

5 November 2014

David Smith
Planning Regeneration and Enterprise
Development Manager
London Borough of Lambeth
Phoenix House
10 Wandsworth Road
London
SW8 2LL



Your ref: 14/02792/FUL

Dear David

PLANNING APPLICATION FOR PROPOSED GARDEN BRIDGE

1) CSCB's interest in the proposals

As you are aware, Coin Street Community Builders (CSCB) is freehold owner of much of the 13 acre site surrounding the proposed south landing of the garden bridge and has a long lease under which it is responsible for the management and maintenance of the south bank riverside walkway (between the National Theatre and Sea Containers House) and of Bernie Spain Gardens.

CSCB has a specific interest in the well-being and success of its commercial tenants and residents living in Coin Street housing co-operatives. It is also responsible for the health and safety and enjoyment of visitors to the Coin Street site and its public realm.

CSCB is long leaseholder of the site proposed for the 'south landing building', the freehold of which lies with the London Borough of Lambeth.

2) Consideration of the proposals

CSCB received a presentation in 2013 of the initial design proposals and the aspirations underpinning the garden bridge. Members welcomed the proposed increase in green public realm and improved pedestrian links with the north bank, and resolved in principle to support this imaginative scheme. Since that time we have had regular meetings with TfL, the bridge designers, and – more recently – representatives of the Garden Bridge Trust. Since April 2014 we have hosted a series of meetings where representatives of TfL and the Garden Bridge Trust can explain their proposals to local landowners and Lambeth officers and respond to their concerns. Perhaps understandably, we have focused on management, maintenance and operational issues at a time when the Trust was primarily focused on costs and fundraising. Together with South Bank Employers' Group and with input from the London Eye, we produced the attached 'Garden Bridge and South Bank impact' report which set out management principles and proposals for the garden bridge itself and for that part of the surrounding area which will be most impacted by increased footfall and by the security, cleansing, maintenance and management issues that go with it. The report has been generally welcomed by Lambeth officers and by representatives of TfL and the Garden Bridge Trust.

If the present application is approved subject to the conditions recommended by Lambeth officers, we will continue to work with the Garden Bridge Trust to ensure that the project brings the promised benefits whilst mitigating its less welcome impacts.

3) Our conclusions in respect of the current application

As will be obvious to Lambeth officers and members of the Planning Applications Committee, there will be great benefits to London and the locality in creating this new, landscaped, pedestrian link with the north bank. It will create new views of London and of the River Thames, it will make it easier and more enjoyable to walk around the heart of London, and it has the potential – as does any such substantial investment – to create a range of employment opportunities. It will undoubtedly be an 'attraction' and such attractions must be effectively managed if they are not to become a liability for the neighbourhood in which they are based. Such management needs significant on-going resources, effectively marshalled, and integrated with the efforts of others with responsibility for public realm in the neighbourhood. Our support for the garden bridge is based on the assumption that satisfactory agreements can be reached in respect of:

- a construction management plan and programme;
- the detailed design of, and materials utilised in, the south landing building and on the adjacent riverside walkway;
- uses within the south landing building;
- management and maintenance of the bridge and of the south landing building;
- pedestrian and vehicular access and servicing, including waste disposal;
- arrangements for the allocation of the proposed contributions to the additional costs of managing and maintaining public realm in the vicinity of the bridge; and
- commitments to collaborate in respect of neighbouring land and security.

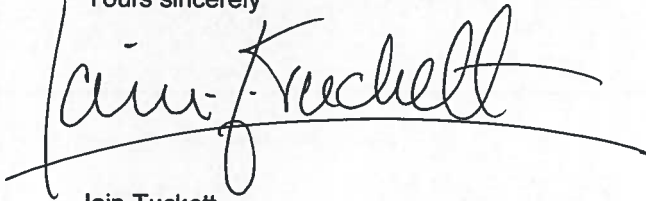
We have delayed submitting our formal response to the application in the hope that progress in reaching satisfactory agreements would have been more advanced by the time the application came before the Planning Applications Committee. Nevertheless we have been encouraged by recent progress and believe that Lambeth officer recommendations in the PAC report are a sensible way of proceeding subject to the following comments:

- i. We agree with officers (PAC report 7.4.34 and 35) that servicing from Upper Ground as proposed is unlikely to work and that there is a need to explore the ability of the north bank – with its adjacent roads – to accommodate more of these requirements. In particular ***current proposals for the storage, trolleying and removal of waste from Upper Ground would be unworkable and alternatives should be agreed with Westminster before the application is determined.***
- ii. The Framework Travel Plan makes reference to 20 new cycle parking spaces at the south landing building (PAC report 7.4.26). For 20 years, with the agreement of Sustrans and Lambeth, the strategy has been to discourage cycling along this stretch of riverside walkway and to place cycle stands on Upper Ground. It would be wrong to undermine this strategy now, particularly in the context of greater pedestrian use of the riverside walkway. ***Any cycle parking in association with the garden bridge should be provided on the north bank adjacent to the proposed east-west cycle super-highway. That location should be signposted in any promotional materials/website.***
- iii. Use of Bernie Spain Gardens by construction vehicles would be unacceptable as would complete closure of the riverside walkway. The Applicant's preferred construction option currently avoids both. Officers state (PAC 7.5.13) that a full construction logistics plan cannot be worked up until such time as a contractor has been appointed. That may be the case but it is for the Planning Applications Committee to set the boundaries within which the contractor must work. ***We respectfully request that members add a condition preventing the complete closure of the riverside walkway and the use of Bernie Spain Gardens by garden bridge construction vehicles.***
- iv. Officers note the loss of 27 trees on the South Bank and, for CSCB, the loss of the 'avenue' of blue and white LED-lit trees is a significant downside to the scheme. We understand the logic of the design of the landing building and do not see how the existing 'avenue' could be retained if the garden bridge was built. However ***we endorse the suggestion by Lambeth Parks and Open Spaces (PAC report 5.3.5) that the LPA explores the potential for the scheme to provide replacement trees in the vicinity of the landing building. We respectfully request that members support this suggestion.*** The blue and white LED lighting is an unique feature of this stretch of the

- riverside and replacement of this characteristic feature of the conservation area should be part of any arrangement.
- v. The application proposes reinstating the current 'bound gravel' and granite sett surface of the riverside walkway post construction. We believe such a surface will wear too quickly with significantly increased pedestrian, vehicle and trolley movements following the opening of the garden bridge. ***We respectfully request that an appropriately robust granite surface is applied between the existing more robust treatments north of the IBM building and on the 'observation area'.***
 - vi. As the organisation most likely to have to cope with the off-bridge impacts of this proposed new link across the Thames, CSCB respectfully requests that it is fully involved in reviewing: the Operations Management Plan; the Operation and Maintenance Business Plan; the allocation of the annual contribution towards managing off-site impacts (which must be index-linked); the Hostile Vehicle Management Strategy; the Construction Logistics Plan, Method of Construction Statement, and Construction Noise and Vibration Strategy; the Pedestrian/Cyclist Management Plan; the Tree Protection Plan and Arboricultural Method Statement; detailed proposals for the design and use of the South Landing Building; the Delivery and Servicing Plan; the Waste Management Plan; the Lighting Strategy; the Signage and Wayfinding Strategy; the Evacuation Plan; the Coach and Taxi Management Plan; cycle parking proposals; the Education and Interpretation Strategy; the Flood Risk Monitoring Plan; the report on the impact of piling on the riverside wall; the Counter Terrorism Strategy and Crime Prevention Statement; the Dredging Method Statement; and the Contamination Risks Assessment and Plan.

Subject to the above comments, we support the conclusions and recommendations made by officers in their report to the Planning Applications Committee. We also fully endorse the comments made by South Bank Employers' Group in respect of the application.

Yours sincerely



Iain Tuckett
Group Director

cc: Iain Rhind, Nathaniel Lichfield & Partners Ltd
Bee Emmott, Garden Bridge Trust
Richard De Cani, Transport for London
Councillors Kevin Craig, Ben Kind and Jennifer Mosley
Kate Hoey, MP

Enc: Garden Bridge and South Bank Impact report
SBEG comments on the application