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21 December 2018

Team London Bridge response to the Capital House redevelopment: Planning application reference 18/AP/0900 (revised)

1. Team London Bridge is the Business Improvement District (BID) representing approximately 400 businesses in the area between London Bridge to the west, Tower Bridge to the east, and south towards Bermondsey. TLB has a strong remit from businesses since 2015 to deliver the [London Bridge Plan](#). Our mission is to ensure London Bridge excels as a leading place for global commerce and continues to develop as a pioneering local centre for enterprise, culture and entertainment.
2. Team London Bridge has welcomed the opportunity to inform development of the Capital House redevelopment proposals. We made representations on the emerging proposals in January 2018 and the planning application in May 2018. We have also made representations on the site through consultation on the New Southwark Plan (NSP) and in [responding to the St Thomas Street East Framework](#) and the November exhibition. We have considered the current proposals in the context of new and emerging development plan policy in both the New Southwark Plan and London Plan and consistency with our London Bridge Plan.
3. Capital House is a highly significant site in the BID, especially given the location directly outside the new station exit from London Bridge, which has generated a huge increase in pedestrian footfall in the area. The proposals relate to part of one (NSP52) of a small number of major development sites identified for London Bridge in the emerging Southwark Plan. The scale of the development proposed and its relationship to St Thomas Street and other development sites along St Thomas Street is critical.
4. The London Bridge Plan sets out the St Thomas Street Boulevard as a key placeshaping project – demanding a ‘world-class vision for the street’, with an active and vibrant local economy - *“Revitalised arches and tunnels and a world-class pedestrian-focused public realm will ensure that the St Thomas Street Boulevard is a showcase of all that is historic and distinctive about London Bridge”*.
5. We welcome a number of changes from the extant planning permission which respond to earlier feedback. These include the provision of more active frontages, an increase in the public realm around the building, important views through the route running along the eastern side and the addition of green walls.

Shared approach

6. We are concerned that the proposals are being brought forward ahead of a further iteration of the St Thomas Street East Framework. The Framework elicited a significant response and the issues raised need to be resolved before consideration of planning applications for any of the individual sites.

7. We are also concerned by the limited response to the public exhibition of the plans for this site. This is at odds with the known public interest in its future development and even fails to register our own representations.

8. As a consequence we do not believe the proposals have yet demonstrated the “*early, proactive and effective engagement with the community*” required by the National Planning Policy Framework (paragraph 128) and so cannot be “*looked on more favourably*”.

9. The shared Framework also set out some important urban design principles. We made representations as to how they could be improved. Yet, the supporting material does not demonstrate how the revised proposals have addressed either the original or our revised principles and there is a need for a much stronger connection between the Framework and what is planned.

Land use

10. Team London Bridge believes there is only incremental capacity to accommodate additional residential development in the area. London Bridge is located in the Central Activities Zone as both a retail cluster and a specialist cluster because of its arts, cultural and creative businesses and activities. The success of these roles requires a careful balance to be struck and we believe a clear priority needs to exist for commercial office, retail and leisure uses over residential. This is consistent with the London Bridge Area Vision (New Southwark Plan AV10.2, 10.3) which supports growth in “*office provision, shops, leisure, culture, science and medical facilities*” over residential development. Policy SD5 C of the draft London Plan also states “*Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ.*” These other areas include London Bridge because of its dual role as a cluster and as an Opportunity Area. The current proposals take land use in the opposite direction, replacing significant B1 office space with largely student accommodation. This is a significant increase of student accommodation from the extant Quill planning permission, and represents a loss of c4,000 sq m of commercial space from the existing Capital House building.

11. We are concerned that student accommodation will not provide significant additional activity to the local community – particularly given the short-term nature of tenure. We believe the plans will displace other uses more appropriate to the strengths of this part of the Central Activities Zone.

The “arrival point”

12. The site’s location as a key arrival point from London Bridge station means it plays a critical role for the whole of the St Thomas St area and as a gateway into the London Borough of Southwark. This requires it to be of the highest design quality and also to

provide significant high quality public realm and a diverse range of uses, including a strong town centre offer. The Framework proposals will bring approximately 10,000 new people to the area with needs to be served outside working hours, at lunch time and at weekends. The site is at the heart of a 7-day space and this needs to be recognised in the range of retail and cultural provision. The previous planning application made a much stronger town centre offer through the Migration Museum, and the loss of this – or any comparative – offer, is a serious setback, resulting in the latest proposals presenting a much weaker proposition.

13. The applicants share the view that the site is located at a point of townscape significance in demonstrating how it meets the requirements of Policies P14 (draft New Southwark Plan) and 3.20 (Southwark Local Plan) for tall buildings. This should be followed through into the building's use.

14. We welcome the strong architectural approach which distinguishes the base of the building from the student accommodation above. We believe this needs to be followed through in the way the three lower floors are used and the diversity of what is on offer to everyone who uses the London Bridge area and not just those living in the student accommodation. This will require:

- A strong, publicly accessible offer across the lowest three floors of the building – as envisaged with the Migration Museum – and not just the ground floor. There is strong demand for similar civic uses in the area – the Florence Nightingale Museum is another venture seeking an appropriate location – and we urge further exploration to develop a compelling offer equivalent to the Migration Museum or the Bridge Theatre (in the One Tower Bridge development) which can deliver multiple spin-off benefits – informed by the [London Bridge Culture Strategy](#). The use of the first floor for staff rooms, staff lockers, landlord storage and student post boxes is not appropriate to a building in this prime location
- Additional provision for locally relevant commercial space on the lower floors – for example flexible co-working opportunities mixed with amenity provision that links up with the exciting plans at Guy's and King's Health Cluster next door (framed in the London Bridge Plan as a Science Eds and Meds cluster), or the high number of sustainable fledgling businesses in the area. These uses would also provide wider access to the building's facilities and better reflects its location. There are a number of existing meanwhile uses in the building which might be provided for in the new development
- A much stronger relationship between the ground floor and St Thomas Street. As envisaged the main arrival point from London Bridge station will be into a student lobby. We believe the student entrance may be better located on Weston Street opening up the whole ground floor frontage to public use.
- Rethinking the internal and external design of the ground floor to make it much more welcoming to casual visitors and the wider public and much less like an office/residential lobby. The latest designs propose a reception desk layout which discourages access and does not provide an open frontage with a wide entrance that will provide the visual prompts and encouragement that will draw people in and encourage the building's use as internal public realm

- Further enhancements to the external public realm facing St Thomas St so it is less disrupted by pillars supporting the building structure and actively managed to promote its animation and use as a cultural and events space

15. A brief review of the public proposition provided at other Greystar student accommodation in central London does not suggest there is an existing precedent which meets the needs of the Capital House site. The application needs to be supported by further evidence that an appropriate proposition can be delivered and maintained.

16. We would encourage continuing support for the use of the current building for meanwhile uses and a plan for helping these businesses migrate to new premises and/or find accommodation in the new building on site.

Servicing and deliveries

17. There is a lack of clarity over how the new development will be serviced and how it will address the significant existing problems with large vehicles in Melior Street where buildings are regularly damaged by vehicle strikes. This redevelopment provides an opportunity to address this issue and we are disappointed that the plans do not appear to have been amended in response to feedback.

18. The lay-bys proposed for servicing and deliveries will occupy the whole pavement and force pedestrians into a narrow space between the building's south face and pillars. We can also expect this pavement to experience a significant transfer of waste across it as material is taken from the building to the road and vice versa.

19. We would welcome further information on how large vehicles will navigate through the site so we can assess whether the existing problems have been addressed. We have not seen a swept path analysis for the large refuse and service vehicles that will access the site which demonstrates they can negotiate, for example, the tight corner at the junction of Melior and Weston Streets without mounting the pavement and having to make complex multiple manoeuvres which pose an unacceptable risk to buildings as well as to pedestrians and other vehicles. To address the problems of manoeuvring and building strikes there is a need for larger kerb radii at the road junctions, wider pavements and realigning of the carriageway in Melior Street and this is not included in the current plans.

20. We recognise that the proposed "consolidated servicing strategy" cannot be fully delivered until other developments envisaged in the Framework proposals have been delivered. Nevertheless, there are existing opportunities to develop a shared approach with the neighbouring Kings College and Guys & St Thomas' sites to use the same vehicles and lessen impact.

Visual impact

21. We welcome a design response to the railway arches opposite the site through use of colour and materials and a relevant datum for the base of the building. We support the NSP Area Vision on the importance of respecting the character of the London Bridge area and the significance of its placemarks. We are concerned by evidence in the supporting information of the impact of the scheme on key views and it is notable that none of the visual and built heritage assessments of the impact on the townscape identify any negative impacts and that the poorest assessment of significance is one of "neutral" impact. It would be

remarkable if this were the case given the location near to Conservation Areas which are notable for the fine grain of their streetscape.

Public realm and landscaping strategy

22. The Capital House site has an important contribution to make to the wider public realm and landscape. The route along the east side linking St Thomas Street and Melior Street is particularly critical in attracting people into the rest of the St Thomas Street East Framework area. There is too little detail in the plans to assess whether the plans will be successful in achieving this and we are unclear whether an agreement has been reached with the neighbouring site that will secure sufficient width for this important new route. It is important that this new route can work even if the neighbouring site is not redeveloped. The relationship with the existing and future arrangements for Melior Street Garden are also unclear.

Other issues

23. We have raised a number of other issues in comments on earlier plans that do not appear to have been resolved, including:

- accommodating the demand for external cycle parking generated by the building and its tenants / inhabitants, a priority raised in the London Bridge Cycling Strategy that is not satisfied by the limited provision to the northern end of Weston Street
- maximising opportunities to use green infrastructure to improve the microclimate and enhance biodiversity; mitigate wind effects; reduce carbon; and provide energy generation and storage measures. We are disappointed, for example, that the proposals do not seek to achieve a BREEAM Outstanding rating

24. In conclusion, Team London Bridge has a number of concerns regarding the proposal that relate to this development's ability to deliver the objectives of the St Thomas Street Boulevard and wider Framework. We look forward to continuing to work with the landowners and prospective developers of the main sites along and around St Thomas Street to help deliver shared ambitions for this critical part of the London Bridge area.

Yours faithfully



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Chief Executive
Team London Bridge