



Historic England

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Ms Victoria Crosby
SOUTHWARK COUNCIL
LONDON
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Direct Dial: 020 7973 3763

Our ref: L01028198
14 February 2019

Dear Ms Crosby

Arrangements for Handling Heritage Applications Direction 2015

NEW CITY COURT, 4-26 ST THOMAS STREET LONDON SE1 9RS
Application No. SE1 9RS

Thank you for your letter of 25 January 2019 regarding the above application for listed building consent.

Historic England Advice

Summary of Historic England's Position

Historic England broadly welcomes the proposed restoration works to the listed terrace, and is happy to provide authorisation for the listed building consent application. However, we have major concerns with the wider redevelopment of the New City Court site which is subject to planning permission (ref: 18/AP/4039). We will be commenting separately on that application.

Significance

4-16 St Thomas Street is a Grade II listed former-residential terrace located within the Borough High Street Conservation Area. The listed terrace dates from the early 19th century and appears relatively unaltered in views along St Thomas Street. Internally and to the rear, however, the terrace has been extensively altered as a result of its amalgamation with the neighbouring 1980s office building known as New City Court. Whilst some party walls and staircases survive, including one fine cantilevered staircase at no.14, much of the plan form and features of interest have been lost.

Impact of the Proposed Development

These proposals seek to remove the 1980s interventions and reinstate much of the lost historic plan of the terrace and many features of interest based on surviving evidence and the research that has been undertaken as set out in the submitted Heritage Statement (KM Heritage, November 2018). This includes the reinstatement of lost chimneys, ironwork, and the reopening of coal vaults and a blocked up passageway between nos. 8 and 10.



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New interventions include the installation of shopfronts to the rear elevation of the terrace which will be accessible via a new public square which is subject to planning permission.

Historic England's Position

Historic England has been involved in pre-application discussions regarding these proposals as part of the wider plans for the New City Court site. We are pleased to see that opportunities are being taken to 'reveal and enhance' the significance of the listed terrace and improve its appearance within the Borough High Street Conservation Area - principles that lie at the heart of the heritage policies and legislation contained within the National Planning Policy Framework (NPPF, July 2019) and Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).

Whilst we have no objection in principle to incorporating shopfronts to the rear, particularly in light of the poor condition of the rear elevations, we disagree with the conclusion of the Heritage Statement that "there will be no disruption to the hierarchy or overall typological characteristics of the listed building arising from this measure" (Para 2.13, p10). The implication from this statement is that no harm would result from the installation of shopfronts to the rear.

Terraced houses are fundamentally characterised by the hierarchy of their plan form, with the front elevation always providing the principal point of entry. Historically, domestic properties such as terraced houses were often adapted to accommodate fixed shops. They were almost always located at the most visible part of the exterior to the passing public, usually the street frontage. It is *highly* unusual for shopfronts to be accommodated to the rear of domestic properties.

Our view remains that the proposed rear shopfronts would be at odds with the terraced house typology, relegating the importance of its street frontage and distorting the legibility of the plan form and circulation of spaces. The design of the proposed shopfronts, whilst seemingly high quality and attractive, possess traditional characteristics that could mislead the public into believing that they are historic and part of the morphology of the terrace and conservation area.

We therefore consider that their inclusion prevents a truly scholarly and heritage-led restoration of the listed terrace from being delivered, and that a small degree of harm to the listed terrace and conservation area would result from this specific element of the scheme. However, we equally recognise that there are significant heritage benefits in reinstating much of the historic terrace plan form, which should more than outweigh the harm we have identified (as per Paragraph 196 of the NPPF).

Recommendation

Historic England is broadly supportive of the proposed restoration works to the listed terrace, however we would urge your Council to address the advice set out in this



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letter in determining the application. We also strongly recommend that you seek comments from your Design and Conservation colleagues, and archaeologist. They will be able to advise on relevant conditions should your Council be minded to approve the application, which should include samples of new materials and cleaning trials to the external brickwork.

We have drafted the necessary letter of authorisation for your Authority to determine the application as you see fit and have referred this to the National Planning Casework Unit (NPCU) (copy attached). You will be able to issue a formal decision once the NPCU have returned the letter of authorisation to you, unless the Secretary of State directs the application to be referred to them.

Please note, however, that **these comments only relate to the refurbishment of the Grade II listed terrace** and do not take into account the wider proposals for the New City Court site subject to application 18/AP/4039. Historic England raised major objections to these emerging proposals at pre-application stage, particularly regarding the scale and massing of the proposed tower development and its widespread impact on the historic environment. We also raised concerns regarding the loss of the Victorian elements of Kings Head Yard, and the dismantling and relocating of Keats House. We will provide a response to your consultation on that application in the very near future (our ref: P01028272), taking into consideration the benefits associated with the works subject to listed building consent.

Yours sincerely

Alasdair Young

Inspector of Historic Buildings and Areas

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