

PROPOSALS FOR DEVELOPMENT AT 110 THE QUEEN'S WALK

24/AP/0918

Representations by Team London Bridge
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1. Team London Bridge (TLB) is the Business Improvement District (BID) representing over 350 businesses in the area between London Bridge to the west, Tower Bridge to the east, and south towards Bermondsey. Team London Bridge has a strong remit from businesses since 2015 to deliver the [London Bridge Plan](#). Our vision is to make London Bridge one of the most sustainable, culturally innovative and compelling places for business and tourism in the world.

2. We informed the consultation proposals for the “*transformation*” of 110 The Queen’s Walk – the former City Hall – and are now considering this planning application in the context of both the London Bridge Plan and development plan policies for the area. We have welcomed the opportunities to engage in the development of the proposals although our views have been more nuanced and extensive than simply being “*supportive of revitalising the building and public realm*” as summarised in the Design and Access Statement (page 58).

3. 110 The Queen’s Walk is a prestige building in a primary Thames-side location overlooking the Tower of London World Heritage Site. It is located in the Thames Policy Area where Southwark Local Plan Policy P25 demands a sensitive approach. The project should adopt the highest standards of design in both the building and public realm and make a major economic and cultural contribution to London Bridge’s future.

4. Overall, we find much to welcome in the proposals which seek to respect the distinct character of the former City Hall, improve the public realm and support the cultural offer. They seek to address many of the known shortcomings in the original building and enhance its contribution to the area. In taking the proposals forward we ask that the following considerations are addressed:

Land use

5. We support the mix of uses proposed for the site and welcome the additional retail and cultural uses. These will also activate the frontage and improve the relationship between the buildings and the surrounding public realm as well as providing public access. The proposals reduce the audience capacity of the Scoop and we believe there is also an important balance to be struck between the mix of future uses. For example, the relationship between the use of The Scoop as a “*performance area*” and as a “*market hall*” or “*marketplace of small food and drink outlets*” has the potential to create conflict. We believe the audience capacity of The Scoop should not be reduced and its primary use should be for events and cultural uses. This will require provision of space within the building to support events and cultural uses. The Scoop should not be a retail destination or primarily used for outdoor eating and drinking. As presented we believe there is a high risk that its cultural use will be secondary.

6. We ask that consideration is also given to providing public access to the former London’s Living Room at the top of the main building. This offers significant public benefits

in terms of the key view of the Thames and the Tower of London World Heritage Site. This would be amplify the benefits identified in the supporting analysis that attracting more people to the site will *“further improve the experience and enjoyment of views and the landmark status of the designated heritage asset grouping at the Tower as well as Tower Bridge”* (paragraph 8.8, Built Heritage, Townscape and Visual Impact Assessment).

7. We acknowledge that the proposed amount of office floorspace does not trigger the requirement in Local Plan Policy P31 to provide at least 10% employment space as affordable. Nevertheless and consistent with other areas where the proposals go beyond policy compliance, such as on the circular economy, we would encourage an approach which maximises the diversity of employment uses in this location by making provision for affordable workspace.

Design

8. The former City Hall, the Scoop and the associated landscaping are on the Southwark Local List adopted only six months ago. Local Plan Policy P26 requires that *“development must take into account”* this designation. We welcome the intention to be sensitive to the distinct curved form of the former City Hall whilst also increasing its size and addressing some practical shortcomings with the original design. The *“dual-curve silhouette”* and the *“diagrid”* are recognised as *“distinctive elements”* of the locally listed building and, given the iconic status of the current building, we hope the departures have been interrogated and approved by Southwark’s Design Review Panel. Beyond these design considerations we do not consider the likely heritage and townscape impacts to be significant.

Public realm

9. We welcome the intention to improve the public realm around the building. The site is a designated area of Borough Open Land and is adjacent to the Metropolitan Open Land of Potters Fields Park. We acknowledge that the small net loss in Borough Open Land is addressed in large part by the significant gain in removing the *“garage/kiosk’ structure”* for the connections with Potters Fields Park. There are further opportunities to green the site and improve the quality of open space which will also help mitigate against this loss. The ownership boundary between the site and Potters Fields Park is uncertain on the ground and should remain blurred to users. It is notable how many images used in the accompanying documents establish the building in a setting provided by Potters Fields Park. There needs to be more clarity on the landscaping proposals, the long term management of all the open space and how the approach to the public realm will be achieved in an integrated manner.

10. Pedestrian and other flows through the area will be significantly changed as a result of creating an active frontage around the main building and the reconfiguration and change of use in The Scoop. These changes will also impact on Potters Fields Park. We believe the assessment of the proposals needs to be informed by a detailed analysis of current and future pedestrian and other flows against a range of scenarios. The analysis by Space Syntax summarised in the Design and Access Statement is of a single future scenario.

11. We are concerned, for example, by the narrowing of the route running to the east of the expanded building which may not have the capacity for greater pedestrian flows in the area given these are set to increase by 66% from 512 to 850 people per hour during the weekday peak and reach 1,250pph at the weekend peak. The project should also embrace the reality that the open space along The Queen’s Walk by The Scoop is occupied on a semi-permanent basis by market stalls/cabins/pagodas for a significant amount of both the

summer and winter every year. This impacts pedestrian flows and impacts on the relationship with use of The Scoop and its surroundings for other events and activities.

12. The consequences for Potters Fields Park are significant. These arise from both the change in adjacent uses to include take away food and drink and the increased footfall. The Space Syntax analysis shows a significant increase of 20-30% in expected pedestrian flows through Potters Fields Park, increasing from 1,395 to 1,700 and 589 to 750 people per hour during the weekday peak on two key routes running east/west (page 214, Design and Access Statement). This requires significant further discussion, including with Potters Fields Park Management Trust to address what further investment is needed to manage this increased footfall and the likely impact from the change in use of the ground floor of the site to food and drink.

13. There are opportunities for enhanced legibility through appropriate navigational and visual cues and wayfinding across the site. These can also help to manage pedestrian and other flows.

14. We also believe there are opportunities for improved cycle parking in the area and the site could be served by cycle parking provision nearby in Battle Bridge Lane as well as additional provision in Weavers Lane.

Greening

15. We support the intention to take inspiration from previous use of the site as the William Curtis Ecological Park. This pioneering early example of urban greening has much to offer the future. The site can make a major contribution to the London Bridge “Green Grid” and it should, as a minimum, meet London Plan Policy G5’s expectation of an Urban Greening Factor score of 0.3. We do not accept the argument that an exception should be made to exclude areas that cannot be greened, such as those for emergency vehicle access. This is an everyday requirement. The recorded score of 0.206 is not adequate and not appropriate given the significant and pioneering role of the site in the history of urban ecology. Further changes are needed to achieve the policy requirement for urban greening. As a minimum there is a need for evidence of alternative additional greening measures having been considered and an explanation why they have not been progressed.

16. We recognise the greening challenges arising from the site’s intensive use used for markets, cultural and other activities. Some of the greening proposals for The Scoop’s seating area also need to be practical in terms of its role hosting major events. We welcome the intention to provide vertical planting on the altered building and further innovative measures will be needed. It will be important that the approach is integrated into the design and its future management is assured.

17. The landscaping plans are indicative. Given their significance and the likely impact of the proposals on increased visitor numbers both on site and in neighbouring Potters Fields Park there is a need for greater certainty as to what will be delivered. This should not be left to internal discussions over planning conditions. It would be helpful to have detailed plans published for public comment prior to determination of the planning application. These should include consideration of changes needed in Potters Fields Park.

Cultural offer

18. The site should make a major contribution to delivering the [London Bridge Culture Strategy](#) and strengthening the community. It is the premier outdoor venue for cultural activity in London Bridge. This role should expand as a result of this scheme.

19. The improvements to make The Scoop and its related buildings and spaces more workable are very welcome but its audience capacity is reduced. The project provides an opportunity to revisit and strengthen the current planning obligations for supporting cultural activity. It should also contribute to the Social Regeneration Charter outcomes envisaged by Local Plan Policy SP2. We believe there are particular opportunities for developing an innovative relationship between the indoor and outdoor space at The Scoop to support events and other cultural activity. The nature and quality of this cultural offer is critical to ensuring the overall impact of the project and to retain and strengthen the informal appeal of the area, especially to families and tourists, and avoid an overly corporate look and feel.

20. To ensure a stronger cultural role we believe more dedicated space is needed within the building to service events and cultural activities. This will also help to balance the mix of uses in The Scoop between its future role as a marketplace and a cultural venue. Further detail on how the cultural offer will be developed, managed and curated is also needed alongside estimates of how the numbers participating can be expected to grow beyond those achieved when The Scoop was at its most thriving during the years when City Hall was fully occupied. We believe the opportunity should be taken to secure this enhanced role through an update to the original planning obligation that provides for the cultural offer.

Sustainability

21. The former City Hall building included pioneering sustainability elements and was an inherently low energy design. There are significant advantages in terms of embodied energy and use of materials in the option largely to retain and extend the existing building and we welcome the intention to integrate sustainability into the future design. It should be a project ambition to achieve net sustainability improvements while still supporting a significant expansion of the existing building. This should include going beyond Local Plan Policy P69 requirements by achieving BREEAM Outstanding given the potential to do so in the pre-assessment provided.

Heating and energy

22. We welcome the intention to make significant use of renewable energy on-site and to make passive provision for being part of a new district heat network. The site includes significant underground space which could be harnessed by a district heat network serving the whole area, including as a location for necessary plant and equipment. It would be helpful to secure obligations to progress this aspect of the plan in parallel with the building's repurposing. This would also accelerate progress towards compliance with Local Plan Policy P70 for reducing on-site carbon emissions against Building Regulations Part L by 40% against the current performance of 32%.

Servicing

23. The proposed development is expected to result in 50 delivery and servicing trips per day with a maximum of nine per hour at the morning and evening peak. We acknowledge that there is adequate provision for managing this level of activity but note that the Delivery and Servicing Plan gives no consideration to the use of cargo bikes despite them being increasingly the norm in the London Bridge area (for example Amazon deliveries in SE1) as well as London-wide.

24. We look forward to future collaboration over the development and use of this important part of London Bridge.