

28 April 2017

Response to the London Bridge Area Vision and Site Allocations within the New Southwark Plan

1. Team London Bridge welcomes this opportunity to help shape the emerging New Southwark Plan. This is a critical land use document and we are keen to collaborate with Southwark Council so that it complements the needs and aspirations of the business community in London Bridge. The London Bridge Plan sets out our strategic vision for the London Bridge area and this informs our response. The aims and projects of the London Bridge Plan 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 and was published in 2016.

2. We welcome the two-strand approach to developing the New Southwark Plan, bringing together the ambitions set out in Area Visions and key sites with the broader planning policy framework for managing future land use development and change. We have structured our comments to respond to the draft Area Vision and map and then to address the key site allocations.

London Bridge Area Vision

3. The Area Vision approach provides a constructive and effective summary of the main priorities and ambitions for the different parts of the Borough. We welcome this and it complements our own London Bridge Plan which takes a similar approach.

4. We welcome the broad content of the draft London Bridge Area Vision. It responds well to our London Bridge Plan and echoes its wording on many issues. The emphasis on London Bridge as a commercial and visitor asset is especially welcome. We also believe there is evidence of clear economic benefit resulting from improved place making and investment in the public realm.

5. This response inevitably focuses on areas where there is a difference of emphasis and we propose revised wording for the London Bridge Area Vision. We have also drafted revisions to the proposed Area Vision Map to help this fulfil its forward-looking role. We believe the approach proposed in both our revised Vision and the Map is consistent with the broad approach of the New Southwark Plan.

6. We are looking to strengthen the London Bridge Area Vision in the following areas:

- a) Stronger recognition for **London Bridge's role as an important local destination and town centre** alongside its global commercial significance – as recognised in the town centre designation for London Bridge in the New Southwark Plan

- b) Greater emphasis on the riverfront and the **role of the Thames** as an important economic, cultural and social asset, that provides a strong sense of place, access to a National Trail (Thames Path), transport resource for people and freight and a major contribution to the quality of life in the area
- c) Establishing a clear **priority for developing commercial, cultural, medical and research opportunities over residential**, notwithstanding the need for student accommodation
- d) Recognising a more **wide-ranging role for heritage and character**, including the important role to be played by public art and ‘placemarks’
- e) Establishing **higher standards** for new development which responds to **London Bridge’s ambassadorial role** in firing the imagination and inspiring the highest quality buildings and public spaces
- f) **Supporting the placeshaping investment** identified in the London Bridge Plan beyond the Low Line and new “high street” role for St Thomas Street to include High Street London Bridge (Tooley Street), Thames Esplanade and the Green Grid
- g) Identifying the **Low Line as an economic and cultural opportunity** alongside its potential to enhance the public realm
- h) Addressing wider measures to **improve accessibility and connectivity**, with a focus on improved options for people with disabilities using all traffic modes, and measures that promote walking and cycling throughout the area
- i) Establishing an expectation that the **world class standard** of the new London Bridge Railway Station is **upheld in surrounding development and across the wider public transport interchange**, with cycling, the river, tube and buses
- j) Taking a more progressive and forward looking approach to **urban resilience, sustainability and the circular economy** so the Area Vision helps London Bridge stand the test of time.

7. The New Southwark Plan Area Vision for London Bridge could be strengthened to address these issues through the following amendments:

**NEW SOUTHWARK PLAN – LONDON BRIDGE AREA VISION
Proposed amendments**

13. London Bridge

13.1. London Bridge Area Vision

13.1.1. London Bridge is:

- A globally significant central London business district which is home to international business headquarters **as well as providing a local destination and town centre;**
- Internationally renowned for its prominent riverfront location providing cultural spaces and retail, including Borough Market, **riverside access and a National Trail;**
- An area with a rich heritage preserved in historic monuments, buildings, yards, public spaces, **placemarks**, vistas and cityscapes;
- **Home to** one of the UK’s busiest **and fastest** growing transport hubs, ~~that has increased rail and river capacity and improved walking and cycling provision and the quality of the public realm~~ **including a new flagship railway station and other modes with potential for growth and improvement for both people and freight, including underground, boat, bus, walking and cycling.**

13.1.2. Development in London Bridge should:

- Attract global commerce and build on its reputation for arts and crafts, food and trade **while serving local needs through its town centre role**;
- Support the creation of a distinctive **and inspiring** world class environment through a mix of innovative new architecture, restored **and reactivated** heritage and quality public realm that provides greenery, **public art** and connectivity **and responds to the placemarks which contribute to London Bridge's identity**. ~~Greenery should also be incorporated into buildings;~~
- Build on **development opportunities** and the fabric of local alleyways and yards to create **a new Green Grid comprising** quiet, green routes with clean air, **as well as incorporating greenery into new buildings and securing a greener visual environment**;
- Strengthen the cultural offer of the area and diversify activities and shops;
- Make sure the new standard of London Bridge Station is upheld **in its wider environs and the station serves as an effective multi-modal interchange**;
- Enhance local accessibility and air quality **through improved wayfinding, travel planning and new and enhanced** walking, cycling, tube, bus and boat **facilities that benefit both freight and people**;
- Contribute towards the development of the Low Line, a new **linear economic opportunity and** public realm corridor adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs and retail;
- Harness the expertise and infrastructure from Kings College London, Guy's Hospital and other medical and science facilities to develop a strong, dynamic and specialised local economy that will attract new specialised services and research **and promote health and wellbeing in the local environment**;
- Enhance the visitor and cultural activities along the Thames riverfront, **including through provision of a step-free continuous high profile walkway along the Thames** ~~and encourage use of riverboat services in a safe and sustainable way~~;
- Support the development of a new high streets on St Thomas Street **and Tooley Street/ Duke Street Hill**;
- **Promote urban resilience, sustainability and the circular economy through sustainable drainage, integrating greenery into new development, providing high standards of cooling and insulation and addressing the microclimatic impact of new development.**

13.1.3. Growth opportunities in London Bridge:

London Bridge is part of central London ~~and has the potential to provide~~ **where** new offices, shops, leisure, culture, science and medical facilities **will be supported and prioritised over new residential development whilst also**. ~~London Bridge will also contribute~~ **ing** towards meeting the borough's housing needs.

London Bridge Area Vision map

8. The draft Area Vision map provides a helpful spatial overview for London Bridge but it is stronger on providing a sense of the existing area than expressing the vision for future development and change. Its "vision" is currently limited to identifying the four key site allocations, two planned additions to the cycle network and a limited reference to the Low Line.

9. We believe the Area Vision map could play a more effective role in describing the forward-looking vision for London Bridge by addressing other aspects of the change envisioned for London Bridge. We have illustrated how this might be done in a reworked London Bridge Area Vision Map provided in the Appendix.

Site allocations

10. We share the view that the sites identified in the Area Vision would benefit from a clear planning strategy for their future development and use – please refer to Appendix 2 with additional diagram comments. Sites NSP 51, 52 and 53 form a contiguous allocation along the southern edge of St Thomas Street and so share common characteristics – we note that New City Court is also a potential site which should be given consideration within the same strategy. We believe there would be significant advantages in combining NSP 52 and NSP 53 into a single allocation with its future development guided by a coherent masterplan.

Shared issues

11. The site allocations for NSP 51, 52 and 53 would be strengthened by:

- Recognising their individual and collective contribution to the development of St Thomas Street as a high street, including part pedestrianisation and support for town centre uses at ground level, but also potentially above ground floor and set back from the St Thomas Street frontage
- Recognising that New City Court as a development opportunity should be considered within the same vision and strategy for St Thomas Street High Street
- Supporting the need for a mix of floorplate sizes to encourage retail and office diversity
- Avoiding a single, monolithic elevation along St Thomas Street
- Acknowledging the need for future development to respect the food, culture and retail offer in Bermondsey Street and the station
- Addressing the future impact of development on the microclimate and shading and requiring development to mitigate the impact of development on wind speeds along St Thomas Street and adjacent areas
- Requiring development to support
- Acknowledging the merit of existing, undesignated buildings
- Increasing permeability throughout the site, building on and adding to the historic fabric of alleys and courtyards
- Delivering an overall increase of public open spaces to create a green grid, incorporating greening into new buildings and trees lining the whole of St Thomas Street
- Supporting the need for sustainable drainage given the area is a critical drainage area

NSP51

12. The site allocation should be strengthened by:

- A stronger analysis of the heritage significance of the site which goes beyond designated views, buildings and archaeological significance
- Recognising the importance of the site's heritage significance in the vision and its contribution to future ambitions
- Recognising the value of existing green and open spaces on the site more effectively
- Addressing the health and wellbeing role of this hospital/medical research site through its own development by promoting green infrastructure and supporting biodiversity in new building and requiring investment in the public realm that contributes to the Green Grid
- Showing respect for the inns and yards both inside and outside its boundaries
- Showing the opportunity for improved connectivity throughout the site and along all site boundaries: east/west including permeability with Borough High Street; a second north south route; and linking through to the inns and yards through New City Court

NSP52

13. The site allocation should be strengthened by:

- Identifying Melior Street Community Garden within the site boundary, ensuring its retention and future management and ensure no adverse impact from development
- Ensuring greenery is embedded in the site, including street trees along St Thomas Street
- Going beyond an acknowledgment of the adjacent railway arches to integrate future development into the Low Line as a major economic and public realm opportunity
- Reducing the suggested development capacity for new housing and ensuring only a small part of the site will be considered for future residential use
- A much closer relationship with plans for Site NSP53
- Recognising the architectural merit of the Home Office building

NSP53

14. The site allocation should be strengthened by:

- Acknowledging the site's role as an area of transition which informs the need significantly to increase permeability and support mixed use
- Requiring new development to preserve and enhance conservation areas, and be sensitive to the unique character and historic scale of Bermondsey Street on the eastern edge
- Recognising the special character of Vinegar Yard and the railway arches along the other side of St Thomas Street
- Providing a dedicated right of way through the site
- Integrating future development into the Low Line as a major economic and public realm opportunity
- Reducing the suggested development capacity for new housing and ensuring only a small part of the site will be considered for future residential use
- A much closer relationship with plans for Site NSP52
- Ensuring greenery is embedded in the site, including street trees along St Thomas Street and Snowfields, and green open space supporting permeability through the site as part of a network of green spaces.

NSP54

15. The site allocation for this prominent and well used site should be strengthened by:

- Acknowledging the gateway role that this site has for people arriving in London nationally and internationally, and the need for a distinctive and inspiring building to define the area
- Requiring new development to have a transformative impact on the quality of the public realm and the experience of travelling between London Bridge Station and London Bridge (at all levels) and along the Thames Path
- Extending the site boundary to include the footbridge over Duke Street Hill and ensuring any future development enhances the view looking east down Tooley Street towards the conservation area
- Requiring an active frontage at ground floor level to support the creation of a new High Street on Tooley Street, in association with the new station developments
- Recognising the importance that scale of buildings plays along the river in safeguarding this important cityscape
- Enhancing the setting of nearby listed buildings and public space to the east of the site
- Enhancing the public space to the east of the site and ensuring greenery is embedded along the site and as part of the transition into Tooley Street
- Correcting an erroneous reference to "Duke Hill Street"

Next steps

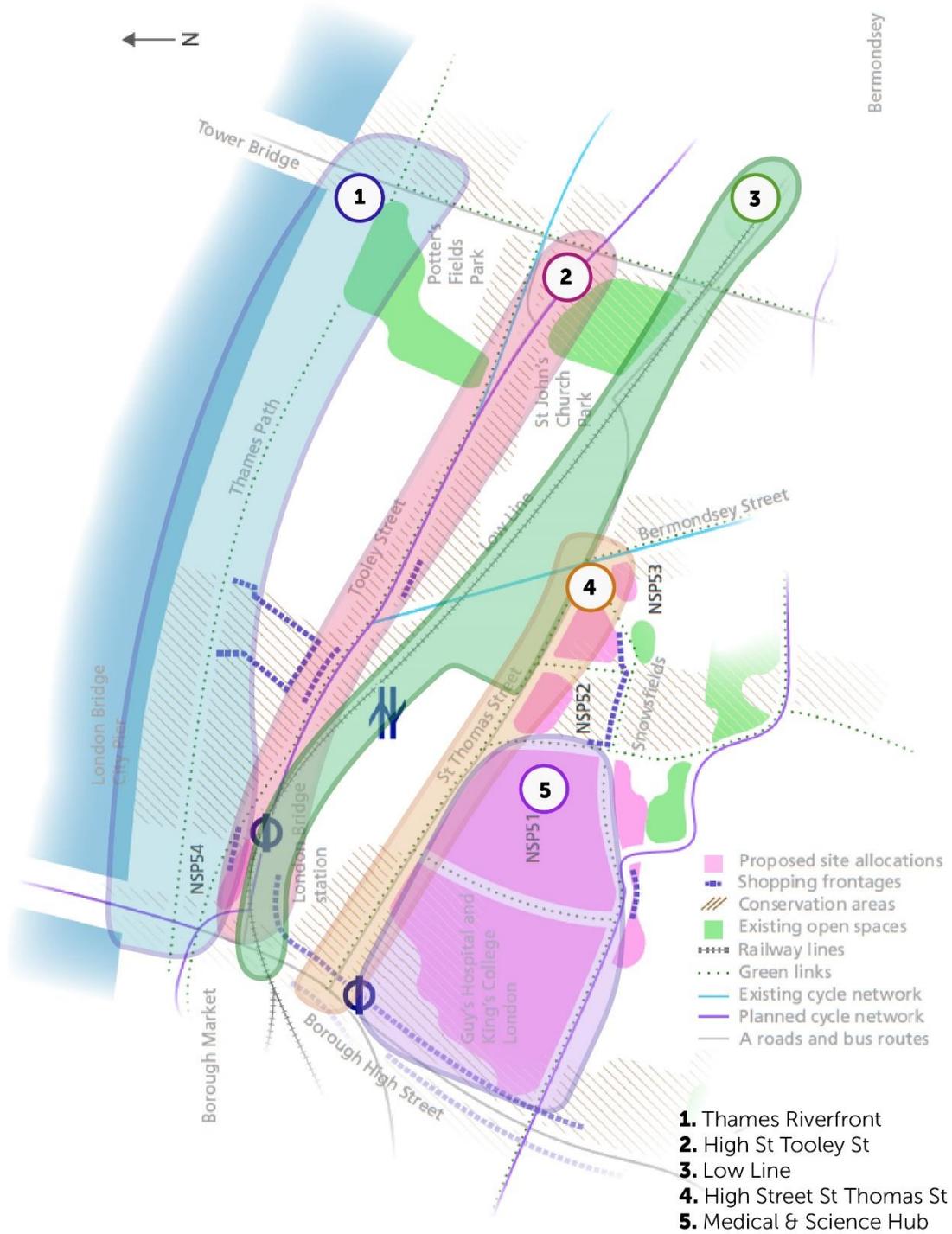
16. We would welcome the opportunity to meet and inform the final consultation draft of the New Southwark Plan, bringing together the policy framework and area visions. We should also welcome discussion over delivery and implementation of the Plan, including the potential for developing a range of supplementary planning documents. These could include a strategy for the Thames riverside, the Green Grid and the Low Line and recognition of important placemarks and views.

Yours sincerely,



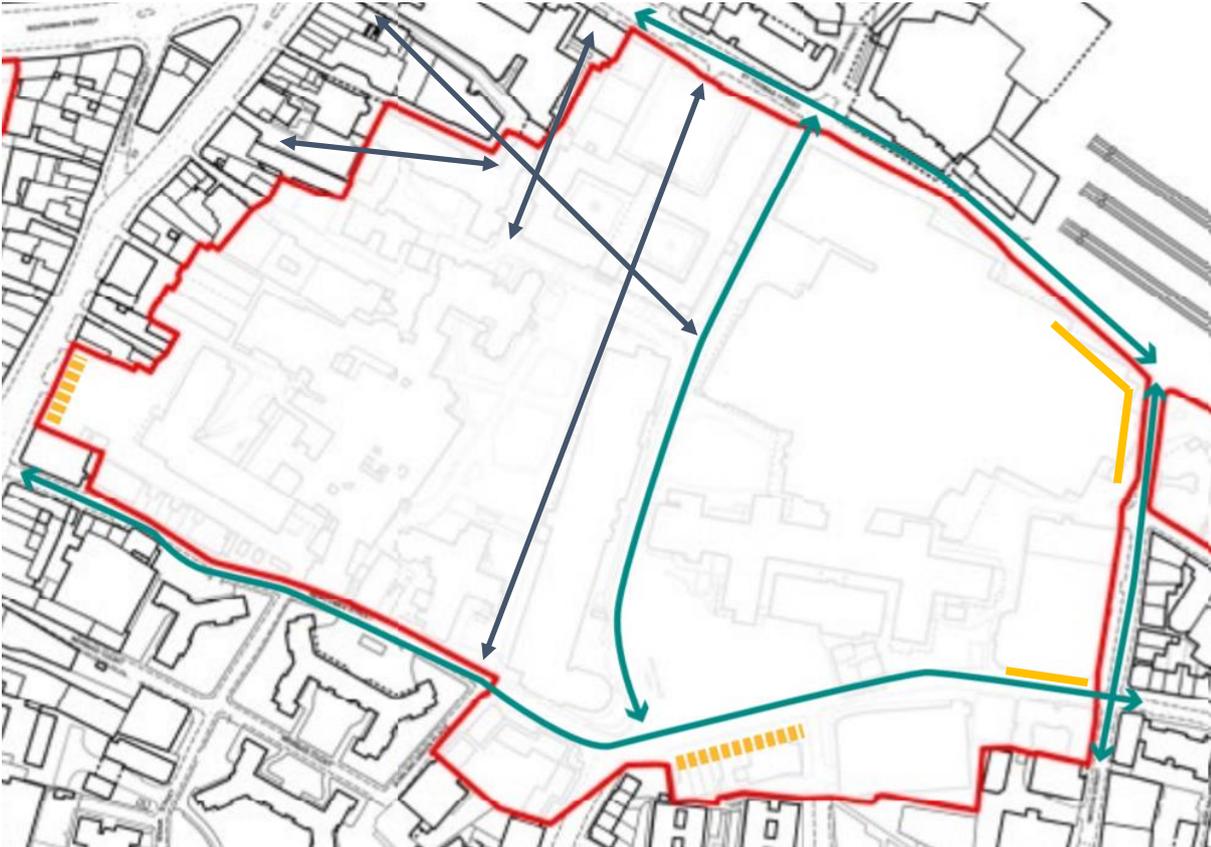
Professor Simon Howell
Chairman
Team London Bridge (Business Improvement District)

Appendix 1 – Reworked London Bridge Area Vision Map



Appendix 2 – Site allocations with additional

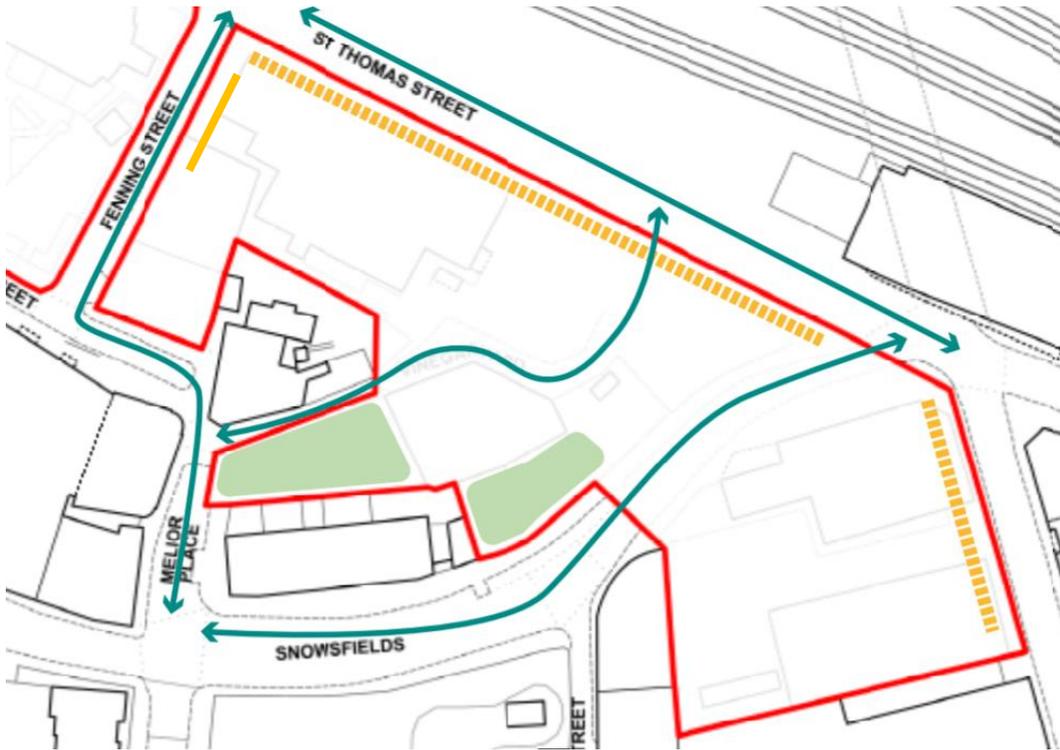
NSP51 London Bridge Health Cluster



NSP52 - Melior Street to St Thomas Street



NSP53 - St Thomas Street, Snowsfield, Bermondsey Street



NSP54 – Colechurch House, London Bridge Walk

