

Leathermarket JMB response to the Draft Bankside, Borough and London Bridge Planning Framework

About us

Leathermarket JMB is a resident-managed housing organisation managing 1500 homes within the boundaries of Tower Bridge Road, Harper Road and Crucifix Lane in the Borough and Bankside area. Our homes are either within the BBLPF area (Kipling Estate, Crosby Row, Lockyer Estate, Hamilton Square, White's Grounds, Tyers Estate, Snowsfields and Bermondsey Street) or just outside the area.

Broad principles

The JMB accept that this area has seen, and will continue to see, substantial development and regeneration. The most important principle is that any new development must reflect and respect the existing communities in the area.

New development is acceptable in principle to the communities that we serve provided there should be appropriate mitigation of the impact of the development to existing people, particularly if it is high density. Put bluntly, we are happy to support new development provided that there is something in it for us. We will not support new development where we are losers in the process.

It is really important for the sustainability of this area in the longer term and for community cohesion in the longer term that this area maintains a balanced community - old and young, rich and poor, families and single people. It is this that makes the BBLPF area as attractive and vibrant as it is. The overall balance of the area - and the need to preserve an appropriate balance - should be considered when assessing potential new developments.

The area must not be allowed to become a ghetto of the rich, with existing people and communities driven out by progressive gentrification.

If there is to be widespread redevelopment of the BBLBPF area then it is important that there is investment in the appearance and fabric of existing social housing. This is vital so the community in the BBLBPF area works as a coherent whole and the residents of the social housing do not feel left behind, ghettoised or implicitly stigmatised by the redevelopment process.

Specific areas

4.1.7 Housing

Much play is made of the term 'affordable housing'. This uses the planning/ DCLG definition which includes shared ownership and other intermediate housing. While these forms of housing play a valuable part in overall housing supply, they are often not a sustainable source for the community – for example, a house progressively bought through shared ownership may then be sold on at market rate and is lost to the 'affordable' sector. Much of the council stock in the BBLBPF area has been lost to social rented sector through 'right to buy' and is now often relet as market rented stock to transient communities such as students.

With the planned changes to housing and housing benefit, it is worth considering a definition of 'truly affordable' – that is social rented housing that can be paid for from housing benefit. The JMB would welcome targets for the level of 'truly affordable' housing across the BBLBPF area.

The use of sustainable models of social housing provision – such as social rented properties within a Community Land Trust – should be considered.

If a development is planned for land that is currently (Nov 2010) part of a social housing development – such as redevelopment of garages/ sheds or public space within an estate – then

we would expect the residential element of such a development to be entirely 'truly affordable' housing – or equivalent truly affordable housing provided within no more than 100 metres of the site.

4.2.1/ 4.2.12 – Tall buildings

The JMB would be happy to support the development of tall buildings within the BBLBPF area in principle. We recognise that there are a number of tall buildings already in this area – such as Guy's Hospital, the Shard and, closer to home, the 20-storey Simla House and Burwash House on the JMB Kipling estate.

However, our support for any individual development, particularly high-density tall buildings, would be contingent on it fitting within the broad principles outlined above. That is that each development should be assessed with regard to the balance and cohesion of the community. Most importantly, there should be clear and apparent mitigation for existing residents and the community – we **must** all benefit from any new development.

Leathermarket JMB would not insist that the 'affordable' section of any proposed development – particularly with regard to tall buildings – is within the building itself. We would regard it as acceptable if the affordable element was on a slightly different site – but that it **should** be within the BBLBPF area and that it **must** be within the SE1 area of the borough. It is not acceptable to mitigate new developments by provision or refurbishment of social housing in other parts of the borough – which would be so far away from the communities of the BBLBPF area as to provide no real mitigation or community balance at all.

Again, when considering the affordable element of proposals, there should be a significant (usually a majority) element of 'truly affordable' housing (as defined above). Intermediate housing must not be allowed to dominate the 'affordable' elements of such developments.

5. Opportunity sites

We note with some regret that the existing JMB block on Snowfields has been identified for redevelopment as an 'opportunity site' as part of the St Thomas Street area.

This block is primarily owner-occupiers and, when we have consulted with the residents, there has not been a strong outcry against redevelopment.

If this block is to be part of a redevelopment proposal, we would want to see 'truly affordable' houses reprovided that would be managed by the JMB.

6.4.2 s106 policy

Leathermarket JMB supports the principles of the affordable housing element of the BBLBPF – that is that affordable housing should be delivered as part of a development plan (though not necessarily all in the same building), that 'in lieu' payments should only be accepted in exceptional cases. However, we would argue that it would be acceptable to use this to increase the supply of good quality affordable housing not just within the Borough and Bankside area, but the wider SE1 area of Southwark (ie including parts of Grange Ward).