

Consultation Summary

There were 113 responses to the consultation. A summary of the consultation is set out below.

Statutory Agencies

Historic England, the Environment Agency, Highways England and Transport for London do not object to the proposal.

Local residents and community groups

There were 84 supporting statements from individuals who were residents and/or business owners/local employees. The comments are summarised as follows:

1. Ideas and concepts are far more in harmony with the local community -residents/workers- than those currently being presented by developers and the council.
2. The overtly high and imposing new development on the 'quill' site, Becket house, Capital House and Vinegar Yard warehouse and carpark, which I believe will have nothing but a negative impact on residents and those working in the area.
3. The additional areas now being applied for show a number of similarities with the northern parts of the (already designated) "Area A" in terms of business and residence type, independent businesses, small shops and many of the buildings manifest a degree of heritage and/or architectural interest.
4. The revised Neighbourhood Area should prove more cohesive as well as giving a better opportunity for local people to have a voice in the planning process.
5. I feel that Southwark Council needs to make sure any planning around this area , keeps as much History as possible , it would be a travesty is we lose our History To Company's making a quick Buck and for us to lose our Fantastic Buildings And History .
6. The Shard end of St Thomas street is too windy and would not like to see more high rise causing a wind tunnel effect.
7. I walk my daughter to school along St Thomas street and currently it is pleasant, but this would not be so if there were to be a line of tall and imposing buildings causing more wind tunnelling effect and in terms of a relaxed community feeling area, it would make it more like the city and therefore is at odds with Bermondsey, which has a lovely provincial feel to it.
8. The unique vibe of Bermondsey Street and the surrounding area makes it a great place to live and/or work, and it is essential that this character is allowed to organically develop. Incorporating the extended area can only aid this process.
9. There are a number of buildings in the extended area of industrial and/or architectural merit and these should be given new life to the benefit of the existing business and residential community and those who come to live and/or work here in the future.
10. Too many parts of London have lost their identity through developers being more concerned with large profits for investors than listening to the existing communities living and working there. Local issues matter to local people, and disregarding them leads ultimately to a poorer quality of life.
11. These are intimate streets and places that will benefit significantly for their granular attention that being in a Neighbourhood Forum can offer. There are lots of interesting and special places which will benefit including the areas to the north and south of the railway

line which if treated carefully have the potential to be strong additions to the plans for a Low Line route stretching south-east towards Bermondsey Spa. More importantly there is the future of the Vinegar Year Warehouse. This for me is one of the finest examples of a heritage building in the northern part of the borough and it should be preserved and subject to a careful restoration to bring it back into use. Its loss after surviving so long and with so much character would be a tremendous loss to the Southwark and its built and cultural heritage.

12. The boundaries proposed by the expanded area to the north match the 'natural' boundaries in terms of feel of the area. Tooley Street is a clear boundary, but the area south of there, albeit north of the train tracks, has a very similar feel to the area of Bermondsey Street. Similarly, the area towards Guy's Hospital is clearly linked to the Bermondsey Street area currently designated.
13. "I fully support the application to extend the Neighbourhood area to the area as designated by the extension, especially with regards to Melior St and its surrounding areas. The numerous small businesses, not to mention the Church based in the area, are intrinsic parts of a 'local neighbourhood' and contribute to the neighbourhood feel. They deserve the ability to have representation as part of a Neighbourhood Forum, and as off-shoots from Bermondsey Streets, it would be ridiculous to exclude them from the careful coordination of neighbourhood planning.
14. Adding in a large quantity of flats in the area will increase road traffic, increasing congestion and pollution in the area.
15. There will be further congestion with local train stations, especially with London Bridge, which are already very busy in rush hours.
16. Local independent businesses may not be able to withstand against property bidding from larger chains, reducing attractiveness of other independent businesses in the area and local economy.
17. Sewage might not be able to keep up.
18. Air quality will be further reduced.
19. Parks will be overcrowded.
20. It's clear that the area to the north of the viaduct matches that to the south in character and architecture, and I consider including it in the ""plannable"" area along with the rest of Bermondsey the most sensible direction, given that the opposite seems to be further development like the proliferation of professional services and expensive chains that is More London, on the other side of Tooley Street.
21. Two examples which I would give as to the enduring quality of the area proposed to be included are first, one of the buildings on the south side of Tooley Street, which I noticed only today still has a large old brick chimney attached - a wonderful piece of history and connection of the area to the past. The second is the vinegar warehouse between Snowsfields and St. Thomas' Street. This is a beautiful building which, sadly, has been neglected over the years in favour of modern high-rise, high-capacity developments, but which could be easily restored and maintain the great feel that the area enjoys. Allowing this area to be included in Neighbourhood Planning for Bermondsey would be a huge asset in maintaining this attractive and historic area.
22. The alternative, leaving this area out of the Neighbourhood area, would open the door for more of the aforementioned high-rise, high-capacity developments - further excluding local residents and bringing more of the sorts of over-priced, under-occupied property that blights much of central London.

23. Neighbourhood planning would instead allow the residents and business in the area to develop more open spaces and use this increased traffic to fuel the already thriving local community, and continue to build an environment that encourages walking and cycling.
24. "I approve the expansion due to seeing the traditional feel of London, including history, heritage and experience being swallowed up by gentrification, high rise buildings and soulless opportunistic commercialisation of any square foot that remains.
25. This area is no longer home to the traditional buildings that survived the war, the pie and mash shops and the factories that once stood. Now we are one or two high rise buildings away from being a generic, non-descript area where you won't be able to tell that you're in the heart of London.
26. The sights and sounds tourists come to see will basically be the same as they will see in the airport terminals, just without the lack of tax.
27. "I support the application to extend the area. Local residents and local small businesses recognize that the character of the area south of the railway arches is distinct to the More London and Shard business-style area, and that this finer-grain, lower-rise and independent nature needs to be recognised and represented. The little area north of the arches shares the characteristics of the southern part, and as such is part of the same neighbourhood.
28. It makes no sense to cut this area out of the OBVNF area, as people recognise it as one and the same neighbourhood.
29. The future developments along St Thomas Street are going to have a huge impact on residents of Snowfields, the council estates to the south, and locals and small businesses within the rest of the designated area, and as such locals should have some power to say how they want the area to develop. This means that the boundary needs to be extended to include the whole area that OBVNF wish to represent.
30. MELIOR STREET — defined by local pub, church and public gardens, residential blocks with ground-floor small business commercial units — this small back street has always, in living memory, been seen as an integral part of the Bermondsey Street 'neighbourhood' both in terms of lived experience (the day-to-day services and amenity provided to the 'neighbouring' local businesses and residents) and the visual 'look and feel' and perception of neighbourhood architecturally and geographically, in that not only is there no obvious 'visual break' in the urban grain or 'neighbourhood' land-use that would demarcate it as being 'outside'/beyond' but there are sites and indeed buildings that extend right to/into one of the neighbourhood's key thoroughfares east-west and the quietway-cycleway.
31. The northern side of SNOWSFIELDS and eastern side of WESTON STREET north the Snowfields junction, which includes buildings that are specifically identified in the conservation management plan as of townscape merit and integral to the setting of heritage buildings opposite that are rightly inside the Neighbourhood Area. This street block, being long-standing residential above ground-floor commercial (an 1870's to 1970's 'neighbourhood' model replicated by the new, 2015, Snowfields Yard development — Snowfields through to Melior Street, see point 1.), has no place in, and indeed no voice as part of, the 'London Bridge Opportunity Area' or any 'Business district'.
32. The people populating these streets at most times of the day-night-week-weekend, defining its 'active frontages' and the lively and welcoming street scene more generally are 'neighbourhood' people (BID-based employees and Guy's patients being in the minority, and concentrating their 'appearances' to weekday lunchtimes)

33. The NORTHERN GATEWAYS to the Bermondsey Street Conservation Area more generally. In order to facilitate 'on the ground', indefinitely in the future, the strategic (Planning) management of the CA in line with agreed LBS planning and heritage guidance and policy, both general and area-specific, while also complying with The London Plan and all relevant Conservation/Heritage and Planning legalisation, the conservation area must not be split with 'half a street view' and or street inside the Neighbourhood area but key parts outside it, even though there is no 'visual break' and or change of urban grain/land-use/ architectural vernacular that might support such encroachment and 'creaming off'.
34. Streets that happen to fall within the TEAM LONDON BRIDGE AREA simply because 1 or 2 'small business' member-businesses have found more affordable/versatile/characterful premises within our long established 'neighbourhood' (as perceived by those who live and work here, and indeed those who made it the successful, cohesive, highly recognisable 'neighbourhood' that it is and as such one of the draws for incoming developers who in the last 10 years having being buying up street frontage, one and then the next, making successive, deeper incursions)
35. DRUID STREET-ST THOMAS' STREET ARCHES – despite all the 'Tunnels and Arches' place-making forums, workshops and surveys, led by Team London Bridge, that emphasised and indeed were premised on retention and diverse small-business use, the BID in conjunction with the local authority have proved to be a poor heritage-viable use advocates and have sadly overseen too greater losses to be trusted with these key 'boundary' (frontier) parts of the 'neighbourhood' on an ongoing basis. If the case is indeed made by others that they must remain within the BID area due to TLB's 'business model' and funding, i.e the location of a handful of outlying BID funder-businesses and of course TLB's own offices on the north side of Snowfields, then I would assert the value of a healthy 'overlap' of boundaries to ensure true diversity in and supply of working knowledge pertaining to conservation, community, SME and 'place-making' .
36. Why does this area wish to be represented differently Bermonsdey is Bermondsey. It's diversity is unique and people will start feel excluded .

Local organisations

Team London Bridge

37. Team London Bridge welcomes this opportunity to inform decisions on the boundary of the Bermondsey Neighbourhood Area. We have been involved in the process of neighbourhood planning in Bermondsey from the beginning. The proposals would overlap with the area of the Business Improvement District managed by Team London Bridge. We have reviewed the proposals in the context of the operation of the Business Improvement District and the boundary considerations set out the Government's Planning Practice Guidance.
38. We recognise and respect the view of Old Bermondsey Village Neighbourhood Forum that the streets included in the additional area proposed "fit better in character, urban grain and scale with the northern part of the area designated by the Council; they mainly consist of small independent businesses and residences with a high concentration of buildings of some historic or architectural
39. Nevertheless, it is also true that the proposed new Neighbourhood Area would significantly increase the commercial uses within the neighbourhood area. This would directly involve a

number of Team London Bridge's members. Were the principle of a more fluid relationship between the two areas to be established then it would be helpful to give consideration to the role of Team London Bridge in respect of the commercial uses along Bermondsey High Street. We would also be keen to see clear safeguards ensuring equal participation of business interests in the Forum as the commercial uses in the Neighbourhood Area increased.

40. The proposed new Neighbourhood Area also includes a number of larger residential estates (e.g. St Olave's) similar to those in the south of the existing Neighbourhood Area which the Forum has acknowledged it has found harder to engage in the neighbourhood planning process.
41. Major transport routes, such as the railway lines out of London Bridge Station, often form the boundary of neighbourhood areas. In this instance, we are keen to support initiatives which would improve linkages north and south of the length of the London Bridge railway through the tunnels and we recognise there may be opportunity in strengthening the connections to the east of Bermondsey street however the proposed boundary extension would create a new division of the railway line at Bermondsey street.
42. Our primary concern is the potential impact of the proposed Neighbourhood Area on the development and delivery of the London Bridge Plan. The London Bridge Plan sets out our strategic vision in partnership with Southwark Council for the London Bridge area. Its aims and projects have developed out of local public consultation with over 300 businesses and 400 individual comments, as well as taking into account existing and emerging local and strategic planning and economic strategies. The Plan was developed following a second BID extension to 2021 which was won in 2015. It is robust and well supported by the local community.
43. The proposed new Neighbourhood Area would only partially overlap with the area of the London Bridge Plan. This would have a particular impact on some of the most important place shaping initiatives, including the Low Line, St Thomas Street Boulevard, High Street London Bridge (Tooley Street) and the Green Grid. Each of these would be partially inside and partially outside the new Neighbourhood Area. The boundary would run down the middle of Tooley Street and along the northern edge of St Thomas Street. It would also include one building north of Tooley Street although there is little rationale provided for this peculiarity in the proposed boundary. We ask that the particular impact of the proposed new boundary on the delivery of the London Bridge Plan is carefully considered in determining the proposals.
44. Moreover, the proposed London Bridge Area Vision in the New Southwark Plan has been based largely on the aims of the London Bridge Plan. We hope this has been written in such a way as to support and preserve the heritage features in the area – including a direct mention of placemarks - and question whether an extended OBVNF boundary would provide additional benefit.
45. We are aware that there are a number of development sites along St Thomas Street, and we are involved in this to create the Boulevard mentioned in the London Bridge Plan (a 'high street' in the NSP). This will be a very contemporary development, and we question whether this will sit well in the 'character' of Bermondsey Street. It is more likely to be in the character of the more commercial area of London Bridge.

46. The submission seeks to justify the extension of the Neighbourhood Plan area on the basis that the current boundaries do not reflect an area for coherence and that the proposed additional areas fit better in terms of character, urban grain and scale. Having reviewed the character of this area, the current planning context and future development visions for these areas it is clear that this is not the case.
47. The area to the north, particularly the land and sites around St Thomas Street, that is sought to be included is intrinsically different in character to the current allocated Neighbourhood Plan area. The additional area is designated as Strategic Cultural Area in the LB Southwark adopted Proposals Map and is within the District Town Centre, unlike the current adopted area. The area therefore meets a different purpose to the current designation and its purpose and future planning is based on a different context to the designated area, which is principally residential. The extended area is characterised by a predominantly commercial nature, this includes significant elements of office and retail uses which incorporates a range of occupiers. This character reflects that existing along St Thomas Street to the West, Borough High Street and Tooley Street, rather than the residential character of the area to the south which is the subject of the current Neighbourhood Plan designation. The transformation of the station on St Thomas Street, including the opening up of the new concourse and entrance, together with recent developments including the Shard, provide a new different context to St Thomas Street to the west of Bermondsey Street. The District Town Centre boundary, which currently forms the northern boundary of the designation, provides a natural subdivision of these two distinct areas and the existing boundary of the Neighbourhood Plan area is therefore appropriate.
48. In addition, the future potential development opportunities within the current designation and of the proposed extended area are fundamentally different, with different visions and opportunities. The extended area includes the identification of opportunity sites within the emerging Local Plan for new residential and commercial development, which will reflect the scale and form of developments around London Bridge, sought by LBS. This also follows the London Plan's strategy of seeking higher densities around central transport hubs, like London Bridge. The inclusion of this area within the Neighbourhood Plan designation would be incongruous with these potential future development opportunities and strategic visions.
49. The comments in the submission statement relating to the issues surrounding lack of engagement, under representation and delays in formulating initiatives are also noted. Given the current lack of progress on the preparation and publication of a plan for the existing designated area since its designation in 2015, there is concern about adding additional areas, which could have the potential to delay the progress of strategic sites through the planning process and ultimately their delivery. We suggest that activity should concentrate on resolving the issues identified in the statement within the current Neighbourhood Area and developing an appropriate plan based on the current designation.
50. We strongly consider that the Neighbourhood Forum should continue to be taken forward on the basis of the current identified area and not be extended, with the focus provided on establishing an appropriate plan to cover the area as designated to drive forward pro-active planning strategies.

51. "Guy's and St Thomas's NHS Foundation Trust wishes to formally object to the Area extension proposal. An extension to Area A would also further complicate, delay and add expense to the current situation in terms of the Trust's ability to adequately respond to existing healthcare / education needs and plan for the future provision for local people.
52. There were comments from Guys and St Thomas NHS Foundation Trust who concluded that The 2014 applications to create neighbourhood areas were refused by the Council who considered a smaller area to be suitable for Neighbourhood Planning. We acknowledge that part of the proposed extension might be considered appropriate for inclusion in the Neighbourhood Area. However, we are concerned that a significant part of the proposed area has the same characteristics as the areas previously applied for; areas which the Council considered to be inappropriate for inclusion in the Neighbourhood Area.
53. Land to the west of Barnham Street should be excluded from the extension area as it contains largely high-rise, high density, commercial sites. It shares the same characteristics as the previously excluded areas. There has been no change to these areas and in the circumstances it would be inappropriate for this additional land to be subject to neighbourhood planning. It is very different in character to Area A.
54. As identified in paragraph 24 of the committee report dated 20 August 2014:
"The area identified consists of two clearly different forms of development, with residential uses located largely in the east, and the strategic sites mainly in the west. The area does not read as a coherent neighbourhood." However, we consider that land to the east of Barnham Street might be more appropriate for inclusion as part of the extension of the neighbourhood area due to its predominantly residential nature.

Guys and St Thomas Charity

55. Between the Council's conclusion on the character of the area in 2014 and now, we suggest it would be difficult for the Council to reasonably reach a different conclusion. The character of the two areas remains distinctly different and therefore the charity do not consider the proposed extension of the neighbourhood area to be appropriate. In addition to the above, the proposed extension area is already well served by a suite of planning policy documents. The Proposed Submission Version New Southwark Plan 2017 contains policies which specifically relate to the London Bridge area and include the extended sites. In particular, Site allocations NSP52 and NSP53, allocate the land between Melior Street, St Thomas Street, Weston Street and Snowfields, for mixed use redevelopment, with particular focus on providing office and other work spaces. The design guidance for the redevelopment of the sites reflects the existing character to the north of Snowfields. Given that the Council are already undertaking a thorough consultation exercise of a development plan document which covers this part of the borough we would suggest that the inclusion of the extended area in the neighbourhood boundary is unnecessary and would provide an additional layer of planning policy that is not required.
56. Furthermore, it is worth noting that the proposed extension sits within the adopted and draft London Plan's London Bridge, Borough and Bankside Opportunity Area. The proposed

further expansion of the Neighbourhood Plan area into an opportunity area contrasts with the aims of the opportunity area to regenerate and intensify the area. This contrasts with the lower density residential character of the existing defined neighbourhood area, further enhancing the differences between the two.

57. Lastly, Guy's and St Thomas' Charity work closely alongside King's College London and Guy's and St Thomas' NHS Foundation Trust to help tackle the major health challenges affecting people living in urban, diverse and deprived areas. To this end we understand the University and the Trust have objected to the proposed extension as it would further complicate, delay and add expense to the current situation in terms of the abilities of the Trust and University to adequately respond to existing healthcare / education needs and plan for future provision

Shad Thames Residents Association and Potters Field Park Management Trust

58. "The revised area will take in St John's Churchyard - an area which Southwark Council have leased to Potters Fields Park Management Trust - the Trust is in the process of re-developing (on a small scale) the SJCy to make it more community friendly - i.e. planting, boulevards, etc. This particular part of the revised area should therefore be excluded from the extension as it is being very well developed to make it a better place for the neighbourhood.
59. The PFPMT is also aware of plans to develop the City Mission Church and will take all possible steps to protect the SJCy."

Local land owners

60. The adopted Proposals Map makes it clear that the areas to the north and south of Snowfields are distinct in their function and, largely as a result of that, in their physical nature. Snowfields is the boundary of the District Town Centre within which, as you would expect, commercial uses and larger buildings predominate.
61. The St Thomas Street East area, includes three strategic development sites, forms an essential part of Southwark Council's aspirations to reinforce the commercial function of the area around London Bridge Station and create a distinct location akin to More London. Emerging policy is clear that St Thomas Street East, taking reference from the Shard and other tall commercial buildings in the immediate vicinity, will optimise commercial floorspace delivery and in future secure significant increases in employment in the area as outlined in emerging plan policy.
62. Outside the District Town Centre designation, to the south of Snowfields, uses are predominantly residential in nature and the buildings are of a lesser density and scale.
63. With reference to the considerations set out in the NPPG, St Thomas East and Vinegar Yard and the wider area to the north of Snowfields does not form part of the 'Bermondsey' neighbourhood because: The proposed extension does not reflect a settlement boundary, an area of planned expansion, a catchment for walking to local services or an area where community groups operate (many such groups cut across this area, though their geographical areas of interest do not reflect the proposed boundary);
64. The area within the proposed extension is predominantly a business area and therefore distinct from the predominantly residential area within 'Area A'. Reflecting the distinct functions, these two areas are also distinct in their physical appearance and characteristics;

65. The proposed area too is not a coherent estate for residents or business (it would instead inappropriately straddle two such areas, one commercial, one residential) nor would it be defined or distinct by virtue of natural setting, features or a particular population size.
66. Paragraph 33 of the NPPG reasons for refusal in the last decision are legitimate and, in our view, correct positions to take in the interest of good neighbourhood planning.
67. "Bermondsey Neighbourhood Forum proposes the designation of an area from the River Thames, as far south as the Bricklayers Arms roundabout [area edged in blue above]. This area incorporates two distinct types of neighbourhood; a predominantly corporate business area to the north of Snowfields with taller building heights and large scale infrastructure, and a lower rise, lower density, predominantly residential area to the south. The Council does not consider this area in its entirety to be appropriate for the purposes of neighbourhood planning. The inherent differences in character, building heights, land use and density of the northern and southern parts of the specified area indicate that the area does not form a coherent neighbourhood which would be appropriate for neighbourhood planning."
68. "Bermondsey Village Action Group proposes the designation of a smaller area [edged in red above], including Guy's Hospital, London Bridge Station including very few residents. This area comprises mainly strategic sites, the planning and development of which would have implications well beyond the neighbourhood area proposed by BVAG. For a neighbourhood forum (potentially comprising as few as 21 persons) to control the London Bridge and Guy's Hospital sites, and to formulate a neighbourhood plan which could potentially have impacts much further afield than the proposed neighbourhood boundary, is not considered to be appropriate."
69. "The area identified consists of two clearly different built forms of development, with residential uses located largely in the east, and the strategic sites mainly in the west. The area does not read as a coherent neighbourhood. For these reasons, the Council does not consider this area to be appropriate for the purposes of neighbourhood planning.
70. Despite this clear analysis the effect of the boundary revision now sought would again be to amalgamate these two distinct areas, broadly north and south of Snowfields. Again, the area to the north of Snowfields, being a business area of predominantly taller buildings, is both physically and functionally distinct from the residential area (of a commensurate, domestic scale) to the south. It is for these reasons, made clear by Southwark Council, that the boundary extension would span two distinct neighbourhoods and as such would not be appropriate for neighbourhood planning.
71. Undoubtedly the proposed boundary extension does exclude some key strategic sites that Southwark have previously ruled as being inappropriate for inclusion in the neighbourhood area e.g. Guy's Hospital and London Bridge. However, the three sites owned by those for whom this representation is written, located to the north of Snowfields and south of St Thomas Street, are again included in the proposed boundary despite also being strategic sites (benefiting from strategic allocations) whose development potential has wide reaching implications far beyond Bermondsey. They should therefore, for the same reasons that London Bridge and Guy's Hospital's inclusion was deemed unacceptable, be excluded from the Bermondsey Neighbourhood Area.
72. Referring to the application prepared by the Old Bermondsey Village Neighbourhood Forum, we strongly disagree with the claim that 'the Council does not optimise the planning process

in which the Forum is engaged and that the boundaries do not reflect an area with coherence for neighbourhood planning purposes’.

73. It is considered that the extension proposed to Area A by the Old Bermondsey Village Neighbourhood Forum does not take into account the current and emerging Development Plan in Southwark, as required by Neighbourhood Plans by virtue of Paragraph 184 of the National Planning Policy Framework, which requires Neighbourhood Plans to be in general conformity with the Strategic Policies for the area.
74. We consider that it would be inappropriate for the Neighbourhood Area Boundary to overlap the boundary of the London Bridge District Town Centre. The proposed extension to Area A would incorporate into the Neighbourhood Plan, the core of the Bankside, Borough and London Bridge Opportunity Area, which in the Southwark Core Strategy (2011) seeks to deliver 1,900 new homes and around 25,000 new jobs.
75. The current Old Bermondsey Village Neighbourhood Forum area is characterised by historic properties of mainly brick, domestic in scale, primarily residential in use and concentrated within the Bermondsey Street Conservation Area. The network of streets and spaces is also heavily based on the history of the area with narrow lanes, yards and pockets of open space. Conversely, the St Thomas Street East area is defined by the Shard, London Bridge Station and Guy’s Hospital to the west and Snowfields and Bermondsey Street to the south and east. This area contains a mixture of hospital uses, civic uses, offices, restaurants and a secondary amount of residential. The area is characterised by its diversity of uses but generally commercial and with a far more modern larger scale townscape. These uses and scales of buildings are expected to increase in line with adopted policy and move even further from the character of Old Bermondsey Village Neighbourhood Forum area.
76. Since the publication of the Core Strategy, the requirement for new homes and new employment opportunities has increased, which is reflected in the submission draft of the new Southwark Plan, which identifies 4 sites for comprehensive redevelopment within London Bridge (2 of which are included in the proposed extension area), and 9 sites for comprehensive redevelopment within Bankside and Borough, with visions to improve these areas as globally significant central London business districts.
77. This is also reflected in the overarching objectives of the draft London Plan which identifies a need for 66,000 new homes annually, 3,500 purpose built student accommodation bed spaces annually and an office floorspace demand in London of 6.1 million sqm of office floorspace between 2016 and 2041.
78. The proposed extension to Area A would also include a significant portion of the London Bridge Strategic Cultural Area, which is located to the north of the boundary beyond Snowfields. The Strategic Cultural Area is designated to protect and enhance the provision of arts, culture and tourism, a notion which the Migration Museum harness in the future. The cultural importance of London Bridge goes hand-in-hand with the area’s strategic importance in terms of housing and employment. We consider that this adds further justification for why the extension of Area A would be inappropriate.
79. We strongly believe that St Thomas Street East should remain outside the Neighbourhood Area. St Thomas Street East’s character consist of a business area with taller building heights and large scale infrastructure. This contrasts to the character of the existing Neighbourhood Area (Area A) which is predominately residential and low rise buildings. There are some small businesses at the eastern end of Tooley Street referred to in OBVNF submission, but

these are exceptional in this immediate area and certainly not characteristic of St Thomas Street. As previously stated by Southwark Council, St Thomas Street East also contains a number of strategic sites. The two strategic sites (ref: NSP52 and NSP53) which are formed of three landownerships are identified as suitable for tall buildings and have an indicative development capacity for hundreds of new homes and thousands of square metres of new employment floorspace. These strategic sites and the scale of development will have a sphere of influence that extends well beyond the proposed Neighbourhood Area boundary. The landowners of these three sites have been working together to bring forward a comprehensive development proposal for the street and significant progress is being made in delivering St Thomas Street Boulevard, as outlined in The London Bridge Plan. These development proposals will further establish St Thomas Street East as a different character area in its own right. Overall, the justification as to why Southwark Council previously excluded the area

80. This area is appropriately covered by Team London Bridge and the BID. It would be inappropriate and could frustrate and delay development should a neighbourhood plan forum cover these strategic sites alongside their other local matters.