

The Hive 1 Melior Place London SE1 3SZ

Tel: 0207 407 4701 www.teamlondonbridge.co.uk

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Team London Bridge response to New City Court consultation development

Team London Bridge (TLB) is a Business Improvement District representing approximately 400 businesses in the area of the planning application. TLB has a strong remit from businesses to deliver the London Bridge Plan (2015). 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. We work with our partners to ensure a world class physical environment that is engaging and distinctive.

We welcome the chance to provide our feedback to the current proposals. New City Court sits within the London Bridge boundary, so its tenants will become members of the BID. We are therefore very interested in ensuring the long-term success of the site, and how it supports the London Bridge Plan - in particular the St Thomas Street Boulevard- and the Area Vision in the New Southwark plan.

In 2017, we responded to the three site allocations identified in the New Southwark Plan on St Thomas Street, and made the following points, which are still relevant:

- 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
- 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

To realise the potential of St Thomas Street, we have broken our comments into five main criteria, which we have continued to use when discussing all the sites along the street. Our comments on the proposed scheme are as follows:

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Traffic and servicing

- The size of the development will be a catalyst for years of construction vehicles, and subsequently, servicing and delivery vehicles. TLB is working with TfL and partners to make this a very low trafficked street we are exploring ways to keep it below 1,500 vehicles per day. To support this, we strongly suggest that New City Court work with neighbouring developments and partners (St Thomas Street East developers and Guy's hospital for example) to create an off-site consolidation centre and share fewer, cleaner, smaller vehicles.
- Servicing at the projected level of 17 vehicles per hr via White Hart and Kings Head Yard does not seem feasible given the aims to increase footfall here (through our Inns and Yards project), the narrow access from Borough High Street, and the busy footfall on BHS that would conflict with vehicle movements. Any vehicle movements should be scheduled away from peak times. This route has been defined as a Low Emission Route and this scheme should respect and support that objective.
- The scheme should support ambitions in the London Bridge Cycle Strategy (2018), which is based on significant business consultation. Cycle-parking provision needs to meet standards in the New London Plan and Southwark plans. As a building with visitor attractions, and to promote visitor business trips, there will need to be generous and visible public cycle parking. It will also be important to explore a contribution to local cycle hire options.
- Cycle access via Kings Head yard is not an appropriate solution given this will mostly be at peak time. Multiple cycles could be forced to wait in the road with heavy traffic as it is difficult to pass through the pedestrians walking past the yard entrance on Borough High Street. Access seems more appropriate from St Thomas Street.

Public realm and open space

- The design makes a positive contribution to new public space and permeability particularly from St Thomas Street into the yard, making a more permeable route into the Health Campus to the east of the site, and opening up a new access route from the underground station. We suggest this exit should be combined with a new link between the high street and the courtyard to really open up access.
- We suggest there still needs to be some work to resolve the loss of the traditional yard, which is being combined as part of a larger courtyard. This can be done with landscaping, and design and activation of the building as it lands in the yard.
- We have been working with Better Bankside to develop a toolkit to inform the future look and feel of the historic yard spaces off Borough High Street, and are currently working on proposals for an exemplar phase 1 in White Hart Yard. The toolkit can be found here https://app.box.com/s/if6ilpe3f2oaqg8eqms9ze5c0f305rgv.

Green Grid + sustainability

- We have a Green Grid vision that "London Bridge will become one of the greenest, most beautiful, environmentally sensitive and civic-minded business districts in the world". We would like more information in your proposal about what the scheme is offering to deliver this ambition. St Thomas is a huge opportunity to showcase innovative methods of water capture, energy generation and zero carbon emissions, as well as abundant greenery integrated on buildings.

- The scheme currently offers a lot of hard landscaping with an elevated garden away from street level. We would like to know how greenery can be made to feel more generous as part of the wider outdoor elements of the scheme. If there is an indoor garden element with permanent gardeners, we would welcome a discussion with you about how it can link up as part of a more ambitious Green Grid for the wider area, rather than in place of external greening.
- One of our current Green Grid projects will provide valuable greenery within the Inns and Yards through large-scale planters and Green Wall. Please find attached initial drawings and we hope your scheme can take this on board when providing more green amenity. The project will provide multiple benefits, including enhancing wildlife, amenity and air quality, and capturing stormwater in this critical drainage area (to a 1 in 30 year storm).
- We welcome the addition of trees, and would be happy to discuss the variety in relation to our Green Grid strategy document.

Town centre and commercial uses

- We know that there is need for more retail in the area, and that we are underserved compared to somewhere like Victoria and your research highlights this.
- We welcome the exciting new retail spaces. The NSP sets out a new High Street on St Thomas Street, so it will be as important to get the access from that side of the retail right, as well as the access from the courtyard. St Thomas Street must not become an inaccessible back wall of the courtyard retail, and access will significantly increase the footfall.
- We are however concerned that insufficient retail space and variety is being provided, and would like to know more about the 3-floors of the main building earmarked for retail. 4,000 new workers will need more than a café, a high-end restaurant, a deli and a barber's as indicated in the exhibition stand. Additionally, we know that Guy's hospital (and the Health Campus) is looking for additional affordable food outlets for its 6,000 staff. The scheme also needs to cater to the weekend and visitor audiences that are so important to the vitality of the area. We strongly suggest that you work with wider St Thomas Street developers to create a more comprehensive future-proofed retail (and cultural) offer along the street that complements the existing offer. We will be happy to play a role in supporting this process.
- We would like to see more activation at ground floor of the main building. While we support the objective for multi-level retail (3 floors), we would like to understand how the building will draw the public in (t is our experience that getting people to access tall or modern buildings can be a challenge, particularly in the current retail climate).
- We would like NCC to support the London Bridge Culture Strategy (2018). St Thomas Street has the potential to become a major cultural attraction, focused particularly on health care and medicine (Old Operating Theatre, Science Gallery, Life sciences Museum). We know that the Florence Nightingale Museum is looking for a new home and the Royal Pharmaceutical Society's historical collection is not currently public. We would be keen to explore how NCC could be part of a unique medical museum quarter, or in the long-term be part of a world medical heritage site.
- We support the commercial nature of NCC. Workspace is in high demand in London Bridge, with very low vacancy rates. We suggest you target a range of sectors, a great strength of our commercial make-up, and provide more affordable start-up and co-worker space to cater for future trends and more local access for local entrepreneurship to flourish.
- We would like to know how the new courtyard will work in practice with the two pubs.
 While this is an exciting opportunity for the pubs to have open outdoor space, it can also create significant overspill into the courtyard, which will bring challenges for space management.

Architecture and heritage

- We welcome the focus on heritage elements in the scheme. The devil will be in the detail, and we would like to know your approach to conservation vs more contemporary style. We suggest this is done by engaging closely with the public and relevant stakeholders. We have engaged on how heritage can be restored or activated through our work on placemarks work (https://placemarks.commonplace.is and 'placemarks' are mentioned in the NSP Area Vision), and welcome working with you to take this discussion forward.
- We welcome how the removal of the current building creates a wonderful uninterrupted Georgian terrace and reveals the historic buildings around the courtyard. The relationship between the terrace and St Thomas' church will be enhanced by this, and we hope the subtle dramatic relationship between these buildings are not dwarfed in impact by the scale of the new building which will largely depend on views and proximity.
- Please take into account the Inns and Yards document mentioned above. We would like to see how the new design can re-create the feel of the yard space in a contemporary way with active frontage, and not undermined by the loading bay.

We would welcome the opportunity to discuss these points in more detail in advance of you taking the scheme to formal planning.

Yours sincerely,

Nadia Broccardo Chief Executive