

## REVISED PROPOSALS FOR REDEVELOPMENT OF 60-68 ST THOMAS STREET

A submission by Team London Bridge

February 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. 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 welcomes this opportunity to inform further revisions to the plans for the redevelopment of the 60-68 St Thomas Street site currently occupied by Beckett House. We made representations on the site through consultation on the New Southwark Plan (NSP) and in [responding to the St Thomas Street East Framework](#) and fed in views in March 2019 on the previous owner's plans and in November 2019 on an earlier iteration of the latest proposals. We have considered the revised 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. We have also reviewed it against the revised St Thomas Street East Framework 3.0 on which we have also made representations. These comments supplement those made in November 2019 which remain relevant.

3. 60-68 St Thomas Street is strategically located in the BID on a key thoroughfare, near the entrance to the refurbished London Bridge Station and playing a key part in the wider development proposals for 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 attention given to the space around the building and the plans for new open space and public realm to the west and embrace the proposals to take these greening intentions further.

4. We have outstanding ambitions where the proposals lack detail or fail to provide necessary certainty about the quality of what is being proposed. Many of these have been raised before and we ask they they are addressed before the proposals are finalised. We note that the analysis of how the plans address the St Thomas Street East Framework is little changed from that presented in November 2019. Our continuing ambitions relate in particular to greening opportunities, servicing, cultural provision, sustainability, and design. We address them below.

### **Public realm and greening**

5. We welcome the amendments to the plan in order to ensure a more mature landscape with a stronger legacy and a direct relationship with "*terra firma*". We think the greening approach can go further and a more concerted effort is needed to green the sides of the buildings, especially where this will augment the green spaces at ground level. The

internal greening also needs to have the appeal of an indoor park if it is to draw people in to what should feel like a public space.

6. The site has an important contribution to make to the greening of the whole St Thomas Street East Framework Area. The landscape management approach is welcome for its continuing involvement of St Mungos but it can go wider, combining the achievement of social regeneration and biodiversity objectives for the whole St Thomas St area through a single approach. Our long involvement in Melior Street Gardens has demonstrated the wider benefits of this approach to the local community. This could include adopting a more ambitious approach based on reforestation rather green space management and be supported by an ambitious Biodiversity Action Plan delivering sustained and significant ecological net gain which also serves physically to link the different sites together.

7. The landscape should also be seen as more than providing attractive plants and a location for water storage tanks by realising the central role it can play in a functional sense as green infrastructure by, for example, providing insulation, absorbing rain and air pollution, and creating a breathable environment.

8. We believe further evidence is required to demonstrate the appeal of the new public realm as a place to linger as well as a new route. It is encouraging that computer modelling and wind tunnel testing has taken place but there is a lack of information on the results and detailed information on the microclimate, including wind speeds, sunlight and shadowing is needed. The new open space needs to be suitable for frequent rather than occasional sitting (indicating mean wind speeds nearer 2.5 m/s than 4m/s) and attractive to children, families, and professionals throughout the week. The space will also need active management to recognise existing uses nearby, including the Manna Centre.

### **Lower levels and active frontage**

9. We welcome the ambition to make the base of the building more civic but are yet to be persuaded that this is being followed through into the delivery of an outward facing, publicly accessible role. This also needs to extend to the lower floors and not just to ground level.

10. The approach still feels too closed and we believe a “town hall/library” approach should mean ongoing public activity and not be limited to timetabled community events on select occasions. This also provides the opportunity to transform the site’s cultural offer with regular cultural activity, curated spaces and places to eat and drink. We believe this will only be successful if it is integral to the business model for managing the building and its surroundings. Activation of this space should not be viewed as a ‘nice to have’ or even charitable endeavour but be financially sustainable based on the footfall it drives and the loyalty it inspires. It will ensure the site can make a major contribution to the London Bridge Culture Strategy as supported by New Southwark Plan Policy P43 and can contribute to the New Southwark Plan Policy P28 requirement for 10% of the workspace to be affordable.

### **Design and placemarks**

11. 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. The New Southwark Plan’s Policy P14 demands tall

buildings “*be of exemplary architectural design*” and this is a key consideration of the Southwark Design Panel. We ask that further consideration be given to how the scheme can provide a truly “Bermondsey building” that becomes loved by locals.

12. It remains important to see evidence in future iterations of the impact of the scheme on key views (including along St Thomas Street from the base of the Shard) and the nearby Conservation Area which are notable for the fine grain of their streetscape.

### **Servicing and deliveries**

13. There is still a continuing and disappointing lack of clarity over how the new development will be serviced and the impact on the local area. This was not resolved by Framework 3.0 which indicates that servicing “*will be addressed by individual planning applications*”. We believe a more strategic approach is essential. While it is encouraging that the information presented says that vehicle trips “*will be*” minimised by service consolidation, it also states that the scheme will “*seek to*” consolidate deliveries. We can see no change on this issue from the November 2019 plans despite their importance.

14. Using the lay-by proposed for servicing and deliveries in Fenning Street will frequently obstruct pedestrians using the strategic routes that are identified in the St Thomas Street East Framework 3.0 as key to pedestrian connectivity both N/S and E/W through the area. There are also likely to be conflicts with the adjacent parking provision for Blue Badge holders. There will also be a significant impact from waste collection in this location and it is also likely to be the access point for the secure cycle parking for occupiers of the building which will cause further direct conflicts. The capacity of Fenning Street to accommodate HGVs is also uncertain.

15. Team London Bridge is supporting the use of cargo bikes in business logistics and it will be important that the building and its loading bay are designed to encourage and support their use.

16. We would still welcome further information on how large vehicles will access the site and details of the number, timings and frequency of vehicles of all sizes. A future planning application will need to include appropriate modelling and a swept path analysis for the large refuse and service vehicles that will access the site (note the final direction of vehicle traffic on St Thomas Street is yet to be determined). We should also welcome further details of how the promised “*service consolidation*” will be delivered and ask to be consulted on the servicing strategy before it is finalised. We commend consideration of how the scheme can utilise and collaborate with the Guy’s and St Thomas’ Hospital consolidation centre.

### **Sustainability**

17. We welcome the fact that “*60 St Thomas Street has been designed to deliver exceptional levels of sustainability*” and ask for more information on what is intended. The levels will need to go beyond commitments to BREEAM Outstanding, WELL Platinum and a policy exceeding energy strategy and address the opportunity to respond to the circumstances now demanded by Southwark Council’s declared climate emergency, a policy we fully support. The future tenants of the development will expect higher standards and the scheme should be based on targets that push new boundaries. 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 and reduce the impact of the urban heat island effect.

18. As part of this we hope to see the following ambitions addressed in any planning application for the lifetime of the building:

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