

REVISED PROPOSALS FOR REDEVELOPMENT OF CAPITAL HOUSE

A submission by Team London Bridge

November 2018

1. Team London Bridge (TLB) 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. TLB 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](#). 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. To this end we welcome the focus on design and activation of space of the proposal.

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 to the proposals 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 commend the way the proposals are now being developed in the context of a shared approach with other major developments planned for the area through the St Thomas Street East Framework. The latest plans do not fully meet the expectations of this Framework and we have also identified a significant number of areas where the Framework needs to be strengthened. These have a direct bearing on the revised proposals. We are particularly concerned to ensure the Capital House site plays a stronger role as an “arrival point” for the whole area which both welcomes people and exemplifies the quality of design

and diversity of uses which is expected. In responding to the St Thomas Street East Framework we have developed a set of urban design principles which we believe should drive the proposals for Capital House. It will be important for a planning application to be accompanied by evidence showing how they have been addressed. The principles are set out below and expanded on in our [response](#):

- *Bookends and arrival points*
- *Pedestrian connection hierarchies*
- *Active frontages*
- *Key elevations*
- *Responding to the Low Line*
- *Creating a Boulevard on St Thomas Street*
- *A variety of defined spaces: alleys, yards and open space*
- *Servicing*

Strengthening the “arrival point”

7. 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 proposal 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.

8. The plans include a 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 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. The proposals for staff back of house and “amenity” uses on the other two floors are a poor substitute for the earlier plans
- More detail and ambition in the range of uses proposed which goes beyond providing six different types of meeting space and some pop-up trading spaces. It should reflect the diversity of uses proposed within the St Thomas Street East Framework as a minimum and it is essential to develop a much stronger town centre proposition which act as a draw and supports other business activity
- 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 its use as internal public realm

- Additional external public realm facing St Thomas St which is at least as generous as the current building arrangements, less disrupted by pillars supporting the building structure and actively managed to promote its animation and use as a cultural and events space
- 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](#)

9. 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, though we would welcome the opportunity to view another with you. We should be happy to work with those tasked to develop the next stage of these proposals to secure the best outcome for this key arrival point. For example, we are currently producing a retail strategy for the area, which could provide useful findings.

Servicing and deliveries

10. There is a lack of clarity over how the new development will be serviced and some of the plans are inconsistent. There are also 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.

11. 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. There are also inconsistencies in the way the southern elevation is illustrated in the exhibition materials - a wide pavement is suggested on some diagrams, directly adjacent to the proposed building, but it is not clear if this area is completely clear of columns or obstructions as the diagram labelled 'Active Frontage' shows columns at street level along the frontage to Melior Street while the diagrams 'Capital House Refuse Strategy' and 'Capital House Servicing & Deliveries' do not.

12. 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. This will require any future planning application to include appropriate modelling and a swept path analysis for the large refuse and service vehicles that will access the site. This needs to show, for example, that the tight corner at the junction of Melior and Weston Streets can be taken 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.

13. We should also welcome further details, including on the proposed "consolidated servicing strategy". This needs to be consistent with the wider Framework and support a shared approach which uses the same vehicles across the whole Framework area.

Design and placemarks

14. 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. It will be important that a similar response is in evidence for all the major development sites along St Thomas Street. Given its prominent location this building demands a stunning design impact benchmarked against the standard set in recent years by Hay's Galleria, The Shard, City Hall, and London Bridge Station.

15. 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 the nearby Conservation Areas which are notable for the fine grain of their streetscape. For example, we would have liked to see more made of the relationship between the building and the view on to the Catholic Church and Melior Street. We are also concerned that the character of Tower Bridge (one of our businesses) in the context of the historic setting of the Tower of London and river Thames is not compromised and lack information on this.

Public realm and landscaping strategy

16. 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. The relationship with the existing and future arrangements for Melior Street Garden are also unclear. We would welcome further discussion and the development of a confident public realm and landscaping strategy that maximises these opportunities.

Other issues

17. We have raised a number of other issues in comments on earlier plans. It would be helpful to see more information on the proposals to be able to assess whether they have been addressed. These include:

- accommodating the demand for external cycle parking generated by the building and its tenants / inhabitants, a priority raised in the London Bridge Cycling Strategy (though we recognise there is internal storage and support your commitment to a free bicycle hire initiative)
- opportunities to: use green infrastructure to improve the microclimate and enhance biodiversity; mitigate wind effects; reduce carbon; and provide energy generation and storage measures.

18. 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.