

24 December 2020

Team London Bridge response to the redevelopment of Colechurch House: Planning application reference 20/AP/3013

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. We welcome the opportunity presented by proposals to redevelop the Colechurch House site between Tooley Street and Duke St Hill. This is both a visually prominent and highly significant location where new development to improve the quality of both the building and the public realm will be very welcome. The site not only provides a key link between London Bridge station and London Bridge normally used daily by thousands of people, but also to other locally important routes (the river, More London, Borough market, Southbank).

3. We made representations on the site (NSP54) through consultation on the New Southwark Plan and also in response to some early consultation by the applicant in July 2020. The site makes an important contribution to the London Bridge Plan's commercial core and the placehaping proposals for developing Tooley Street as London Bridge's High Street and also the Green Grid and Thames Esplanade. Redevelopment can also contribute to the London Bridge Plan's ambitions for culture, public space and improved navigation.

4. We have established the ambitions for redevelopment of Colechurch House during public consultation in July 2020 around the following headings (full list detailed in Apendix 1):

- Town centre uses (retail, cultural and commercial)
- Design, heritage and public space
- Transport, movement and servicing
- Sustainability and greening

5. The planning application is accompanied by a preliminary Design Framework for the area, including land in adjacent ownership. We warmly welcome this initiative and believe the successful redevelopment of Colechurch House will benefit from being brought forward as a contribution to wider ambitions for this part of the London Bridge area. It is important that the Framework drives the development proposals rather than the reverse and we commend an approach which develops and confirms the Framework prior to final consideration of individual development proposals. We are contributing separately and in an ongoing manner to the Design Framework.

6. We have reviewed the proposals against these ambitions and in the context of the New Southwark Plan and London Plan (intend to publish version). The proposals have

much to commend them while there are issues on which we believe further consideration is needed to secure the best outcome from this critical site.

Pedestrian bridge

7. The removal of the bridge carrying London Bridge Walk is central to the planning application. We share the need to address the intrusive existing bridge and any future development should enhance both the view looking east down Tooley Street towards the Conservation Area and the setting of nearby listed buildings, including Southwark Cathedral. Nevertheless, the need for further evidence and analysis is made clear in the application with the proposals subject to an ongoing modelling exercise and dependent on decisions to be made by Transport for London. For example, if Transport for London does not permit extension of the western footway and widen the crossings on Duke Street Hill (both measures we support, if workable) this would have significant implications for the modelling.

8. We recognise the stated benefits for removing the bridge whilst also acknowledging that it offers convenience and capacity for commuters moving through the area to cross the Thames at London Bridge. While this area may currently be relatively underused outside commuting hours this could be transformed by a different mix of uses and an improved public realm which performs better against Transport for London's Healthy Streets indicators. It is also important to acknowledge that having public realm and routes at different levels can add positively to the experience and contribute to the character of this part of the London Bridge area. We believe further work should be done on the option of a bridge of exemplary design and exploration of the merits of this option before a decision is made on its removal.

9. We recognise that the bridge removal itself does not negatively impact on businesses within the Team London Bridge area (other than tenants within the existing building). Indeed, neighbouring businesses have indicated to us that removal will be a benefit due to improved public realm. However, ensuring comfortable pedestrian movement around the station is a priority as it has been raised regularly as a concern for commuters, and we need to ensure that new conflicts are not being introduced into the street environment without sufficient analysis. It appears that commuters from the main station are outside the modelling exercise, and we would like further understanding of this. Getting this right will of course be very important for the future tenants of the building.

Public realm and greening

10. The addition of a significant area of new public realm and green space is welcome in an area recognised for having a deficiency. Our London Bridge Green Grid Strategy (2018) indicates that the busiest places outside the station are also those with the least greenery. The site can make a strong 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*". In addition, this site has the potential to form a highlight in the green vision for a *Low Line Commons*, a strategy supported through the Good Growth Fund. We would therefore like to explore how the green space can go further than currently proposed to showcase the green credentials of the building.

11. Greening will largely be provided as a new undercroft with associated challenges for providing appropriate levels of natural light and an appealing microclimate. We welcome the attention paid to this in the supporting analysis but more needs to be done to demonstrate the appeal of the new public realm as a place to linger as well as providing new ways of moving through the area. The computer modelling and wind analysis 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 (requiring mean wind speeds nearer 2.5 m/s and avoiding the low natural light levels anticipated for the middle “square”). The wind speed analysis shows relatively few locations meeting the LDDC Comfort Category for Sitting within the new public realm underneath the buildings.

12. We are also keen to see full public access to the new space at all times and that the “*private maintenance*” of public realm accords with the Mayor’s Public London Charter principles.

13. The plans for such a significant site should exceed the Urban Greening Factor of 0.3 just as the project intends to exceed some sustainability standards. We believe the greening approach can go further to meet the expectation of the London Plan (intend to publish version) policies GG2, D3 and G5 and the New Southwark Plan policies P11, P66 and site allocation Policy NSP54. 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, despite the Winter Gardens, 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 – in particular the potential for the eastern façade to provide greenery value for the length of Tooley Street (it seems the green wall here will be on the internal wall). The case for more external greening is also illustrated by the greater mass of the new building in this area where it will overhang significantly more public realm. We believe more can be done to provide more abundant greenery in and around the balconies which is of value to those outside and inside the building. There are many good precedents to draw upon.

Design and Placemarks

14. The New Southwark Plan Area Vision supports our view on the importance of respecting the character of the London Bridge area and the significance if its placemarks. 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 rather than ourselves. In particular, the scheme has impacts on protected views of St Paul’s and Southwark Cathedral and along Borough High Street and while these have been reduced during the design process they still demand the most sensitive treatment.

15. The proposals can also do more to provide for future placemarks in the design of the public realm, named St Olaf’s square. Team London Bridge recently worked with the London Festival of Architecture to deliver the Tooley Street Triangle on this site (for a trial period of two years, unless it must be removed in order to commence site construction). We would be happy to offer the beacon as part of the future public realm, or to work with you to provide a new ‘placemark’ should you wish to remove it.

16. The Tooley Street Triangle is one innovative approach to improving wayfinding in this important area used regularly by tourists and others passing through. We believe the development should do more than is evident from the information so far provided to enhance the legibility of this part of London Bridge for visitors through appropriate navigational and visual cues and wayfinding, and also to maximise the public space area by converting excess carriageway on the junction of Tooley Street with Duke Street Hill.

Land use and culture

17. The site is located in the Central Activities Zone and we support mixed use without any residential provision. London Bridge plays an important role as both a retail cluster and a specialist cluster because of its arts, cultural and creative businesses and activities. The success of these roles requires a careful balance to be struck with other competing uses and the proposals are for over 90% of the site to be for office use. We believe the plans should do more to strengthen the role of Tooley Street as a High Street, with a better balance of uses, although we recognise the benefit of the winter garden in this mix. All retail should ensure active frontage.

18. 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. The provision for Southwark Playhouse Theatre within the scheme is a significant public benefit which we strongly support. Nevertheless, it is just 6% of the total floorspace and in a deep basement location with relatively low ceiling heights. Given recent experience which failed to provide appropriate accommodation for Southwark Playhouse Theatre in London Bridge station it is imperative that the design of the proposed theatre space is driven by its future occupiers. This includes the capacity and design of the two auditoria and ensuring a strong presence at street level. Southwark Playhouse Theatre's support for the design of the plans should be secured before the application can be determined. The theatre use will also require adequate provision of related services and food and drink to be provided within the development site.

19. We recognise that the provision of employment opportunities through Southwark Playhouse Theatre makes an important contribution to meeting the requirements of 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.*" Further consideration for the provision of additional affordable workspace in an appropriate range of unit types and sizes may be needed to meet these policy requirements.

20. The intention to provide a "*curated programme of public activities for the local community*" is also welcome and we would encourage further opportunities to be taken to activate the public realm and squares for cultural events and activities. In part this should be viewed as an extension of the internal performance space and designed to be more flexibly used for different purposes.

21. It will be important to ensure that valued existing retail businesses are provided for within the new development or nearby, including potential in adjacent railway arches.

Sustainability

22. It is welcome that there is a commitment to the development being "*a new model for future building development sustainability targets.*" This will require it to meet or exceed all the targets we have identified in paragraph 5 and it is notable that a number of targets are either less ambitious, aspirational (e.g. WELL) or not provided.

Transport and servicing

23. The development will place significant additional demands on local transport networks, especially for servicing. This is an area where a joined up approach across the Framework area is needed and opportunities for shared servicing taken forward. We

welcome the approach to providing fully off street provision for deliveries and refuse collection and the plans for off-site consolidation. Even with this approach reducing deliveries by 50% the development will generate 60 deliveries a day and approximately one every 10 minutes during permitted hours. This is significant and we would encourage a higher target for off-site consolidation and one that is integrated with other developments in the area.

24. There is significant potential to reduce the impact of deliveries along Tooley Street and Motague Close through an increased role for e-cargo bikes, and this needs to be reflected in the servicing plan. In particular this has benefits for road safety given the vast majority of pedestrians walk in the carriageway here due to lack of pavement width. It will also reduce noise and air pollution. It is essential to detail in designs how dedicated loading bay provision for cargo bikes will work so they are not held up by other loading vehicles.

25. The development also provides an important opportunity to address shortcomings in the important connection between Tooley Street and Montague Close under London Bridge, part of the Jubille Walkway. This important route should be reconfigured as shared space with an enhanced public realm.

26. We welcome the innovative approach to automated cycle storage in the application, which will be welcome not only to users of the building, but also wider visitors to London Bridge. The London Bridge Cycling Action Plan welcomes the use of innovations in cycling to attract new users to cycling and use public space efficiently. It is not clear how the pricing for this will work, but given it is replacing publicly accessible cycle parking, it should be free. It is unfortunate that the cycle parking overall is not meeting the London Plan requirements. We suggest that some of the cycle parking on Duke Street Hill and Tooley Street is maintained, as this provides the flexibility of choice that cyclists enjoy, and which will lead to higher take up of the facilities on offer.

27. We are aware that the cycle hire facilities on Tooley Street are amongst the best used in London, due to poor availability of docking stations elsewhere, and we are working with TfL to increase local provision. It will be necessary to find another location locally, and indeed we may need to find increased space not only for docked bikes, but also dockless hire bicycles, e-bikes and now e-scooters. Determining how all these uses fit into the development and surrounding streetscape will be important, particularly given the flagship transport status of London Bridge.

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

Yours faithfully



Nadia Broccardo
Chief Executive
Team London Bridge

Appendix 1: Key points raised by Team London Bridge to consultation, July 2020.

We are looking for the redevelopment of Colechurch House to

- Acknowledge the site’s gateway role for people arriving in London nationally and internationally, and the need for a distinctive and inspiring building to define the area
- Have a transformative impact on the quality of the public realm and the experience of travelling between London Bridge Station and London Bridge (at all levels) and support access to the Thames Path
- Enhance the legibility of this part of London Bridge for visitors through appropriate navigational and visual cues and wayfinding, especially to enhance the connection between London Bridge station and London Bridge – this should build on the objectives behind Team London Bridge’s Tooley Street beacon
- Be informed by a detailed analysis of the impact of different development options (including removal of the Duke Street Hill footbridge) on pedestrian flows to, through and around the site and its critical function in supporting the links between London Bridge station and London Bridge without overcrowding
- Address the intrusive footbridge over Duke Street Hill through its removal or an enhanced design and ensure any future development enhances both the view looking east down Tooley Street towards the conservation area and the setting of nearby listed buildings
- Provide an active retail frontage which supports the creation of a new High Street on Tooley Street and activates the main pedestrian routes to London Bridge
- Meet policy requirements for provision of affordable office and retail units with appropriately small floorplates and discounted market rents to help meet the demand in the area
- Collaborate with neighbouring on-street traders to provide appropriate retail space and free up the neighbouring public realm
- Bring a unified approach to the surrounding public realm and railway arches, in conjunction with Transport for London, Network Rail, The Arch Company and St Martins Property Group
- Support delivery of [London Bridge Culture Strategy](#), including through long term support for cultural and community assets
- Make a strong 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*”, including greening inside and on the side of a new building as well as the creation of a major new public green space and by achieving the highest possible Urban Greening Factor
- Recognise it will be will be one of the first major developments to be brought forward with the experience of managing the Covid-19 pandemic and visibly address this by anticipating 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

- Set exemplary sustainability standards which respond to the circumstances now demanded by Southwark Council's declared climate emergency and the higher expectations of future tenants, including commitments to:
 - 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 (as this site is within a designated critical drainage area)

- Exceed the cycle parking standards expected by the New Southwark Plan and make provision for visitor parking which avoids conflict in the public realm, including provision of a major new cycling hub

- Recognise the importance that scale of buildings plays along the river in safeguarding this important cityscape.