

**ST THOMAS ST EAST DESIGN FRAMEWORK 3.0**

A response by Team London Bridge

July 2019

1. Team London Bridge welcomes publication of St Thomas St East Design Framework 3.0. The continuing development of the Framework is essential to provide a unified approach to the development of the area. The work on the Framework is to be applauded and we congratulate all concerned on the commendation for the Framework at the New London Architecture Awards.
2. The continuing value of the Framework lies in its role to inform decisions throughout the lifetime of the changes proposed to the area. This will require it to be a living document. We welcome the acknowledgment in Framework 3.0 that there is continuing work to inform its development. It is important that the Framework both informs planning applications for the area and endures well beyond them to shape both delivery and long term management.
3. We believe that all development proposals in the Framework area should explicitly demonstrate how they support its delivery and justify any departures on grounds which demonstrate even greater public benefit. It has been very disappointing to see applications coming forward which do not do this.
4. Following our review of Framework 3.0 we make the following key suggestions:
  - A much stronger response to the climate emergency declared by both Southwark Council and the Mayor of London
  - Further consultation on the landscaping strategy given its importance to the success of the proposals and the volume of new information provided
  - Preparation of a separate servicing and consolidation strategy for public consultation which is compatible with the Framework's public realm strategy and expected growth in pedestrian and other movements
  - More visible intent to manage the variety of new spaces and public realm so they are welcoming, open to all communities and actively connecting people to their surroundings; including through an integrated approach to licensing, security, cultural initiatives, activation and landscape maintenance and management. We would welcome opportunities for public engagement around these issues, including through further consultation
  - A strengthening of the relationship with the surrounding area. This includes:
    - greater effort to integrate with the diverse London Bridge community to ensure developments provide a positive and public facing addition for the area,
    - extending the Framework area (to include the St Thomas Street/Bermondsey St/Crucifix Lane junction and the area bounded by Snowfields and Weston Street), and by addressing the potential for strong collaboration with neighbouring landowners, including Network Rail, Horseshoe Inn, Melior Street Gallery, the London Bridge Campus and the emerging medi-culture district
5. We have reviewed Framework 3.0 in the light of our earlier submission and the evolution of proposals for each of the sites in the context of our London Bridge Plan. We hope it is helpful to have feedback to inform the continuing process of development and decisions over the future management and servicing of the area.

6. We welcome the narrative describing the evolution of the design and how consultation feedback has been addressed. We are, however, unclear how the numbering of the responses to feedback on Framework 2.0 on page 19 (in the range 9 to 18) relates to the changes described on page 18 (in the range 1 to 10). It would be helpful to have this clarified as it provides essential transparency for the process. The new numbering appears to relate to that provided on page 48 of the separate *St Thomas Street East Community Commitments & Consultation Report*.

### **Urban Design Principles**

7. We welcome the further development and strengthening of the urban design principles, including explicit recognition for the role of Placemarks. There are opportunities further to strengthen these key principles:

Principle 1 – Bookends – This continues to fail to address the actual location of the arrival point at the east end of St Thomas Street at the key junction with Bermondsey St and Crucifix Lane. This is outside the Framework boundary and to the east of the location shown. Further work is also needed to recognise and strengthen the arrival point from the south at the junction of Snowfields and Kirby Grove. This would be consistent with the updated recognition of this as a “Threshold” in Principle 6.

Principle 2 – Pedestrian Connectivity – We welcome recognition of the important role to be played by Snowfields. We are concerned that the pedestrian hierarchy presented is unlikely to be borne out in reality and is also inconsistent with that presented on page 28. It would be helpful to see the analysis of pedestrian flows which underpins these diagrams. We believe the pedestrian flow across the new Vinegar Yard public space and through the new route to Bermondsey Street will be much higher than indicated. It is important to be able to demonstrate convincingly that the new route has the capacity to accommodate the likely flows of people. The landscaping strategy should strongly complement this principle.

Principle 3 – Setting of heritage buildings – Given the importance attached to the sensitive development along Bermondsey Street it is an omission not to include it as a location where the setting of historic buildings is expected to be enhanced.

Principle 6 – Spatial character – This principle risks re-enforcing a concern that the Framework is looking inward and not outward. This could be addressed by extending the character areas so they include the full perimeter of buildings and address the full Framework area.

Principle 8 – Servicing – This continues to be one of the weakest elements of the Framework and it is an area where the benefits of integration across the different sites are particularly strong. The locations shown are loading and delivery bays not service consolidation points. Their location and size will only be successful if there is an effective servicing strategy which results in a major reduction in vehicle movements necessary to service the buildings. This requires much stronger intent than a commitment that major development “*will seek to consolidate their deliveries*” which is also repeated on page 27. The maximum number of movements should be identified for each location and the whole servicing strategy should be a focus for additional consultation.

Principle 9 – Placemarks – We warmly welcome this additional design principle and the intention to create new Placemarks as indicated. This area is much loved with a unique history, so building on placemarks will help integrate the scheme (<https://placemarks.commonplace.is/>). These could include the overbridges in the new access route to Bermondsey Street and also the plans for glass

bricks in building construction and for the public realm around the Horseshoe Inn. Others will emerge as the local community responds to the new development.

### **Cumulative impact**

8. This section is welcome for the inclusion of new and important information although it could be more clearly structured.

9. The EIA section needs to provide more than a summary of the EIA process. The Framework's role is to be more than descriptive. It is to provide an input into the building design and development which is subsequently subjected to EIA. This should address ambitious targets for issues such as wind speed, air pollution, carbon use and the quality of the microclimate.

10. The first section (p.27) on "Transport Strategy: capacity modelling" is a discussion of the approach to servicing in the Framework area. It would be clearer if it were retitled. This section does not address the significant challenge of managing servicing and deliveries in a constrained area where there will be major increases in pedestrian footfall and there are ambitious aspirations for an improved public realm. The Framework's whole approach to managing pedestrian and cycle flows, improving the public realm and landscaping is dependent on addressing this issue and a more robust approach is needed. We believe a commitment to producing a consolidated servicing strategy which works within a threshold number and timing of vehicle movements compatible with the public realm strategy is needed. This should include details of the maximum number of movements along each route and at each loading and delivery bay across the week. It should identify where the off-site facilities will be and what impact consolidation will have on the number and location of on-site loading bays (both on-street and off-street).

11. We have also considered other aspects of the approach to transport, including:

- The need to extend the Framework area to include that bounded by Snowfields and Weston Street, not least because of the impact of pedestrian, cycle and vehicle movements across this whole area
- The need to present a more substantive transport strategy which goes beyond some limited interventions (p.30). This should include local area traffic management to reduce traffic flows and address the whole length of Snowfields. It is crucial to get their input in these discussions for the public realm proposals to carry weight.
- The importance of understanding the commitment of both Southwark Council and Transport for London to the various proposals presented, including their responsibility (or otherwise) for the Tier 2 and Tier 3 initiatives on page 29
- A need for a clear and strategic approach to both public and private cycle parking which addresses routes, entrances, parking and impact on the public realm and includes:
  - an approach to public cycle parking which is consistent with the ambitions for an improved public realm and addresses the compatibility of the 85 spaces planned for Melior Street Gardens and its environs with other objectives for this area. The locations for public cycle parking need to be informed by a study of where the public will feel comfortable leaving bikes given the variety of destinations within the Framework area (this could be the subject of a specific meeting with Will Norman, London's Walking and Cycling Commissioner)
  - the location of entrances to internal cycle parking in each building along with the expected daily use
- The need for an approach to the St Thomas Street/Snowfields/Bermondsey Street/Crucifix Lane junction which addresses the whole junction (as shown on page 29 but not on page 30)

- The detail of the approach taken to Snowfields/Melior Place and the junction at the east of the Framework area should be extended to both Fenning Street and Melior Street which both provide an equally important function
- The figures for use of the main entrances to the buildings should additionally show the number of users not resident or working in the buildings, especially given the ambitions for wide public use of the ground floors

12. The approach to St Thomas street could be more based on shared space principles, with related benefits to the 'Boulevard' feel of the street, if a future arrangement can be agreed where Southwark take on the ownership of the street from TfL. It could immediately not have the feel of a strategic route. This is an area where the developers can use their influence.

### **Retail and Workspace Strategy**

13. We welcome the work that has been done in developing the strategy for the significant retail and workspace opportunities which will come forward within the Framework area. The overall approach remains high level and needs significantly more granularity than, for example, generalised references to "office lobby" and "independent retail unit" across much of the area. Generally, the strategy is stronger on its approach to workspace than retail and details of the intended retail mix remain vague. The strategy demonstrates the challenge of establishing a shared set of principles for these distinctly different issues. An option for the next stage of development is to prepare separate retail and workspace strategies.

14. Office lobbies will be a significant new land use and given the welcome intention to make these multifunctional and multipurpose they are deserving of their own separate strategy. This will ensure that the needs of the Framework will be built into the initial layout, the business planning for the developments and their future management plans. The risk of these becoming sterile, poorly used places with little public face needs active intervention if it is to be avoided.

15. The Framework needs explicitly to demonstrate how development will meet New Southwark Plan Policy P24's requirement for a minimum of 10% affordable workspace.

16. A key determinant of the success of the Framework will be its ability to influence what happens outside its immediate boundary. This includes addressing the specific opportunities for working with Network Rail to repurpose The Signal Box, improve the loading bay spaces along St Thomas Street and open up more of the railway arches for retail use. There are also important opportunities for collaboration with the Horseshoe Inn and Melior Street Gallery (consented scheme). These should be included in the opportunities identified on page 32.

17. In reviewing the welcome principles to inform retail and workspace decisions we have identified the following considerations:

Principle 1 – this needs to address the impact of personal home/office deliveries and the use of Uber and other sources of vehicle movements

Principle 2 – this should embrace the need to work with existing partners, such as Kings College and Guy's Hospital and business occupants within the current buildings, many of whom are on short term lets. The approach to collaboration – expanded on page 41 – needs to recognise the role of the main developers providing the management and resources necessary to ensure it can be delivered with maximum benefit to the local community

Principle 4 – this could draw out some of the key themes, such as food and sustainability, associated with the area and extend wider than Bermondsey Street to embrace, for example, the significant influence of King’s College and Guy’s Hospital and the emerging medi-culture district

Principle 5 – this welcome principle needs more practical evidence of the means of delivery, including provision of a variety of different sizes and types of business space and affordable rents

Principle 8 – could be strengthened through a joined up approach across the whole Framework area in the management and curation of spaces delivered by a diversity of small independent curators.

18. We believe there is scope for an additional principle addressing the contribution of retail and workspace to the cultural offer in the area, as evidenced by the music venue, Signal Box, medi-culture district and opportunities for using public spaces both inside and outside the buildings.

### **Landscape**

19. We are encouraged by the inclusion of a significant new section in the Framework on landscape. The success of the landscaping strategy is central to the success of the whole Framework and we ask that this is the subject of separate, public, consultation. This should also address its contribution to climate change adaptation, biodiversity, air quality, urban heat island, surface run off targets.

20. Our initial response is that the approach is generally favouring hard landscape and risks not integrating with the established and supported local community. This is despite the stated intentions for both informality and abundance. We are particularly concerned by the weak translation of an ambition to echo the historic Inns and Yards. This will require a much more intimate, human scale approach than, for example, the use of granite paving in the “yard” and “garden” areas which match that of the high footfall St Thomas Street. Where intimacy is best achieved this tends to be on land which will be the responsibility of the Highways Authority and its commitment to the Landscape Strategy is unclear.

21. We strongly believe there is a much more significant opportunity for urban greening than envisaged in the initial landscape strategy. This needs to be much more three dimensional, with a “hanging gardens” feel that is bold enough to make an impact despite the very significant scale of the buildings anticipated to be developed. It is notable that no elevations or isometric drawings are used in the Landscape section of the Framework and a strategy based on two dimensional plans alone will not achieve the potential of the area. Planting could link the ground to upper tiers and there is potential for more substantial planting ambitions on the upper tiers (publicly visible at street level) than is evident in the majority of the schemes coming forward. Melior Street Gardens should also have a stronger community feel and avoid a corporate look where green space is sacrificed for footfall. These gardens must respond positively to their status as a protected Southwark Open Space. As presented, the proposals fall well short of what is required and Melior Street Gardens resemble three raised flower beds. We are also concerned by the practicalities of delivering mature trees in planters and the impact of significant public cycle parking on some of the key locations, such as Melior Street Gardens. The Manna Centre is located here and it is essential that this necessary service is worked with and integrated into the management of the space.

## **Massing proposals**

22. We have recently completed some significant social regeneration research exploring attitudes of local residents to developments in the area. This demonstrates the importance of the Framework ensuring delivery of a strong public offer for existing residents as well as new occupiers. There are significant opportunities for providing this through the warehouse, music venue, Melior Street Gardens, Melior Street Yard, Capital House ground floor (and we think on floors 1 and 2) and the three floors of maker space and retail in Vinegar Yard.

23. We have specific comments on the individual areas identified in the retitled section on massing:

Weston Approach – This is unchanged from Framework 2.0 despite not meeting the urban design principles. A much stronger approach is needed to providing cultural activities at street level by the entrance to Capital House and strengthening public use of its ground floor. This can still be achieved within the scheme recently granted planning consent.

Melior Walk/Melior Gardens and Melior Gardens – This fails to deliver the intention of abundant, informal green space with a strong level of community ownership. This is a space where users should be able to immerse themselves in the surroundings rather than one where the green space is provided in small trees and large planters for users to walk between. Similarly, the area is one to be enjoyed by the local residential community as well as used by visitors and office workers. We are concerned that there is still no information on the continuity provided with the existing Melior Street Community Garden which appears to be lost. We believe a more community-led approach, including employee volunteering, is needed where the community feels a sense of belonging. It is notable that none of the significant public cycle parking proposed for this area is evident in the images provided in the Framework.

St Thomas Street East/Low Line – This area requires a much more ambitious approach to urban greening to realise the transformation of St Thomas Street into a boulevard. An example would be the innovative approach to greening lamp posts being pioneered in Belgravia with the use of “The Smart Pillar” developed by The Scotscape Group and Greenwich University.

Melior Street Yard – This – renamed – space is successful in revealing the Horseshoe Inn but we are unclear how it responds to the historic character of other Yards in the immediate area and avoids simply being a functional through route between Melior Gardens and Horseshoe Inn.

Leather Walk – This important new route requires a much more ambitious approach to urban greening to achieve its potential.

Snowsfields Place – This retains unaltered text from Framework 2.0 which recognises the need for further work to explore pedestrianisation and strengthen the anchor point. This work needs to be undertaken before the Framework can be finalised.

## **Environmental resilience**

24. Southwark Council and the Mayor of London have declared a climate emergency and the Framework does not yet respond to the scale and urgency of this challenge or fully address its role in supporting the ambassadorial role that London Bridge has in promoting innovation and environmental resilience. This cannot be left to individual planning applications, especially given the cumulative impact and interdependency of the different schemes.

25. The Framework needs to establish the ambition for environmental leadership, informed by clear targets for BREEAM (Outstanding), biodiversity net gain, air quality positive and other measures, including carbon, energy, run off speeds, wellness and reduced ground level wind speeds and urban heat island effect. The Framework also needs to address environmental considerations, such as air quality, during construction.

26. We believe there are particular opportunities in the following areas:

Net carbon positive – the Framework should be the basis of a comprehensive and integrated carbon strategy that is committed to by all who bring forward development proposals within its area. This is supported by the London Plan and should include approaches based on zero heating and natural cooling

Clean energy – the approach should develop new approaches to supply that go beyond CCHP (Combined Cooling Heat & Power) to look at options for clean supply, hydrogen/aquifer/ground or air source cooling and different renewable options combined with offset investment taking place within the Framework area

Climate adaptation – delivered through building, public space and urban greening initiatives which both deliver biodiversity net-gain and an improved micro climate and address flood risk and urban heat island issues

27. This approach needs to be taken forward with resources invested in appropriate communications, engagement and partnerships that can be sustained over the long term.

28. We look forward to continuing to collaborate with all those involved in developing and delivering change in this important part of London Bridge.