



Application: Redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels) of a maximum height of 108.0m AOD, restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation and reinstatement of the historic façade on a proposed building, to provide 46,851sqm GEA of Class E(g)(i) office floorspace, 360sqm GEA flexible office E(g)(i)/retail E(a) floorspace, 592sqm GEA Class E(b) restaurant/café floorspace and a public rooftop garden, and 5,190sqm GEA of affordable workspace within the Georgian terrace, Keats House and part of the tower, associated public realm and highways improvements, provision for a new access to the Borough High Street entrance to the Underground Station, cycling parking, car parking, service, refuse and plant areas, and all ancillary or associated works.

LPA ID: 21/AP/1364

Address: New City Court 4-26 St Thomas Street London Southwark SE1 9RS

Dear Ms Crosby,

Thank you for consulting the Georgian Group on this application for Planning Permission. On the basis of the information available to date, the Group forwards the following comments to assist your Local Authority in determining this application.

The significance of the designated heritage assets on the site and within the vicinity has been set out by other parties, so their importance will not be repeated here. The Georgian Group's statutory remit is 1700-1840 so only those buildings that fall within this time frame will be alluded to within this letter. This does not mean that no harm will be caused to the designated heritage assets that do not fall within this time frame.

Historic England have set out those heritage assets which would be harmed by the proposed development, with those of particular concern to the Group being Guy's Hospital (grade II\*), St Paul's Cathedral (Grade I) and the Borough High Street Conservation Area. The Groups supports the observations set out by HE.



The proposed 26 storey tower would cause significant harm to firstly, the setting of Guy's Hospital the South and West ranges which can be viewed with a clear skyline behind from St Thomas Street. The protected vista towards St Paul's Cathedral from Kenwood Gazebo would be harmed due to the impact the new building would have on the ability to appreciate the landmark status of St Paul's. Finally, the Borough High Street Conservation Area due to the inappropriate scale of the new building in relation to the established height along the high street.

In its current form the proposed application fails to meet the requirements set out in paragraph 193, 194, and 196 of the National Planning Policy Framework. Due to these reasons, the Group recommends your Local Authority refuse Planning Permission.

The Group would like to remind your local authority of its obligations in line with section 66 (1) and 72 (1) of the Planning (Listed Building and Conservation Area) Act 1990. Within the Act, it states that special regard should be given to the desirability of preserving a building or its setting; and in reference to conservation areas (section 72), that special attention should be paid to the desirability of preserving or enhancing the character or appearance of the conservation area.

Your Authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely,