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1 March 2019

Team London Bridge response to the New City Court development: Planning application references 18/AP/4039 and 18/AP/4040

1. Team London Bridge 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. Team London Bridge 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. We have considered the current 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.
3. New City Court is prominently located in the BID both fronting and connecting St Thomas Street to Borough High Street and providing access to the Inns and Yards. Its relationship to future developments guided by the St Thomas Street East Framework and at Kings College London and Guy's Hospital is also critical.
4. We made representations on the site through consultation on the New Southwark Plan (NSP) and welcomed the opportunity to contribute to the emerging proposals in August 2018. Our comments on the St Thomas St sites remain relevant to this planning application which we believe needs to:
 - Recognise 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
 - Recognise that New City Court as a development opportunity should be considered within the same vision and strategy for St Thomas Street High Street
 - Support the need for a mix of floorplate sizes to encourage retail and office diversity
 - Avoid a single, monolithic elevation along St Thomas Street
 - Acknowledge the need for future development to respect the food, culture and retail offer in Bermondsey Street and the station
 - Address 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

- Acknowledge the merit of existing, undesignated buildings
- Increase permeability throughout the site, building on and adding to the historic fabric of alleys and courtyards
- Deliver 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
- Support the need for sustainable drainage given the area is a critical drainage area

5. We find much to welcome in the plans. They will provide significant new routes and increase permeability in an area already experiencing high footfall. The development will in part replace existing buildings which detract from the area's character and it will also provide affordable workspaces and retail units which are in high demand. The changes will also reveal important existing buildings and refurbish a significant stretch of Georgian buildings on St Thomas Street.

Nevertheless, there are other aspects of the proposals where we ask for further consideration and a different approach to maximise the potential of the site. These include significant concerns over servicing and we question whether the site has the capacity to support such a major development given access constraints. We are also keen to see improvements to the relationship with St Thomas Street and a more imaginative approach to urban greening and landscaping of the public realm, including inside the Tower. Given the scale of the proposals we also believe there is scope to increase the amount of affordable workspace provided.

6. Our representations are largely structured around the main issues identified in the London Bridge Plan and our submission on the New Southwark Plan.

Servicing and transport

Servicing

7. We are seriously concerned by the servicing strategy planned for the development and its impact on both White Hart Yard and St Thomas Street. The plans envisage up to 99 light good vehicles and cars using White Hart Yard a day, with a peak of 24 movements an hour. We foresee significant conflicts with other users of White Hart Yard, especially given the narrow entrance which runs for a considerable distance off Borough High Street. Team London Bridge is working with several partners and investing significant funding into a project to enhance White Hart Yard and increase footfall – the bespoke planters in the yard could easily get damaged from volumes of two-way passing vehicles. We do not believe that a requirement to pre-book deliveries will address this issue and that a 10 minute turnaround time for deliveries, especially where a vehicle lift needs to be used, is unrealistically short. Team London Bridge is currently promoting a project to businesses to make use of cargo bikes, and some have significant capacity, and this might be the only appropriate vehicle that can use this access point.

8. The impact on St Thomas Street of up to 29 heavy goods vehicles per day plus regular waste collections of 25 large waste bins will also be significant. The majority of these bins are stored two levels below ground and only two bins can be brought up at a time. There is storage for only six bins at the surface.

9. The servicing constraints are such that we question whether the site has the capacity to support such a significant development. As a minimum we believe arrangements need to be in place ahead of planning consent for a consolidated servicing strategy, ideally with a shared approach involving neighbouring properties who are to use the same vehicles and lessen impact (Guy's hospital is opening a consolidation centre, and other St Thomas Street East developments have consulted on a joint approach to servicing). Other mechanisms include a commitment at planning for policies on tenant leases to not allow personal deliveries, or any deliveries at peak times in this busy footfall area.

Cycle parking

10. We welcome the planned provision of cycle parking for public use. Wherever possible this should be provided on the street rather than the pavement and we are concerned by the impact of significant cycle parking on St Thomas St.

11. We do not believe the planned access off Kings Head Yard for secure employee cycle parking for the Tower is a sensible approach. Cyclists entering Kings Head Yard will too frequently find themselves unable to enter at the narrow entrance due to congestion from peak hour pedestrian footfall. This needs to be considered in terms of road danger, with cyclists trapped on the carriageway on the heavily congested Borough High Street. We believe a better alternative would locate the employee cycle access so that it encouraged a route from St Thomas Street.

Public realm

Inns and Yards

12. We warmly welcome the increased permeability the development will bring to this part of London Bridge. This will have major benefits to the area, supported by the new and welcome exit from London Bridge Underground Station.

13. The new public realm to be created between St Thomas St and Kings Head Yard is also welcome. It will used both as a through route and a place to linger. An important use will be by patrons of the two public houses and this will have a major impact on pedestrian flows that requires further consideration.

14. It is important that the new public realm respects the significance of the Inns and Yards that are so important to this area and we have prepared guidance in conjunction with Better Bankside on how to do this. The current plans could be more sensitive and need to do more to address the replacement of an historic yard with an overly large courtyard between the new Underground entrance and the Tower. This can be achieved by visually breaking up the area through more appropriate landscaping, surface materials, use of colour, activation of the Tower as it lands in the yard, and the contour of the building to the shape of the yard.

15. We welcome the intention to make the new Underground entrance fully open. This will become a new pedestrian route between the site and Borough High Street. This role should be explicitly recognised and addressed by designing the route through as a new piece of public realm. The new entrance is necessary for the rest of the scheme to work without creating pedestrian congestion or exacerbating pedestrian safety issues on the

corner of St Thomas Street and Borough High Street. Its design should, therefore, be more developed so that the route through is designed as a key passageway from the first day of its operation.

16. The new public realm should contribute much more 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”* by providing significantly more planting and recognising the potential for green walls. We recognise a significant opportunity linked to the ‘St Thomas Street Boulevard’ concept - and other St Thomas Street developments - of landscaping at ground level, and visible abundant greenery at other levels, on terraces etc, and which value to contribution of green infrastructure in building’s environmental performance. The elevated garden could offer more in this sense than being an attractive offer inside the building.

The “Grand Hall”

17. There is a need for a much stronger relationship between the ground floor of the Tower and the new public space that surrounds it. The proposed “Grand Hall” is at risk of becoming an oversized office lobby with low public footfall. We believe there is a need to rethink the internal and external design of the ground floor to make it much more welcoming to casual visitors and the wider public. This needs to address the limited entrance points and visual prompts necessary to draw people in and encourage the building’s use as internal public realm. We suggest that the ground floor offer retail outlets with external entrances on western and northern sides which can complement the retail in the wider scheme, and which would reduce the inactive frontage created by such a large internal lobby.

Architecture and urban design

Impact on St Thomas Street and surrounding area

18. 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”*. The scale of the development proposed and its relationship to St Thomas Street and other development sites along St Thomas Street is critical.

19. We welcome how the removal of the current building creates a wonderful uninterrupted Georgian terrace and reveals the historic buildings around the courtyard. There is a tension, however, between the welcome improvement to the buildings along St Thomas Street and the looming impact of the Tower. This is exacerbated by its widening at higher floors with the result it overhangs the Georgian Terrace, with a potentially detrimental impact on views of the Old Operating Theatre. This is particularly significant as it will not support the sense of openness sought in the evolution of St Thomas Street into a boulevard. There are also potentially significant impacts on views from London Bridge, Southwark Street and Kings College London courtyard. We are also concerned by impacts of the distinct profile of the Shard from some viewpoints, such a landmark feature of the area,

especially when considering the attention given to respecting this by other neighbouring development proposals.

20. We do not consider the plans for accessing the retail units to be provided in the refurbished Georgian Terrace best meet the future role of St Thomas Street. The units have been designed to be accessed off the new courtyard with limited direct access off St Thomas Street. This risks turning their back on the historic entrance and reducing footfall. There is also a risk that the St Thomas Street entrances may be closed up at some future point (e.g. for security or shop layout reasons) leaving to an inactive frontage on the area's major thoroughfare.

Kings Head Yard

21. We are disappointed by the impact of the southern elevation of the Tower's base on the characteristic and elegant curve of buildings along the northern edge of Kings Head Yard. The stepped and angular elevation at ground level is much inferior and detrimental to the historic significance of this important space. The issue is exacerbated by locating bicycle storage within each of the new stepped areas. We ask that this approach is reconsidered better to respect the elegance of the existing curve.

Land use

22. We support the site being used 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 AV10.2, 10.3) 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 address this below.

23. We welcome the commitment to provide affordable office and retail units with appropriately small floorplates and to secure this provision through a planning obligation. We ask that these arrangements are able to provide truly affordable space and secure it in perpetuity.

24. The proposals make provision for 46,374 sq. m of B1 space and only 1,067 sq. m is identified for affordable workspace. This comprises just 2% of the total provision. 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*" we would expect a significantly greater provision. There could, for example, be additional provision for locally relevant commercial space on the lower floors of the Tower with flexible co-working opportunities mixed with amenity provision and links to the exciting plans for a world leading Biomedical Cluster at Guy's and King's campus next door. These uses would also provide wider access to the building's facilities, including the ground floor public realm ("Grand Hall"), Elevated Garden and Hub and support the retail provision in the Tower.

Culture

25. A development of this scale and significance in such a critical location should be making a major contribution to the London Bridge Culture Strategy as supported by New

Southwark Plan Policy P43. In particular, this is an opportunity to provide a significant contribution to the emerging 'Medical Museum Quarter' (Old Operating Theatre, Science Gallery London, Life Sciences Museum, Gordon Museum of Pathology), and we are particularly excited by the desire for organisations like the Florence Nightingale Museum which aim to be part of this cluster.

26. Another approach to addressing the current lack of any cultural offer would be to repurpose the Elevated Garden to support the wider Museum Quarter through a planting, education and interpretation focus on medicinal plants and herbs. This will also help to ensure the primary users of the Elevated Garden are the public and not occupiers of the Tower.

Sustainability and environmental resilience

27. The London Bridge Plan outlines a strong vision to become one of the '*greenest, most beautiful, environmentally sensitive and civic minded business districts in the world*'. This is given weight in the NSP London Bridge Area Vision as "greenery and innovations in environmental resilience should be incorporated into buildings". We therefore welcome the range of measures and commitments relating to the development's sustainability performance, indeed we have . Nevertheless, too many of these lack formal targets and remain aspirational and there is no clear focus on the development's carbon intensity. The "*aiming to achieve*" BREEAM Excellent commitment is both weak and lacking aspiration. BREEAM Excellent should be a recognised target for the scheme supported by an intention to secure BREEAM Outstanding. The development, as part of a concerted ambition for all the St Thomas Street developments, should be aiming for the highest level of environmental standards, including in carbon, EPC rating including , wellness, urban heat island effect, cycle-score, being air quality positive, greenfield rate water run-off and impact on wind.

28. In relation to neighbouring large scale developments and their cumulative impact, opportunities should be sought in relation to shared delivery of: power generation, wind mitigation, servicing strategy, and construction consolidation, use of green infrastructure as well as public realm treatments and landscaping, particular as part of the Boulevard concept.

29. In conclusion, while welcoming many aspects of the New City Court proposals, Team London Bridge has a number of outstanding issues and concerns. We look forward to continuing to work with the applicants to help deliver shared ambitions for this critical part of the London Bridge area.

Yours faithfully



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