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Team London Bridge response to the Capital House redevelopment: Planning application reference 18/AP/0900

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 Capital House redevelopment proposal. We made representations on the emerging proposals in January 2018 and have also made representations on the site through consultation on the New Southwark Plan (NSP). We have considered the current proposals 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.
3. Capital House is a highly significant site in the BID, especially given the location directly outside the new station exit from London Bridge, which has generated a huge increase in pedestrian footfall in the area. The proposals relate to part of one (NSP52) of a small number of major development sites identified for London Bridge in the emerging 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 focus on design and activation of space of the proposal.
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”*.

Shared approach

5. We are concerned that the proposals are premature and miss important opportunities for a more shared approach to the major development sites along the south side of St Thomas Street. TLB has identified the following objectives for realising the potential for a new St Thomas Street within a shared framework:

- Minimises traffic flow and speeds
- Creates space to attract large numbers of pedestrians and cyclists
- Enhances east-west and north-south pedestrian flows linking the station and destinations
- Develops a holistic vision for the uses and activity on the street
- Ensures a diverse and thriving economy, across health, education, commerce, innovation, culture, retail (incl food and drink) and the nighttime economy
- Retains and enhances the character and visual quality of the street through greening, public realm, architecture and active frontage.
- Ensures balance between the unique heritage of Guy's/Kings and Bermondsey and innovative new architecture.

6. We believe this is best achieved through preparation of a shared masterplan for site allocations NSP 51, 52 and 53 in the New Southwark Plan (as set out in our response to the NSP consultation 28 April 2017) which:

- Recognises their individual and collective contribution to the development of St Thomas Street as a high street, including part pedestrianisation and support for town centre uses at ground level, and also potentially above ground floor and set back from the St Thomas Street frontage
- Supports the need for a mix of floorplate sizes to encourage retail and office diversity
- Avoids a single, monolithic elevation along St Thomas Street
- Acknowledges the need for future development to respect the food, culture and retail offer in Bermondsey Street and the station
- Addresses the future impact of development on the microclimate and shading and requiring development to mitigate the impact of development on wind speeds along St Thomas Street and adjacent areas
- Acknowledges the merit of existing, undesignated buildings
- Increases permeability throughout the site, building on and adding to the historic fabric of alleys and courtyards
- Delivers an overall increase of public open spaces to create a green grid, incorporating greening into new buildings and trees lining the whole of St Thomas Street and securing the retention and management of Melior Street Community Garden as a community run asset
- Supports the need for sustainable drainage given the area is a critical drainage area

7. The Capital House proposal fails to address some of these critical issues and by taking a premature single site approach it will constrain delivery of the wider vision expressed in the London Bridge Plan and the Area Vision for London Bridge in the New Southwark Plan.

Land use

8. TLB believes there is only incremental capacity to accommodate additional residential development in the area. London Bridge is located in the Central Activities Zone 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 within the London Bridge area we believe a clear priority needs to exist for commercial office, retail and leisure uses over residential. This is consistent with Policy SD5 C of the draft London Plan which states “*Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in other core commercial areas of the CAZ.*” These other areas include London Bridge because of its dual role as a cluster and as an Opportunity Area. The current proposals take land use in the opposite direction, replacing significant B1 office space with largely student accommodation. This is a significant increase of student accommodation from the extant Quill planning permission, and represents a loss of c4,000 sq m of commercial space from the existing Capital House building.

9. We are concerned that student accommodation will not provide significant additional activity to the local community – particularly given the short-term nature of tenure. We believe the plans will displace other uses more appropriate to the strengths of this part of the Central Activities Zone. If the development were to proceed then we would like to see additional provision for locally relevant commercial space – for example flexible co-working opportunities mixed with amenity provision that links up with the exciting plans at Guy’s and King’s Health Cluster next door (framed in the London Bridge Plan as a Science Eds and Meds cluster), or the high number of sustainable fledgling businesses in the area. These uses would also provide wider access to the building’s facilities.

10. We are excited about the contribution of the Migration Museum to St Thomas Street as part of a strengthening of the cultural offer in the London Bridge area. A new museum over three floors will make a very significant and welcome contribution. The museum will help achieve the vision set out in the new London Bridge Cultural Strategy “London Bridge will be the front stage that creates our favourite memories of the city through innovative and contemporary cultural programming”.

11. The relationship between the museum and the street is critical and we are concerned at the limited capacity to accommodate cultural activities at street level and the relatively weak contribution to the high street offer, especially at street level, from the limited retail and café uses associated with a museum (both off the main street - though we do recognise that both elements could be of great benefit to the area if delivered effectively). There is also a risk of a large lobby area, outdoor queuing, and also security checks all detracting from the ‘active’ frontage.

Public realm

12. The area in front of the proposed Migration Museum is a prominent and important new node at the exit of the station – including the Capital House forecourt, the station exit and the hospital. TLB has recently improved the planting on the hospital frontage and is looking at funding a shared space surface in front of this site. Although providing c250 sq m of public realm, the plans feel ungenerous in such a confined space. Indeed, there is no significant addition to the existing public realm along the critical St Thomas Street frontage. There is a need to pay more more attention to the critical space around the building and this requires:

- capacity to accommodate cultural activities at street level by the museum entrance
- a softer relationship between the building and the street – along Weston Street / Melior street – through greening (walls or landscaping) and sightlines into an active lobby area in the museum
- addressing the inadequate approach to the space in front of the loading bay which has a high footfall and needs a more positive use
- providing greater space at ground level along Melior Street where there are already very tight vehicular movements which have caused damage to street furniture and buildings in this location
- a stronger relationship between the new building, Melior Street garden and the alley by Beckett House – for example through the frontage of the café and museum shop, and the legibility of the route. This is essential both in bringing this section of St Thomas Street Boulevard to life and encouraging footfall into the green space and beyond into other new developments, the pub and into the borough.
- ensuring the design avoids creating public spaces perceived as being private, as evidenced elsewhere along St Thomas Street.

13. We are concerned that without addressing these issues the proposals fail to meet the expectation of the new Southwark Plan Area Vision for development to “*make sure the new standard of London Bridge Station is upheld*” and for development on site NSP52 to “*enhance St Thomas Street by providing high quality public realm and active frontages including town centre uses (A1, A2, A3, A4, D1, D2) at ground floor.*”

Design and placemarks

14. We welcome a design response to the railway arches opposite the site through use of colour and materials and a relevant datum for the base of the building. It will be important that a similar response is in evidence for all the major development sites along St Thomas Street. We welcome the views of the Southwark Design Review Panel as to whether the building meets the ambition to deliver “*a distinctive and inspiring world class environment*” with “*inspiring new architecture*” in London Bridge, as set out in the NSP. Given its prominent location and the plans for a major new museum, this building demands a stunning design impact. It must be part of a new wave of iconic architecture in London Bridge, benchmarked against with a standard set in recent years by Hay’s Galleria, The Shard, City Hall, Guy’s Cancer Centre and London Bridge Station.

15. The NSP Area Vision supports our view on the importance of respecting the character of the London Bridge area and the significance of its placemarks. We are concerned by evidence in the supporting information of the impact of the scheme on key views and the nearby Conservation Areas which are notable for the fine grain of their streetscape. For example, we would have liked to see more made of the relationship between the building and the view on to the Catholic Church. We are also concerned that the character of Tower Bridge (one of our businesses) in the context of the historic setting of the Tower of London and river Thames is not compromised.

Transport and servicing

16. 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 different development sites is needed and opportunities for underground servicing taken forward. It is also unclear how the particular and growing need to accommodate home deliveries for over 1,000 students will be met, especially given the conflict between access to the loading bay and the very limited capacity for pull-in short term parking which appears confined to a single vehicle.

17. There will be a high cycle use associated with both resident students, staff and visitors. This will require more practical access to storage than the planned “bike stair”. Given the intentions to increase cycle use more widely in the local area and the shortage in existing capacity, the development should also make public provision for cycle parking.

Green Grid

18. We welcome the proposals for an element of landscaping on the roof of the proposed development and the small number of enhancements proposed at street level. Nevertheless, important environmental opportunities have not been taken, especially for a much more positive approach to greening the building and roof. The new Southwark Plan area vision is that *‘greenery should be incorporated into buildings’* and this is complemented by the London Bridge Plan’s support for more greening, including green walls and development of a Green Grid providing connections across the area. The plans present an inadequate response.

19. Given the planned height and scale of the development there are particular opportunities to use green infrastructure to improve the microclimate, mitigate wind effects, and provide energy generation and storage measures. We are concerned that the Environmental Statement confirms some locations around the building did not comply with wind comfort and safety requirements. It is welcome that mitigating measures have been taken but the necessary screens do not enhance the design and local experience of The Shard indicates a more sensitive approach is needed to avoid unintended impacts. It is also important to confirm that the impact of the building on the local microclimate has been considered in terms of the expected use of St Thomas Street as a boulevard, rather than a highway, and the future need to host cultural and other activities at street level.

20. In conclusion, TLB has a number of concerns regarding the proposal that relate to development’s ability to deliver the objectives of the St Thomas Street Boulevard, and which require a more joined up approach with neighbouring developments. 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



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Chief Executive
Team London Bridge