

The Hive  
1 Melior Place  
London  
SE1 3SZ

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**Team London Bridge response to the Vinegar Yard redevelopment:** Planning application reference 18/AP/4171

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 the Vinegar Yard proposals. We made representations on the site through consultation on the New Southwark Plan (NSP) and in responding to the St Thomas Street East Framework and the earlier public consultation. We have considered the planning application 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. While cognisant of the existing development plan we believe these revised plans provide the most relevant planning policies for considering the site.

3. The Vinegar Yard site is highly significant, especially for its contribution to the potential of St Thomas Street and the inclusion of a main arrival point into the area from the tunnels under the railway at the Bermondsey Street/Snowsfields/St Thomas Street junction. The proposals relate to part of one (NSP53) 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. To this end we welcome the development of the St Thomas Street East Framework.

4. 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”*. It also sets out ambitions for the Low Line.

### **Shared approach**

5. We have welcomed the development of a shared approach through the St Thomas Street East Framework for the otherwise separate major developments planned for the area. The latest plans for Vinegar Yard do not fully meet the expectations of the latest iteration of

the Framework 3.0 and the Design and Access Statement does not provide an analysis of the plans in respect of the Framework or any justification for departures. We have also identified a number of areas where the Framework itself needs to be strengthened. In order to properly consider the plans we believe it necessary for an assessment of their compatibility with Framework 3.0, developed since submission of the planning application, to be provided.

### **St Thomas Street Boulevard**

6. The site has an extensive frontage along St Thomas Street and is in the setting of its listed railway arches. We welcome the intention for the St Thomas Street elevation to respond positively to the rhythm of the arches. We also welcome the response to earlier comments from the Design Review Panel that the building needs to root itself in the site. Despite important improvements we still believe more work is needed to achieve a design at ground level which is of a more human scale. Further opportunities also need to be taken to address the reality that much of this stretch of St Thomas Street will be heavily shaded.

### **Cultural offer – music venue**

7. The proposal depends heavily on the quality of the music venue and recording studios as the keynote contribution to the site's cultural assets. The music venue is also pivotal in the cultural offer for the whole St Thomas Street East Framework area. We note the ambition has been heavily scaled back from a 2,000 to a 200 seat venue and we question whether this is sufficient given the very significant growth in the number of people living in, working in and visiting the area as a result of the planned developments. The scale of the offer is critical for St Thomas Street East to meet the ambition set out in the [London Bridge Culture Strategy](#).

8. Securing a successful venue two and three floors below ground will be a challenge. As proposed the main venue feels cramped and sits alongside the development's plant room, though we recognise this will help deal with noise. It is unclear how it will successfully integrate with the proposed retail uses and the new public realm and square. It is also important to the success of the venue that it is managed with a view to providing a diverse cultural offer and that lessons are learned from the Scoop which has had to adapt to conflicting requirements from diverse tenants, the community and the landlord.

9. We welcome the way in which the music venue supports the "arrival point" function at the east end of St Thomas Street. It plays an important role as a 360 degree building and needs to encourage footfall on all sides. The activating role this plays will be undermined if it is focused solely on ticket sales and accommodating an occasional influx of people at the end of performances. This space needs to work for other users of the area and be a destination in its own right even when the music venue is not being used for performances.

### **Maker space and retail uses**

10. We welcome the emphasis on providing for maker space and retail uses over three floors. It is less certain whether making significant provision at basement and mezzanine level will be successful. This will demand a bold and innovative approach to maximise the availability of natural light, increase visibility and carefully locate different uses to secure the necessary footfall. The space provided also need to meet the needs of independents and complement the Bermondsey Street offer.

11. There are important positive lessons to learn from the success of current meanwhile uses in Vinegar Yard. These are popular, interesting, fun, artistic, unexpected and adaptable in contrast to the more formal, corporate indoor and outdoor spaces in the proposed development.

12. Taken as a whole the Framework proposals will bring approximately 10,000 new people to the area with needs to be served 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, including the availability of an affordable offer during the office lunch hour.

#### **Office lobbies and retail access**

13. We welcome the separation of the office lobby from the ground floor retail. The design and management of the ground floor space will be critical, as it needs both to steer office workers and visitors via an escalator to the office lobby on the first floor and be a welcoming space for the general public accessing the retail uses. On the basis of the material supporting the application we believe stronger visual prompts and encouragement will be needed to draw people in to the retail space and the right of public access to this space for most of the day and night will also need to be secured by planning condition.

#### **Public realm and pedestrian flows**

14. The new public square alongside the music venue is important not only for its contribution to the Vinegar Yard development. Its design will also influence the flow of pedestrians and others through the whole Framework area and have a particular impact on Sellar's proposals for White Lion Yard. There is conflicting information about the scale and location of the key pedestrian flows in Framework 3.0. It will be important that the flows into and out of White Lion Yard across the new public square are manageable and that congestion is avoided.

15. The design and layout of the new public square should influence these flows by emphasising its role in the pedestrian hierarchy as a public space to dwell over its role in providing a through route. This can be achieved through internal design and appropriate planting and landscaping. It is important, however, to avoid introducing planters into the new public square and we note that these are not included in Framework 3.0. We welcome the proposed wayfinding features shown on p47 of Framework 3.0, including echoes of the former tanneries in the paving of the new public square, and ask that the intention to provide them is confirmed given that they do not appear in the detail of the planning application.

16. We welcome the new east/west secondary route which has a potentially transformational impact on permeability. It is important this new route has its own distinct and intimate character and this is not yet successfully delivered. For example, the plans show an intention to use the same surface material as for St Thomas Street which serves a very different function, currently as a Transport for London strategic route.

#### **Fenning Street building**

17. We remain concerned by the new freestanding building at the southern end of Fenning Street. This is a key location in the wider Framework area and it requires the removal of an existing building considered to make a positive contribution to the Conservation Area. As a result we believe it needs to work harder, provide an active

frontage and create a new placemark associated with the new rain garden being installed by team London Bridge. Accessing basement cycle parking should not be the key use of this central location and such access should be provided more discretely. We believe more evidence is needed that the strategy of providing two bike lifts to manage access to the internal bike parking will be successful. We do not want to see queuing actually deterring people from cycling, or forcing them to use the public parking.

### **Environment and greening**

18. We welcome the BREEAM ambitions. These will be helped by a stronger approach to greening roofs and walls plus some additional planting (for example greening the wall in Fenning Street as a joined up approach to Melior Street Garden). The proposed planting for the roof terraces feels meagre and lacks the necessary abundance which could also provide green links between the different roof terrace levels. A building of this scale requires a proportionate greening response to help integrate into this dense area, in which greening is already part of the character.

19. The scheme will have a notable and deleterious impact on the view from Leathermarket Gardens which further reinforces the case for a more abundant greening strategy to mitigate this impact.

20. We would also welcome more information about other areas of environmental resilience – which should form part of a framework approach - aiming for the highest accreditation in areas including carbon, energy, wellness, and reduced ground level wind speeds and urban heat island effect.

### **Transport and servicing**

21. There is a lack of clarity on how the buildings will be serviced. We should also welcome further details on the proposed “freight and services consolidation scheme” which is so far lacking in Framework 3.0. This needs to be consistent with the wider Framework and support a shared approach which uses the same vehicles across the whole Framework area.

22. There is a lack of information on the overall approach to public cycle parking provision. The London Bridge Cycling Strategy indicates that public cycle parking needs to be conspicuous to the final destination, and this needs to be fleshed out further with the framework partners and highways authorities.

We look forward to continuing to work with the landowners and prospective developers of the main sites along and around St Thomas Street to help deliver shared ambitions for this critical part of the London Bridge area.

Yours faithfully



Nadia Broccardo  
Chief Executive  
Team London Bridge