

ST THOMAS YARD PROPOSALS Planning application 24/AP/3803 Representations by Team London Bridge April 2025

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. Team London Bridge has a remit from businesses since 2015 to deliver the London Bridge Plan, a plan that was subsequently embedded to a great extent in the London Bridge Area Vision in the Southwark Plan (adopted 2022). TLB priorities are constantly being kept up to date through new strategies and consultation, ensuring our responses to planning reflect the wider aims of the business district. Our vision *is to make London Bridge one of the most safe, sustainable and engaging places for business and tourism in the world*.

2. TLB responds to planning applications that have the potential to deliver significant impact in the local area. TLB's responses aim to encourage investment that can help realise the priorities set by businesses in the area, with particular focus on:

- Public realm and greening
- Area identity
- Land use and active frontage
- Transport, servicing and network management
- ESG

3. We have considered the future of the site in response to earlier iterations of the development plans for New City Court and during the development of the New Southwark Plan. We also contributed to the evolution of the current proposals in response to the earlier public consultation. The site's location means it provides significant opportunities to bring positive and welcome changes to London Bridge.

4. The proposals will bring welcome improvements to the area. We welcome the improvements to buildings which are retained and the benefits brought by the refurbishment of a significant terrace of Georgian buildings on St Thomas Street. Opportunities are taken to replace some existing buildings, which add little to the identity of the area, with contemporary office space. There are also significant benefits in terms of the use of embodied carbon from making more use of existing buildings. They are significantly improved on the earlier proposals for New City Court, with a reduced impact on the Conservation Area.

5. The points below provide further details on how this proposal can help deliver local priorities.

Public realm and Area Identity

6. The character of Kings Head Yard makes an important and unique contribution to local identity, along with other Inns and Yards off Borough High street. We worked with Better Bankside and Southwark Council to produce the <u>Inns and Yards Toolkit</u> to support better recognition and investment of these spaces. There is a particular opportunity to add to



the character of the Yard through the detailing of the balconies – which is suggested in the documents provided. This could create a distinct <u>Placemark</u> which will add to local character and we would welcome clarity on this. We hope our Toolkit can still be helpful as further detailing is done.

7. Kings Head Yard needs to work as both a well-used through route and a place to linger and be designed and manged to minimise the risk of anti-social behaviour, which is a persistent problem here. Security will be assisted by having a well-used entrance to the building from Kings Head Yard, a managed loading area, and the fine metal mesh screen at night.

8. We welcome the reduced scale of the building from previous iterations, which more effectively addresses the context in which it faces the medieval yard, the Old Operating Theatre and Herb Garret opposite, and the formal buildings of St Thomas Street and Guy's Courtyard. We welcome the improvements to the St Thomas Street frontage brought by replacing the existing building with a new entrance building. We acknowledge and welcome the further refinements to this building since consultation stage, which sit more comfortably within the elevation.

9. The Southwark Plan's Area Vision for London Bridge indicates development should "support the creation of a distinctive world class environment through a mix of innovative new architecture, restored heritage and quality public realm that provides greenery and connectivity. Greenery should also be incorporated into buildings". We think that the developer has made concerted and sensitive efforts to deliver this, in a key location between historic and contemporary parts of the area and would welcome the views of the Southwark Design Review Panel in the success of this.

Greening

10. We welcome the improvements to the proposals which means it meets the requirement for a 0.3 Urban Greening Factor score, particularly challenging given the historic nature of much of the building. TLB brings significant greenery to the area as part of our vision for a "Green Grid". Greening is consistently highlighted as a local priority by the business community, so any further opportunities being taken are welcome. Despite this, we are unsure on the feasibility of the additional greening shown on drawings of the temporary pavement (outside the development), which will be difficult to maintain given the high footfall.

11. We welcome the development stating it achieves greenfield run-off rates, as set out in the London Plan. Adaptation and resilience is important to the BID and has been a focus through the delivery of the London Bridge SuDS pilot, delivered in partnership with Southwark Council and Thames Water. Any opportunity to do this through green infrastructure rather than engineered solutions (tanks) would be further welcomed.

Land use and active frontage

12. We support the proposed land use and an approach which does not include residential uses consistent with the London Bridge Area Vision. This emphasises growth in *"office provision, shops, leisure, culture, science and medical facilities"* over residential development.



13. We welcome the intention that 10% of the workspace will be affordable, and particularly any ongoing conversation that can ensure that this offer delivers true benefits for the London Bridge area. Examples of affordable workspace in the area that can contribute to local priorities include providers like the health campus next door, to support the SC1 Health cluster on the doorstep, as well as providers of culture, and we have previously indicated the potential to relocate the Florence Nightingale Museum to this area.

Transport, servicing and network management

14. Points 15-18 below relate to the specific proposals of this scheme, which are constrained within the existing road layout. However, this application (and others nearby) provides an opportunity to agree a final plan for how St Thomas Street functions, which could offer more options for this development and others. Southwark Council is also about to embark on its Streets for People Delivery Plan for this area (Zone B), which provides further impetus. As part of our commitment to be an exemplar area for walking and cycling, TLB has a long-term ambition to enable a contraflow cycle lane servicing the whole street. The current arrangement by TfL with widened footway on the south side is temporary following the pandemic, and could be re-considered to better enable walking, cycling, waste and servicing on St Thomas Street, away from the constraints of King's Head Yard. We realise that this is a complex issue and neighbouring sites have similar issues. We would suggest a working group to look closely at this as details of the scheme develop (a similar working group has been created with developers on neighbouring Snowsfields, which could be expanded to include this scheme, and TfL has a local construction working group). Perhaps there are options to build flexibility into the development (allowing future access from the front) if decisions cannot be made in time, to future-proof the building.

Servicing

15. We welcome the intended reduction in the number of servicing vehicles, despite the increased floor space, that has been secured through use of off-site consolidation. The plans are based on using Kings Head Yard as a main servicing route, requiring continued sharing of a confined space with pedestrians and cyclists. The success will be dependent on the details of the agreement with an off-site consolidation provider, for example the type and frequency of vehicles, time of day (avoiding peak hours), and the extent to which all the building's servicing can be managed in this way. We welcome the proposed cargo bike promotion strategy and the intention to prioritise and incentivise cargo bike use. We have created a cargo bike <u>service directory</u> to support businesses with this.

16. We have some concerns about the proposal for a loading bay across the pavement of St Thomas St to be used for waste collection. While it appears there will be only 10 collections a week, this could create conflicts with the other users of this busy pedestrian route and a location off the pavement would be preferable. This will require strict management and should be done at periods that are not busy.

Cycle access and parking

17. Cyclists entering and leaving Kings Head Yard from Borough High Street risk being in conflict with heavy footfall and vehicular traffic at peak times, as well as vehicles using the narrow Yard. However, the proposed arrangement matches the existing arrangement for the



building. An alternative access to secure cycle parking off St Thomas Street could be preferable (see 14).

18. The plans do not appear to make provision for docked and dockless cycle hire. This would be in addition to the 16 on-street short stay cycle stands. Managing an increasing number of dockless bikes is becoming an increasing priority, perhaps even above internal cycle storage – though policy has not kept pace with these evolving needs.

Sustainability, ESG and building credentials

19. The credentials of a building have become increasingly important, particularly in relation to sustainability. We welcome the range of measures and commitments relating to the development's sustainability performance. Given the vision and aspirations for the site, and the environmental credentials of the developer, we believe it should achieve BREEAM Outstanding. TLB has developed a <u>Decarbonisation Charter</u> with businesses aligned to the Council climate declaration, and buildings like this will make a significant contribution to the aim for a business district that is recognised as taking leadership on sustainability. It will also meet the changing expectations of future tenants.

20. On top of BREEAM, other certification that has been attractive to new tenants include:

- WELL Platinum
- air quality positive
- EPC rating A
- <u>SEAM accreditation</u> and <u>Living Wage Building accreditation</u> to secure an appropriate level of social impact.

21. The development could form part of a district heat network whose feasibility is currently being investigated in the area. Of course this will depend on timing, and we welcome continuing the conversations that have already taken place.

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