanaian and Aramaic speaking independent churches on our premises. In addition to the worship space, there is also a hall used for many community activities and we also offer office space to four charities, including Bankside Press, who produce the SE1 Community newspaper. We have close links with the Bankside Open Spaces Trust with whom we co-operate closely. As you will be aware there is a huge amount of development going on within Bankside and I have had contact with most of the developers around Blackfriars Road. I fully support the boundaries as outlined in the draft plan, which I believe are appropriately drawn, workable and a good reflection of the natural boundaries of the community. Please don't hesitate to contact me if you need further information.		
43	992		Area	Bankside Neighbourhood Forum and Neighbourhood Plan Please find this letter as an expression of support from Network Rail for the Bankside Neighbourhood Forum's aspiration to make Blackfriars, Bankside, and Borough a better place to live and work and visit. The proposed boundary is considered acceptable and justified. If you have any questions or wish to discuss in detail, then please do not hesitate to give me a call.		Support noted.
42	991		Area	I understand from Tim that the question of representation is still being sorted out. I would like to point out, as one of the resident representatives, that when I attend the Forum I attend not as myself but as a representative of my local community, in which I have lived for 15 years and have volunteered in for the past 7 years. I have regular contact with many local community groups including SE1 Safer Roads, FMM Playgroup and Boroughbabies as well as the local parent/teacher groups at the four local schools - which I have used to inform the opinions I present at the Forum. I	01/03/2013	Support noted.

				Bankside Neighbourhood Plan		
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				understand fully that the role of the resident representative is not to represent their own interests but that of their community. I feel that when I state my opinions at the BN Forum Plan meetings it is not as an individual person but as someone drawing from my wealth of community and personal experiences. Should any member of the Council wish to discuss my representation of my local community in further detail I am more than happy to do so.		
41	990		Area application	I am aware that the council is near to making a decision in respect of the boundaries for the first Neighbourhood Plan areas that have come forward. You will know that Better Bankside is a membership organisations with around 500 members in the Bankside area. We also have a fruitful working relationship with developers and contractors active in the area through a mechanism known as the Logistics Group. Given the scale and impact of development on the Bankside area our board has taken an increasing interest in how to influence and shape the course and nature of that development. Hence when the opportunity to work on a Neighbourhood Plan arose in mid 2011, first as supporters of a resident application and subsequently as a so-called business front-runner, we eagerly became involved. At that early stage we carefully examined what would constitute a natural neighbourhood for this purpose and it was apparent that, depending on what perspective you adopted, the boundary could be drawn in different ways. What should constitute the area was one of the main topics of debate at the early meeting of the emerging Neighbourhood Forum, a body which for the first time brought together residents, businesses and other stakeholders to consider planning issues at the macro/strategic level rather than on a project basis. There was debate about whether the boundary could be stretched as far south as the Elephant I remember but it was agreed that the boundary as currently drawn was the most appropriate. As you might imagine not all of our business membership is engaged of even interested in this topic, but information has readily been made available to the membership and we have had no adverse comments, even though the Plan boundary goes		Support noted.

				Bankside Neighbourhood Plan		
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				further than the BID boundary. The board on the other hand have been very engaged and have asked that the Plan be a standing item at board meetings over the past year. At a recent meeting they went further than this and resolved to use the Plan as a means to formulate responses to the large planning applications that are in the pipeline. Better Bankside and its board are clearly in favour of the proposed boundaries. From our discussion with developers in the area it is evident that they are also in favour of the boundaries as drawn. In support of this they have either already contributed financially or indicated that they will do so. These include Land Sec, Native Land, and the Blackfriars' schemes promoted by GPE, St George and Carlyle Group. Where there have been issues where the plan has butted up against others, we have sought to find a solution which will ensure that those stakeholders with interests adjacent to the Plan area are afforded every opportunity to participate in the development of the plan. We have been involved in discussion with a number of groups already, i.e. in advance of any formal designation of the Forum and Area. We fully accept that more will need to be done when the area is ratified and the forum formally constituted. From our knowledge of this process locally and nationally we have done as much as many and more than most in this respect thus far. Please do not hesitate to contact me should you require anything further to support the council's deliberations at this stage.		
39	989		Area	Tim Wood of Bankside Neighbourhood Forum has suggested that I write to you regarding the geographical boundary of 'Bankside'. I understand that it has been suggested that Bankside ends at Blackfriars Road. I have lived in the area since 1997 when I moved into a flat in River Court on Upper Ground, immediately west of Blackfriars Road. I have always considered myself to be living in Bankside and as I understand it, the western boundary of the Neighbourhood Plan is the Borough boundary somewhat to the west of where I live. I am on the steering group of Christchurch Gardens which is just to the south of where I live and again, just to the west of Blackfriars Road – a space with which Bankside Open Spaces Trust (of which I am the Secretary) has been involved for many years. I		Support noted. It is proposed that the area between Blackfriars Road and the administrative boundary to the west is included in the Bankside neighbourhood area.

	Bankside Neighbourhood Plan								
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				take part in meetings of Bankside Residents Forum and other 'Bankside' events and consultations. Developments in the area mean that I am surrounded by building sites with more proposed. It would be perverse if this part of Southwark was not regarded as being part of Bankside simply because it is west of Blackfriars Road					
38	988		Neighbourhood Area application	I am writing to advise that Blackfriars Settlement supports the proposed boundaries for the Bankside Neighbourhood Plan. The Settlement has welcomed involvement in development of the draft plan, particularly the consideration of social and community services required by local residents into the future, which will inform our own future strategy. There was early discussion around the boundaries and our view is that the proposed boundaries are logical and offer opportunity to include the needs of long- standing residents in social housing alongside those residents who live in privately owned accommodation.	05/03/2013	Support noted.			
35	987		Neighbourhood Area application	I am writing in support of the present proposals for the creation of a neighbourhood and neighbourhood council for Bankside and Borough. As someone who was born in Southwark; has represented this area at both Ward and Constituency level, and been active locally for over 40 years, I strongly support the move. This is an area with very historic boundaries. For example, I was a Trustee of Borough Market for over 30 years. Trustees were drawn from the old parishes in the area, including people from Rennie Court, Copperfield Street (both sides), Peabody - Southwark Street, Bankside, Borough High Street (both sides), Friars Close - Bear Lane - to mention a few. It is important to respect these historic affiliations. I am not in favour of drawing boundaries down roads for the same reason. It is a completely arbitrary and anti-historic way of looking at an area. Another example is Copperfield Street Garden, which I and other locals have looked after for 40 years. Currently we are discussing re-using the church with the Cathedral Authorities, because it is one of the very few buildings available in Bankside/Borough for community use. It is important therefore that any boundary to the south takes in Copperfield Street on	20/03/2013	Support noted.			

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				both sides. I am also against the idea of a neighbourhood extending into Southwark from the Lambeth side. Quite apart from the reasons set out above, it seems completely unethical that money that should be allocated locally in Southwark through CIL would instead be spent in Lambeth. The area to the west of Blackfriars Road (adjacent to where I live) is one where many developments are planned. It seems to me as a matter of principle that adjacent residents who are going to be inconvenienced in the surrounding neighbourhood in Southwark be the first beneficiaries. I look forward to further news as the neighbourhood develops.		
34	986		Neighbourhood Area application	I am a Bankside resident. I would like to endorse my full support for the neighbourhood plan put forward by the Bankside Neighbourhood Forum. I feel that the proposed boundaries, plan and associated documents will support the aspiration to make Blackfriars, Bankside and Borough a better place to live, work and visit.	01/03/2013	Support noted.
33	985		Neighbourhood Area application	Please accept my apologies for being so late with this as I have been away. I just wanted to confirm that in my role as a member of the Bankside Neighbourhood Plan forum I have been representing both Tate Modern (Head of Regeneration) and Borough Market (Chair). Both of these organisations are fully supportive and enthusiastic about the process we are undertaking, the boundaries and the exciting strategy that is and will emerge in wider consultation with community and business. Indeed, as you know, Borough Market has already formed an environs group of public and private bodies in that immediate area to look at how the plan can work there. I look forward to continuing to work with you and realising this important project.		Support noted.
31	984		Neighbourhood Area application	Sorry for the delay in our response. Thank you for consulting with us on the proposal to designate the Bankside Neighbourhood Plan area which lies within the administrative boundaries of the Borough of Southwark but borders the Waterloo Opportunity Area within the Borough of Lambeth. In accordance with the Duty to Co-operate regulations in the 2012 National Planning Policy Framework which expects joint working on areas of	15/03/2013	Comments noted. The council's decision will be based on the information provided and with regard to the requirements of the Town and Country Planning Act 1990 and the associated

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				common interest to be diligently undertaken for the mutual benefit of neighbouring authorities, there has been an ongoing process of consultation and co-operation between Southwark Council and Lambeth Council over the Bankside Neighbourhood Plan area designation. In this matter Lambeth Council is of the opinion that the decision to designate the Bankside Neighbourhood Plan area should be framed against the process of ongoing co-operation and dialogue between the various interested parties, including the South Bank Employers Group (SBEG) whose established operational structure encompasses the western boundary of the Bankside area application boundary (up to Blackfriars Road). Our view is that we need to encourage both parties to work together to agree a mutually acceptable position as if this is not achieved it will difficult for either parties to demonstrate they have met the tests of ensuring adequate involvement of all parts of the resident and business community in the proposed area. One such solution may involve SBEG forming part of the Bankside neighbourhood forum or both groups developing a memorandum of understanding on how they will work together in relation to issues of shared interest. Without such an agreement between the parties, Lambeth Council is not in a position to support the proposed Bankside neighbourhood forum/area designation		Neighbourhood Planning Regulations. The Neighbourhood Planning IDM report addresses the issues of a memorandum of understanding between Bankside Neighbourhood Forum and the South Bank Neighbourhood Forum. The cooperation between Lambeth and Southwark Councils is noted and we are confident that this can continue as neighbourhood plans are developed in both boroughs.
32	983		Neighbourhood Forum application	We are writing with regards to the Bankside Neighbourhood Forum which is seeking approval as the formalised forum for the Bankside area. Guy's and St Thomas' NHS Foundation Trust holds a large land interest within the neighbourhood area and as such our views should be given great weight in consideration of the relative merits of their proposal. Bankside Neighbourhood Forum ("BNF") The Trust has been developing a key relationship with the BNF in the last year, as the group covers the catchment area for Guy's Hospital's staff, patients and visitors. The early draft of the Bankside Neighbourhood Plan sets out its aspirations for the area and the Trust welcomes the opportunity to engage with BNF and develop ideas from this plan to also include the Trust's future plans for its Estate, particularly around Borough High Street. A number of points of the	04/03/2013	Comments noted. At this stage, the decisions to be made just relate to defining the neighbourhood area and determining whether or not Bankside Neighbourhood Forum can be designated as the Neighbourhood Forum for this neighbourhood. Once an Area and Forum are designated, a neighbourhood plan can be prepared. We will relay these

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				draft plan need some further consideration, particularly in view of the work for the Trust: - 1. There is an aspiration to reduce the speed limit on all roads within the Neighbourhood to 20 mph. Whilst Guy's Hospital is not within the Neighbourhood, our ambulances may well use some of the streets during an emergency. We are aware that this is not a planning matter, however and would question the relevance of this with the Neighbourhood Planning Framework (see Policy 6.1). 2. Policy 1.4 outlines Hotels and Student accommodation and highlights that such developments may be supported where they demonstrate a clear contribution to the local community by: • Supporting local employment • High design quality • Provide active frontages • Access to communal facilities for public • Management plan in place to protect residents The Trust's view is that this creates additional constrictions for the development of student accommodation in the area that is not too overly restrictive. We look forward to working on developing our working relationship with Bankside Neighbourhood Forum and in support of their application. We hope that you will find the views of Guy's and St Thomas' NHS Foundation Trust to be helpful with your decision with regards to the applications for the neighbour plans in the Bankside area.		comments to any neighbourhood forums whose areas include or affect the Guy's and St Thomas's Estate.
59	983		Area application	Thank you for your letter dated 21 March 2013 regarding the consultation on Bankside Neighbourhood Development Area proposal. We feel that there has been some confusion with regard to the responses to the two different consultation requests for Bankside and Bermondsey Neighbourhood Forum on 5 March 2013. Our understanding at the time was that we were required to provide the Trust's views about the respective neighbourhood plans set out by the forums rather than what has now been assumed as the Trust's preference for the respective neighbourhood areas. Firstly the preferred neighbourhood plan for the purposes of Guy's and St Thomas' NHS Foundation Trust and Guy's and St Thomas' Charity is the Bermondsey Neighbourhood Development Area. This would better serve our interests as both institutions have larger land interests in this area which include the new Cancer Centre which is being	10/04/2013	Comments noted. The proposed Bankside neighbourhood boundary has been scaled back so that for the most part it only includes the buildings immediately adjoining the eastern side of Borough High Street. The main hospital campus has therefore been excluded from the neighbourhood area.

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				built on the corner of Great Maze Pond and Snowsfields. Also with London Bridge station being located within the boundaries of the Bermondsey Neighbourhood Development Area this would greatly impact to our business development plans, services to staff, patients and visitors. We have also outlined in our response to the Bermondsey Neighbourhood Planning that we were fully in support of the Bermondsey Neighbourhood Forum (BNF) as we have been working closely with them sharing the Trust's future plans for its Estate and the relationship has been mutually beneficial. Whereas we have found that Bermondsey Village Action Group (BVAG) has not been as engaging with key stakeholders or for that matter a group that has been supportive of any new developments in the area but instead more of an action group defending the character and heritage within the area. We feel that the Council needs to look closely at which ever forum takes on the Bermondsey Neighbourhood Development Area has aims in accord to those of the NPP Framework. In view of the Trust's request to remain within the Bermondsey Neighbourhood Development Area, we also ask that the extended line added to the Bankside Neighbourhood Plan be set back to not include the Trust's site, but instead create the neighbourhood line to run along Borough High Street which would effectively be the 'Old Bankside Neighbourhood Forum boundary'. We hope that you will find the views of both Guy's and St Thomas' NHS Foundation Trust and Guy's and St Thomas' Charity helpful with your decision with regards to the neighbourhood planning within the Southwark area.		
29	982		Area	I am in agreement with Cllr Morris, and as per my comments at Community Council I believe it to be essential that Borough High Street is contained within a single plan area.	01/03/2013	Support noted. The proposed neighbourhood area contains the entirety of Borough High Street.
27	981		Area	I would just like to formally add my support to my colleague's e-mails for the Bankside Neighbourhood Plan boundaries. In regards to the boundaries my comments would be as follow Northern boundary-the River Thames obviously provides a logical boundary Eastern boundary-I strongly		Support noted. The proposed boundaries reflect the points made.

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				believe that including both sides of Borough High Street in the Bankside Neighbourhood Plan is the best option despite the competing aims of one of the Bermondsey Neighbourhood plans for Borough High Street. The primary reason I believe it is better suited in the Bankside Neighbourhood Plan is the fact that the Bankside Plan is a joint business and residential plan and Better Bankside as the local Business Improvement District recently extended their BID area to include Borough High Street. Furthermore I believe that Borough High Street with a significant amount of office, retail ad other businesses will benefit from being in a joint residential and business led plan. Southern boundary-While I personally believe there may have been merits to extending the southern boundary further south, I still support the current proposal and recognise that the proposed southern boundary better reflects the existing boundaries of Better Bankside. Western boundary-while I fully accept that a case can be made for including the land to the west of Blackfriars Road in the proposed South Bank Neighbourhood Plan I also believe a strong and valid case can be made for it being included in the Bankside Neighbourhood Plan. The neighbourhood plan is effectively a planning document and would sit as part of the hierarchy of Southwark planning documents. To this effect placing this westerly part of the ward with the rest of ward makes perfect sense as all the areas are subject to the same strategic council planning policies and therefore would benefit from a consistency of thinking and planning policy. Conversely if the western side was put with South Bank a small piece of Southwark would be linked with an area that is predominantly controlled and subject to Lambeth strategic planning policies and thinking. For these reasons I strongly support the proposed Bankside Neighbourhood Plan boundaries.		
25	980		Area application	The principle of 'sustainable communities' is not only about their long-term life, nor even only about the cross-sectional social mix which gives them internal mutual cohesion, but also, it seems to me, about the character of the community, which is often locally defined. You're fully aware that the northern end of the Borough is not one but a network of micro-	05/03/2013	Support noted.

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				communities, many of them very specific, historic and local. Blackfriars is not Bankside, and Bankside is not Borough, and local people, including young people, are very tribal in their allegiance. There is something positive to be said for encouraging people out of social ghettos and widening cultural horizons, and I believe the draft Neighbourhood Plan does that by embracing Bankside, Blackfriars and Borough. From my knowledge of the local area, working at the Cathedral and in West Bermondsey, living at the Elephant and Castle and as a Director of Bankside Residents Forum, I would simply suggest that widening the NP boundaries further in the name of greater inclusivity is paradoxically likely to become less sensitive to the existing cross-sectional mix of old and young, rich and poor, workers, students and residents by requiring ever- more broad-brush approaches to planning and development, hostile to the existing inclusive character of these small local communities. I would therefore urge the acceptance of the Neighbourhood Forum's overall aspiration, and their proposed boundaries.		
24	966		Forum application	Regardless of what area is selected for the Neighbourhood Plan, I would be keen to know: o What communication and consultation mechanism is proposed to ensure Waterloo Quarter BID is able to participate fully in future decisions affecting its members? o How, in the case of The Cut in particular, does the Neighbourhood Forum propose to engage with Lambeth Council and Waterloo Quarter BID to ensure that its policies do not further reinforce the inconsistencies caused by the current borough boundary?		We acknowledge that developing any new planning guidance for the area covered by the Waterloo Quarter BID, including the Cut, will require a coordinated approach between all parties. Bankside Neighbourhood Forum has stated that they will continue to work closely with all the stakeholders within and outside the boundary and have drafted a memorandum of agreement. We have made them aware of these specific concerns.
23	966		Neighbourhood	I had the following specific comments and questions relating to the	15/01/2013	Comments noted and have been

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			Area application	westernmost boundary of the proposed Plan area where it meets the Lambeth borough boundary: - What is the rationale for extending the boundary of the Plan area west as far as the borough boundary with Lambeth (ie half way down The Cut)? The Waterloo Quarter BID area in Southwark was established with the specific aim of overcoming some of the difficulties caused by the borough boundary – specifically in the case of The Cut to treat the street as a coherent whole. Southwark Council has recently supported Waterloo Quarter's successful Portas Pilot for Lower Marsh and The Cut, which also aims to reconnect this important route. I am concerned that the proposed Plan boundary area may only serve to reinforce the sense of disjunction caused by the borough boundary		passed on to Bankside Neighbourhood Forum. The neighbourhood forum has the discretion to propose a boundary which they believe captures the local neighbourhood. Their reasons for the western boundary are set out in the information supporting their application.
81	966		Area	Thank you for your letter dated 21 March 2013 regarding the revised proposed boundary for the Bankside Neighbourhood Plan area. We note that an additional section of The Cut has been included, comprising properties on the south side of the street as well as an additional section of properties on Blackfriars Road south of the boundary with The Cut. We are not aware of any prior consultation with the BID regarding this amendment. The previous iteration of this boundary was problematic for Waterloo Quarter BID due to the effect it had of segmenting The Cut. However, as it only included two commercial properties in the BID area on the northern side of the street, we chose not to object for practical reasons. The latest version only serves to make this severance half way along The Cut even worse, in particular through the inclusion of a large section of retail frontage, and is not acceptable to Waterloo Quarter BID. Extending the BID boundary to include both the Lambeth and Southwark sections of The Cut was central to the BID's extension into Southwark in 2008, which was supported by Southwark Council. Businesses in this area voted to be part of the BID, as they feel the street should be read as a single whole and unified, not divided by administrative and policy boundaries. We feel that the proposed neighbourhood plan boundary makes little sense in planning terms, as it will only serve to strengthen the inconsistencies in policy application at either end of the street, particularly in terms of the allocation	10/04/2013	Comments noted. All iterations of the proposed Bankside Neighbourhood Area have included parts of The Cut. It is considered that issues affecting The Cut will need to be addressed as part of the preparation of planning policy and that cooperation and coordination between the Waterloo Quarter BID, Southwark and Lambeth Councils and any Neighbourhood Forums will be essential in achieving this.

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				of use classes along the street relating to A-class uses. I trust that you will take these comments seriously and enable The Cut to be considered as a whole as part of future locally-led proposals		
22	965		Forum application	Thank you for your letter dated 15 November 2012 informing us that Southwark council have received two applications to designate the Bankside Neighbourhood Area/Business Area and the Bankside Neighbourhood Forum. At present we do not have any comments to make on the two applications but as a neighbouring borough we have a material interest in how these applications progress and consequently on how they may affect our neighbourhood plans, with a particular reference to the potential South Bank Neighbourhood Plan. In light of any possible cross boundary implications we would be grateful if you would keep us informed of any pertinent contact you have with the South Bank Employers Group (SBEG), an organisation that intends to lead on the South Bank Neighbourhood Plan through its designation as a Business Neighbourhood Plan front runner by the Department for Communities and Local Government (DCLG) in 2012. Of course we will be happy to reciprocate any information sharing arrangement with you.		Comments noted. We acknowledge that there is potential for a future South Bank Neighbourhood Plan and will keep Lambeth Council informed of contact with the South Bank Employers' Group and of any neighbourhood planning developments in Southwark.
21	965		Neighbourhood Area application	Thank you for your letter dated 15 November 2012 informing us that Southwark council have received two applications to designate the Bankside Neighbourhood Area/Business Area and the Bankside Neighbourhood Forum. At present we do not have any comments to make on the two applications but as a neighbouring borough we have a material interest in how these applications progress and consequently on how they may affect our neighbourhood plans, with a particular reference to the potential South Bank Neighbourhood Plan. In light of any possible cross boundary implications we would be grateful if you would keep us informed of any pertinent contact you have with the South Bank Employers Group (SBEG), an organisation that intends to lead on the South Bank Neighbourhood Plan through its designation as a Business Neighbourhood Plan front runner by the Department for Communities and Local		Comments noted. We acknowledge that there is potential for a future South Bank Neighbourhood Plan and will keep Lambeth Council informed of contact with the South Bank Employers' Group and of any neighbourhood planning developments in Southwark.

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				Government (DCLG) in 2012. Of course we will be happy to reciprocate any information sharing arrangement with you.		
9	960		Neighbourhood Area application	In addition we note that Southwark does not currently operate a local list of buildings of historic and/or architectural interest. As the area contains notable buildings of townscape merit which fall outside the designated conservation areas, but are not of national significance, this might be an aspect which can be sensibly be incorporated into the development of the Plan. If you consider this appropriate we would be happy to explore this further with you and the Neighbourhood Forum. I have attached the links to our published guidance on local listing http://www.helm.org.uk/upload/pdf/local-listing-guide.pdf?1355485658 and our general guidance on neighbourhood planning which you may find useful http://www.english-heritage.org.uk/professional/advice/hpg/historicenvironment/neighbourhood dplanning/	19/12/2012	Comments noted. This does not affect the determination of the applications for the Bankside neighbourhood area or Bankside neighbourhood forum.
8	960		Neighbourhood Area application	Thank you for consulting English Heritage in respect of the proposed boundary for the Bankside Neighbourhood Plan. English Heritage's remit is advice on proposals affecting the historic environment. Our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets. I have had the opportunity to liaise with Council officers and to review the proposed boundary on site and can offer the following observations. The proposed Bankside Neighbourhood Plan area incorporates a large area which includes the Bear Gardens Conservation Area and much of the Borough High Street Conservation Area. In the south the boundary abuts the King's Bench Conservation Area. It includes a substantial number of designated heritage assets including the grade 1 listed Cathedral and George Coaching Inn, and the grade II* listed St George the Martyr, Winchester Palace and Hopton Almshouses. There are concentrations of listed buildings around the historic High Street, Market, and Hopton Street. The area displays a great variety of character and drama through the juxtaposition of industrial and	19/12/2012	Comments noted. All of the boundaries have been reconsidered on the basis of their impact on heritage assets and conservation areas. This has led to minor changes to the south and eastern boundaries in particular.

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			transport related buildings and infrastructure, small garden spaces and cemeteries, the Cathedral, the Tate Modern, historic pubs, small cottages, housing estates and new architecture. The proposed eastern Plan boundary includes both sides of Borough High Street. We are aware that there are a number of potential Neighbourhood Plans with a sense of ownership for the High Street. In our view there are clear benefits in ensuring this important historic thoroughfare is treated holistically and that artificial boundaries dividing the High Street are avoided. In addition, the High Street falls within the Borough Conservation Area, and the eastern boundary of the Conservation Area extends further east than both the High Street and the proposed Bankside Neighbourhood Plan boundary. It would therefore be sensible to encourage community liaison to ensure a consistent approach to heritage and development management policies across any Neighbourhood Plan boundaries. The southern Plan boundary appears to cut through St George the Martyr. It would be useful to consider how this might relate to other neighbourhood boundaries and the wider conservation area. With the exception of the historic church the 1970's/80's office developments offer little architecturally or in the way of active frontages, however it would be useful to consider how the Plan might seek to frame and enhance the setting of the church, and the busy junction and within which Plan the church best sits. Moving west, the boundary logically follows Great Dover Street. However, there may be merits in considering a boundary to follow the line of the conservation area. Both the proposed Plan boundary and conservation area boundary are drawn along Copperfield Street. However, there may be merits in considering a boundary that extends south to encompasses the grade II listed Firestation Museum and Winchester House, and returns via Sawyer Street and along Lonman Street. The western limit of the boundary is defined by the borough boundary and, the northern limit by th					

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				Neighbourhood Plan and if you wish to discuss any of the above observations please do not hesitate to contact me.						
28	916		Neighbourhood Area application	I am writing further to our discussion on the proposed Bankside Neighbourhood Development Area at the Borough, Bankside and Walworth Community Council on 26 February 2013. As you will be aware the community council voted unanimously to support the boundaries of the Bankside proposal. However, I thought it worth writing to reiterate my own views. While the River Thames and Borough High Street provide a natural barrier to the north and east of the proposed Neighbourhood Plan area, the western boundary is defined by the long established borough boundary. Critics from the neighbouring South Bank Employers' Group claim this western boundary (which includes the area west of Blackfriars Road, east of the Southwark/Lambeth boundary and north of The Cut) does not reflect the exiting neighbourhood. However, Blackfriars Road is changing – with a development pipeline of at least 1700 homes on or very close to Blackfriars Road. It will be important that these residents are given the opportunity to shape the place where they live. To this end, the Bankside neighbourhood plan is a hybrid effort led jointly by local residents and business with its membership drawn from across the neighbourhood (including west of Blackfriars road) and from different sections of the community. I am conscious that the purpose of the neighbourhood plan is to set out a range of policies and proposals for land use that will be used when determining future planning applications. Here again, it makes sense to reflect the long established boundary of the local planning authority, both to make sure that any neighbourhood plan is in conformity with wider planning policy – such as the local Opportunity Area and Core Strategy – and to ensure that future development opportunities can be addressed in an inclusive way as the focus of regeneration moves southwards. As a local councillor for the affected area I am acutely aware of the close connections between South Bank and Bankside, but there are clear advantages - and sound planning reasons - for keeping the		Support noted.				

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				the line anywhere else would create an even more arbitrary division and destroy what is fast becoming a cohesive community in its own right. As the Chair of the Bankside Neighbourhood Forum pointed out during our community council meeting, the forum will have to secure the backing of residents and businesses from across the area if their plans are to gain statutory force. Ultimately it will for local residents to have the final say in a referendum! I trust you will bring these point to the attention of Cllr Colley in advance of her decision on this matter.		
12	896	17	Area application	These representations are made on behalf of our client CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP PLC, in respect of the London Borough of Southwark Neighbourhood Plan process, specifically the Bankside Neighbourhood Area and Forum. As you are aware, CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP PLC, have a number of interests in LB Southwark including Sampson House and Ludgate House. We request that CEREP Sampson House, CEREP Ludgate House and Carlyle Real Estate Advisors LLP PLC are kept informed of the consultation process via Louise Steele of this office. We look forward to receiving confirmation of receipt of our representations and welcome further discussions regarding the Neighbourhood Area and Forum process.		Comments noted.
2	643		Neighbourhood Forum application	Thank you for consulting us on the above. It is not within our remit to comment on the proposed boundary of the area that will comprise the Neighbourhood Development Plan. We are also unable to provide any comments on the proposed composition of the Bankside Neighbourhood Forum. The Environment Agency encourages growth that can be supported by the necessary environmental infrastructure (for water resources, wastewater, waste and flood risk management), provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities. Once the neighbourhood area is determined and the Neighbourhood Forum is set, we will be able to provide environmental information on the emerging Neighbourhood		Comments noted.

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				Development Plan. In the meantime please find attached a guidance document produced between the Environment Agency, Natural England, the Forestry Commission and English Heritage. It covers: • Ideas on how to improve your local environment through neighbourhood planning; • Where to go for information about your local environment; • Information on environmental assessment; and • When to consult us – the above mentioned organizations. For the most up to date and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. http://www.geostore.com/environment-agency/ We are keen to work closely with you to identify infrastructure projects and environmental improvement schemes which will benefit sustainable development of the neighbourhood.		
1	643		Area application	Thank you for consulting us on the above. It is not within our remit to comment on the proposed boundary of the area that will comprise the Neighbourhood Development Plan. We are also unable to provide any comments on the proposed composition of the Bankside Neighbourhood Forum. The Environment Agency encourages growth that can be supported by the necessary environmental infrastructure (for water resources, wastewater, waste and flood risk management), provided in a co-ordinated and timely manner to meet the physical and social needs of both new development and existing communities. Once the neighbourhood area is determined and the Neighbourhood Forum is set, we will be able to provide environmental information on the emerging Neighbourhood Development Plan. In the meantime please find attached a guidance document produced between the Environment Agency, Natural England, the Forestry Commission and English Heritage. It covers: • Ideas on how to improve your local environment through neighbourhood planning; • Where to go for information about your local environment; • Information on environmental assessment; and • When to consult us – the above mentioned organizations. For the most up to date and accurate		Comments noted.

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				environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. http://www.geostore.com/environment-agency/ We are keen to work closely with you to identify infrastructure projects and environmental improvement schemes which will benefit sustainable development of the neighbourhood.		
56	643		Neighbourhood Area application	Consultation on Bankside Neighbourhood Development Area Proposal Thank you for consulting us on the above. We responded to the initial consultation in our letter of 27 November 2012 reference SL/2009/104986/AP-08/IS and have no further comments. Once the neighbourhood Development Area is determined we will be able to provide environmental information on the emerging Neighbourhood Development Plan. For the most up to date and accurate environmental evidence we recommend using our Data Share service where you can access our environmental datasets and also datasets from Natural England, Forestry Commission and English Heritage. http://www.geostore.com/environment- agency/ We are keen to work closely with you to identify infrastructure projects and environmental improvement schemes which will benefit sustainable development of the neighbourhood.		Comments noted.
26	642		Neighbourhood Area application	I am writing to express my support for the proposed boundaries of the Bankside Neighbourhood Plan area. It makes sense as a "neighbourhood", and it is a practical and workable area. It is essential that Borough High St is kept completely within one Neighbourhood Plan area rather than split between two. The residential properties west of Blackfriars Rd up to the borough boundary need to stay with a Southwark Neighbourhood Plan. We have resident support for that both in the form of one of our 21 members and also from discussion with residents in River and Rennie Court and the OXO Tower. I believe that my Borough and Bankside colleagues also supportive of the proposed boundary, as was shown at the community council meeting earlier this week. I trust that they will correct		Support noted.

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				me if I am wrong.					
50	437		Neighbourhood Area application	Consultation on Bankside Neighbourhood Development Area proposal March 2013 We write in relation to the above consultation. Better Bankside is the third BID in the UK, the second in London and the first south of the river. A Business Improvement District (BID) is an independent, business-owned and led company, which seeks to improve a given location for commercial activity. Better Bankside's members are the 460 companies in the BID area who pay its annual 'levy'. Many of these are heavily involved in the governance of the company. Our vision for Bankside is that it will be the best neighbourhood in the world by 2020. As you are aware the Bankside area received business front-runner status from DCLG in 2011 – a recognition of the mixed-use and commercial character of the neighbourhood. Since then Better Bankside has been working with resident, business and community partners through the Bankside Neighbourhood Forum to develop a draft plan for the Bankside Neighbourhood Forum over the last 18 months to establish the boundaries for the Bankside Neighbourhood Plan area which were formally consulted on by the Council in late November-December 2012. We are aware that the Council have reviewed the boundaries through a site visit involving the Chair of Bankside Neighbourhood Forum and a planning officer from the Council to ensure that there were no major anomalies in planning terms. We now understand that the Council suggests a number of changes to these boundaries as set out in the consultation letter dated 22nd March 2013. We have reviewed these proposed changes, and suggest that a more practical way forward would be for the Council in late 2012. We understand from the CDLG that there are provisions in the Localism Act (Section 61G(6)) for these boundaries to be amended at a future date if deemed necessary. We would be happy to discuss any of the		Comment noted. The proposed Bankside neighbourhood area has been scaled back from the option that was consulted on in March 2013. For the most part, the neighbourhood area only includes the buildings immediately adjoining the eastern side of Borough High Street. The main hospital campus has been excluded from the neighbourhood area. Aside from a series of minor changes, the reasons for which are set out in the Neighbourhood Planning IDM Report, the proposed boundary largely reflects the original boundary proposed by Bankside Neighbourhood Forum in November 2012.			

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				above points further with the Council if needed.		
11	375		Area	To our understanding, and this has been clarified by Better Bankside, in all the consultation and work done on the Bankside Neighbourhood area plan the London Bridge Station was not included. London Bridge Station does not fall within Bankside so it would make no sense to have it within the area.	18/12/2012	Comment noted. London Bridge Station is excluded from the proposed neighbourhood area.
10	375		Neighbourhood Area application	Team London Bridge, the London Bridge Business Improvement District, would like it noted that there is a discrepancy in the application of the boundary to the eastern side of the Bankside Neighbourhood Plan Area. It is stated in the boundary plan that London Bridge Station is included: "The eastern boundary is one block to the east of Borough High Street, as far south as Borough tube station, ensuring that both sides of Borough High Street can be included and this largely retail street be considered as a whole rather than divided along the middle. London Bridge Station is also included, as this is seen as an important element in the consideration of the railway line and the northern section of Borough High Street". However the eastern boundary follows the line of Borough High Street to the east one building block back as per the map listed in the application and does not include London Bridge Station.	18/12/2012	Comment noted. London Bridge Station is excluded from the proposed neighbourhood area.
78	375		Neighbourhood Area application	Consultation on Bankside Neighbourhood Development Area proposal Eastern Boundary. This letter details Team London Bridge's (TLB) response to the consultation currently underway to change the Eastern boundary of the Bankside Neighbourhood Area proposal. It is our understanding that Neighbourhood Development Areas are being established to improve and encourage a sense of community. The proposed Eastern extension of the Bankside Neighbourhood Development Area boundary encompasses an area that has never been considered part of the Bankside Community. With its history and organisations the area east of Borough High Street is firmly rooted in the London Bridge / Bermondsey community. We are not of the opinion that historic buildings necessarily define communities therefore Neighbourhood boundaries need		Comment noted. Both sides of Borough High Street are included in the proposed Bankside neighbourhood area, but the boundary has been scaled back so that for the most part it only includes the buildings immediately adjoining the eastern side of Borough High Street. The main hospital campus has been excluded from the neighbourhood area.

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			not be consistent with English Heritage or Conservation Area boundaries. Unofficially Borough High Street defines the boundary between Bankside and London Bridge. When the boundaries for the Business Improvement Districts (BID) were being drawn up it was agreed that both sides of Borough High Street should be included within one BID to allow the street to be considered as a whole. Borough High Street became included within Better Bankside and we believe that the Neighbourhood boundary should be established using the same logic. Furthermore we consider it would be wrong to include any part of St Thomas Street within the Bankside Neighbourhood area. It is stated in your consultation proposal, "In being part of the Bankside Neighbourhood Development Area the hospital and university will also gain from the possibility of access to some of the community infrastructure levy CIL funds that development in the area will generate, this will be 25% of the total money generated money in each Neighbourhood Plan area once a plan is agreed." It is our understanding that development is also planned for the London Bridge / Bermondsey area. Does this infer that no CIL from these areas will be accessible for the hospital and university if the new proposed Eastern boundary where to be adopted? We object to the notion that that the CIL generated from planned developments at Guy's and Kings might not be used within the London Bridge / Bermondsey Area because of their inclusion in the Bankside Neighbourhood Development area. This issue needs to be addressed during the development of the Neighbourhood Plan and not only at this stage in the designation of area boundaries. Lastly an extensive amount of research, consultation and progress (over two years) has been made during the development of the Bankside Neighbourhood Development area proposal. However this latest proposed boundary change was never part of that consultation and the stakeholders have not been party to the discussions. We therefore see no logic to including the eastern					

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				redevelopment plans in the area and is interested in nurturing a sustainable relationship with both the business and residential community.		
40	365		Neighbourhood Area application	As a local resident for 36 years and as a member of the BRF Management Committee I should like to support the boundaries proposed for the Bankside Neighbourhood Plan. Although I have long argued for cross Borough working in the N Southwark and N Lambeth area in question I think that on this occasion unnecessary complications would ensue to the implementation of the Plan.	05/03/2013	Support noted.
20	362		Neighbourhood Area application	For all these reasons, South Bank Employers' Group suggests that the section of the Plan area west of the railway line running south from Blackfriars Station should be removed from the plan area in anticipating of a South Bank, business-led, growth-focussed neighbourhood plan, drawn up in full consultation with all stakeholders. Should the Bankside Plan area and Forum be confirmed in full despite these representations, we would ask: a) London Borough of Southwark should publish the reasons for any decision to support the application in light of the comments above b) Confirmation should be contingent upon an agreement that the policies in the Plan relating to the area west of the railway line be developed with the fullest involvement of and in partnership with SBEG and its members, and with the future South Bank Neighbourhood Forum.	19/12/2012	Comments noted. The Council has passed the concerns on to the Bankside Neighbourhood Forum. The advice from the DCLG says that the council should attempt to find a compromise or a position where both groups can work together through a memorandum of agreement. This issue has been discussed with both groups and they are aware that they need to work together to prepare effective neighbourhood plans. BNF have stated that they will continue to work closely with all the stakeholders within and outside the boundary and have drafted a memorandum of agreement. Southwark Council will work with South Bank Neighbourhood Forum when it is set up to prepare an effective neighbourhood plans. If subsequently an application for a

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						neighbourhood area is submitted that impacts on another neighbourhood area that is already adopted, it is procedurally possible to change this boundary if there is a compelling reason to do so.
19	362		Forum	18. At no point to date have SBEG, nor its member, including a key member of SBEG, Coin Street Community Builders – a major landowner in the proposed plan area – been approached to discuss work being undertaken towards the Bankside Plan or been invited to join the neighbourhood forum, which should be open to all who live and work in the area covered by the plan. 19. Nor to our knowledge has there been adequate consideration of cross-borough issues through consultation with Lambeth, or with SBEG members in the work done to date on the Plan.	19/12/2012	Comments noted. The Council has passed the concerns on to the Bankside Neighbourhood Forum and has emphasised the need to contact residents, businesses and community organisations that could be affected by their proposed Neighbourhood Plan.
14	362		Neighbourhood Forum application	3. There has been no involvement to date and to our knowledge of neighbouring business organisations such as South Bank Employers' Group (which has been working on projects and activities in the area for over 20 years), or Waterloo Quarter BID (in whose area some of the proposed plan area falls), or members of those organisations, either in developing the Plan or determining the Plan area. It is not clear how it is intended that the plans of the various organisations will fit together and whether the Waterloo Quarter BID or SBEG qualify for places on the Neighbourhood Forum.	19/12/2012	The Council has passed the concerns on to the Bankside Neighbourhood Forum and notes the desire of residents and businesses to set up a South Bank Forum. The advice from the DCLG says that the council should attempt to find a compromise or a position where both groups can work together through a memorandum of agreement. This issue has been discussed with both groups and they are aware that they need to work together to prepare effective neighbourhood plans. Bankside Neighbourhood Forum has stated that they will

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						continue to work closely with all the stakeholders within and outside the boundary and have drafted a memorandum of agreement. If there is an application by a Forum where there is a particular reason to change the boundary at a later stage then this is procedurally possible. Southwark Council will work with South Bank Neighbourhood Forum when this is set up to prepare an effective neighbourhood plan(s).			
15	362		Area	4. Section 61 of Part 1, Schedule 9 of the Localism Act specifically provide that Neighbourhood Plan areas may cross boundaries, recognising that these areas are often most in need of local coordination and planning. Three quarters of the South bank Neighbourhood Plan area is in Lambeth, one-quarter in Southwark. The cross-borough neighbourhood has around 6,000 residents, 50,000 employees and a huge number of visitors – the South Bank riverside attracts an estimated 25m visits pa. It contains international businesses, London's premier cultural quarter, its most popular paying tourist attraction, a world-class university and teaching hospital, and the country's largest and busiest station. It is a very complex neighbourhood in terms of its community, land-ownerships and density of use, but also very coherent, with extremely mature neighbourhood organisations. Its continued growth and success is of vital importance nationally, for London, and for the two boroughs in which it sits. 5. Its coherence, and a high degree of consensus about how it should develop, derive from an alignment of national, regional, local and neighbourhood structures and organisations which have come together in a key local organisation, the South Bank Partnership, for which SBEG provides	19/12/2012	We note that applications to establish neighbourhood areas can cross administrative boundaries. At present, the council is required to consider the application submitted by Bankside Neighbourhood Forum. If there are future applications by other neighbourhood forums and whose boundaries overlap with that of Bankside, or any other neighbourhood area in Southwark, then it is procedurally possible to amend an adopted boundary if there is a particular reason to do so. Southwark Council will work with South Bank Neighbourhood Forum if they are designated as a			

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				administrative support. The body, which has operated effectively since 1994, is co-chaired by the two local MPs, Rt Hon Simon Hughes, MP for Bermondsey and Old Southwark and Kate Hoey, MP for Vauxhall. It is attended by Cabinet members of both local authorities and representatives of the Mayor's agencies and transport undertakings. At neighbourhood level there are businesses, landowners, cultural, educational and health organisations, with ward councillors from both sides of the borough boundary who, alongside the MPs have a mandate to represent the views of residents. This partnership has served to generate consensus and alignment, across parties and across boroughs, between all levels of government and across the components of the neighbourhood community, which comprises residents, employees and visitors.		Neighbourhood Forum and are in a position to prepare an effective neighbourhood plan(s).
16	362		Area	6. The South Bank Partnership has published the South Bank Manifesto and Action Plan, first in 2006, updated in 2010, to which all members of the Partnership are signed up an which represents a strong consensus on the priorities for the neighbourhood. Its priorities for development and action are set out under six headings: •Economic growth, new developments, new jobs and better retail; •Improved schools and training, especially to benefit local residents without work; •A safe, clean and accessible environment for all; •An efficient transport interchange and improved transport links; •Improved health and housing and increased opportunities for culture, sport and recreation and community engagement; •Reduced carbon emissions All these, with the strong support of all elements of the Partnership, are approached on a cross-borough basis. 7. The South Bank Manifesto is in many ways a forerunner to a neighbourhood plan, setting out the challenges the neighbourhood faces and the proposed solutions. Its recommendations were further supported via an IPSOS MORI poll conducted for SBEG in 2009, updating a similar exercise in 1999, which sought the views of residents, employees and visitors on both sides of the borough boundary on a range of issues, many of them relevant to a neighbourhood plan. It is hoped to repeat this exercise more frequently in future. 8. Alongside the South Bank	19/12/2012	Comments noted. The Council has passed the concerns on to the Bankside Neighbourhood Forum and notes the desire of residents and businesses to set up a South Bank Neighbourhood Forum.

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				Partnership and also informing the South Bank Manifesto sits the South Bank Forum, also co-chaired by the two MPs, with close involvement from ward councillors from both boroughs. It represents the main resident consultation body for the area, regularly attracting around 100 local people on a quarterly basis to discuss key issues affecting the neighbourhood. Like the South Bank Partnership, it has been successful for nearly 20 years as a forum for communicating the views of local residents and helping to steer local priority setting. It too has always operated on a fully cross-borough basis. 9. As further evidence of the approach to the natural neighbourhood area it is worth emphasising that the Waterloo Community Coalition, bringing together many of the voluntary and community sector organisations in the neighbourhood, adopts the same cross-borough boundary as that described above for the South Bank Partnership. This was also the boundary set for the £20m Waterloo Single Regeneration Budget programme which ran from 1999 to 2006 and delivered a wide range of public realm and economic, social and community benefits in the area. 10. These structures are mature, established channels of consultation and collaboration which represent the self-defined, natural neighbourhood at every level. They indicate a community capable and prepared to enter into neighbourhood planning. They reflect the fact that the natural neighbourhood crosses the borough boundary. At no point until the formal consultation to which this is a response has there been any attempt at briefing or engaging with the South Bank Partnership or the South Bank Forum on the Bankside Plan Area, the Bankside neighbourhood forum or the likely content of a Bankside neighbourhood plan.					
17	362		Neighbourhood Area application	11. The Lambeth/Southwark boundary is not a priority issue in the mind of the local community except where it directly impinges on the lives of residents, businesses and employees or where the lack of cross-borough co-ordination affects their day-to-day experience. There has however been a distinct lack of cross-borough co-ordination, for example in the approach to mitigation of development impacts across the borough boundary, most		Comments noted. The Council has passed the concerns on to the Bankside Neighbourhood Forum and notes the desire of residents and businesses to set up a South Bank Neighbourhood Forum.			

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				recently in the poorly consulted upon closure of Upper Ground leading to serious operational disruption to Lambeth-based neighbours such as ITV, IBM and the National Theatre as well as the cross borough Coin Street Estate. The South Bank neighbourhood plan would aim to address such issues. A plan which stops at the borough boundary which artificially divides the neighbourhood could not adequately do so. 12. The natural commercial neighbourhood is to a considerable degree defined by the transport nodes that serve it, and in the case of the South Bank the great majority of employees travel to Waterloo and pass through the public realm around it to reach their workplace, including those travelling through Waterloo to Blackfriars Road. It is therefore logical that a public realm focused business-led neighbourhood that they experience most. Communities among the residential neighbourhood centre and its nursery, St John's Church or Waterloo Action Centre, as well as Christchurch or Blackfriars Settlement. Public spaces such as Jubilee Gardens, Archbishop's Park, Millennium Green and Bernie Spain Gardens are also included within the plan area as vital to the functionality of the neighbourhood. St Thomas' Hospital and the campus of King's College London generate their own communities with specific requirements. Of vital importance to all of these are retail facilities, to be found in the Station, Lower March and The Cut.					
13	362		Neighbourhood Area application	Thank you for your letter regarding the designation of the proposed Bankside neighbourhood Plan area. As you will see below we have serious concerns about this proposal because: a)The inclusion of the area west of the railway line at Blackfriars (Blackfriars Road, east end Upper Ground and Stamford Street) does not reflect the natural neighbourhood b)Nor does this area reflect the boundary of Better Bankside, the business element of the Neighbourhood Forum c)The only justification provided in the Neighbourhood Forum's statement on the boundary is 'to include Blackfriars Road' and to match the borough boundary. d)The natural	19/12/2012	The council acknowledges that South Bank Employers' Group (SBEG) is a DCLG frontrunner for the purposes of producing a business-led neighbourhood plan and notes the concerns regarding the western boundary of the proposed Bankside Neighbourhood Area. Theses			

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				neighbourhood crosses the borough boundary between Lambeth and Southwark and any neighbourhood plan should also do so. The effect of the area proposed will inevitably tend to reinforce rather than mitigate the issues which arise because of the cross-borough nature of the neighbourhood Our comments are as follows: 1.South Bank Employers' Group (SBEG) is a not-for-profit company limited by guarantee comprising 18 of the major organisations in South Bank, Waterloo and Blackfriars dedicated to achieving the best possible experience for employees, residents and visitors to the area. 2.SBEG is a DCLG business-led neighbourhood planning frontrunner organisation, and like Bankside is also developing a business-led neighbourhood pln. The area for the Neighbourhood Plan is attached – it represents that part of the cross- borough SBEG area (Lambeth Bridge to Blackfriars Railway Bridge to St Georges Circus) that is clearly predominantly business in nature. The South bank plan area includes a section of the proposed Bankside Plan area – from Blackfriars Rail Bridge and the west side of the railway line south of it to the borough boundary.		concerns have been considered and forwarded to the Bankside Neighbourhood Forum. Specific points are addressed in detail below and also discussed in the IDM Report on the applications for the Bankside Neighbourhood Area and Forum.
73	362		Neighbourhood Area application	Paras 6 and 7. Southern Boundary – no comments	10/04/2013	Noted.
75	362		Neighbourhood Area application	Finally, we recognise that there is continuing discussion with Southwark and Lambeth Councils and the Bankside Neighbourhood Forum about the necessity for close collaboration between adjoining neighbourhood forums. Clearly SBEG is not the Neighbourhood Forum and therefore cannot respond on this, I am sure that the South Bank Neighbourhood Forum when formed will wish to operate on this basis. In the meantime, however, I would ask that as Southwark Council undertakes further consideration of these boundary issues it should take full account of the concerns about the lack of engagement by the Bankside Neighbourhood Forum with businesses in the area from Blackfriars Road to the borough boundary and the strong support in the South Bank neighbourhood for a neighbourhood	10/04/2013	Comments noted. We have noted the comments received from businesses in the area between Blackfriars Road and the borough boundary and advised Bankside Neighbourhood Forum to engage with these groups.

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				plan and forum which includes the area of Southwark between Blackfriars Road and the borough boundary.					
18	362		Neighbourhood Area application	13. In the 21 years since its formation, SBEG's mission has been to promote and improve this neighbourhood for the benefit of employees, residents and visitors – to improve the public realm, encourage appropriate development and growth, and help manage the neighbourhood's extraordinary transformation into a global leisure and cultural destination. Our promotion and leadership of major capital schemes such as the South Bank Spine Route and Jubilee Gardens for the use of the community has been at the forefront of this mission. When Upper Ground and Belvedere Road were once an unattractive rat run, we drove forward a scheme which pioneered shared space principles and high quality materials, catering for the residential community in the Coin Street co-ops as well as businesses. The use of pooled funding, including developer contributions to deliver the Spine Route and other schemes (refurbishment of King's Plaza, Lower Marsh and the Cut, IMAX subway improvements) continues with ambitions to improve permeability and legibility at the IMAX and Waterloo Road, a new design for the Spine Route, and close involvement over many years in proposals for improving Blackfriars Road. 14. The development of Blackfriars Road to reach its growth potential is a shared ambition of the street, including the Blackfriars Urban Improvement Strategy by Martha Schwartz Inc and Lifschutz Davidson Sandilands produced in 2011 and an updated 2007 study. We will imminently complete our Public Realm Framework which examines in detail eight key routes through the area, including Blackfriars Road and Upper Ground, and makes recommendations for their improvement. This body of SBEG work should be central to developing a neighbourhood plan for Blackfriars Road and the surrounding area and our experience in pooling and defraying developer contributions for the delivery, management and maintenance of		Comments noted.			

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				streetscape schemes is equally important. The developments underway now are a once-in-a-generation opportunity to secure improvements to the public realm, unlocking the growth and employment potential emphasised in the Mayor's Waterloo Opportunity Area Planning Framework, and the Waterloo and Bankside Supplementary Planning Documents. 15. Our ambition for a South Bank Neighbourhood Plan is to formalise the public realm priorities set out above into a capital improvement plan for the neighbourhood, with an emphasis on how it will be delivered through development. 16. The plan will also set out the need for ongoing management and maintenance, in order to protect the capital investment in the area. This is vital and not so far practically considered by the Bankside consortium. Our experience of delivering high quality capital schemes into the management of local authorities not willing to devote the resources necessary to look after the new public realm has taught us the importance of this. As far as public realm management is concerned SBEG currently delivers extensive additional services in the Lambeth area adjacent to the plan boundary, and has successfully extended some across the boundary. In matters such as illegal trading, street drinking and anti-social behaviour it is essential to have a fully cross-borough approach. 17. The neighbourhood plan proposals being worked on by SBEG are genuinely business-led in a way that is not the case for the Bankside proposal, despite the fact that the area we believe should not be within the Bankside Plan is predominantly commercial in nature. The Bankside BID area and the BID therefore does not have the mandate to represent commercial interests beyond the Blackfriars Road area may be driven more by the concerns of residents which might restrict development than those of the natural commercial neighbourhood.				
74	362		Neighbourhood Area application	Other points We also wish to comment on the consultation deadline. It seems to us that a three week consultation period which includes the Easter holidays when many people are away is too short. We also believe	10/04/2013	The three week deadline reflected the fact that the changes being proposed were particularly minor		

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				that the South Bank Forum meeting on 18 April will prove a very valuable opportunity for residents to hear more about the proposed Bankside and South Bank neighbourhood plan areas and to express their views on them. There has not previously been the opportunity for such a debate. We believe that it would be highly desirable for the response period to this consultation be extended, say for a week after that meeting, to enable further comments to be submitted.		and were proposed in response to comments previously made by a small number of respondents. This consultation was in addition to that required under the Regulations, which was carried out in November and December 2012.
72	362		Area application	As Southwark Council and Lambeth Council have been aware, South Bank Employers' Group has been promoting the concept of a cross- borough neighbourhood plan for the South Bank for some time. These representations and our previous response reflect all the reasons for which the Group believes that the eastern boundary of the South Bank Neighbourhood Plan should be Blackfriars Road. However, as you know, any formal proposal for a neighbourhood plan area needs to come from 'a body capable of becoming a neighbourhood forum'. In this connection I should report that some 32 businesses have expressed to us an interest in becoming involved in a neighbourhood forum (more than half of them in the Southwark part of the proposed area) as well as the Waterloo Quarter BID whose area includes over 300 Lambeth and Southwark businesses. We have also received interest in joining a Neighbourhood Forum from 12 residents to date, as well as from a range of voluntary community and non- profit organisations.	10/04/2013	Comments noted. The council will work with South Bank Neighbourhood Forum when they are in a position to formally pursue neighbourhood planning.
71	362		Neighbourhood Area application	There has been a striking lack of engagement by the Bankside Neighbourhood Forum with long-established consultative bodies fully recognised by Southwark. These organisations have for 20 years covered the whole South Bank including the area between Blackfriars Road and the borough boundary. The two key bodies are: The South Bank Forum: this meeting is a regular quarterly public meeting jointly chaired by Kate Hoey MP and Simon Hughes MP and open to all in the area from Lambeth Bridge to Blackfriars Bridge to St Georges Circus. Invitations and agendas are delivered to every household in this area and the meeting regularly	10/04/2013	Comments noted. The Council has passed the concerns on to the Bankside Neighbourhood Forum. BNF have stated that they will continue to work closely with all the stakeholders within and outside the boundary and have drafted a memorandum of agreement.

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			attracts 80 to 100 people. Bankside Neighbourhood Forum has never at any time attended to or asked to attend this effective and well-attended public meeting to explain its neighbourhood plan proposals. The next meeting of the South Bank Forum is on 18 April 2013. Neighbourhood Planning is on the agenda and both the Bankside Neighbourhood Forum and those promoting a South Bank Neighbourhood Plan and Forum will be speaking. We would hope the Council would wish to take the outcomes of this meeting into account in making its decision on the Bankside Neighbourhood Plan Development Area Proposal. The South Bank Partnership: this is also co-chaired by Kate Hoey MP and Simon Hughes MP and regularly attended by Lambeth and Southwark Cabinet and Ward Councillors as well as major South Bank organisations. The Partnership has been actively engaged in overseeing regeneration and planning issues in the area for some 20 years. Its administration has in the past been financially supported by Southwark Council. The Bankside Neighbourhood Forum did not ask to attend a South Bank Partnership meeting to explain its proposals and proposed boundaries for its Neighbourhood Plan until after the start of the formal consultation at the end of 2012. The South Bank Partnership Manifesto and Action Plan (2006, updated in 2010) which covers that part of Southwark between Blackfriars Road and the borough boundary and proposes many actions and initiatives in the Southwark part of the South Bank And/or across the borough boundary. The current Manifesto and Action Plan (which the Leader of Southwark signed up to in 2010) provides a strong vision and consensus on the future of the area as the basis for a South Bank Neighbourhood Plan. The Partnership also commissioned the comprehensive survey of residents, employees and visitors throughout its cross-borough area in 2008-09 which provides a solid evidence base for a South Bank cross-borough plan. There has been a lack of information to and engagement with businesses in the area between Blackfriar					

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				Bankside Neighbourhood Forum to businesses in the area and no knowledge of the Bankside Neighbourhood Forum boundary proposal • Considerable support for the area being covered by a South Bank Neighbourhood Plan not a Bankside Plan This seems to us to suggest that there have been serious flaws in the business engagement process in a neighbourhood which is agreed by all parties to be 'predominantly commercial in nature'.		
70	362		Neighbourhood Area application	We have set out in our previous representations the key concerns which we summarise and amplify here: a) The view that the South Bank neighbourhood crosses the borough boundary and includes a part of Southwark as well as Lambeth is widely held. A neighbourhood plan spanning the cross-borough South Bank neighbourhood will provide major opportunities for mitigating the effect of the boundary on planning issues rather than reinforcing the difficult issues it can create b) All the work done previously by South Bank Employers' Group (which may inform the preparation of the South Bank Neighbourhood Plan by the emerging South Bank Neighbourhood Forum) covers the section of Southwark from Blackfriars Road to the borough boundary as well as Lambeth, for example: i. South Bank Public Realm Framework (2013, in final draft) ii. South Bank Urban Design Strategy (2002) iii. South Bank Streetscapes Design Guide (2004) iv. South Bank Partnership Manifesto and Action Plan (2006 and 2010) v. South Bank surveys of residents, visitors and employees (1999 and 2009) vi. South Bank Decentralised Energy Network Pre-Feasibility Report (SBEG/LSBU 2009)	10/04/2013	Comments noted.
69	362	-	Neighbourhood Area application	Thank you for the further opportunity to comment on revised boundary proposals for the Bankside neighbourhood development area. Our comments are (using your paragraphs) Para 1. Northern boundary – no comments Paras 2&3. Eastern boundary No comment on the boundary. However, in terms of process we note that there are continued discussions with various neighbourhood forums. This would seem to set a precedent for continued open discussion on the western boundary with the emerging	10/04/2013	Comments noted. The council is currently considering applications to establish a neighbourhood areas in Bermondsey from two groups, both of which adjoin Borough High Street and so warrant detailed consideration.

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				South Bank Neighbourhood Forum before the Bankside boundary is finalised. Paras 4&5. Western boundary a) Extension south and west of Blackfriars Road to Surrey Row As with our previous comments on the western boundary, this amendment has also not been the subject of any engagement with South Bank Employers' Group concerning a change within the area in which the Group has a long-standing interest. Nor as we understand has there been any engagement with Waterloo Quarter Business Improvement District whose BID area this change affects. This reinforces out concerns over engagement with business expressed in our previous consultation response and at various meetings since then. b) General Points We would wish to reinforce our previous comments on the western boundary as a whole (copy attached) as we believe that they have not been fully taken into account. Nor have we received written response to them. We also note your comments in paragraph 4 that 'there are few physical features for choosing this boundary, however, the boundary makes sense in planning terms as it matches the area being planned by Southwark Council'. We do not think this reflects the spirit of neighbourhood planning which should be driven by local neighbourhood considerations not by what 'matches the area being planned by Southwark Council'.		Comments on the western boundary are noted and have been considered in detail. We have recommended that the Bankside Neighbourhood Forum work closely with all the stakeholders within and outside the boundary and note that a memorandum of agreement has been drafted.
37	318		Area application	The Forum includes the western strip of Southwark where BOST has a high level of activity at Christ Church Garden. Although coming under the jurisdiction and management of Southwark Council, (for example at Christ Church Garden the park is managed by Southwark Parks Department), this area has long been neglected from any area planning either by Southwark or Lambeth. This has resulted in groups such as ourselves having to have relationships with LBS for parks management, borough- wide planning policy, ward Councillors and local funding schemes, while attempting to work with strategic groups on the Lambeth side who purport to cover this area, but in fact are locked into their own relationships primarily with Lambeth borough! The Forum's discussions have been increasingly focused around the needs of parks and open spaces in this	08/03/2013	Support noted.

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				unified area - which reflects the needs of our organisation for a consultative forum based on this. With all thanks again for giving me the chance to comment.					
36	318		Forum	I am writing on behalf of the trustees of Bankside Open Spaces Trust(BOST) to support the forum's official request to be recognised for these reasons: The Forum provides the only central visioning group to discuss future plans and policies in the area that BOST is most active. We appreciate very much that it includes key community groups and business and is open to more, all the more so since the upsizing of local Community councils, although I appreciate they have a different function.	08/03/2013	Support noted.			
30	227		Area application	I am writing, as current chair of Bankside Residents' Forum (BRF), to say that we welcome the opportunity to contribute to the work of the Neighbourhood Forum "group of 21" currently involved in putting together a Neighbourhood Plan (NP) for Bankside. The area is a vibrant mixed business and residential area that has had, and continues to undergo, rapid and exciting development and change and a good local plan, taking advantage of local knowledge and ideas, should be beneficial to it. There are said to be in the order of 6,000 residents in this area, together with around 60,000 people working here and 6,000,000 visiting annually. We seek to represent all the residents of Bankside, irrespective of type of tenure, and we hold regular open meetings designed to make people aware of and provide information about significant developments proposed in the area, to help give them a voice and reflect their views. Our committee is elected annually, by residents, at a meeting to which all who live in the area are invited and elected members work on behalf of all local residents. These annual meetings invariably include other matters of wide community interest and so they are usually well attended. We have particularly welcomed the chance to be involved in the formulation of the NP as it allows us to be proactive in putting forward proposals and policies designed to enhance the area for all. In particular we have welcomed the opportunity to think holistically about the townscape, route-ways, heritage		Support noted.			

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				and open spaces throughout our very varied area as well as to consider the implications of greater development on those who live here and on local infrastructure, education, transport, recreation, health and welfare facilities etc We understand that the council is in the process of making a decision on the boundaries for this and other nearby neighbouring plan areas. We are very happy to support the boundaries currently proposed for Bankside. The inclusion of the part immediately east of Blackfriars Road, as far as the Borough boundary, has been contested by some, but this forms, and has for around 10 years since BRF's inception formed, part of it's designated area. As this land is a part of Southwark (as opposed to Lambeth) and as the NP document will be a planning document, and hence under Southwark's jurisdiction, it would seem irrational to modify the western boundary from that proposed. Similarly, in the east, we think it would be counterproductive to divide the main local high street (Borough High Street) down the middle with half in the Bankside plan area and half in Bermondsey. This would not assist effective planning. We therefore support a boundary that extends a short distance east of the High Street to incorporate the main parts of the various historic yards, which are integrally related to the street architecturally and historically, all as is currently proposed.					
61	225		Area application	Thank you for sending us the Bankside Neighbourhood Development Area boundary consultation map. We are glad to see that Bankside's eastern boundary, which previously crossed the Riverside Ward, has been amended to the Most up-to-date lines which take our Ward boundary in to consideration and does not take a slice off Tooley Street and Duke Street. Sharon has made me aware that there is an on-going issue with the City of London Corporation regarding the old PWC building. I would be most grateful if you could let me have some more background about this when you have time. To conclude, we have no objections to the Most up-to-date lines because it does not impinge on the Riverside Ward and our proposed boundary.		Comments noted.			

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7	214		Forum application	Thank you for consulting TfL on the applications from the Bankside Neighbourhood Forum to define a Neighbourhood Area/Business Area and formally establish a Neighbourhood Forum. TfL would advise that any Neighbourhood Plan should be in general conformity to the London Plan. We would also wish to be consulted on any proposals or policies being considered by the Forum (if it is established) which could impact upon the safe and efficient operation of the Transport for London Road Network and the Strategic Road Network or upon public transport, cycling and walking infrastructure and operations in which TfL has an interest. Please note that TfL may also wish to provide comments as a party with an interest in commercial property in the Bankside Area and as a business occupier		Comments noted.
6	214		Area application	Thank you for consulting TfL on the applications from the Bankside Neighbourhood Forum to define a Neighbourhood Area/Business Area and formally establish a Neighbourhood Forum. TfL would advise that any Neighbourhood Plan should be in general conformity to the London Plan. We would also wish to be consulted on any proposals or policies being considered by the Forum (if it is established) which could impact upon the safe and efficient operation of the Transport for London Road Network and the Strategic Road Network or upon public transport, cycling and walking infrastructure and operations in which TfL has an interest. Please note that TfL may also wish to provide comments as a party with an interest in commercial property in the Bankside Area and as a business occupier		Comments noted.
64	176	55	Area application	Thank you for giving us this further opportunity to comment on proposals for the Bankside neighbourhood area boundary. I am responding on behalf of my client, King's College London. While the idea put forward in your email of 21 March is interesting, we do not feel that the inclusion of the entire campus within the Bankside Neighbourhood Area has a strong logic. King's is a member of the Bankside Neighbourhood Forum group because it acknowledges the relationship between King's campus and Borough High Street and, in particular, the relationship of its site at 127-143 Borough High Street, the redevelopment of which will have a direct and		Comments noted. The proposed neighbourhood boundary has been scaled back so that for the most part it only includes the buildings immediately adjoining the eastern side of Borough High Street. The main campus has therefore been excluded from the neighbourhood area.

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				significant impact on the regeneration of the High Street. However, the remit of this group and its normal area of interest does not normally extend further east than Borough High Street frontage properties and it does not seem appropriate to add the university campus to this area. It may be more appropriate for King's and Guy's campus itself to sit outside both the Bankside and Bermondsey neighbourhood areas, because as operational estates with masterplans of their own, there will be limited scope for the local community to bring forward their own proposals for this area. It is also a concern, as expressed in our original representation, that neighbourhood planning should not impact the efficient operation of these important teaching and hospital estates. We consider that the Council's own planning policies can provide an adequate policy framework for the Borough High Street to its environs, including the campus and an additional layer of policies in a neighbourhood plan on these points is not necessary. Therefore, on balance we consider that the east side of Borough High Street should remain within the Bankside Neighbourhood Area, while the remainder of the King's and Guy's campus should sit outside both the Bankside and Bermondsey Neighbourhood Areas.		
66	166		Area	Thanks for the opportunity to comment again on the proposals for the Bankside Neighbourhood Forum. Although we reiterate our concerns that the proposals do not reflect the real community boundary which exists at Blackfriars Rd, I understand that this may have been misinterpreted as giving support to the alternative proposals put forward by SBEG for a South Bank Neighbourhood Forum. This is not the case. While the SBEG proposals benefit from better reflecting the community boundary at Blackfriars, they suffer far more from failing to include the residential community south of the railway station and viaducts. As such they do not reflect the Waterloo community, which has traditionally been recognised by SBEG and ourselves as being bounded by Blackfriars Rd, Lambeth Rd and the river. The SBEG proposals also suffer from a complete absence of consultation thus far; by contrast, over the same period we have been		Comments noted.

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				consulted on a number of occasions by Bankside Residents Forum and have attended various meetings about the issue. I do not therefore believe the issue of the alternative proposal by SBEG for a South Bank Neighbourhood should be given much weight in your consideration of the appropriate western boundary for proposed Bankside Neighbourhood Forum. Nevertheless we consider the proposed western boundary of Bankside inappropriate for the reasons given in our original submission last year		
4	162		Forum application	Thank you for your email dated 16 November 2012 inviting the Highways Agency (HA) to comment on the Applications to designate the Bankside Neighbourhood Area/Business Area and Bankside Neighbourhood Forum. The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the consultations and do not have any comment at this time.		Comments noted.
3	162		Area application	Thank you for your email dated 16 November 2012 inviting the Highways Agency (HA) to comment on the Applications to designate the Bankside Neighbourhood Area/Business Area and Bankside Neighbourhood Forum. The HA is an executive agency of the Department for Transport (DfT). We are responsible for operating, maintaining and improving England's strategic road network (SRN) on behalf of the Secretary of State for Transport. The HA will be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN. We have reviewed the consultations and do not have any comment at this time.		Comments noted.
65	119		Area application	Thank you for your letter dated 21 March 2013 concerning potential changes to the Bankside Neighbourhood Development Area boundary. It is a little unclear exactly what the PLA is being asked to comment on when looking at Appendix B. The previously proposed boundary appears to be shown in blue and then there is a "revised" boundary in red and a "most up		Noted. The northern boundary has been scaled back to address the concerns of the London Port Authority.

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				to date" boundary in green. In relation to the northern boundary the supporting letter gives no indication as to whether it is the red or the green line or both that are the subject of the consultation. It says the red is an option that was discussed and the green is a wider area that could include the whole of Guys and Kings. The letter advises that there are minor changes to the boundary to overcome objections from the PLA and City of London but the letter does not explain what they are. It is only in the concluding paragraph of the letter that it states "the closing date for comments on this proposal set out in green" I am therefore assuming that it is the green northern boundary that the Council wishes to receive comments on. On that basis I can advise that the PLA has no objection to the boundary shown in green.		
5	119		Area application	Thank you for consulting the PLA about the application to designate the Bankside Neighbourhood Area/Business Area. The PLA would question the northern boundary of the Plan area. It is stated that it follows the Borough boundary but this is not technically correct. The Borough boundary follows the mid point of the river but the Bankside Neighbourhood Plan Area boundary does not include any of the river in the area around Clink Street, extending to the mid point of the river around Blackfriars. It is also questioned why the boundary needs to include the River Thames. The PLA would suggest that unless there is a particular reason for extending into the river then it should stop at the river bank. A boundary should not just be chosen because it is the Borough boundary, there needs to be a specific reason for it.		The northern boundary has been scaled back to address the concerns of the London Port Authority.