

**REDEVELOPMENT OF 147 SNOWFIELDS**  
**Planning application 20/AP/0744**  
Representations by Team London Bridge  
June 2020

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. This area includes 147 Snowfields. 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. The site is adjacent to the St Thomas Street East Framework and site allocation NSP53 in the Southwark Local Plan on both of which we have made extensive representations. We also made representations in December 2019 on the emerging proposals for 147 Snowfields, although have had no contact with developers. We have considered the planning application 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 and the St Thomas Street East Framework 3.0.
3. 147 Snowfields is located in a key area of transition between the significant new development proposals for the St Thomas Street East Framework area to the north and the historic character of buildings and green spaces to the south. It is adjacent to the Bermondsey Street Conservation Area and Snowfields Primary School. The current building sits easily within the townscape by virtue of its mass and height but is of modest design quality.
4. The redevelopment of 147 Snowfields is welcome for the opportunity it provides to introduce a new building of high design quality which contributes more positively to the future of this rapidly changing part of the London Bridge area. Its relationship not only to the development by Sellar of both the Vinegar Yard and Bermondsey Street sites but also the existing buildings along Hardwidge Street is critical.
5. We believe there are opportunities to strengthen the proposals by:
6. More commercial mixed development – The proposals are for 17 homes and 210 sq m of B1 office space compared to the current 11 homes and 125 sq m of office space. This is not consistent with the site's location in the Central Activities Zone and 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. We do not support an increase in residential use and the scheme should provide a stronger commercial offer. This would also respond to the large increase in local footfall consequent upon delivery of the developments proposed in the St Thomas Street East Framework. This is expected to bring approximately 10,000 new commercial staff and students to the area (a figure which will be increased by visitors), creating a “7 day space” which needs to be recognised in the range of retail and cultural provision. 147 Snowfields has an important

contribution to make and should include significant provision for A1-A4 retail and related uses with an active frontage at street level.

7. Greening – Our Green Grid vision is that “*London Bridge will become one of the greenest, most beautiful, environmentally sensitive and civic-minded business districts in the world*”. This prominent site has the potential to deliver significant new opportunities, including on its walls as well as the commitment to a green roof. The approach should also be informed by the Landscape Strategy now being developed as part of St Thomas Street East Framework 3.0.

8. Sustainability – There are important sustainability commitments included as part of the proposed development, including the use of air source heat pumps, provision of a green roof and appropriate passive design. Overall, however, we are disappointed by the sustainability ambitions which do not adequately address the opportunity to respond to the circumstances now demanded by the declared climate emergency. The BREEAM Pre-Assessment confirms the scheme achieves an Excellent rating and we believe it should be achieving Outstanding. Future tenants of the development will expect high standards and the scheme should be based on targets that push new boundaries, including:

- BREEAM Outstanding
- WELL Platinum
- carbon neutral
- air quality positive
- EPC rating A with a combined approach to energy efficiency (potentially integrated with St Thomas Street East Framework developers)
- wirescore (platinum)
- reduced ground level wind speeds and urban heat island effect
- water run off at greenfield rates

9. Team London Bridge is working with developers across the St Thomas Street East Framework Area supported by Useful Projects to deliver this more ambitious approach which will inform decisions all the way through to completion of the scheme, including the choice of materials and the approach to landscaping and planting to deliver net biodiversity gain in the area and reduce the impact of the urban heat island effect. We would welcome the opportunity for this work to support the development of this key site in a manner which achieves these sustainability ambitions.

10. Servicing – We are concerned by the limited information on servicing the site beyond a statement that it will “*remain on-street*”. This is despite the major increase in the intensity of use of the site which will generate significantly more office and residential deliveries and other servicing requirements. The scheme is adjacent to a school playground in an area which will also experience a major increase in traffic servicing the Sellar sites which has two servicing points on Snowfields. It is already recognised in the St Thomas Street East Framework as the “Snowfields Service Zone” even before redevelopment of 147 Snowfields is considered. We believe servicing should be consolidated with the adjacent sites.

11. Design quality – We welcome the proposals as an improvement on the design quality of the existing building. The New Southwark Plan Area Vision stresses the importance of

respecting the character of the London Bridge area and the significance of its placemarks. The Snowfields elevation of the proposed development is extremely prominent and the scheme proposes a significant improvement in the quality of this key elevation. Nevertheless, there remains an awkward transition between the new building and the contrasting height of the existing buildings of character along Hardwide Street. We do not believe this is explained or justified by the Heritage and Townscape Visual Assessment Statement that *“the scheme presents a means of demonstrating evolution in an urban context”*

12. Public realm – This stretch of Snowfields will change character as a result of future developments, including the new active frontage to be provided as part of the redevelopment of Vinegar Yard Warehouse and alterations to the public highway and improvements planned for Snowfields/Melior Place. We are disappointed at changes made during pre-application discussions which have taken out the additional public realm provided by the ground floor set-back. The need for additional public realm in areas of high footfall is clearly evident in addressing the long term needs to be able to accommodate appropriate physical distancing in public places. The Design and Access Statement acknowledges the existing conjunction of a *“busy thoroughfare”* with *“relatively narrow pavements”* and the development provides an opportunity to address this in anticipation of a significant increase in footfall. We believe the need for a strong street presence could best be addressed by combining a set-back with a more active retail use at street level. The commitment to *“provide a contribution towards on-street cycle parking”* is welcome and necessary given the anticipated increase in demand. It should be developed as part of an integrated approach to the provision on on-street cycle parking across the whole Framework area.

13. Cycle parking - We support this as a car-free development and note the provision of 30 residential cycle parking spaces. This does not meet the minimum standards required by the New Southwark Plan for one space per bedroom plus one per dwelling in an area with a 6b PTAL rating. These are higher than the current London Plan. With 17 dwellings and 34 bedrooms the scheme needs to provide 51 residential cycle parking spaces to meet these standards. The provision of four cycle parking for the office use also falls short of the requirement for seven in the New Southwark Plan.

14. Construction – This area of London Bridge will shortly experience major construction activity for a long period of time. It will be important for any redevelopment of 147 Snowfields to integrate its approach with the construction plans for adjacent sites. The details provided with the planning application do not demonstrate how this will be achieved and it should be a condition of any consent.

15. Overall, we would welcome revised proposals which take account of the other major developments planned for the area via the St Thomas Street East Framework which has not adequately addressed the site to date, and also our own vision for the area particularly related to sustainability, reduced traffic and air quality, greening and biodiversity, public realm, and culture and retail. It will be important that any future planning application for the site responds positively to a strengthened Framework and is accompanied by evidence showing how it matches up to it.

15. We should be pleased to work more with the landowners and prospective developers of the 147 Snowfields site to help deliver shared ambitions for this critical part of the London Bridge area.