

22 December 2020

**Team London Bridge response to the development of a new Orthopaedic Centre,
Guy's Hospital: Planning application reference 20/AP/3101**

1. Team London Bridge (TLB) is the Business Improvement District (BID) representing approximately 400 businesses in the area, including the London Bridge Campus. 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. This is an important site with strong historical associations. The proposed eight storey development will be the latest addition to the nineteen existing buildings at Guy's which tell a continuous story back to the early 18th century.
3. We made representations on the London Bridge Health Cluster site (NSP49, previously NSP51) which includes the proposed development site through responses to the consultation on the New Southwark Plan. This confirmed the need for the heritage significance of the site to go beyond designated views, buildings and archaeological significance, and to recognise the importance of both existing green and open spaces and the opportunity for improved connectivity. We identified the need to address the health and wellbeing role of the location through an approach to its future development which promotes green infrastructure, supports biodiversity, secures sustainability and air quality goals and invests in an improved public realm. Reference to the wider Medical Innovation District and London Bridge Bio-Medical campus would also, we believe, strengthen the application. We made representations on earlier proposals for the site in response to a preliminary consultation by the applicant.
4. We believe the proposals are best developed in the context of a wider masterplan for the London Bridge Health Cluster site which establishes the strategic ambition and objectives, informs the development of specific sites and avoids the problems of piecemeal development. We believe such a Masterplan should be agreed prior to consideration of individual development proposals. For example, it is crucial to know how access and permeability is planned into the campus linked to neighbouring areas and planned developments such as those on St Thomas Street and Melior Street.
5. The proposals are based on a clearly articulated evolution of the design in response to feedback from Southwark Council and others. We recognise them as making a distinctive new contribution to the assemblage of buildings that make up the Guy's Hospital campus.
6. Given the health and wellbeing role of Guy's and its status as a global innovation hub we would expect the development to support appropriately high sustainability standards. This would also meet the expectations of the London Bridge Area Vision in the New Southwark Local Plan. The standards should include:
 - ambition to be BREEAM Outstanding alongside commitment to BREEAM Excellent
 - 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

7. The proposals are silent on many of these targets or lack their ambition, for example committing to BREEAM Excellent without any ambition to attain BREEAM Outstanding. As the BREEAM assessment shows, this could be achieved through greater ambition on, for example, reducing energy and water use and improved construction practices.

8. The proposals acknowledge that they only achieve a 28% improvement in carbon emissions over Building Regulations and this is recognised as falling well short of the requirements of both the New Southwark Plan and London Plan. While the “*specialist clinical nature*” of the building creates particular challenges, and the shortfall can be financially offset, the disparity is significant. We ask that it is further interrogated with a view to significantly improving performance.

9. The plans could also more visibly address their role as one of the first major developments to be brought forward on a hospital site with the experience of managing the Covid-19 pandemic. They could anticipate 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

10. We are disappointed that the opportunity to 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*” has not been taken. This should including a positive impact on the Urban Greening Factor achieved through greening the building inside and out and supporting biodiversity net gain. There is relevant experience nearby with the Orchard Isle Living Wall, supported and owned by Guy’s and St Thomas’ Charity, and its positive impact on health, wellbeing, wildlife and air quality.

11. The provision of cycle parking for ten additional bikes is welcome but we believe it should be more generous and anticipate and incentivise a growth in cycle use, particularly since we know cycling by the Trust has increased dramatically in 2020. The plans identify the best route to connect with National Cycleway 4 is via Great Maze Pond which is already an area with significant congestion and conflicts between users on foot and on bike. The plans should be accompanied by measures to support alternative routes.

12. We welcome the efforts to minimise the impacts of servicing through use of the existing Guy’s consolidation centre.

13. We should be pleased to work more with Guy’s and St Thomas’ NHS Foundation Trust to help deliver shared ambitions for this important site.

Yours faithfully



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