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**Team London Bridge response to amended plans for development of Leather Warehouse and Bermondsey Yard:** Planning application reference 19/AP/0404

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 has welcomed the opportunity to inform development of proposals for this key transition site between Bermondsey Street and St Thomas Street which straddles the Team London Bridge Business Improvement District boundary. The site is highly significant for: its impact on the historic and visual importance of the former Leather Warehouse; its influence on a main arrival point into the area from Bermondsey Street tunnel at the junction with Snowfields/St Thomas Street and Crucifix Lane; its role in the 'St Thomas Street Boulevard' vision set out in the London Bridge Plan; and a busy stretch of the Low Line, the walking destination along the Victorian rail viaduct.

3. We have made representations on the area and previous proposals through consultation on the New Southwark Plan (NSP) and in responding to the St Thomas Street East Framework and the previous planning application, amendments and further developer consultations. We have considered the proposals in the context of both the New Southwark Plan (NSP), including the London Bridge area vision, the London Plan and consistency with our London Bridge Plan.

4. We welcome many of the significant changes that have been made to the scheme in relation to previous applications following consideration by Southwark Council and GLA. The most notable and welcome change is to significantly reduce the overall impact of the proposals on the Leather Warehouse.

**Shared approach**

5. The St Thomas Street East Framework 3.0 plays an essential role in providing a shared approach to the major developments planned in the area. While it is cited variously throughout the supporting information there is no effective analysis of how the revised proposals address its urban design principles and other requirements as a minimum. We believe it to be essential to be able to demonstrate a strong connection between the Framework 3.0 and what is planned.

6. The Framework is particularly important because of the strong functional relationship the plans have to the neighbouring plans for Vinegar Yard and along St Thomas Street. This will present and function as a single piece of public realm and an integrated approach across the boundary is essential.

7. We address the most relevant design principles established through the St Thomas St Framework 3.0 in the detail of our comments. Specifically, we consider the following to be particularly significant in terms of our consideration of the current proposals:

Bookends – With changes to the neighbouring Vinegar Yard scheme the significance of the proposals for key views and the public realm at the junction of Crucifix Lane, St Thomas St Boulevard, Bermondsey Street and Snowsfields is even more significant as it will define perceptions and be a key influence on perspectives at this key point. More could be made of this northern elevation in establishing an identity

Pedestrian Connectivity and Hierarchy – The extension of development east along St Thomas St on the Vinegar Yard site further than envisaged in Framework 3.0 has a significant impact on likely pedestrian routes and flows through to Bermondsey Street. This is fundamental to the function and success of the new White Lion Court

Active frontages – The scheme is not as positive as the principles presented in Framework 3.0 with significant office lobbies and ground floor office space replacing active frontage, including in White Lion Court and the former Leather Warehouse.

### **Design approach**

8. We welcome the revised scheme and recognise its design as an improvement on earlier proposals in the context of the site.

9. The proposals for Bermondsey Street will still have a significant impact on the Conservation Area. This is reduced by the sensitive re-use and redesign of the existing elevation for 40-44 Bermondsey Street and the emphasis on masonry over glass.

10. The proposals for Vinegar Warehouse are particularly welcome for better respecting this heritage asset by giving it necessary space and avoiding oversailing development. The new build presents more as a modern extension that echoes and responds to the historic warehouse without mimicking it. We welcome the mix of old and new buildings creating a lively and varied built environment, extending the established character of London Bridge. The combination of traditional and modern materials can be successful, so long as high quality materials are chosen. This responds positively to the London Bridge vision in the NSP to create a “distinctive and inspiring world class environment through a mix of inspiring new architecture, restored and reactivated warehouses and other heritage”.

11. Similar attention also needs to be paid to the “bookend” function of the site at the junction of Crucifix Lane, St Thomas St Boulevard, Bermondsey Street and Snowsfields. This will establish initial impressions of Bermondsey Street for many visitors, and be a key node on the Low Line. The northern elevation largely follows the line of the existing building and now includes a significant lobby area. There is limited attention given to this elevation in the Design and Access Statement despite its significant role framing this open space and it should make a distinct and more positive contribution – a ‘strategic elevation’ as set out in the Framework document.

12. We remain concerned by the sheer wall of the west elevation of the office building facing 8-11 Snowsfields, which is the most visible feature of the building across a wider area to the west. This part of the scheme also needs to be considered in the light of possible future development of the adjacent site.

### **Pedestrian flows and cycle routes**

13. The creation of White Lion Court is a significant change to the previous proposals, and the to the flow of people proposed in the Framework. It takes a different line and serves a different mix of functions. When combined with the impact on pedestrian flows of the extension of building further east along St Thomas St in the Vinegar Yard scheme than previously anticipated this will require a new analysis of the route and volume of pedestrian flows to that previously provided by Space Syntax.

14. We believe this analysis will confirm the importance of the junction of Crucifix Lane, St Thomas St Boulevard, Bermondsey Street and Snowsfields on a main route linking Bermondsey Street and London Bridge Station. This supports further measures to improve the public realm at this junction and along the northern elevation. We have made proposals to improve [this junction](#) which we are happy to discuss as a highways response to this application.

15. The analysis will also be crucial to understanding whether the new White Lion Court will work successfully. The current plans require this new space to support a lot of different activity. It dedicates a significant area to seating, tables and planting as well as providing a major entrance to both offices and cycle parking. It also includes a lunch bar and access to a major retail/restaurant space is at the eastern end. In addition it will be an important pedestrian route both for accessing these uses and for pedestrians moving between Snowsfields and Bermondsey Street. The western arm is also proposed to include a cycle route running between a pedestrian route and an eating out space in order to access a significant area of cycle storage.

16. In the absence of more detailed information on likely pedestrian (and cycling) flows we are concerned that the space may not be able to support all these functions without conflict. Under any scenario we do not believe the route for cyclists to access bike storage facilities is compatible with the western arm also being used for extensive dining/refreshment and pedestrians. This is exacerbated by the lack of access for cyclists exiting the storage to Bermondsey Street in the absence of a contra-flow at the eastern end of Snowsfields. This will result in cyclists also using the southern arm of White Lion Court, causing further conflict. It highlights the need for a cycling contraflow here.

17. The nature of the pedestrian route across Snowsfields at the junction with White Lion Court is unclear. It is likely to be well used and needs to be uncluttered, particularly on desire lines.

### **Building uses**

18. We support the site being for office and retail use. This is consistent with its location in the Central Activities Zone and the London Bridge Area Vision (New Southwark Plan AV11) which supports growth in “*office provision, shops, leisure, culture, science and medical facilities*” over residential development. We believe a development of this scale should also be contributing to London Bridge’s cultural offer and provide affordable retail and workspace units. The New Southwark Plan requires 10% affordable workspace in major development schemes delivering employment space (Policy P31). The quantum being

provided in the scheme is unclear and the Social Value Statement uses conditional wording around intentions for the site.

19. We are disappointed by the overall mix of uses provided at ground floor level. A majority of the scheme will comprise offices or lobby space at ground level with only one large and one small retail/restaurant opportunity - a smaller area than exists today. We are concerned that this may not provide the animation required to make the scheme a success. The site also needs to contribute to meeting the needs of approximately 10,000 new people to the surrounding area in the St Thomas Street East developments, including outside working hours, at lunch time and at weekends. The site serves a 7-day space and this needs to be recognised in the range of retail and cultural provision. The retail approach can also influence pedestrian flows by encouraging browsing along key routes to slow movement and influence route choices.

20. Given the former warehouse's contribution to the whole Framework area it needs to be in a distinctive use with a convincing, publicly accessible offer. We are particularly disappointed by the lack of intent for more than office use on the ground floor of the Leather Warehouse. This will not create the positive and dynamic relationship with the public realm in Vinegar Yard that is required. The future of the former Leather Warehouse should also be informed by the [London Bridge Culture Strategy](#) and make a significant contribution to its delivery consistent with Southwark Local Plan Policy P46. We have also discussed with the developer an ongoing ambition to bring the neighbouring derelict signal box into use, potentially for cultural use.

### **Greening and public realm**

21. We welcome the significant greening proposed for the the Bermondsey Street building. Nevertheless, the overall Urban Greening score is only marginally in excess of that required to be policy compliant and there are further opportunities for greening the scheme.

22. To better meet the ambition in the London Bridge area vision for 'greenery and innovations in environmental resilience should be incorporated into buildings', we would be especially keen to extend the existing terraced approach to provide more vertical greening that links the terraces and makes a distinct visual contribution to the area. This would also better respond to the contemporary approach we have set out for the 'St Thomas Street Boulevard', where green roofs, terraces and walls should support increased biodiversity and water capture and be more than ornamental.

23. There are also greening opportunities at street level through the provision of rain gardens. These can also enhance the performance of the sustainable urban drainage system proposed in order to achieve betterment of 100% on existing surface water run off on both sites. Team London Bridge has worked with Southwark Council to deliver rain water gardens nearby on Snowfields and we would welcome collaboration on how additional rain water gardens either on site or in the immediate carriageway can be used to better manage run off and improve biodiversity.

24. We welcome the potential of a new and significant public space comprising this proposal and the consented Vinegar Yard – this is a crucial public legacy for London Bridge. The proposed public space is disappointing, and supporting information is inconsistent in the way it includes aspects that lie outside the boundary of the site. It demonstrates the potential for conflict with the service route through Vinegar Yard that bisects the public realm. We recognise there are challenges reconciling a scheme across separate

developments, but this is where the Framework approach – seemingly lacking here - is essential, and this new public space should be greater than the sum of its constituent parts. For this it will be essential to have an integrated and consistent approach across both properties, including the service yard, and Snowfields. This space should be able to accommodate a range of activities from street performance and pop-up markets to offering a pleasant place to sit and a route to walk. A brief should be agreed for this public space before the design is finalised, and we would support a joint design competition (other design competitions have been very successful in the area, including winning the New London Architecture Overall Prize, and another nomination, both in 2021).

25. We are concerned that the proposed building shades the joint public space, which will impact on its success.

### **Environment and sustainability**

26. This scheme will be one of the first major developments to be brought forward following declaration of a Climate Emergency by Southwark Council and with the experience of managing the Covid-19 pandemic. It will be important to visibly address this by anticipating future public and tenant expectations and requirements.

27. We note the scheme's welcome sustainability commitments and these are necessary to secure planning consent. They do not fully address the opportunity of this significant new development to respond to the circumstances now demanded by the declared climate emergency and to go beyond policy compliance – although the reuse of the existing structure to minimise embodied carbon is very welcome. The future tenants of the development will expect higher standards and the scheme should be based on more ambitious targets. Team London Bridge has developed a Net Zero Routemap and is working with local developers to deliver this more ambitious approach which will inform decisions all the way through to completion of the scheme and at zero carbon at operation. This should include 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. We are also exploring the potential for a London Bridge heat network and all new developments should have a connection to this.

28. The scheme should move well beyond policy compliance to set exemplary sustainability standards, including commitments to:

- BREEAM Outstanding – currently only Excellent *“with a path to consider an aspirational “Outstanding” rating”*
- WELL Platinum certification – currently only committed to achieving the WELL Standard
- Air quality positive – currently only committed to being air quality neutral
- EPC rating A – not provided
- Wiredscore Platinum certification – not provided
- Water run off at greenfield rates – not achieved

29. In the light of the pandemic it should also include use of filtration systems, set high standards for fresh air provision in the building, make use of wider doors, lifts and routes, deploy touchless systems, and use anti-viral coatings on surfaces

30. The scheme will have a significant impact on the local microclimate. It is particularly important to the success of the public realm to evidence the impact of the scheme on ground level wind speeds and the quality of the public realm as a place to dwell as well as pass through. White Lion Court in particular will already be largely either covered or in significant shade and its success is dependent on it being an attractive place to dwell. Consequently we do not believe it is sufficient to provide only a desk based re-assessment of the impact of the scheme on wind speeds at ground level in the Environmental Statement Addendum, especially when this gives no direct consideration to White Lion Court.

### **Servicing**

31. The servicing approach to each of the two main buildings raises different issues that will need to be resolved.

32. Servicing of Vinegar Warehouse is dependent on access between its basement and an on-street service bay. This is accessed by a lift which is also used by cyclists to access the basement bike storage and washing facilities. The capacity of the lift and entrance for use just by cyclists is already limited and we believe there is considerable scope for conflict between cycling and servicing requirements.

33. Servicing of the Bermondsey Street building is dependent on a single large service bay accessed off Snowfields. The swept path analysis confirms that vehicles entering the loading bay will disrupt flows of traffic and that there is potential for conflict with the space identified for servicing Vinegar Warehouse. Use of the loading bay by larger vehicles is, therefore, likely to need stewarding.

34. We are concerned that neither site provides an adequate approach to handling cargo bikes whose use is growing exponentially in the area.

35. We believe that the servicing proposals should be brought forward within the context of an overall consolidation strategy for the whole Framework 3.0 area or otherwise run the risk of needing to retrofit such an approach when conflicts arise following the completion of the most significant schemes.

36. We look forward to continuing to work with the landowners and prospective developers of this site to help deliver shared ambitions for this critical part of the London Bridge area.

Yours faithfully



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