

Victoria Crosby
Planning Division
London Borough of Southwark
160 Tooley Street
London
SE1P 5LX

Your reference: 21/AP/1364 &
21/AP/1361
Our reference: 166101



25th June 2021

Dear Ms Crosby,

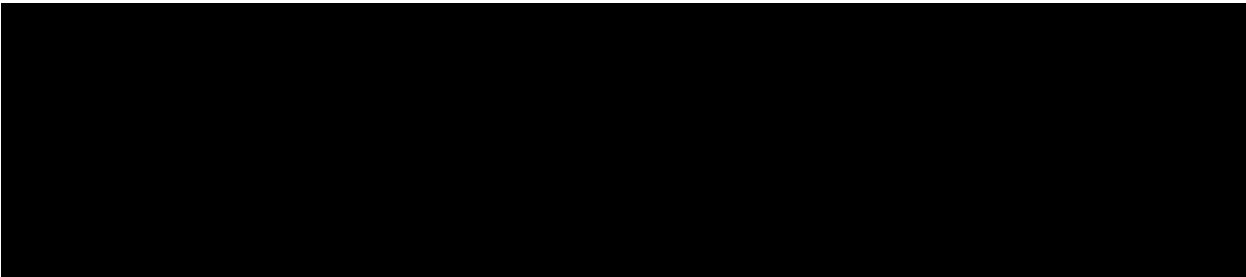
RE: New City Court, 4-26 St Thomas Street; redevelopment to include demolition of the 1980s office buildings and erection of a 26-storey building (plus mezzanine and two basement levels), restoration and refurbishment of the listed terrace (nos. 4-16 St Thomas Street), and redevelopment of Keats House (nos. 24-26 St Thomas Street) with removal, relocation, and reinstatement of the historic façade on a proposed building

Thank you for consulting us on this scheme which was discussed by our Southern Buildings Committee. We **object** to the application on the grounds that it would cause unjustifiable harm to the conservation area, and our comments are outlined below.

Significance and Harm

The Borough High Street Conservation Area is characterised by a diverse range of building types and styles, from orderly classical frontages on St Thomas Street, to the long, narrow, and handsome building façades on Borough High Street. Buildings are usually 3 or 4 storeys in height, whilst the urban fabric is tightly woven with numerous alleyways connecting through to buildings and yards. These are not only characterful features but a tangible reflection of Borough's historic development as an area servicing the City of London with coaching inns, brewing and butchery etc. It is imperative that as London continues to develop as a city, elements which make areas such as this unique, are protected.

A previous application was submitted for the redevelopment of the site. Whilst the proposed height of the building has been reduced by 10 storeys, 26 storeys continues to be a wholly inappropriate height for the context. It would overshadow listed and unlisted buildings in an area largely characterised by 3 & 4 storey buildings, and be completely at odds with centuries of development. The omnipresence of the proposed development would moreover disrupt low-lying undulating roof lines and have an adverse effect on a number of key viewpoints within and outside the conservation area. The harm which the proposed buildings would have on the Borough High Street Conservation Area would be significant and set a further precedent for tall buildings which could end up obliterating the character of the area.



We are moreover concerned by the impact the development would have on King's Head Yard. This is currently a bright and small open space within the tightly woven urban fabric of Borough High Street Conservation Area. The yard also contains the Grade II listed King's Head pub, and the facades of the hop sampling warehouses, which continue to form an important part of the pub's setting. Despite being rebuilt, these facades remain largely authentic, and through their historic association with the brewing industry, continue to contribute towards the character of the conservation area. Their demolition would therefore have a negative impact on two designated heritage assets: the pub and the wider conservation area, and should be strongly resisted. This harm would be increased by the base of the proposed structure which appears to bear no relation to the existing character of the Yard, or the wider area. The scale of the proposed development would remove the current roof lines and reduce the yard to a dark, windy and corporate foyer space, forever disconnecting King's head Yard from the significance of its early origins.

Policy

The Conservation Area appraisal notes that new design should observe the scale of earlier buildings, and that "overall heights of buildings and their position on the street need also to conform to the established street "envelope"." The proposed scheme not only fails to adhere to these stipulations but disregards them so completely that the negative impact on the surrounding conservation area would be significant. Under paragraph 194 of the NPPF, any harm to designated heritage assets, should require "clear and convincing justification". However, as adequate justification for this level of harm has not been provided, the scheme should be viewed not only inappropriate, but unacceptable.

This is a precious piece of townscape as recognised by the designation of the Borough High Street Conservation Area. The development, if permitted, would make a mockery of protection afforded to conservation areas and we urge you to refuse consent.

I would be grateful if you could inform me of your decision in due course.

Yours sincerely,

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