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Team London Bridge response to amended plans for development of 60-68 St Thomas Street: Planning application ref. 20/AP/0944

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 made extensive contributions to the evolution of this planning application for the redevelopment of the site currently occupied by Becket House, including three rounds of representations since March 2019. We also made representations on the site through consultation on the New Southwark Plan (NSP) and in [responding to the St Thomas Street East Framework](#). 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.
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 New 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.
4. We welcome the attention given to the space around the building and the plans for new open space and public realm to the west. This will contribute to the ambitions of the London Bridge Plan to develop St Thomas Street as a boulevard and to green the London Bridge area. It will also help to accommodate the significant increase in footfall expected in this area as a result of the wider developments expected over the next few years.
5. There are a number of outstanding issues where the proposals lack detail or fail to provide necessary certainty about the quality of what is being proposed. These opportunities for the site relate in particular to further greening opportunities, the mix of uses, servicing, cultural provision, sustainability, and the design ambition. We address them below.

Land use

6. 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 which supports growth in “office provision, shops, leisure, culture, science and medical facilities” over residential development. We believe there should be a stronger retail offer in the mix of uses and a development of this scale should also be contributing to London Bridge’s cultural offer in line with the [Cultural Strategy](#), London Plan policies SD4 and HC5 and New Southwark Plan Policy P43 and the London Bridge Area Vision. There is a lack of evidence that this will be provided.

7. We are looking to this development to include affordable office and retail units with appropriately small floorplates to help meet the demand in the area and in accordance with New Southwark Plan Policy P28 to “*Incorporate well designed and flexible units suitable for small and independent businesses. These must include a range of unit sizes and types*” and Policy P30 to “*Deliver at least 10% of the proposed gross employment floorspace as affordable workspace on site at discount market rents.*” It is welcome that discussions are taking place with Southwark Council over how to secure these outcomes through planning obligations but there is a lack of clarity as to what will be provided through what is described as a “flexible approach” to be agreed “following the application submission.”

St Thomas Street Boulevard

8. The London Bridge Plan sets out the St Thomas Street Boulevard as a key placeshaping project – demanding a ‘world-class vision for the street’, with an active and vibrant local economy - “*Revitalised arches and tunnels and a world-class pedestrian-focused public realm will ensure that the St Thomas Street Boulevard is a showcase of all that is historic and distinctive about London Bridge*”.

9. The 60-68 St Thomas Street site is central to the delivery of this ambition. We welcome the provision of additional public realm along St Thomas Street and the intention to activate some of the St Thomas Street frontage. We are also encouraged by recognition of much of the base of the building as being for public use. It is essential to avoid the deadening effect of a major office lobby and reception area centrally located on the St Thomas Street frontage. The impact of the scheme would be more positive if more of the frontage to St Thomas Street was active. It also presents a significant and unappealing “back” to Fenning Street dominated by servicing, deliveries, bike access, and plant at street level which detracts from its street presence.

10. The site needs to deliver a stronger town centre proposition which reflects the diversity of uses proposed within the St Thomas Street East Framework 3.0 as a minimum and supports other business activity. Developments in the Framework area are expected to bring approximately 10,000 new commercial staff and students to the area (a figure which will be increased by visitors). This will be a “7 day space” which needs to be recognised in the range of retail and cultural provision and every development needs to make its own distinctive contribution. To achieve this we believe the St Thomas Street frontage needs to provide a stronger offer and we support continuous retail use in this area as part of a more mixed retail and office development.

11. The civic function of the base of the building has evolved and strengthened during the scheme’s development. This is welcome but it does not yet achieve the outward facing,

publicly accessible role expected of such a major scheme in so prominent a location, including by New Southwark Plan Policy P34 and London Plan (intend to publish) Policy D8. Given the scale of the building and its prominent location we believe the civic ambitions for the base to be for public use should extend over the ground and first floors as a minimum and that this should be intuitively clear to the casual visitor. The success of the scheme depends on a seamless relationship between the interior and exterior spaces, supported by abundant planting and encouraging extensive public access. This also underpins the business model for the use of the lower part of the building as this relies on a high footfall from people entering the building. This is even more the case if the town centre proposition is increased. There are also opportunities for the building base to support the cultural offer in the way public realm is animated and used.

Public realm and greening

12. Each iteration of the scheme has strengthened the quality of its public realm and taken the opportunity to create a more mature landscape. Nevertheless we believe the greening approach can go further to meet the expectation of the London Plan (expect to publish version) policies GG2, D3 and G5 and the New Southwark Plan policies P11, P66 and site allocation Policy NSP50. The site can make a stronger contribution to the Green Grid vision that “*London Bridge will become one of the greenest, most beautiful, environmentally sensitive and civic-minded business districts in the world*”. This includes a more explicit recognition of its role in creating an abundant, distinctive and contemporary interpretation of the ‘Boulevard’. London Plan Policy G5 states that major development should be “*including urban greening as a fundamental element of site and building design*”. This is not yet achieved through the design and the scheme does not take the full opportunity 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. The plans for such a significant site should exceed the Urban Greening Factor of 0.3 and go beyond information that “*the opportunities to improve on the minimum requirement are being explored*”.

13. 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. The relationship with St Mungos is one example of how direct links between businesses, the local community and the environment can be fostered to create a stronger sense of place. Our long involvement in Melior Street Gardens has demonstrated the wider benefits of this approach to the local community. This could also 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.

14. The landscape can also do more than provide attractive plants and a location for water storage tanks by realising its role in a functional sense as green infrastructure by, for example, providing insulation, absorbing rain and air pollution, and creating a breathable environment.

15. The applicant also needs to do more to demonstrate the appeal of the new public realm as a place to linger as well as providing a new route. The computer modelling and wind tunnel testing is welcome but there is a lack of interpretation of the results and more insight into the future 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 seven days a week. It is uncertain that this will be delivered given the uncertainty over whether neighbouring developments will proceed as currently proposed and the dependency of the modelling on them proceeding. The space will also need active management to recognise existing uses nearby, including the Manna Centre.

Design and placemarks

16. 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 Southwark Council gives further consideration to whether the scheme provides, as claimed, a truly "Bermondsey building" that becomes loved by locals. In particular, the façade on St Thomas Street is visible all the way from The Shard and Joiner Street, so merits architectural treatment as a future placemark for the area.

17. The development will be one of the first to be brought forward with the experience of managing the Covid-19 pandemic. We believe there should be a more visible response to this which anticipates future public expectations and requirements, including use of filtration systems; higher standards for fresh air provision in the building; wider doors, lifts and routes; touchless systems; and use of anti-viral coatings on surfaces.

Servicing and deliveries

18. There is still a continuing and disappointing lack of clarity over how the new development will be serviced and the impact this will have on the local area. This was not resolved by Framework 3.0 which indicates that servicing "*will be addressed by individual planning applications*" and it is not sufficient to be told that "*The Applicant is looking into a delivery consolidation solution*" and "*preliminary discussions are being held*". Without a solution over 80 deliveries to the offices per day are estimated. We believe a more strategic approach is essential and needs to be concluded before development can proceed. This could be secured through a planning condition requiring a satisfactory solution to be agreed before commencement.

19. The use of a 15m lay-by for servicing and deliveries in Fenning Street is inadequate. It will frequently be a major obstruction to 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. The swept path analysis confirms 10m+ vehicles entering Fenning Street will have direct impacts on the nearby pavement. There will also be conflicts with the access point for the secure cycle parking for occupiers of the building and with the adjacent parking provision for Blue Badge holders. In addition there will be a significant impact from waste collection in this location.

20. Team London Bridge is supporting the use of cargo bikes in business logistics and we look for clarity that the building and its loading bay are designed to encourage and

support their use. During construction the building contractor utilise e-cargo bikes where possible to replace van trips – something that is happening in other building sites locally, supported by TfL.

Sustainability

21. We welcome the fact that the plans are “*designed to deliver exceptional levels of sustainability*”. This requires more than commitments to BREEAM Outstanding, WELL Platinum and a policy exceeding energy strategy if it is to address the opportunity to respond to the circumstances now demanded by Southwark Council’s declared climate emergency. 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.

22. The scheme needs to confirm it can meet the following objectives for the lifetime of the building:

- 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

Cycle parking

23. It is disappointing that the scheme does not meet the cycle standards expected by the New Southwark Plan and is only “*based on an ambition to achieve compliance with the standards in the emerging New London Plan*”. Moreover, provision for visitor cycling risks creating conflicts in the newly created public realm. It will be important to work with neighbouring developments to find the best public cycle parking solution for the wider area, which may include parking placed on the highway.

24. We should be pleased to work more with the developers of the Becket House site to help deliver shared ambitions for this critical part of the London Bridge area.

Yours faithfully



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Chief Executive
Team London Bridge