

The Hive
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June 2021

Team London Bridge response to the revised New City Court development: Planning application references 21/AP/1361 and 21/AP/1364

1. Team London Bridge 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. Team London Bridge 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. New City Court is prominently located in the BID both fronting and connecting St Thomas Street to Borough High Street and providing access to the Inns and Yards. Its relationship to the future developments being guided by the St Thomas Street East Framework (NSP 50 and 51) and at Kings College London and Guy's Hospital (NSP49) is also critical.
3. We have considered the latest proposals in the context of new and emerging development plan policy in both the New Southwark Plan (at Examination) and London Plan and consistency with our London Bridge Plan. Team London Bridge neither supports nor objects to planning applications, but responds to ensure the aims set out in the London Bridge Plan, and complementary strategic documents representing the business community, are attained.
4. We made representations on earlier applications in September 2020 and March 2019 and we welcome the opportunity to address the further changes made to the proposals for this critical site. We welcome the opportunity provided by new development in this area to bring positive and welcome changes to London Bridge and stand ready to continue to work with the proposals to fulfil the objectives of the existing, and future business community – as reflected in the London Bridge Plan.
5. Team London Bridge considered the site's future during consultation on the New Southwark Plan (NSP) and the recent Examination in Public and we find much to welcome in the proposals. They will provide significant new routes and increase permeability in an area that normally experiences high footfall. The development will in part replace existing buildings which detract from the area's character and it will also reveal important existing buildings and refurbish a significant terrace of Georgian buildings on St Thomas Street.
7. The most recent changes are significant and overall are an improvement on those first put forward. We welcome the reduced impact of the scheme on the Conservation Area

and heritage assets, and the public realm with new connections with the Underground station. The scheme is welcomed for its increased presence facing St Thomas Street and the commitment to 10% of the workspace being affordable will make an important local contribution. Subject to Transport for London's support the significant change in servicing arrangements to be provided via St Thomas Street and not the Yards addresses one of the most serious shortcomings in the original plans. We are also supportive of the move towards providing new green space and public realm on the rooftop rather than inside the building. The improved provision for cycle parking and the strengthened environmental commitments are also welcome.

8. Nevertheless, there are a number of issues where we ask for further consideration to improve the plans or adopt a different approach to maximise the potential of the site.

Public realm

Inns and Yards

9. We warmly welcome the increased permeability the development will bring to this part of London Bridge. This will have major benefits to the area, supported by the new and welcome exit from London Bridge Underground Station.

10. The success of the new Kings Head Courtyard and covered gallery linking St Thomas St, Kings Head Yard and the Underground station is critical to the scheme. It needs to work as both a through route and a place to linger.

11. This new public realm is a 21st century addition to the Inns and Yards which are such a characteristic feature of this part of London Bridge. It needs to respect the significance of the Inns and Yards and we urge that further consideration is given to the guidance we have produced in conjunction with Better Bankside on how to do this. The current plans create a large courtyard and there is no particular activity here to provide any sense of character, activity or vitality beyond being a through route and entrance to offices – which could create a sterile space in the covered gallery between the new tower and the rear of the Georgian terrace. The quality of light and the microclimate in this area is uncertain and some of the public realm is obstructed by columns. We believe further improvements can be secured by visually breaking up the area through more appropriate and abundant landscaping, surface materials and use of colour. More should also be done to activate the proposed King's Head Square, King's Head Yard, the lower part of the tower and the rear of the Georgian terrace with an improved retail and cultural offer. This will require a clear commitment to securing retail uses by the entrance to the Underground station – the material accompanying the application is equivocal on this point. The Georgian terrace may also contribute to the retail offer (and did in the previous proposal).

12. There is a need for a much stronger relationship between the ground floor of the tower and the new public space that surrounds it. This is compromised by the extensive office lobby and the additional lobby for visitors to the rooftop garden. The combined effect is to create a poor frontage for all those passing through the area. There are opportunities to make more of the ground floor as internal public realm that is much more welcoming and interesting to casual visitors and the wider public. More needs to be done to activate the building in particular the ground floor frontage of the tower on its western, eastern and northern sides and extend planting into the ground floor indoor public realm.

13. We welcome the intention to make the new Underground entrance fully open. This will become a new pedestrian route between the site and Borough High Street and this should be planned for from the start by designing the route through as a new piece of public realm. The new entrance is necessary for the rest of the scheme to work without creating pedestrian congestion or exacerbating pedestrian safety issues on the corner of St Thomas Street and Borough High Street. Its design should, therefore, be more developed so that the route through is designed as a key passageway from the first day of its operation. It will be important to secure Transport for London's approval for the approach prior to determination of the planning applications.

Green Grid and Urban Greening Factor

14. The applicant's landscape approach references borough-wide policies in the new Southwark Plan but does not reference the Area Vision for London Bridge. This is emphatic about the importance of "*quality public realm that provides openness, connectivity and a 'green grid'. Greenery and innovations in environmental resilience should be incorporated into buildings*". Our Green Grid vision is that "*London Bridge will become one of the greenest, most beautiful, environmentally sensitive and civic-minded business districts in the world*" and we believe there is considerable scope for more to be achieved by development of this scale on this site. An Urban Greening Factor of 0.41 is only just compliant with the London Plan and a majority of the scheme's contribution is provided on its upper levels. There should be much more at ground level where the public benefit is greatest. The contribution to the Green Grid of King's Head Square and Yard and the covered gallery is meagre. It should be supplemented by more abundant planting and a commitment to planting in the main office access from St Thomas Street being to the full height of the gallery. There is also scope for more vertical planting than that provided by the planting of the north facing balconies and for extending planting into the lower floors of the tower. This would all contribute to the London Bridge Plan's ambitions for St Thomas Street to be developed as a boulevard. We would welcome an approach to landscaping which contributes to a joined up biodiversity action plan for St Thomas Street, opening up social regeneration opportunities, for example as we have done through Putting Down Roots and has been achieved locally through the Bankside Open Space Trust.

Roof garden

15. The publicly accessible roof garden is a welcome evolution of the plans, however we would like reassurance that it is an inclusive space that is used by all and accessed by the local community. For this we would welcome a long term activation and management plan for the space.

16. The roof garden and its associated restaurant should contribute to London Bridge's night time economy and be an attractive destination which is open beyond the early evening. The scheme should also be clearer as to whether there is a formal educational function envisaged, including for the "Jar" which will need to be a bookable space for this to be provided – and this would support point 15 above..

Architecture and urban design

Impact on surrounding area

17. We welcome the removal of the overhang above the Georgian terrace and opposite the Old Operating Theatre and the reduced impact of the building on more distant views. The local impacts remain significant, however, and it is acknowledged that there is visual harm to the Conservation Area and a number of sensitive locations, including views from Guy's Hospital's Quads and Courtyard, Southwark Cathedral, Borough Market's entrance and St Thomas Street looking west. The amended building also occupies more of the site footprint which brings some additional impact on neighbour amenity. We ask that Southwark's Design Review Panel gives particular consideration to these issues.

Kings Head Yard

18. The northern edge of Kings Head Yard is distinguished by a characteristic and elegant curve which needs to be more sensitively addressed by the southern elevation of the tower's base. The stepped and angular elevation at ground level is inferior to the historic significance of this important space and will impact on its sense of enclosure. We ask that this approach is reconsidered better to respect the elegance of the existing curve and it should be considered by Southwark's Design Review Panel. Greening in this space would be welcome, and match the ambition we have set with a Living Wall in Collingwood Street on the Orchard Lisle building, and plans for major planters directly adjacent to this site (currently unrealised during the pandemic period).

Land use

19. We believe the site requires a significantly improved mix of office, cultural and retail uses. Introducing a stronger culture and retail element would be consistent with its location in the Central Activities Zone. We support an approach which does not include residential uses consistent with the London Bridge Area Vision which emphasises growth in "*office provision, shops, leisure, culture, science and medical facilities*" over residential development. We believe a development of this scale should be contributing to London Bridge's cultural offer and address this below.

Affordable workspace

20. We welcome the increased in affordable workspace provision from 2% to 10%. It will be important to secure the rents and service charges at appropriate levels and ensure appropriate local marketing to maximise local benefits and secure affordable workspaces in perpetuity. There are particular opportunities in this location as a result of the health cluster associated with nearby uses.

Culture

21. We are disappointed that the contribution to the London Bridge Culture Strategy as supported by New Southwark Plan Policy P43 has not yet been addressed. A development of this scale and significance in such a critical location should be making a major contribution.

22. There has been significant progress made by local partners to strengthen the Medi-Culture offer in the area and the SC1 ambitions. The Florence Nightingale museum has expressed a firm commitment and desire to be incorporated into the development at New

City Court. It is a leading option that would enable the development to provide a cultural offer that is inclusive and relevant, and expected for a scheme of this scale and significance in such an iconic location. It would also be of appeal to prospective new occupants and could potentially be recognised as part of the overall affordable workspace offer.

23. There is also scope for the scheme's planting, including in the rooftop garden to have an education and interpretation focus on medicinal plants and herbs.

Servicing and transport

Servicing

24. We welcome the revised servicing strategy which will halve the number of vehicle movements per hour at their peak and reduce the number of light goods vehicle from 99 to 38 per day from the earlier plans. Critically, the plans are for all servicing to now take place using access from St Thomas Street.

25. These plans are dependent on the successful use of an offsite consolidation centre and no details of this have been provided. It will be important for these arrangements to be confirmed as deliverable prior to the applications being determined. This includes the opportunity for a shared approach involving the neighbouring Kings College and Guys & St Thomas' sites to use the same vehicles and further reduce the impact of servicing.

26. We believe further measures can be taken to reduce the impact from servicing the new development, including requiring the use of e-cargo bikes for deliveries.

Cycle parking

27. We welcome the significant increase in provision for cycle parking. The plans for extra cycle parking for public use should, wherever possible, be provided on the street rather than the pavement and we are concerned by the impact of significant cycle parking on St Thomas Street. Moreover, we are concerned that the highway plans accompanying the scheme do not show a contraflow lane for cyclists moving from west to east along St Thomas Street, which must be the ambition.

28. The quantum of secure cycle parking provision for employees is appropriate. Further evidence is needed that the planned access off Kings Head Yard is practical based on the expected levels of use. Cyclists entering Kings Head Yard risk being unable to enter due to congestion at the narrow entrance while cyclists leaving Kings Head Yard in any numbers risk creating congestion with a heavy and growing pedestrian footfall, people standing outside the pub and conflict with incoming cyclists. It is essential that access to the secure cycle parking is possible from St Thomas Street, which does not appear to be the case.

Sustainability

29. We welcome the range of measures and commitments relating to the development's sustainability performance. Nevertheless, too many of these lack formal targets or those targets that are provided remain aspirational at the level expected of such a major scheme. The net zero commitment is welcome although it is unclear how much of this will be achieved through offsetting. We believe the proposals should be achieving BREEAM Outstanding and WELL Platinum.

30. We look forward to continuing to work with the applicants to help deliver shared ambitions for this critical part of the London Bridge area.

Yours faithfully

A handwritten signature in black ink, appearing to read 'N Broccardo', with a stylized flourish above the name.

Nadia Broccardo
Chief Executive
Team London Bridge