

No.	Title
Appendix A	Consultation responses to Herne Hill Forum Neighbourhood Area Application
Appendix B	Herne Hill Neighbourhood Planning Application & Appendices
Appendix C	Applied-for Neighbourhood Area Map with LB Southwark boundary
Appendix D	Proposed amended neighbourhood area boundary (LB Southwark portion only) with amendments identified
Appendix E	Proposed revised boundary (LB Southwark portion only)
Appendix F	Consultation responses received by LB Southwark relevant to LB Lambeth

Representations for the designation of Herne Hill Neighbourhood Area as a neighbourhood area for the purposes of neighbourhood planning

Colour denotes neutral (grey), object (pink) or support (green)

Representor ID	Comment	Comment summary	Council response
HHNA01	<p>I live at [redacted] Burbage Road and I consider this part of Burbage Road to be part of Herne Hill. Herne Hill is where I shop, go to community activities and take public transport.</p> <p>The Herne Hill velodrome (which is further towards the Dulwich end of Burbage Road) is included within the proposed area, but my home is not! i'd like the proposed boundary of the area to be pushed out slightly to include (at minimum) the terrace of homes just to the east of the viaduct in Burbage Road (nos 29-41). My next door neighbour wants this too.</p>	<p>Have the area include the terraced homes on Burbage Road close to (to the south of) the velodrome</p>	<p>The council considers this section of Burbage Road to be most associated with Dulwich, rather than Herne Hill and that the railway line to the north of the Velodrome and properties referenced is a more fitting, natural boundary to a Herne Hill neighbourhood area.</p>
HHNA02	<p>It would be situated on the boundary of the proposed Hill Neighbourhood forum area and it would seem sensible to consult with our providers and see the facilities when making this proposal.</p> <p>The Centre is planning to make changes to the premises and grounds which will require planning permission within the next 12 months.</p> <p>How does the forum propose to work with Dulwich Estate which have planning control on some the area proposed?</p> <p>I would like to know more about the implications for St.Faith's church and Centre by its inclusion in this</p>	<p>Boundary better suited to the proposed "Hill Neighbourhood Forum"</p> <p>Need to consult with providers in the community.</p> <p>Community centre is likely to undergo works that require planning permission.</p> <p>What is the relationship to the</p>	<p>Not clear what "Hill Neighbourhood Forum" refers to in the context of Red Post Hill.</p> <p>Noted. The application documents set out how HHH has consulted on their proposals so far.</p> <p>Noted but not relevant for the designation of the Herne Hill Neighbourhood Forum and Neighbourhood Area.</p>

	<p>particular boundary. The ward boundaries are going to be changed, our parish boundary includes Denmark Hill and some of Champion Hill Estate.</p>	<p>forum with the Dulwich Estate.</p> <p>What does the inclusion of the church and community centre mean? Ward boundaries are going to be changed.</p>	<p>It is understood there is no formal link between the HHF and the Dulwich estate. Engagement with the relevant stakeholders is set out in the forum's application documents.</p> <p>The implications for inclusion of any sites within a neighbourhood area boundary are that, once the boundary has been confirmed, neighbourhood planning policies drawn up by the neighbourhood forum and local community will affect relevant development proposals for sites within the boundary. If the church and community centre are included in the confirmed boundary, then development on the site of the church and/or community centre will be subject to the relevant neighbourhood planning policies included in a future Herne Hill Neighbourhood Plan.</p>
HHNA03	I know it has been difficult to establish and am satisfied they have come up with the best solution.	Proposed boundary is supported.	Noted
HHNA04	I agree with it.	Proposed boundary is supported.	Noted
HHNA05	I don't understand the grouping for the new boundary. We already have administrative boundaries at Ward level and Estate level boundaries, why introduce a	Purpose/rationale of proposed boundary is not clear.	Noted. The boundary would serve to facilitate the application of neighbourhood planning policies

	third? From what I can see, it just adds another layer of bureaucracy without any obvious benefits.		included in a neighbourhood plan, should a corresponding one be prepared and voted by the local community at a referendum. Ward and estate boundaries are not eligible to be used for the purposes of neighbourhood planning.
HHNA06	Looks acceptable	Proposed boundary is supported.	Noted.
HHNA07	I find the boundary illogical. The Herne Hill Velodrome is included in the Neighbourhood Plan, but the section of Burbage Road on which the entrance to the Velodrome is situated is excluded from the area covered. This leaves a small bubble of Herne Hill excluded from the plan and the entrance and surrounding street in particular, where there may be planning issues, is not part of the scheme.	There is not a clear rationale for the boundary decision relating to the Herne Hill Velodrome.	Noted. See response to HHNA01 above.
HHNA08	My comment, if you honestly think my comments will make a difference in can seeasily the cuckoos gathering even as I write. I used, in a previous life, to play your game and I know that a veil of meaningless verbiage ensures that left hands are hidden from right hands. I honestly can't be bothered to plough through ithe all.	[Purpose/intending meaning of comments not clear]	Noted but no response.
HHNA09	The SE5 Forum for Camberwell objects to the proposed area boundary. The proposed area boundary takes in significant parts of	Object to inclusion of Dylways, Green Dale, Woodfarrs and the properties accessed from these streets	Noted.

	<p>Camberwell, which, like Herne Hill, is a district that is (happily) in both the London Borough of Lambeth and the London Borough of Southwark. The SE5 Forum for Camberwell's objection would be resolved if the area boundary was amended to remove from the area those locations that form part of Camberwell SE5. This includes (but is not necessarily limited to) Acland Crescent, Bicknell Road, Cambria Road, Crossthwaite Avenue, Deepdene Road, Dylways, Finsen Road, Green Dale, Herschell Mews, Kemerton Road, Northway Road, Porchester Close, Sunset Road and Woodfarrs and the properties accessed from these streets.</p> <p>Please note that while the SE5 Forum for Camberwell chooses to use the SE5 postcode district as its working definition of Camberwell, the SE5 Forum's objection to the proposed area boundary is not because we consider that postcode district boundaries are, or should be, definitive in relation to determining the boundaries between communities. We recognise that postcode district boundaries are set to facilitate the efficient sorting and delivery of mail, and not for other reasons. In this case, however, the boundary between the SE5 (Camberwell) postcode district and the SE24 (Herne Hill) postcode district does coincide with both how local people identify themselves and with the principal natural geographical feature of the location, i.e., the crest of the hill that is called Denmark Hill, a part of Camberwell, on its northern flank, and Herne Hill on its southern flank; a fact that has been reflected for hundreds of years in the nomenclature of the streets that ascend this hill from the north and from the south, with the point where the street name changes being the crest of the hill. We do consider that these factors, local people's identity and</p>	<p>in the neighbourhood area [alongside numerous other streets/locations in LB Lambeth]. This is because they are more commonly associated with Camberwell (SE5) rather than "Herne Hill" (SE24).</p>	
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	<p>local geography and history, should be definitive in setting the area boundary.</p> <p>Nevertheless, in relation to the attitude of the Royal Mail, we note that the Royal Mail considers Camberwell to be entirely contained by the SE5 (Camberwell) postcode district; and that, although the Royal Mail does consider Herne Hill to cover more than one postcode district, the two relevant postcode districts are the SE24 (Herne Hill) and SE22 (East Dulwich) postcode districts, not the SE5 postcode district.</p> <p>Finally, we note that the Herne Hill Neighbourhood Forum considers that it should not matter that the proposed area boundary includes parts of neighbouring areas because these neighbouring communities are not proposing to prepare neighbourhood plans for their areas. This is, at least in the case of the SE5 Forum for Camberwell, true. We remain unconvinced by the value of neighbourhood planning and rather wish to put our efforts into working with the London Borough of Lambeth and the London Borough of Southwark to ensure that the boroughs' planning documents reflect the policies and proposals that best address Camberwell's needs and priorities. This does not mean that it would therefore be appropriate for a neighbouring community group to instead undertake neighbourhood planning for parts of Camberwell (although it does leave open the possibility of another Camberwell community group (e.g., the Camberwell Society) wishing to become the neighbourhood forum for Camberwell); it should be Camberwell's people's choice to work to improve their community in ways other than via a neighbourhood plan if we wish to, rather than becoming a peripheral part-area in another community's plan.</p>		
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	<p>We would welcome an opportunity to discuss these comments with Lambeth and Southwark councillors and officers and would be especially keen to do so if anything in this objection is unclear.</p>		
HHNA10	<p>There are some questions about the boundary with Dulwich/Southwark eg why split Village Way, SE21.</p> <p>Why split Village Way SE21? Why include the Herne Hill Velodrome? - houses directly impacted by the Velodrome activities in Burbage Road, Village Way and Dulwich Village are not included in Herne Hill NF. A Dulwich Forum is under development and is likely to have a boundary with the HH NF. It would make sense for the whole of Village Way to be included in the Dulwich Forum area and the Velodrome as well.</p>	<p>Rationale for the proposed boundary not clear, particularly around the Velodrome and Village Way.</p>	<p>Noted.</p>

<p>HHNA11</p>	<p>The Trustees of the Friends of Ruskin Park (FoRP) have serious concerns about the potential benefits and risks for the future of Ruskin Park (RP) of including the park within the boundary of the neighbourhood area proposed by the Herne Hill Forum (HHF) in their application. We feel these concerns are not adequately addressed in the application and that we have not had opportunity for sufficient discussion on the unique nature of Ruskin Park and its geographical setting in relation to neighbourhood planning.</p> <p>We believe that a large proportion of Ruskin Park users do not reside or work within the proposed boundary and would not necessarily identify Ruskin Park as a prime asset of Herne Hill. The park most associated Herne Hill is Brockwell Park, which is not included in the proposed area. We have many initiatives to engage local people in RP. Many users live in Loughborough Junction, Camberwell, Denmark Hill and Peckham, or work /attend Kings College or the Maudsley Hospital. There is a lack of green spaces for these communities. We have good links with associated community groups, eg LJAG, SE5 Forum and the NHS.</p> <p>As many of the trustees live close to the park, in the north of the proposed area, and are in close touch with park users, we believe that the views of people in this area on where they identify with are even more mixed than concluded in the application. The applicant's surveys undertaken, in our view, are not conclusive. The postcode at the west end of Ruskin Park is SE24, at the east end SE5, with the area having a history of being part of Camberwell and the 'town centres' of Camberwell/Denmark Hill and Loughborough Junction</p>	<p>Future implications of boundary designation not understood and could impact on local funding opportunities for e.g.</p> <p>North east of proposed neighbourhood area is not supported as this is associated with Camberwell/Denmark Hill rather than Herne Hill.</p>	
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	<p>which are actually closer than that of Herne Hill. Understandably, for people living around Ruskin Park, this is a highly significant amenity, as revealed in HHF's survey.</p> <p>We do not understand yet the future implications on the communities outside, or on, the boundaries of a neighbourhood-area-being-statutorily-designated, such as being proposed. Unless all territory is subdivided into neighbourhood areas, inequalities or anomalies could emerge e.g. around access to funding for local investment, and unnecessary boundaries and divisions could be created. We fear this could be the case in the north east of the proposed area.</p>		
HHNA12	<p>East side of Denmark Hill: The proposed boundary follows an arbitrary line through the middle of a local authority housing estate. This is not practical in planning terms. Either the whole estate, including Dylways, should be included, or it should be excluded. Boundaries should not follow the centre-line of minor residential streets.</p> <p>Herne Hill Velodrome: This is the only site clearly highlighted in the promoters' proposals, yet is separated from the rest of the proposed Plan area by a railway embankment. It is ridiculous for the promoters to dictate future use of the site when they have excluded the site entrance and houses just outside in Burbage Road which would be affected by any intensification of use. The Velodrome site is more properly dealt with as part</p>	<p>The proposed boundary goes through the middle of a housing estate which is impractical.</p> <p>Herne Hill Velodrome is isolated from the rest of the estate and should be removed.</p>	<p>The proposed boundary does not go through the middle of a housing estate. It follows the boundary between estates.</p> <p>Noted.</p>

	of Dulwich.		
HHNA13	<p>As a resident of Turney Road and committee member of the Residents Association – I would endorse the proposed HH boundary map (appendix 1) as presented for consultation.</p> <p>I would also wish to draw your attention to a couple of relevant matters for the purpose of good planning and consistency between the emerging neighbourhood policy framework.</p> <ul style="list-style-type: none"> - Turney Road is split between two local authority boroughs Lambeth and Southwark - Turney Road is proposed to be split between three or four neighbourhood plans – Herne Hill / Norwood (Lambeth Side) and HH Southwark and Dulwich Village /West Dulwich. It is essential that as preparation moves forward that each of the neighbourhood plans is fully coordinated with others to address all relevant local issues. - Agree that Turney Road is included within the HH neighbourhood plan area but note that the Croxted Rd junction of Turney Road is included in the Norwood Plan, reflecting the pattern of architectural development along Croxted Road and Dalkeith Road. - Southwark’s Dulwich Village and separate Herne Hill Neighbourhood Plans are yet to be submitted or boundaries confirmed but is essential that these meet those of Lambeth’s to ensure that there are no gaps in plan coverage. - Community consultation on draft plans going forward must be very clearly presented and policy themes coordinated to avoid confused community engagement 	<p>Proposed boundary supported.</p> <p>Neighbourhood planning activities around Turney Road must be appropriately co-ordinated, where it is likely that x4 neighbourhood area boundaries will meet.</p>	Noted.

	<p>– maybe a need for an overview neighbourhood planning statement and agreed policy approach between both boroughs to provide clear future development plan framework.</p> <p>- The plans and policies must be place based because the community don't tend to use the local neighbourhoods by way of defined boundary or borough/ward lines.</p> <p>For clarity I have highlighted the area of Turney Road where it is essential that there is consistency in plan preparation.</p> <p>[Attached map]</p>		
HHNA14	<p>Thank you for consulting Historic England in respect of the application to designate the Herne Hill Neighbourhood Forum Area and Boundary.</p> <p>The Government, through the Localism Act (2011) and Neighbourhood Planning (General) Regulations (2012), has enabled local communities to take a more proactive role in influencing how their neighbourhood is managed. The Regulations require Historic England, as a statutory agency, be consulted on Neighbourhood Plans where the Neighbourhood Forum or Parish Council consider our interest is affected by the Plan. As Historic England's remit is to advise on proposals affecting the historic environment our comments relate to the implications of the proposed boundary for designated and undesignated heritage assets.</p> <p>The area covered by the proposed Neighbourhood Plan,</p>	<p>Neighbourhood area boundaries should be informed by and careful consideration should be given to the appropriateness of following conservation area boundaries, such as the Dulwich CA boundary.</p>	<p>Noted.</p>

	<p>as illustrated on the map and straddles the borough boundaries between Southwark and Lambeth. Copies of this advice will be sent to both Council's in respect of this consultation.</p> <p>Proposed Boundaries</p> <p>The area included in this consultation is substantial and includes the Grade II* St Paul's Church and Grade II* Half Moon PH. There are also 20 list entries for buildings/structures at Grade II (21 if the Railway Bridge to the south of Brockwell Park is included. Of these Dorchester Court is considered to be At Risk (please see our London Heritage At Risk Register). Additionally the area includes the Grade II registered landscape of Ruskin Park. The area also appears to covers all or the greater part of 4 conservation areas, and smaller parts of Dulwich Village and Brockwell Park CA (in the form of the velodrome).</p> <p>Historic England normally advocates that Neighbourhood Plans should respect pre-defined boundaries such as those for conservation areas. This is because the boundaries of conservation areas should cover clearly defined character areas. As such respecting these boundaries in the plan making process is important in ensuring a consistent application of planning policies for the historic environment. This in turn will better protect local character and identity from piecemeal change. We would therefore to encourage consider whether the proposed areas should be amended so proposed boundaries take in, or omit, all of the conservation areas. There may of course be relevant reasons wider than those of local architectural or historic character (such as management) which</p>		
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	<p>should be taken into account. In the event of the proposed boundary being adopted we would stress the need that any Neighbourhood Plan policies developed should be developed with a clear understand of local character areas and not undermine excluded areas of CA's.</p> <p>The boundary includes parts of both Lambeth and Southwark and as such must be in compliance with both Local Plans. However, this can make sense where areas of distinct local character straddle more than one barrier (Highgate Village in Camden/Haringey for example) and the application of a coherent framework is beneficial. We would advise that there needs to be a clear justification for this if this is the case.</p> <p>.General advice on developing a Neighbourhood Plan</p> <p>As part of the neighbourhood planning process, Historic England is keen to encourage a review of the local evidence base and the inclusion of policies that promote the positive management of heritage assets.</p> <p>In developing a robust evidence base, upon which to develop policies that sustain and enhance positive elements of local character and their settings, we would encourage the Neighbourhood Forum to identify areas and topics that require updating or further analysis.</p> <p>Our Greater London Archaeology Adviser, Mark Stevenson has provided advice in respect of archaeological sensitivity . However we advise neighbourhoods to consider consulting the Greater London Archaeological Advisory Service (GLAAS),</p>		
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	<p>Heritage Environment Record (HER) as a primary resource for the identification of heritage assets (GLHER@historicengland.org.uk).</p> <p>The HER should be able to provide details of any nationally designated heritage assets and also of locally-important buildings, archaeological remains and landscapes. We note that the APAs for Lambeth are due to be reviewed in 2019, and recommended that both GLAAS and the HER should be consulted particularly if and when the forum look to identify preferred development areas. Southwark employs its own borough archaeologist, Gill King, and therefore provide their own archaeological advice.</p> <p>We would also encourage the Neighbourhood forum to involve local voluntary groups such as local Civic Societies or local history groups in the production of the Neighbourhood Plan.</p> <p>Further guidance on techniques for identifying and managing character and heritage assets is available on Historic England's website. This includes links to the following publications: <i>Local Heritage Listing: Historic England Advice Note 7</i> and <i>Understanding Place Historic Area Assessments: Principles and Practice</i>. These and other relevant documents can be viewed at: https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</p> <p>In the event of agreement to the designate the proposed boundary and Neighbourhood Forum, we would be happy to comment further on the developing plan. Finally I must note that this opinion is based on the information provided by you and for the avoidance of</p>		
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	<p>doubt does not take precedence over our obligation to advise you on, and potentially object to development proposals which may subsequently arise from an eventual Neighbourhood Plan and which may have adverse effects on the environment.</p>		
HHNA15	<p>I write on behalf of the Dulwich Estate to set out our response to the proposed Herne Hill Forum and Neighbourhood Plan area.</p> <p>The Estate's interest is comprised of two elements; we have a significant freehold ownership of residential, recreational and commercial assets across the Neighbourhood Plan area and via the Scheme of Management where a consent system is in place for external works to preserve the character and appearance of the area.</p> <p>The Estate is responsible for and has plans for future development in the proposed area to varying degrees, with the greatest potential found in those freehold sites which are suitable for redevelopment. It must therefore be recognised that the Estate is intrinsic to the deliverability and success of any future Neighbourhood Plan.</p> <p>To date the Forum has not sought to engage with the Estate and we have not been consulted on the proposed boundaries. The Estate will therefore be reaching out to the Forum to discuss mutual interests and opportunities in forming part of the plan preparation process.</p>	<p>No comment on the proposed boundary at this point in time.</p>	<p>Noted.</p>

	<p>It is fundamentally important to the Estate that Dulwich continues to grow and thrive while retaining its neighbourhood characteristics and appeal which make it unique, and we look forward to working with the Forum to achieve this.</p>		
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End