

## **PROPOSALS FOR REDEVELOPMENT OF 92-112 SNOWFIELDS**

Representations by Team London Bridge, November 2023

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 welcome this further opportunity to inform proposals for the redevelopment of this important series of sites on Snowfields. We made representations responding to the “listening exercise” in 2021 on the emerging plans and reaffirm many of the proposals put forward then. We welcome meeting to discuss any aspect of our comments.
3. We made representations on the wider site allocation NSP52 for the London Bridge Health Cluster, which comprises these sites south of Snowfields, during consultation on the New Southwark Plan. Our representations were informed by the London Bridge Plan from 2015 which outlines a *London Bridge Science, Education and Medical Hub*. The adopted New Southwark Plan supports an approach which underpins the London Bridge Health Cluster subject to townscape and heritage impacts, provides improved permeability and protects green space. These all need to be achieved by what is proposed for the sites.
4. The proposed sites form only one part of this wider site allocation and we would support a wider masterplan for the whole London Bridge campus into which the proposals for Snowfields would sit. If this is not possible at this stage, then it would be useful to see explicit recognition from campus partners that these plans support their wider strategic thinking and ongoing masterplanning. We welcome the progress made through the SC1 Innovation District, and that vision appears to underpin this proposal.
5. There is relatively little detail on the proposals in the consultation information provided online. We would welcome sight of any other work which has been undertaken to inform the approach. We know there has been significant outreach with local community and stakeholders this year, but none of the information presented illustrates the results from this work, nor how this consultation has informed choices made. We welcome plans for an Integrated Panel and we would be happy to contribute to this, and would welcome more detail on its scope and role. A “co-design” rather than the proposed “consultation” approach is preferred. The planning application should only come at the end of this process and having involved the main stakeholders likely to respond to what’s planned.
6. Our comments can broadly be categorised under the following headings
  - Land use
  - Urban design and active frontages
  - Movement and servicing
  - Landscape and greening
  - Cultural and community offer
  - Sustainability and responsible business

### Land use

7. We welcome the mix of uses proposed for the sites, including no provision for residential use. The proportion of medical research/innovation, offices, cultural and community uses in the mix is uncertain and a ground floor plan is the only information provided on the mix of intended uses. Given the unique synergies provided by this location we support the predominant use being for medical purposes. There should be a minimum of general office use. We support provision of affordable workspace in line with Local Plan Policy P31 as part of this, and were impressed when GSTF showed us the Health Foundry as an exemplar for affordable co-working with the potential for start-ups, which could be a supportive and dynamic element of SC1.

8. The proposals could be clearer about the extent to which the building is planned as an extension for local public sector health and education bidoes, which is suggested in the SC1 text, or whether the aim will be to attract more private investment.

### Urban design and active frontages

9. It is helpful to have an early indication of the scale and height of buildings being proposed for the sites. This also confirms the important role the site plays in the transition between the scale of buildings associated with the Central Activities Zone and the more modest scale and residential character of the neighbourhoods to the south. The plans should recognise the importance that scale of buildings plays in the townscape and respect the Conservation Area, key views and heritage assets. There should be a reasoned justification for the scale and mass of new buildings and the emerging plans should be positively received by Southwark's Design Review Panel before proceeding.

10. The development should maximise the opportunities for an active street level relationship with both Snowsfields and Guy Street Park, including by making significant improvements to the quality and extent of active frontage. The existing active frontage to Snowsfields in the western site makes an important contribution to the area and is explicitly recognised in Local Plan site allocation NSP52. These small footprint retail outlets are a feature of Newcomen Street, Snowsfields and Bermondsey Street in the immediate vicinity. Active frontage should be strengthened and extended through the new scheme, but this is not apparent in the plans, for example with bike storage and co-working spaces. There is risk that inactive frontages will dominate Snowsfields. This frontage at ground level can be designed to be welcoming and distinctive, design aspects which can easily be lost in large corporate buildings.

11. The nature of the proposed street and park frontages is unclear from the information provided. A "*science on display street section*" illustration presents a weak relationship and suggests only a passive opportunity for passing pedestrians to "look down" on people at work in the laboratories. The combination of new community and café uses facing Guy Street Park provides exciting new opportunities to animate this area of the park as a place for people to meet and also for relevant events and cultural activities. This could be part of a wider repurposing of Guy Street Park and improvements to its management, planting, facilities and access routes. This would of course require significant outreach with park users to get the right balance.

### Movement

12. We welcome the commitment to "*improving connections*". It is unclear from the information provided how this will be achieved and there are no specific proposals presented. Improved pedestrian movement and permeability is also an expectation of the

Local Plan site allocation. We believe there are opportunities for making a significant contribution to improved permeability, supported by enhanced legibility through appropriate navigational and visual cues and wayfinding. The approach should be informed by a detailed analysis of the impact of different development options on pedestrian and cycling flows through and around the site. The result should be significantly increased movement through and around the site on foot and by bike. As indicated above, active frontage will play a role to encourage footfall along this road, whereas inactive frontage would add to the relatively closed façade of the Cancer Centre.

13. The impact of the development on Snowsfield as a street is unclear from the information presented. The scheme provides an opportunity to support its role as a pedestrian and cycling route and its contribution to the Healthy Streets Network and as a designated Quietway. We would be interested to understand the expected impact that the loss of vehicle parking from the HCP car park will have on the area, so that provision can be made if needed to mitigate where this might have a negative impact on the local area.

14. The plans should meet the cycle parking standards expected by the New Southwark Plan. There needs to be provision for additional public cycle racks, as well as consideration of e-bikes and e-scooters, and how all these will not impact negatively on the pedestrian environment or spaces to linger outdoors.

15. In terms of servicing the building, we expect all building occupiers will use the CEVA consolidation centre established with GSTT. There should be loading provision for significant deliveries by e-cargo bike, a priority in the area to reduce the negative impact of motorised vehicle deliveries.

#### Landscape and greening

16. The development should be designed around an ambition to achieve the highest possible Urban Greening Factor and make a strong contribution to the London Bridge Green Grid vision, which has had a particularly positive impact in Snowsfields and the Health Campus through the Greenwood Theatre, Orchard Lisle Living Wall, the Waste to Wildlife garden and SuDS raingardens. Opportunities to achieve this include:

- greening inside and on the side of new buildings - even the existing car park has a green frontage which we have helped to maintain
- supporting investments in Guy Street Park which enhance its wildlife and amenity roles, reduce anti-social behaviour and support new green links through the area between the network of existing and new green spaces – the character of Guy Street Park as a local green space serving the needs of the nearby community should be retained and not dominated by the building.
- providing new high quality public green space and public realm which serves the local community as much as occupiers of the new development (without feeling like the private grounds of the hospital).
- ensuring all green space and public realm is permanently open (consistent with the Mayor's Public London Charter) and provides a microclimate conducive to its public enjoyment as a place to dwell not just pass through
- an increased tree canopy both within and outside the site, including the retention of existing mature trees.

17. The precedent images for landscaping are not consistent with this ambition, presenting a relentlessly hard landscape and minimalist planting.

#### Cultural and community offer

18. We have an agreed vision for the Medi-Culture District “celebrating health and wellbeing at the heart of London Bridge”. We are delivering this vision mainly through cultural programming and extensive partnership work, which can be viewed at <https://www.mediculture.co.uk/>. There is an unprecedented opportunity at Snowfields to contribute to this vision. We have raised with each new development the possibility of hosting the Florence Nightingale museum, and we would welcome an opportunity to further this discussion at an early stage.

19. We welcome proposals for a dedicated community space and the commitments to training and education opportunities and “*making science inclusive*”. It is unclear how involving the “*science on display*” provision will be as the example illustrated suggests a very passive relationship with the public as distant onlookers. Further detail on the whole approach would be helpful. Both the Francis Crick Institute and Wellcome provide helpful precedents for what can be achieved, and we would welcome examples that you think we can look at to better understand this.

20. The plans involve the loss of some significant existing community assets, including a retail parade, The Miller and the important training and performance role of Hoopla Impro. We know that Impro has many benefits for personal wellbeing. Through our Medi-Culture Festival, we have had real success in ‘science show off’ where science and comedy are combined – a novel example of *science on display*.

21. We are unclear about the fate of The Miller. The ground floor plan on the consultation website indicates provision for a pub in a similar location but other text states that provision will be made for “*a social space providing food and drink to replace the existing public house*”. This “*social space*” is also aligned with the new community provision and it is unclear where it is to be located. We are also concerned that the significance of Hoopla Impro is not addressed in the information provided, where it is not mentioned. We believe both should be sustained such that the final development results in a net community gain for flexible cultural and community space.

22. Similarly, the plans for the dedicated community space are unclear with references to provision being made for a “*community hub*”, a “*social space*” and a “*studio space*”. It would be helpful to understand more about whether these are intended to be co-located, whether they are mutually exclusive and how they are intended to be run. Any community space needs to be affordable and available to a wide range of local groups and organisations.

23. We are aware of significant community provision across a number of locally based developments still in construction, so some joined up work will be necessary to ensure these do not duplicate each other. We know that Community Southwark has a strand of work, alongside the Southwark planning team and United St Saviours Charity, to link up VCS with premises in Southwark. We would welcome support for a coordinated approach, supported through the London Bridge Stakeholder Board.

#### Sustainability and responsible business

24. We welcome the commitment to “*being as sustainable as possible*”. It is unclear whether this includes going beyond meeting existing planning policy requirements and we believe the approach will best be supported by demonstrating a commitment to the circular

economy. For example, the proposals should illustrate what can be retained from existing buildings in the construction of the building to significantly reduce embodied carbon (though we recognise the challenge of buildings ready for medical purposes). There are other developers locally that have managed to do this, along with re-purposing materials from other sites, as part of a commitment to sustainability (Tower Bridge Court and Bermondsey Yard and Snowfields)

25. We believe meeting exemplary sustainability standards is an appropriate response to the circumstances now demanded by Southwark Council's declared climate emergency, GSTF's mission and the changing expectations of future tenants. These standards include:

- BREEAM Outstanding
- WELL Platinum
- air quality positive
- EPC rating A
- wirescore (platinum)
- reduced ground level wind speeds and urban heat island effect
- water run off at greenfield rates

26. The development could also form part of a potential district heat network – a concept being developed by Team London Bridge and other partners including GSTT as part of delivering our carbon neutral [routemap](#) for the area. We would welcome discussion about the possibility to host an energy centre when the project undergoes a Strategic Business Case, which could support an extension of clean energy to this building and local housing estates. The scheme could also support and benefit from local community project SE1 Solar to meet its energy needs and its proposed installation on the adjacent Kipling Estate.

27. There is the potential for a leadership role to be played by this being one of the first major developments of its kind to be brought forward with the experience of managing the Covid-19 pandemic. It could visibly address this by anticipating future public expectations and requirements, which might include filtration systems, fresh air provision, wider doors, lifts and routes, touchless systems, and use of anti-viral coatings.

28. We invite development partners to sign the [London Bridge Decarbonisation Charter](#), supporting both a collective vision to be one of the most sustainable business districts in the world, and part of a carbon neutral Southwark by 2030. This can also be signed by future delivery partners and suppliers to demonstrate their own commitments to sustainability when partnering with the scheme.

29. Team London Bridge is a London Living Wage employer and we encourage employers to take part in this. We would welcome a commitment from this development, which can also be promoted through supply chains.

We should be pleased to discuss further how to help deliver shared ambitions for this important location.