

The Hive
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28 October 2021

Revised proposals for 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 this opportunity to consider revised proposals for the redevelopment of Colechurch House incorporating a redesigned footbridge over Duke Street Hill. Our representations are within the context of our views on Southwark Plan site allocation NSP54, our overall ambitions for the site provided in July 2020 and our detailed comments on this planning application in December 2020. These representations on other aspects of the plans still stand.

3. The revised plans address the key function of the site as an essential link between London Bridge station and London Bridge. This is normally used daily by thousands of people and it is also important for other locally significant routes. In this respect our ambitions are for the redevelopment to:

- have a transformative impact on the quality of the public realm and the experience of travelling between London Bridge Station and London Bridge and support access to the Thames Path
- address the intrusive footbridge over Duke Street Hill through 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

4. Our earlier representations identified a need for further evidence to support the removal of the Duke Street Hill footbridge and raised a number of concerns about the impact of doing so. We welcome the subsequent work which has been done and recognise the benefit overall of retaining a footbridge in a redesigned form. Nevertheless, the revised proposals raise a number of additional considerations:

5. Bridge design – We welcome the minimalist and transparent approach to the bridge and the benefit this brings to views down Tooley Street and of a range of heritage assets. We look forward to greater clarity on the design, and views from Southwark’s Design Review Panel on what will be an important new feature in the street.

6. Views – The new bridge will bring improved views of heritage assets in the local area. The assessment of these benefits focuses on Southwark Cathedral and should acknowledge more clearly the positive impacts on views including Hays Galleria, London Bridge Hospital and London Bridge station where it will reveal more of its distinctive Victorian brickwork. The new framing of St Olaf’s House should also be more clearly recognised and this will emphasise its contribution as a placemark within London Bridge. As with other Local Plan site allocations, new development should not detract from the primacy of The Shard in key views, including from London Bridge. Again, we would welcome consideration by Southwark’s Design Review Panel on this.

7. Urban greening – We do not accept that a reduction in the Urban Greening Factor from 0.3 to 0.28 is either a desirable or necessary consequence of retaining a footbridge over Duke Street Hill. It means the proposals are in conflict with London Plan Policy G5. The reduction should trigger further greening measures across the site and we share the GLA’s view that *“the proposal has a potential to improve the UGF and the applicant is encouraged to explore further design details to improve the overall UGF of the proposal.”* This can be achieved through:

- Realising the opportunity of a new green wall on the key elevation alongside the escalators and stairway from the footbridge (as seen in the bottom left image of page 13 of the Design and Access Statement) – this will also significantly improve the experience of pedestrians heading north over the footbridge and using the escalators or stairway. The drawings show a gap of 1.4m between the most northerly escalator and the building (Study D Plan, page 10 Design and Access Statement) which provides sufficient space for introducing a new green wall
- Provision of fully mature trees in larger tree pits, with precedents in the area including at Fielden House
- Consideration of further planting to the west of the site by the Duke Street Hill/London Bridge junction, including outside the planning application boundary, which would also support the drainage strategy

8. We seek clarification as to the area of green roof which is shown as 547 sq. m in Figure 2 and 840.5 sq. m in the summary “Results” table in the Urban Greening Factor report from Schofield Lothian. An area of 547 sq. m would reduce the Urban Greening Factor to 0.19 and require significant additional greening measures to be introduced.

9. Flood risk – The site lies in a Critical Drainage Area and proposes to use attenuation tanks to deal with run off and to make no provision for rainwater harvesting. We would support a more positive approach which makes use of rainwater harvesting, including through the provision of rain gardens and other above ground sustainable urban drainage measures. This will also contribute to biodiversity and urban greening targets. The site area from which run off needs to be managed should include the total area of the new footbridge and all the land west and uphill of the building. TLB is also investing in SuDS projects (with the council and Thames Water) which help attenuate water in highways and we welcome other partners supporting this approach.

10. Public realm – We welcome the opportunity to create a new and significant area of public realm underneath the new building between Duke Street Hill and Tooley Street. The analysis provided with the application shows that the quality of this as a place to dwell in terms of its microclimate, light levels and wind speeds needs to be carefully considered. The comparisons provided with the British Museum and the Leadenhall Building are of limited

value given their different contexts and functions. The limited public benefit from the space under the Leadenhall Building serves to demonstrate the challenge of providing an impactful and vibrant space. More evidence is needed as to how this will be achieved. This should include further detail on the “roof” of the undercroft which is a key elevation that needs detail and interest.

11. We also believe further consideration is needed to:

- Maximise permeability and confident navigation through the site, including by providing significant wayfinding and more obvious visual prompts to the key north/south routes linking Duke Street Hill and Tooley Street.
- Rename the stretch of Tooley Street from Montague Close to the junction with Duke Street Hill which is a regular source of confusion (TLB could help facilitate such an initiative)
- Demonstrate how opportunities for graffiti and tagging have been minimised, including through use of rough surfaces and other deterrents and/or a zero tolerance maintenance approach
- Demonstrate there will be no obstruction or health and safety issues arising from the angled pillars at ground level

12. London Bridge station arches – The relocation and redesign of the Duke Street Hill footbridge provides an opportunity to work with Network Rail to develop a shared plan for making best use of the new public realm and space within the London Bridge station arches that lie between the entrances and exits to London Bridge underground station.

13. Other issues - We share concerns expressed by the GLA and others about the lack of detail on key issues, including:

- The likely effectiveness of the proposed bike lift
- Provision and location of additional cycle hire docking stations
- The adequacy of servicing arrangements, including a need to increase the target for off-site consolidation and minimise impact on the Thames Path
- The lack of specificity in how the sustainability targets will be achieved

14. 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