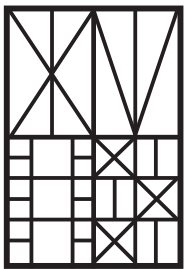


New City Court 2018 Scheme / 2021 Scheme



Proof of Evidence of Peter Stewart
- Heritage and Townscape

June 2022



December 2018 Planning Application (*Appeal Reference: APP/A5840/W/22/3290473*)

December 2018 Listed Building Consent (*Appeal Reference: APP/A5840/Y/22/3290477*)

April 2021 Planning Application (*Appeal Reference: APP/A5840/W/22/3290483*)

April 2021 Listed Building Consent (*Appeal Reference: APP/A5840/Y/22/3290490*)

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1 Qualifications and experience

Peter Stewart
MA (Cantab) Dip Arch RIBA

- 1.1 My name is Peter Stewart. I am a registered architect and I practise as an independent expert adviser in architectural and planning matters, as a Board Director of townscape and heritage practice The Townscape Consultancy ('TTC') (formerly of Peter Stewart Consultancy ('PSC')).
- 1.2 I have a degree in architecture from the University of Cambridge and a postgraduate diploma in architecture from the Polytechnic of Central London (now the University of Westminster). I am a member of the Royal Institute of British Architects (RIBA).
- 1.3 Between 1982 and 1996 I was employed in a number of architectural practices in London and was involved in the design and construction of substantial commercial and residential projects in central and inner London and elsewhere, many of which were on sensitive sites.
- 1.4 In 1997 I was appointed Deputy Secretary of the Royal Fine Art Commission (RFAC), which was a non-statutory consultee in the planning process. In 1999 the RFAC was wound up by the Government and I joined the staff of the replacement body, the Commission for Architecture and the Built Environment (CABE). Until 2005 I was Director of CABE's design review programme, which offered expert advice on major development proposals. CABE (which has subsequently been absorbed into the Design Council) was a non-statutory consultee for significant projects in England.
- 1.5 My work at CABE involved me in advising on a wide range of projects, including many of the most significant projects in England during my time there. In many of these cases local authorities sought advice on questions of new architecture in historic contexts, and on the effects of tall buildings on the existing environment. My responsibilities included preparing CABE's case and representing CABE at a number of planning inquiries where these subjects were central to the issues considered.
- 1.6 I was the principal author of the original editions of a number of CABE publications, including Design Review, which sets out CABE's method for assessing projects, and was the lead author for CABE of the first edition of the national CABE / English Heritage Tall Buildings Guidance.
- 1.7 In 2005, I founded PSC, a specialist consultancy advising on architecture, urban design and planning. Most of the projects on which I advised involved questions of the relationship between substantial new buildings and sensitive settings. The consultancy's clients included, in the public and third sectors, CABE, English Heritage, Transport for London, University College London, the Tate Gallery, and the Home

Office; and in the private sector, British Land, Canary Wharf, Chelsfield Partners, Derwent London, Hammerson, Land Securities, London and Regional Properties, Qatari Diar and Great Portland Estates.

- 1.8 In October 2021, Peter Stewart Consultancy was acquired by TTC, a new townscape and heritage consultancy.
- 1.9 As a consultant, I have given evidence on architecture, townscape and conservation matters as an expert witness at 35 or so planning inquiries and hearings since 2005.
- 1.10 I am a member of the Design South East design review panel which operates across London, the South East and East of England. In the last fifteen years or so I have served in the following capacities:
 1. Member of the London Advisory Committee of English Heritage (now Historic England)
 2. Chair of the regional design review panel for the East Midlands
 3. Member of the Quality Review Panel of the London Legacy Development Corporation
- 1.11 In each case the role involves or involved the provision of independent expert advice to planning authorities about the effect of significant new development on sensitive contexts.
- 1.12 I have also served as Chair of the Planning Group of the RIBA, as a nationally elected council member of the RIBA, and as the Chair of a conservation area advisory committee in the London Borough of Hackney.
- 1.13 I have contributed essays and articles to the architectural and planning press, on a broad range of matters relating to my work at CABE and subsequently, including the relationship between new architecture and the historic environment, and the effect of tall buildings on their setting. I have spoken on these and related subjects at national and local conferences and seminars and have taught and lectured at universities and colleges. I have prepared and delivered training sessions on the relationship between new development and the historic environment for English Heritage. I have also prepared and delivered training in architecture and urban design for Urban Design London, and for council officers and planning committee members at a number of local authorities including the City Councils of Westminster, Newcastle, Nottingham, Cambridge and Norwich; and I have facilitated training sessions for several of the English regional design review panels. I have also contributed to training sessions for the Planning Inspectorate.

2 Introduction

- 2.1 This proof of evidence is submitted on behalf of the appellants, GPE (St Thomas Street) Limited, in connection with their appeal against the London Borough of Southwark's ('LBS') failure to determine two separate proposed schemes, both made up of a planning permission and listed building consent application in accordance with the statutory determination timescales for the redevelopment of New City Court, 4-26 St Thomas Street, London, SE1 9RS ('the Site').
- 2.2 PSC was appointed by Great Portland Estates ('GPE') in 2016 to provide advice on townscape and heritage considerations to inform the development of the project designs, and to provide a townscape, visual impact and built heritage assessment ('TVIBHA'), forming part of the Environmental Statement ('ES'), and a Heritage Statement ('HS') not forming part of the ES, to support the planning applications. The TVIBHA draws on the content and findings of the HS, and the KM Heritage report referred to below. The TVIBHA is in two sections, a townscape and visual impact assessment ('TVIA') and a built heritage assessment ('BHA').
- 2.3 KMHeritage was appointed to advise on the proposed work to the terrace of listed buildings on the Site, and provided a separate Heritage Assessment in support of the listed building consent application in respect of these buildings.
- 2.4 The first applications for planning permission and listed building consent ('the 2018 Scheme') were received by LBS on the 11 December 2018 (LBS Ref: 18/AP/4039 & 18/AP/4040). The listed building consent application was validated on 8 January 2019 and the planning application was validated on 22 January 2019.
- 2.5 Further applications for planning permission and listed building consent ('the 2021 Scheme') were received by LBS on 21 April 2021 (LBS Ref. 21/AP/1361 & 21/AP/1364), with the listed building consent application validated on 22 April 2021 and the planning application validated on 27 April 2021.
- 2.6 My evidence addresses issues of architecture, urban design, townscape and the historic environment. It addresses each scheme in turn; for each of the two schemes it sets out the following:
1. A description of the scheme
 2. An assessment in respect of the effect on townscape and views
 3. An assessment of the effect on the historic environment
 4. An account of the scheme in relation to relevant policy and guidance
 5. A commentary on objections the scheme
- 2.7 Appendix 1 to my proof of evidence provides an account of the character and appearance of the Site and the surrounding area. This study has informed the assessments in my evidence.

- 2.8 The evidence which I, Peter Stewart, have prepared and provide for this appeal in this written statement is true. The opinions expressed are my true and professional opinions.

Statements of Common Ground

- 2.9 The Statement of Common Ground - historic environment and the Statement of Common Ground - character and appearance will, once finalised, set out matters on these topics that are agreed between the Appellant, the London Borough of Southwark and Historic England.

London Bridge at the heart of a global city

- 2.10 I set out below a preamble to my evidence, which sets the Site and the 2018 and 2021 Schemes in the context of central London considered as the heart of a global city which continues to experience change and development.
- 2.11 The Southwark Local Plan characterises London Bridge as an internationally renowned and globally significant central London business district with a rich heritage of buildings and archaeology and one of the UK's busiest and fastest growing transport hubs.
- 2.12 I have witnessed the change that has taken place around London Bridge over the last 20 years or so. I took part in CABE's reviews of the developing designs for the Shard and helped prepare CABE's evidence for the public inquiry for that project. Since that time the Shard, the News Building and Shard Place have been completed, major new projects have been granted planning consent along the south side of St Thomas Street: Edge London Bridge at no.60; and Capital House at nos. 42-46 Weston Street. Planning applications have been submitted for major projects on the Colechurch House and New City Court sites.
- 2.13 The continuing development of the London Bridge area should in my view be seen as part of a bigger picture that has been subject to a substantial amount of significant new commercial development, often incorporating tall office and residential buildings, built and proposed in central London over the last 25 years or so, within the square mile of the City of London but also, given the demand for new office space and homes and the limited area of the Square Mile in areas that adjoin the City: to the north of the City in the Shoreditch area, and to the south of the City at London Bridge. As a result of the varied character of central London, and the density of development, all of these projects are close to listed buildings and conservation areas and have affected their settings. North of the City, several tall buildings have been granted planning consent within the South Shoreditch Conservation Area, and 50 metres or so

from the Site, Shard Place has been built with the Borough High Street Conservation Area ('CA').

- 2.14 The rich mix of historic buildings and areas juxtaposed with large modern development has become one of the defining characteristics of the central areas of a London which is now generally recognised as a global city (and categorised by the Globalization and World Cities Research Network as one of only two 'Alpha++' world cities, the other being New York).
- 2.15 The challenge for architects, developers and planning authorities is that the 2000+ year history of London and the richly layered cityscape that has resulted are clearly part of what has helped it to achieve that status. All involved are mindful that they should enhance and not undermine that status.
- 2.16 The last 20 years of development in central London have seen the Shard, the London Eye and the 'Gherkin' tower (the 30 St Mary Axe tower) in the City of London established as defining symbols of London in addition to its most famous historic buildings - the Houses of Parliament, the Tower of London and Tower Bridge. This combination of new and old is now an essential and admired aspect of the image of this world city, for Londoners and for visitors.
- 2.17 The Shard - the tallest building in western Europe - together with the renewal of London Bridge Station, the News Building and Shard Place have, as an aspect of the wider picture set out above, brought about a transformation of the London Bridge area, and this is set to continue. The pressures and considerations are similar to those in the City of London, which the area faces across the river.
- 2.18 All of the projects mentioned above, in London Bridge, the City and north of the City, have as noted above had a major effect on the settings of many listed buildings and conservation areas. Within the London Borough of Southwark, the Shard appears prominently in the backdrop of the Grade I listed Southwark Cathedral, and another project near Tate Modern, Neo Bankside, appears dramatically in the backdrop of listed almshouses - a complete contrast of scale and architecture which is a further example of the contrasts between new and old referred to above.

3 The 2018 Scheme

- 3.1 This section and the following sections 4 to 7 address the 2018 Scheme.
- 3.2 My assessment draws on the following documents submitted with the applications:
1. December 2018 Townscape Visual Impact and Built Heritage Assessment ('TVIBHA') undertaken by PSC [CDA.12];
 2. Heritage Statement ('HS') undertaken by PSC [CDA.18];
 3. Listed Building Heritage Statement undertaken by KMHeritage [CDA.22];
 4. December 2018 TVIBHA Views for On-Site Assessment undertaken by Millerhare [CDA.12];
 5. June 2020 Environmental Assessment Addendum undertaken by Waterman Infrastructure & Environment Limited, including the following appendices produced by PSC [CDA.57]:
 - a. Updated Figure 3-7 of the TVIBHA
 - b. TVIBHA Erratum Notice
 - c. Correspondence with LBS on the agreed viewpoints
 - d. TVIBHA Clarifications Part 1
 - e. TVIBHA Clarifications Part 2
 - f. TVIBHA Supplement
 - g. TVIBHA Addendum
 - h. TVIBHA Night Views Supplement [CDA.45]; and
 - i. June 2020 TVIBHA Cumulative Assessment Addendum undertaken by PSC .
- 3.3 My evidence should be read with the above documents and with the application drawings, the Design and Access Statement ('DAS') [CDA.06] submitted with the planning applications, and with evidence provided by others in support of these appeals.
- 3.4 The 2018 Scheme would provide:
1. Demolition of the existing 1980s buildings and alterations;
 2. Delivery of a 37-storey building (including ground, mezzanine and two storeys of plant at roof level) extending to 144m AOD, providing high quality office and retail floorspace;
 3. Introduction of retail floorspace at ground, lower ground and first floor level with active frontages along St Thomas Street;
 4. Provision of affordable workspace on upper floors of Georgian terrace and affordable retail space at ground floor/lower ground floor level of nos.4-6 St Thomas Street;

5. Provision of hub space at 21st and 22nd floor levels of office building providing auditorium and exhibition space for both office and wider commercial use;
6. Sympathetic restoration of listed buildings along St Thomas Street;
7. Reconstruction of Keats House as a standalone building with retention of existing façade;
8. Delivery of high quality and fully accessible public realm, providing enhanced connectivity through new public routes and a public square;
9. Delivery of an elevated double height public garden at fifth and sixth floor levels with a complementary café/restaurant area;
10. Creation of a new entrance to London Bridge Underground Station

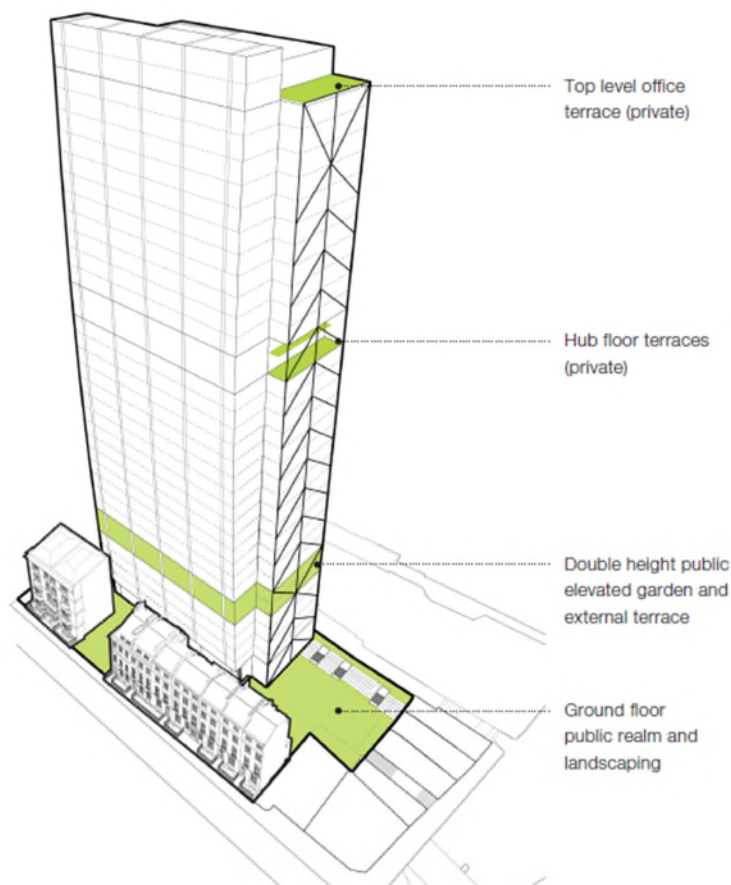


Fig 1. Overview of building form (Source: AHMM)

3.5 I and my colleagues at PSC were actively involved as advisors throughout the development of the design that was submitted in the 2018 applications. We attended internal meetings and pre-application meetings with LBS and consultees. We provided advice on townscape and heritage considerations relevant to the site and the scheme: most notably, effects on views and townscape character, and effects on the significance of heritage assets. Kevin Murphy of KM Heritage provided expert advice on the effects of the proposal on the fabric of the listed buildings on the Site.

Viewpoint locations and relevant heritage assets were discussed and agreed with LBS and consultees, and the scheme was modelled digitally in views from the outset, and on a continuing basis as the scheme developed, so that the effects could be tested and discussed with LBS. The TVIBHA and the HS were informed by pre application discussions.

3.6 The aspects of the design that were most important to our consideration of and advice on the developing scheme were:

1. The form, height, design and appearance of the main tower element of the 2018 scheme
2. The appearance of the tower in identified views
3. The public realm design, the pattern of public routes and spaces on the Site, and the effect on Kings Head Yard
4. The effect of the project considered as a whole on the character and appearance of the Borough High Street CA
5. The effect of the proposal on the listed buildings on Site
6. The effect of the project considered as a whole on the settings of other identified heritage assets.

3.7 The tower building has been designed to respond to these considerations. The principal aims were to maximise the public realm on site by reducing the footprint of the building, and to refine the appearance of the tower at the top and bottom. The form was developed through the introduction of a curve on the north facade to provide sufficient “breathing space” and sky visibility to the rear of the listed Georgian terraces. Adjustments were also made in the massing at the corners such that a smaller width and length would be read to make the building appear slender in views. The roof profile of the tower was further refined through stepped levels and the layering of elevations to create an interesting play of light and shadow.

3.8 The tower’s façades have been designed in part to respond to the pattern of subdivisions found across the adjacent Georgian/Victorian grain of St Thomas St and the medieval grain of Borough High Street through the articulation of the building massing with these interlocking grains.

3.9 Horizontal metal spandrels have been introduced following studies of the historical context and the architecture of the original coaching inns. The tower’s elevations similarly feature solid horizontal panels covering the floor plates.

3.10 On east and west façades there is an exoskeleton external structure which makes reference to the visual language of the local Victorian railway bridges.

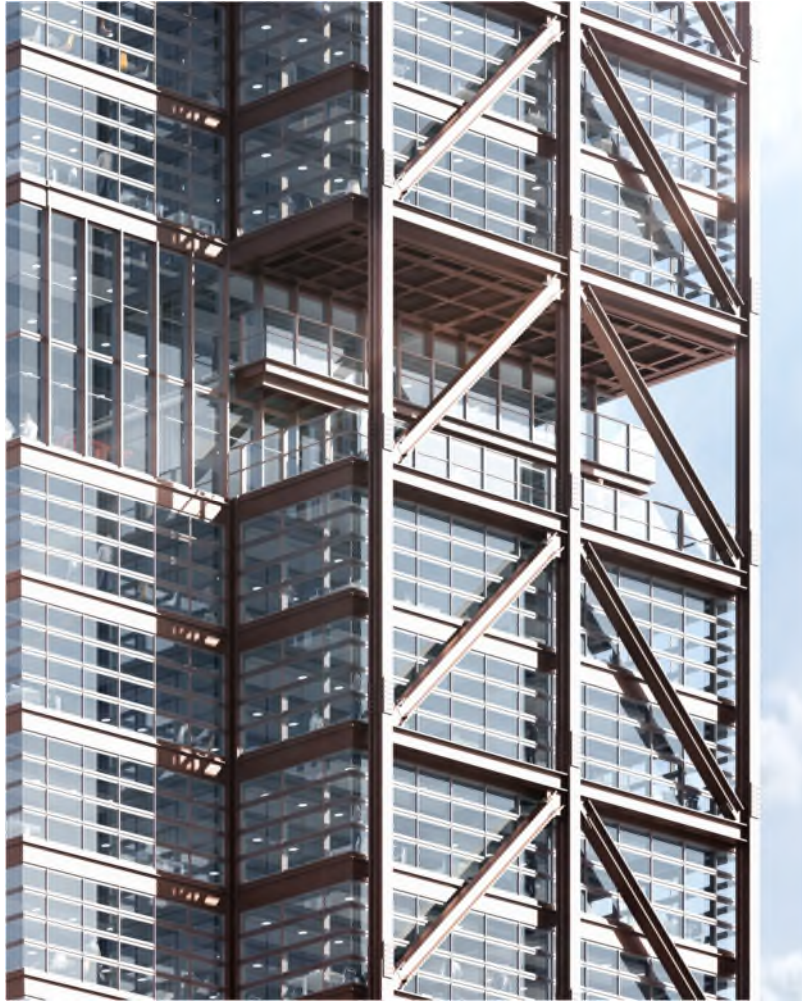


Fig 2. External structure (Source: AHMM)

- 3.11 Keats House is returned to a standalone building of a more traditional and appropriate form and appearance by removing the unsympathetic and jarring 1980s New City Court building.
- 3.12 The existing grade II listed Georgian terrace on the Site, at nos. 4-8 and 12-16 St Thomas Street, is currently connected to the 1980s building at two points and has lost its plan clarity and original circulation logic. The removal of the intrusive 1980s bolt-on volumes and the creation of breathing space with permeable public north-south routes through to the backs provides the opportunity to undo damage and enjoy previously inaccessible elevations. The proposals involve a substantial recovery of plan form lost in the 1980s.
- 3.13 The 2018 Scheme seeks to maximise the amount of public open space provided on the Site, providing spaces of different scales and identities. They are categorised as follows: 'Square', 'Passages' and 'Yards'.
- 3.14 The 2018 Scheme offers two public squares in strategic locations where pedestrian flow rates into and out of the Site are envisaged to be the highest.

- 3.15 St Thomas Street Square is created in the space released by the demolition of the 1980s entrance building to New City Court on St Thomas Street, between the Site's Georgian terrace and Keats House. It would be activated by the new retail offerings provided in both buildings and provide external seating on raised platforms.
- 3.16 King's Head Square, proposed for the western end of the Site, to the east of properties fronting Borough High Street and the south of the Site's Georgian terrace, would provide the largest public space on the Site. It would incorporate south-facing seating with a view of the Old King's Head Public House. The new exit proposed for the London Bridge London Underground Limited (LUL) station to the west will also deliver people into this space.
- 3.17 As noted above, an original passage through the Georgian townhouses will be re-opened to provide better connections into the Site and restore another element of the historic grain of the Site.
- 3.18 The 2018 Scheme introduces two new routes to the site, named New Yard and East Yard. The New Yard would provide a retail streetscape at the rear of the Georgian townhouse terraces. The East Yard would provide a pedestrian connection between King's Head Yard and the hospital accommodation to the south and Keats House retail and St Thomas Street to the north.
- 3.19 The reception for the proposed New City Court tower is envisaged as an extended part of the public realm. The elevated public garden at Levels 5 and 6 is intended to be fully accessible.

4 The 2018 Scheme: assessment of scheme design and effects on townscape and views

The Scheme Design

- 4.1 The Site is located at a point of landmark significance, being situated at the junction of two important historic routes, where one finds a concentration of commercial activity a short distance from one of London's most significant transport hubs and an expanding grouping of large scale and tall buildings (see aerial view at Fig. 30 in Simon Allford's evidence). The project would come forward in an immediate context that includes both historic buildings and areas, and major new commercial and transport developments and associated public realm improvements, referred to above, that have already transformed the settings of those historic buildings, and the character of London Bridge more generally. The 2018 Scheme will be read as part of a cluster of major tall and large buildings all lying within 100-150m of the Site: the Shard, Shard Place, the Place and the Guy's Hospital Tower.
- 4.2 The 2018 Scheme would continue the successful story of the regeneration of London Bridge, as envisaged and encouraged by the recently adopted Southwark Plan. The scheme would replace a building that contributes nothing positive to the conservation area or the local townscape with a major new building that transforms the Site and opens it up to public access at ground level.



Fig 3. Ground plane plan: public realm (Source: AHMM)

- 4.3 The arrangement of built form and open spaces across the Site would have a strong sense of order and logic. It would open up a Site that is currently cut off from its surroundings, inviting the public to use a wide range of external and internal

amenities intended to widen both the appeal, and appreciation of, the Borough High Street Conservation Area. The location of new build development at the east end of the Site maximises permeability across the Site through the creation of linked public spaces and routes that would be fully integrated into the surrounding street network. The character of these new spaces and links also takes inspiration from their historic context. They should prove a vital and viable part of Borough, activated day and night by a constant pedestrian flow, supported by the new entrance provided for the London Underground Station. The contribution to the public life of the Borough area would be an enduring benefit of the 2018 Scheme.

- 4.4 In respect of urban design considerations, the case for development at the scale proposed for the Site is a strong one. The 2018 Scheme's office tower, which would be comparable in height to Guy's Hospital Tower, would mark the western end point of a run of tall buildings situated on or close to St Thomas Street, including Shard Place, The Shard and Guy's Hospital Tower, together with further projects proposed to their east. Development of the height proposed would also help to promote the Site's new public amenities and functions in area. The difference in scale between the tall building and the historic buildings found in this area would be consistent with the large differences in scale which are already evident within this part of the conservation area, contrasts that provide striking juxtapositions and views, adding richness to the area's character and making it memorable as a place.
- 4.5 The office tower would have a distinctive form and profile, and highly ordered elevations, with depth and articulation. The manner in which the office building's form, massing and elevations would be articulated both vertically and horizontally would successfully break down its scale. Its expression also makes direct references to the Victorian railway bridges found in this part of the conservation area. The top of the building would have a distinctively modelled appearance, concealing roof plant from view. The DAS sets out a thorough and carefully considered design process that has balanced, as any good design must, the requirements of the brief with the requirement to respond appropriately to the particular characteristics of the Site and its setting. The result is a building that is a work of architecture of high quality in its own right that relates successfully to its immediate and wider context.

The effect of the scheme on views

- 4.6 The TVIA provides 'before and after' view images from 67 viewpoint locations agreed with LBS and consultees including Historic England, together with a narrative and assessment for each view as existing, as proposed, and as proposed when considered in combination with other relevant projects that have been submitted or consented but not yet built ('cumulative' schemes) [CDA.12].
- 4.7 In the long range views illustrated in the TVIA [CDA.12], including London View Management Framework ('LVMF') views, the 2018 Scheme would add coherently to

the grouping of large scale and tall buildings at London Bridge, in those views where it will be seen to any noticeable extent (see TVIA views 1-10) . Where visible in conjunction with St Paul's Cathedral, the 2018 Scheme would not affect one's ability to perceive and appreciate that landmark from those locations.

- 4.8 In medium range views to the south/south-west of the Site, opportunities to view the 2018 Scheme would be limited to the few larger open spaces located in the Bermondsey and Newington areas and those streets aligned on the Site (e.g TVIA views 37-40). Where seen, it would be in conjunction with existing tall development at London Bridge, particularly The Shard and Guy's Hospital Tower – and therefore, would not come as a surprise to the viewer.
- 4.9 In medium range views from points to the north of the Site, from the bridges and north bank of the Thames (e.g. TVIA views 12, 14, 22, 24) , the 2018 Scheme would be recognised as forming part of the grouping of large scale and tall buildings at London Bridge, the main focus of which would remain The Shard. The 2018 Scheme's refined form and massing and high-quality architecture would be seen to complement that of The Shard, Shard Place and The Place.



Fig 4. Shard Place and The Place, seen from Guy's Hospital Courtyard (Source: TTC)

- 4.10 In medium to close range views from the Borough area (e.g. TVIA views 39-57), the 2018 Scheme would be a noticeable, and sometimes prominent, addition to the local townscape. It would form a dramatic contrast with the buildings on surrounding streets, such as St Thomas Street and Borough High Street, in a manner comparable with the relationship between the nearby grouping of large scale and tall buildings

located at London Bridge and the low scale buildings in their immediate vicinity. The closest of these large buildings to the Site, Shard Place, lies within the same conservation area as the Site. This contrast is an established aspect of the part of the conservation area within which the Site lies. The high quality architecture of the office tower, which has been designed to reflect particular characteristics of the conservation area, such as its railway bridges, would be a positive aspect of medium to close range views.



Fig 5. View from Montague Close (TVIA view 56.4)

- 4.11 As noted above, it is to be expected that a building of the scale proposed for a Site that lies within a conservation area that features a number of highly graded listed buildings would have a number of significant effects on the local townscape and views, as has been the case with all the recent tall building projects in central London. The TVIBHA [CDA.12] notes a small number of those effects on views that are identified as adverse, including views of Southwark Cathedral, Guy's Hospital, Borough High Street and St Thomas Street.
- 4.12 In respect of visual impacts identified in the TVIA, there would be beneficial effects on a number of views in the local and wider townscape (TVIA views 12, 14, 22, 24, 25, 26, 38, 45, 51, 52, and 57) – not least the marking of a point of townscape significance at the confluence of two historic main roads, and the strengthening of the London Bridge gateway to Southwark through the consolidation of the existing grouping of tall buildings at London Bridge. In addition, there are significant positive experiential aspects of the 2018 Scheme in respect of improvements to local pedestrian routes, the provision of new public realm and elevated views of the conservation area.

- 4.13 In the few instances where significant adverse effects have been identified in the TVIA (views 43, 44, 47, 49, 50, 56.2, 56.3), it is not considered that the effect of the 2018 Scheme would be unacceptable. Rather, it is an acknowledgement that the quality of the view affected – which may or may not have a specific pictorial quality today – would be somewhat diminished as a result of the introduction of the 2018 Scheme, but not necessarily to an unacceptable degree. In coming to the conclusion about the overall effect of the 2018 Scheme, adverse effects should in any case be balanced against the substantial beneficial effects the 2018 Scheme would bring.
- 4.14 It is increasingly recognised that townscape and views are experienced dynamically, and that the 'before and after' view photography provided in support of planning applications should be thought of as a no more than guide to how townscape and views will be experienced in real life. A photorealistic verified view image shows you what you would get if you took a photograph of the finished project from the same place at the same time with the same lens - a guide to what you would experience on site, but no more than that. This was recognised in the Inspector's Report in the 'Chiswick Curve' planning inquiry (APP/F5540/W/17/3180962 & APP/F5540/Z/17/3173208) in which (at paragraph 12.3) the Inspector noted that any visual representation should be approached with caution and that 'It is important to remember that illustrations of this type are only a guide for the eventual decision-maker; they are there to act as an aide-memoire, and to assist site visits.'
- 4.15 In the case of the 2018 Scheme, many of the views, for example views of Southwark Cathedral, views along Borough High Street and St Thomas Street, are of representative locations along a route in which the visual relationship between the proposed building and the existing townscape would be continuously changing as you walk along it. As you would see the building from a distance, you would take in its full height, but from points closer to it, you would see the lower parts but would have to raise your head to look up at the top - something that cannot sensibly be represented in a still photograph. As you look around you, you would see other tall buildings, present in your wider field of view, and contributing to your understanding of the character of the townscape, but outside the borders of a photograph.
- 4.16 In pre-application discussions with planning officers of LBS and with Historic England (HE), the effect of the proposals on the setting of Southwark Cathedral was the subject of considerable discussion with regard to the acceptability or otherwise of the height and scale of building proposed, and as far as the visual impact of the 2018 Scheme was concerned, it was this area that received more attention than any other. Although the HE guidance on setting [CDF.04] refers to the importance of considerations other than visual impact, it is nearly always the 'before and after' view images from agreed locations that are the focus of attention and discussion, and that was the case in the discussions about the 2018 Scheme.

- 4.17 The Site is about 100m from the cathedral, but separated from it by intervening buildings, busy main roads, two substantial rail viaducts, and a change of level, so it feels more separate than that distance would lead you to believe, and unsurprisingly the cathedral and the Site lie in different sub areas of the CA. The primary consideration with the regard to the effect on the setting of the cathedral is the effect on those views of the cathedral where the 2018 Scheme appears in its backdrop, i.e. views from points west and north of the cathedral.
- 4.18 The significance of the cathedral, the contribution of its setting to its significance and the effect of the 2018 on its significance are discussed in more detail below.

The effect of the scheme on identified townscape character areas

- 4.19 Townscape character areas (TCAs) are identified and characterised in the TVIBHA [CDA.12], and are discussed in more detail at Appendix 1 of this proof, as follows:

TCA 1 – Bankside, Borough and Potters Fields

TCA 2 – Newington

TCA 3– Bermondsey

TCA 4 – Tower

TCA 5 – North Bank

- 4.20 The 2018 Scheme would reinforce the existing character of TCA 1 (Bankside, Borough and Potters Fields) within which it is located. In places, it would result in a pronounced contrast in height in relation to the lower scale development of the area, echoing similar juxtapositions created by post-war and modern tall development at London Bridge. As a consequence, there would be a limited number of adverse effects on individual views within the TCA. The 2018 Scheme would enhance the Site's appearance and amenity value through its contribution to the legibility and composition of the grouping of tall buildings around London Bridge, its distinctive, high quality architecture, and through the provision of new routes and public spaces.
- 4.21 The 2018 Scheme would add coherently to an existing background layer of townscape of central London, as seen from TCA 2 (Newington) and TCA 3 (Bermondsey), in particular, augmenting the grouping of large scale and tall buildings at London Bridge, from those viewpoints where the 2018 Scheme would be seen to any noticeable extent (i.e. views 35, 36, 37, 62 within the TVIA) .
- 4.22 The 2018 Scheme would be seen to add recognisably to the existing grouping of large scale and tall buildings marking London Bridge Station from TCA 4 (Tower) and TCA 5 (North Bank). Its high quality architecture would lend it an affinity with the modern buildings in this group – The Place, The Shard and Shard Place.

- 4.23 The 2018 Scheme would be consistent with national, regional and local planning policy in respect of townscape and design matters as a result of its high quality architecture and urban design. It would not adversely affect any LVMF or Borough views. A limited number of local views would be adversely affected, though not to an unacceptable degree. Overall, the 2018 Scheme would enhance the skyline of London, and is in line with the London Plan and LVMF.
- 4.24 In conclusion, the 2018 Scheme would transform the Site from a disparate collection of buildings, varied in quality, into a major new development in which the best buildings are retained, a major and substantial new building of high quality is added, and the buildings are brought together into a coherent whole with a significant new contribution to the public realm of the conservation area which provides useful new routes and connections, and a variety of new landscaped spaces open to all. The 2018 Scheme would encourage more use and enjoyment of King's Head Yard, benefitting the conservation area in which it lies. The 2018 Scheme's office tower would be at a height and scale that would reflect the landmark significance of the Site at the intersection of Borough High Street and St Thomas Street, in close proximity to London Bridge Station. It would take advantage of the townscape opportunities offered by the Site, to the benefit of the local and wider area around it.

Cumulative effects

- 4.25 The TVIA notes that some of the cumulative schemes considered would reduce the visibility of the 2018 Scheme in certain views; however, the cumulative schemes do not affect the general conclusions concerning effects on the TCAs considered.
- 4.26 The TVIA Addendum (June 2020) [CDA.57] considered the additional cumulative schemes requested by LBS at the time: Capital House; 2-4 Melior Place; 40 Bermondsey Street, 42-44 Bermondsey Street and 1-7 Snowfields; Vinegar Yard; and Becket House. It concluded that 'The conclusions of the December 2018 TVIBHA remain valid for the purposes of this updated cumulative assessment'.
- 4.27 Cumulative schemes have since been updated for the Inquiry to reflect the latest cumulative condition. A representative set of thirteen views have been revised to illustrate the effects. The revised views illustrated are those where the new cumulative schemes could have a significant visual presence. Most of these views show the 2018 Scheme; in some cases where relevant cumulative schemes postdate the 2021 Scheme TVIA, views from the latter have been revised as well, as noted below. These views, which are contained in Appendix 2 of this proof, are as follows:
1. View 3.1 (2018): LVMF 2A.1 Parliament Hill: the summit - looking toward St Paul's Cathedral;
 2. View 5.1 (2018): LVMF 3A.1 Kenwood: the viewing gazebo - in front of the orientation board;

3. View 12 (2018): LVMF 10A.1 | Tower Bridge: Upstream - The North Bastion
4. View 14 (2018): LVMF 12B.1 | Southwark Bridge: downstream - close to the City of London bank;
5. View 12 (2021): LVMF 12B.1 | Southwark Bridge: downstream - close to the City of London bank;
6. View 15 (2018): Millennium Bridge (centre);
7. View 24 (2018): London Bridge: upstream - at the City of London bank;
8. View 18 (2021): London Bridge: upstream - at the City of London bank;
9. View 25 (2018): Old Billingsgate Walk;
10. View 26 (2018): Tower of London: Inner Curtain Wall Walkway;
11. View 27 (2018): Tower of London: Inner Ward, north of the White Tower;
12. View 21 (2021): Tower of London: Inner Ward, north of the White Tower;
13. View 56.2 (2018): Southwark Cathedral | north-west corner 1;
14. View 56.3 (2018): Southwark Cathedral | north-west corner 2; and
15. View 57 (2018): London Bridge, outside Glazier's Hall.

- 4.28 The full list of cumulative schemes shown in the above views are identified at the end of Appendix 2. The updated views reveal that the cumulative assessment of effect on one view would differ from that presented in the December 2018 TVIBHA: View 25 Old Billingsgate Walk. In that instance, the submitted scheme at Colechurch House, London Bridge Walk, SE1 (LBS planning reference 20/AP/3013) would conceal the 2018 Scheme from view. In all other instances, the conclusions of December 2018 TVIBHA would remain valid.

5 The 2018 Scheme: assessment – heritage

- 5.1 The 2018 Scheme is designed by a well-known and respected award-winning architectural practice that has delivered a carefully considered proposal that is particular to this place and of a high standard of design that is sensitive to heritage assets. PSC was actively involved in the design process, providing advice on potential effects on heritage assets and their settings.
- 5.2 The principal considerations concerning the heritage context of the Site, all taken into account from the outset of the design process, are as follows:
1. The Site lies within the Borough High Street CA and therefore has a direct effect on that CA.
 2. The terrace of listed buildings on the Site will also be affected directly by the 2018 scheme.
 3. For other heritage assets (HAs), the 2018 Scheme has the potential to affect their settings, which may contribute to their significance.
- 5.3 An assessment of the scheme design was set out in the previous section. The quality of the design and the appropriateness of the design to its context are principal considerations in determining the effect of the 2018 Scheme on the heritage significance of relevant heritage assets. The architectural language and use of materials is respectful of its historic context, demonstrating both obvious and subtle references in its design to local building typologies, such as the 19th century warehouses that have informed the expression of north façade of the office tower, and the Victorian railway arches that have been a clear inspiration for the structural bracing located on the east and west elevations of the building.
- 5.4 At ground level, the arrangement and character of the routes and spaces will also contribute to an enhanced experience of the part of the Borough High Street CA around the Site, not least King’s Head Yard, in terms of new high quality public realm, active uses, and better local connections, supported by the new exit provided to London Bridge LUL Station. The 2018 Scheme would deliver a major new attraction in the conservation area, providing an experience that complements that of Borough Market, the High Street, George Inn Yard, and the recently opened public space in Guy’s Hospital courtyard. The 2018 Scheme is uniquely placed to deliver both new and improved connections that are safe and attractive to use, for the wider benefit of the conservation area.
- 5.5 The Heritage Statement (HS) provides statements of significance for all relevant HAs, and an assessment of the effect of the 2018 Scheme on significance of those assets.
- 5.6 In most cases there is little impact on designated HAs further afield on both sides of the River Thames. The 2018 Scheme’s office tower will be viewed in conjunction with

The Shard, Guy's Hospital tower, The Place and Shard Place, as part of the largely post-war and modern grouping of tall buildings located around London Bridge Station. It is of a high quality of architectural design and use of materials and finish and will be positive addition to central London's townscape.

- 5.7 The TVIBHA and HS concluded that there was some 'less than substantial' harm to two designated heritage assets: Southwark Cathedral and Guy's Hospital. The Statement of Case of the London Borough of Southwark and Historic England state that there is less than substantial harm to a number of other heritage assets. The assets in question are:

a. Less than substantial harm identified in TVIBHA and HS (and by LBS and HE):

1. Guy's Hospital
2. Southwark Cathedral

b. Less than substantial harm identified by LBS and by HE:

1. Borough High Street CA
2. Tower of London
3. St Paul's Cathedral

c. Less than substantial harm identified by LBS, not identified by HE:

1. The George Inn
2. The Monument and St Magnus the Martyr Church
3. 9, 9A and 11-13 St Thomas Street
4. Church of St George the Martyr
5. Bunch of Grapes Public House
6. Nos. 4-8 and 12-16 St Thomas Street
7. 15 St Thomas Street
8. Kings Head Public House
9. Trinity Church Square Conservation Area
10. The Bank Conservation Area in the City of London.

- 5.8 All of the heritage assets listed above are considered below. A large number of other heritage assets were considered in the TVIBHA and the HS, which concluded that there was no harm to their heritage significance. These have not been identified by LBS or by HE as being harmed by the 2018 Scheme; they are not considered further below.

Borough High Street CA

- 5.9 The Borough High Street CA, within which the Site lies, is extensive and varied, and its significance would be hard to capture in a summary statement of significance. The CA

appraisal (BHSCAA) [CDE.06] states at paragraph 5.2.8 that 'Borough High Street has throughout its history had to accommodate change, and part of its character is due to the immense variety that change has brought'.

- 5.10 The significance of the Borough High Street Conservation Area lies principally in the persistence, from the time of the earliest river crossing built by the Romans, of its status as a bridgehead settlement opposite the City of London. Its urban structure and its built form reflects this status. The CA appraisal notes 'the importance of Borough High Street as the primary route into the City of London from the south for 2,000 years is the most powerful influence on the physical evolution of the Conservation Area, and this street still forms the spine of the area'. London Bridge Station lies on the CA's north-east boundary. There are heavy traffic flows north-south and east-west through the conservation area. Patterns of movement are an important aspect of this very intensively occupied conservation area, with its distinctive and varied urban form and with very large numbers of people, residents, workers, shoppers and also many tourists, using its streets and routes, especially in the rush hours.
- 5.11 The conservation area contains within it distinctly varied sub-areas; the BHSCAA remarks on the 'great diversity' of the conservation area, which has informed the identification of four sub-areas. The Site is located within sub area 4: St Thomas Street.
- 5.12 The conservation area includes a variety of listed and unlisted buildings and structures of many periods, including two Grade I listed buildings: Southwark Cathedral and the George Inn. It contains major institutions – Southwark Cathedral, Guy's Hospital and Borough Market; the start of the main road from the City to south-east England and continental Europe; and major rail infrastructure, recently greatly expanded with new Thameslink tracks and a large and prominent new bridge over Borough High Street.
- 5.13 The BHSCAA notes that Borough High Street is the focus of the conservation area (3.1.1), and identifies Borough Market as 'the most distinctive element of a distinctive conservation area' (2.1.15). The key approach to the conservation area is over London Bridge (3.1.4).
- 5.14 The setting of the conservation area to its east, on the side closest to the Site, is dominated by London Bridge Station – the fourth busiest station in the UK - and four very large buildings: The Shard, Shard Place, the News Building and Guy's Hospital Tower. These have a significant influence of the character and appearance of the conservation area, particularly in the area around the Site.
- 5.15 The principal effects of the 2018 scheme on the character and appearance of the CA are as follows:
 - 1. On Site: replacement of some of the existing buildings by new buildings, the remaining buildings being retained; the creation of new routes and spaces and connections; and the opening up of the Site to the public.

2. Kings Head Yard: the replacement of the existing inactive 2 storey screen and four storey office building on the north side of the yard (i.e. the south side of the Site) with the new elevation to the lower part of the tower building, and the creation of public space opposite the Kings Head Public House, as well as views across to the Georgian terrace on the Site.
3. St Thomas Street: replacement of the 1980s entrance building to no.20 St Thomas Street by new open space, giving access to the Site; sensitive reconstruction of Keats House; reordering of nos. 4-8 and 12-16 St. Thomas Street; and the visibility of the new tower building (including its garden levels) as seen above the existing street frontage building and across the new entrance square.
4. Remainder of the CA: views from various places in the CA of the upper parts of the new office building.

5.16 These effects are considered in turn below.

5.17 The Site in its existing arrangement has little in the way of a public face and no public access. The 2018 Scheme opens it up to the public, with new routes and spaces and significant new active frontages, including to the south side of the listed buildings on St Thomas Street, as well as to King's Head Yard. The variety of spaces proposed in the 2018 Scheme, providing both hard and soft landscape, will be located away from traffic, and be well connected with their surroundings in all directions. The planning of these spaces is informed by an in depth analysis of the character of the conservation area, as experienced today, and a study of the historic development of the Site and its surroundings. These spaces would add positively to the conservation area.

5.18 Proposed internal spaces include the entrance hall of the new office building, which will have a strong presence – not obviously related to the existing character of the conservation area, but bringing something new and attractive to a varied area, in a manner comparable with the new glazed hall of Borough Market facing Borough High Street, within the CA (see Figure 6 below). The other significant public space within the tower, the garden levels, will also bring something new to the conservation area and allow one to appreciate it from an elevated position.

5.19 The character and appearance of Kings Head Yard have informed the design of the south face of the proposed development. At present its north side is formed by a service yard; a heavily modified late 19th century façade, forming part of the 1980s office building; and a nondescript 1980s office building in brick at the east end. The modified late 19th century frontage has glazed panels and dummy doors but is effectively blank. The redevelopment of this frontage results in the loss of some historic fabric but the new elevation makes successful reference to the character of

the conservation area and provides active frontage. There are new connections from the yard to public spaces on Site to the east and west of the main new building. The effect is to maintain the reading of the historic yard but to make it more attractive and better connected with its surroundings, improving the setting of the Kings Head Public House considerably in the process.



Fig 6. The glazed hall of Borough Market on Borough High Street (Source: TTC)

- 5.20 TVIA view 45 illustrates the Site's new relationship with Kings Head Yard. On entering the yard from Borough High Street, there will be a sense of a discovered space and refuge from the trafficked High Street. The cobblestone route will be more generous in width and steps and trees will make the threshold into the Site proper – a new public space overlooked by the ground floor shops and public lobby of the office tower, as well as the tower's garden levels seen a few storeys above that. Consequently, it will be a new focus for urban life and a place of exchange that, in the mind of the visitor, is likely to strengthen the association of the yards with the conservation area. At the same time, the contrast of the historic and the modern will be akin to that aspect one's experience of George Inn Yard today, where The Shard's presence is keenly felt (although in respect of the other buildings and the hard landscape, George Inn Yard forms a rather unsatisfactory setting for an important building).
- 5.21 In St Thomas Street, the principal effects are the work to the listed buildings and Keats House; the loss of the existing 1980s no.20 St Thomas Street frontage building; the opening up of the space in the street frontage between these; and the presence of the new office building seen to the south of these buildings. Today, all that

remains of Keats House as originally constructed is its retained 19th century front façade. The office space that currently occupies this building forms part of the 1980s New City Court development. The proposed works would result in the relocation of the original façade 2.7m to the west, and the creation of a standalone building of a more traditional and appropriate construction, including pitched roof forms that would have been present in the original building. These works will give it a new life and provide active frontages at ground level by virtue of the new retail use occupying part of the building. Its contribution to the character and appearance of the conservation area will be significantly enhanced as a result.

- 5.22 The new opening in the street frontage makes a significant difference to the street: a modern analogue of the Guy's forecourt, informal rather than axial in its composition, a new open space leading to a series of open spaces and buildings beyond. As well as being seen through the new opening in the street, the new office tower will be a major new presence in parts of St Thomas Street where it is seen above and beyond street frontage buildings, in a manner comparable with the effect of the Shard, the Guy's Hospital Tower or Shard Place. The public garden levels of the tower will be noticeable from the street, acting as a further draw into the Site.
- 5.23 The remainder of the Borough High Street CA includes many listed buildings, some of them highly graded. The effects on the settings of these are considered later in this section. In respect of the remainder of the conservation area, the views assessed in the TVIA show that the tall building will be prominent from some streets within the conservation area, principally from the major main roads, Borough High Street, St Thomas Street and Southwark Street. It will appear as a development of high architectural quality, its expression clearly informed by the character and appearance of the conservation area within which it lies. The most obvious reference to the conservation area will be the structural bracing to its east and west elevations, which will be seen to echo the character of the Victorian railway bridges that cross over the High Street and Southwark Street.
- 5.24 In considering the effects of the new main building on the character and appearance of the CA it is useful to consider the effects of the existing tall buildings in the area. A distinction may be made between Guy's Hospital Tower – a routine building of its time, lacking in architectural quality and admired by almost no one – and the Shard and Shard Place – designed by an eminent architectural practice, of a quality that was recognised by the respective decision makers (the Secretary of State and Southwark Council respectively), and admired by many. As all relevant guidance makes clear, for a tall building to be acceptable, it should be of a high standard of architecture.
- 5.25 As a corollary, if a new building is of a high standard of architecture, it is likely to add positively to views in which it appears. The 2018 Scheme would result in some striking new conjunctions between old and new, and between the small scale of historic buildings and the large scale of new buildings. Such contrasts are not unusual

in central London – examples include, in the City of London, the 30 St Mary Axe tower seen in the backdrop of the Grade I listed St Andrew Undershaft church, and, with other recent tall buildings, in the backdrop of the Tower of London (see Figure 7 below); and in Southwark, The Shard seen in the backdrop of many smaller scale historic buildings, and the Neo Bankside development seen in the backdrop of the Grade II* listed Hopton’s Almshouses (see Figure 8 below).



Fig 7. The Tower of London, as seen from Tower Bridge (Source: TTC)

5.26 Although the 2018 Scheme lies within a conservation area, whereas The Shard and Guy’s Hospital Tower do not, this does not make a fundamental difference to the nature of the impacts when one is considering the effect on the backdrop of a view from within the CA – the addition of a new tall building into what is presently sky space. The visual impact of Shard Place - which also happens to fall within the same conservation area as the Site - would not change if the conservation area boundary were altered to exclude that development.

5.27 The character of the conservation area is not just to do with what one sees. It also derives from patterns of activity, use and inhabitation. The existing 1980s buildings on the Site are standard office buildings with few positive aspects. The 1980s main entrance building on St Thomas Street offers few clues that there is a large office building behind. By contrast the 2018 Scheme would make major contributions to the life of the conservation area: in providing new public routes, spaces and connections; in the new public and semi-public spaces at upper levels, which will offer new views over the conservation area; and in the connection between the new office building’s entrance hall and St Thomas Street, which by its visibility and accessibility connects the office space much more directly with the life of the streets

around it and the wider conservation area. For those who live and work in the area and for those who visit, the association between Borough High Street as a historic commercial artery and the major transport node at London Bridge would be reinforced by the experience of using the Site's new exit to the LUL station as an outlier of the mainline station.



Fig 8. Grade II* listed Hopton's Almshouses seen in conjunction with Neo Bankside project
(Source: TTC)

- 5.28 The effects of the proposed development on the conservation area may be summarised as follows.
- 5.29 Effects on and close to the Site at the lower levels:
1. Replacement of poor existing office building by a high quality new building, including an elevated public garden terrace from which to appreciate the conservation area;
 2. New, high quality public realm on the Site that is fully integrated with its surroundings, enhancing local connections and offering a safe alternative for pedestrians to the trafficked road junction of the High Street and St Thomas Street, and providing a new entrance to London Bridge LUL Station;

3. Significant improvements to the experience of Kings Head Yard, with new active frontages and public space replacing the Site's inactive screen wall and vehicular service entrance; and
4. Listed buildings on Site, and their immediate settings on Site at ground level and lower levels, reordered and improved.

5.30 Middle distance effects:

1. The new tower building will be seen in the backdrop of Guy's Hospital, and in the backdrop of the existing listed buildings on Site (these buildings are close to the existing London Bridge cluster);
2. The new tower building will be seen in the backdrop of Southwark Cathedral, the George Inn and the Tower of London - as are existing tall buildings at London Bridge; and
3. The new tower building will be seen in the backdrop of various conservation area views, including from Southwark Street, Borough High Street and St Thomas Street.

5.31 The 2018 Scheme will have an adverse effect on some views within the conservation area – in particular, it may be felt by some that the new building will overshadow smaller historic buildings in such views to an unacceptable degree. Such effects will however be individual incidents within a very large conservation area, across much of which the 2018 Scheme will have little or no effect. The change to the character and appearance of the conservation area that is brought about by the 2018 Scheme will be major in its immediate locality but not across the whole of the conservation area, which is the designated heritage asset under consideration. The TVIA states that there would be adverse effects, as seen in certain views, that would result from the 2018 Scheme, but that these do not necessarily mean that the result is unacceptable, but rather that that view as seen before is preferable to the view as proposed, considered as a visual or pictorial composition. The adverse visual effects would be offset by the many positive qualities of the 2018 Scheme which would benefit the conservation area as a whole, both in respect of its heritage significance and in more general terms.

5.32 Taking into account the fact that tall buildings at London Bridge and in the City are an existing aspect of the character and appearance of the conservation area, the change that will result will not bring about any effects of a kind that are not already present, in respect of the presence of substantial modern buildings which contrast with finer grained, older parts of the conservation area. The high quality of design will be a factor that will tend to result in effects being positive rather than negative.

5.33 The balance to be struck in reaching a judgement about the effect of the 2018 Scheme on the CA is comparable with that which applied in determining the planning application for Shard Place, close to the Site and also in the conservation area; the report to committee for that scheme stated at paragraph 107 that 'Officers

are satisfied that this is a point of landmark significance and that the council's policies in respect of conservation areas can support a proposal that conserves the significance of the conservation area whilst at the same time delivering substantial enhancements to this historic area and its setting.'

- 5.34 The effects of the 2018 Scheme on this CA can be summarised as falling into two main categories: effects on and immediately around the Site, mainly resulting from the public realm proposals and the lower parts of scheme; and effects more widely, mainly resulting from the visual impact of the tower.
- 5.35 The closer-up effects are positive; the benefits for local residents, workers and visitors will include new active ground floor uses, new areas of public realm which will be attractive in their own right and will also relieve pedestrian congestion and provide useful new pedestrian links, relieve pedestrian congestion at the Borough High Street / St Thomas Street junction and provide better and less congested access to the underground station. All of this improves the character and appearance of this city centre CA.
- 5.36 The 2018 scheme will be prominent from some locations within the CA, principally from the major roads. It will not be visible from street level from most of the CA. The views illustrated in the TVIA are chosen for the most part to be representative of those locations from which it will be seen. When seen from some points within the CA it will be seen as a high quality addition to the existing group of tall buildings; from other locations it will be seen on its own in the backdrop of the existing CA buildings, comparable in its effect with many tall buildings in central London, including the Shard.
- 5.37 Effects on the CA are not limited to visual effects. Most people who experience the visual effects of the tower as seen in mid distance views within the CA will be people who live or work in the area or who are regular visitors. The tower building will be the marker of the new place that is created by the 2018 Scheme, with its active ground floor uses, access to the underground station, and improved public realm. The tower will be a marker of a place with a positive and attractive quality, rather than just an anonymous office building. The experience of what is seen in a view and the reaction to it is influenced by what the viewer knows about what they are looking at - in this case, a new building that is a high quality work of architecture in its own right, but also a marker of a larger redevelopment which offers significant benefits to the area.
- 5.38 In summary, the effect of the 2018 Scheme on the character and appearance of the conservation area, considered in the round, is positive. There are some minor losses of heritage significance, as a result of adverse effects on the appearance of the CA as seen from a limited number of locations, but these are outweighed by the substantial public benefits, in terms of urban design and townscape improvements

to the Site and to the wider area delivered by the scheme, which include significant improvements to the character and appearance of the CA.

4-8 and 12-16 St Thomas Street

- 5.39 The Listed Building Heritage Statement [CDA.22] by KMHeritage considered the effect of the proposed works to this listed Georgian terrace on its special interest. It noted a number of benefits that would result from the proposals, including:
1. The reversal of inappropriate change to the terrace and the reinstatement of plan form, decorative detail and appropriate materials;
 2. The re-creation of the passageway from St Thomas Street; and
 3. The provision of suitable uses that would help sustain its significance over the long term.
- 5.40 KMHeritage concluded that the works would preserve or enhance the special architectural or historic interest of the terrace, as well as enhance the character and appearance of the Borough High Street CA.
- 5.41 The TVIBHA also assessed the effect of the proposals on the setting of this listed terrace. It noted that most significant change to setting would be the removal of the 1980s office building on the Site, which adjoins the terrace to the south and east, and the introduction of the tower building immediately to the south of the terrace, separated by a new public route. A new public space would be located immediately to the east of the terrace on St Thomas Street, where the existing office building's entrance block at no.20 stands today.
- 5.42 The removal of the 1980s office development from the Site would return nos.4-8 and 12-16 St Thomas Street to their original state as a stand-alone terrace. This would better reveal their heritage significance by allowing one to appreciate these buildings from the new public realm proposed on the Site to their south and east.
- 5.43 The proposed tower building would represent a very noticeable change to their immediate context. The tower building would be prominent in views of the terrace from the west, at Borough High Street's junctions with St Thomas Street and Bedale Street, where it would be seen to rise above the roofline of the terrace alongside Guy's Hospital Tower. This is apparent from TVIBHA view 53 (Bedale Street) and view 54 (Borough High Street, corner with Bedale Street), where it is apparent that the silhouette of the terrace is seen against Guy's Hospital Tower. Both The Shard and Shard Place are also seen to feature prominently in the view from Borough High Street, located a short distance away on the north side of St Thomas Street.
- 5.44 The proposed tower building would also be a prominent in views of the terrace from the east, moving west on St Thomas Street. As illustrated in TVIA view 50 (St. Thomas

Street, corner with London Bridge Street), one would observe a dramatic contrast in scales, and a clear juxtaposition of the historic and the modern – of a kind that is commonly observable in this northern fringe of the conservation area, close to London Bridge Station. One would notice the pronounced curvature of the tower's north façade, seen to pull away from the terrace. Also observable would be the public garden levels of the tower (which would provide a new opportunity to appreciate the terrace from above) and the structural bracing to its east elevation. The degree to which the tower dominates the existing street scene from some viewpoints would be considerable, disrupting the coherent quality of the view of the terrace from the corner with London Bridge Street, as TVIA view 50 illustrates.

- 5.45 As one moves closer still, one's awareness of the tower above would diminish and one would see the terrace in a new light as a result of the new public space introduced between the building and Keats House, where the 1980s entrance block to no.20 once stood. This is illustrated in TVIA view 51 (St. Thomas Street, opposite Guy's Hospital) and TVIA view 52 (St Thomas Street, outside St. Thomas' Church). That space would draw one into the Site, where one would appreciate the listed buildings from the south from a new route activated by shops that occupy the ground floor units of these properties.
- 5.46 The terrace, as redeveloped, would form an integral part of the proposals. The delivery of significant new external and indoor public space on the Site would enhance the contribution made by the terrace to the conservation area, giving visitors the chance to appreciate its newly revealed south elevation with shops at ground level that address the Site's main public space. The re-established pedestrian 'short cut' from St Thomas Street through no.8 will also contribute to the objective of opening up a Site long cut-off from its surroundings through the provision of new and enhanced local connections.
- 5.47 While the 2018 Scheme would have an adverse effect on TVIA view 50, the overall impact on these listed buildings would be a positive one; their significance, and ability to appreciate that significance, would be enhanced as a result of the works to the buildings.

Southwark Cathedral

- 5.48 The grade I listed Cathedral is the former medieval Augustinian priory of St Mary Overie; it has been an Anglican cathedral since 1905. Its history and construction are complex, with elements from many centuries represented. The 12th century church was damaged by fire and rebuilt from 1220. The east front, choir and retrochoir are from 1214-1260. The rest of the exterior has elements from the 14th / 15th to 19th centuries. The interior has elements of many periods from the 12th century onwards. External materials are principally knapped flint with stone dressing; the tower and transepts are of ashlar.

- 5.49 The Cathedral was extended to the north in 2000. Designed by Richard Griffiths, the additions include meeting and conference rooms, a library, the Education Centre, the Shop and Refectory. A new public space to the north of the Cathedral was also introduced at this time, named the Millennium Courtyard.
- 5.50 The following is an extract from Cherry and Pevsner's description of Cathedral: *'First impressions are not rewarding. Seen from the E the four gables of the retrochoir huddle in a cramped position below the approach to London Bridge. Beyond rises the five bay E arm with its clerestory and E window rebuilt by Gwilt, and behind this the tall central tower with its four pinnacles. The exterior surfaces are all visually and unappealingly C19, mostly of knapped flint with stone dressings, with the exception of the tower and transepts, which are of ashlar'*.
- 5.51 The Cathedral is of significance as a Southwark landmark that stands at the oldest crossing-point of the River Thames. While it has only had the status of Cathedral since 1905, a church has stood on this site since at least 12th century and it includes surviving fabric from this period. It is first referred to as a 'minster' in the Domesday Book of 1086.
- 5.52 The Cathedral dominates the Riverside sub-area of Borough High Street CA and this area forms its immediate setting. Parts of the immediate environs of the Cathedral can be relatively tranquil - surprising given that London Bridge, the High Street, railway viaduct and Borough Market all lie just yards away – although there are frequently large numbers of tourists in the area. The Cathedral sits cheek by jowl with a rather disparate group of late 20th century office and residential buildings on Montague Close to the north. This area was occupied by wharves and riverside industry until the mid- 20th century. The sensitively designed ancillary buildings to the Cathedral, completed in 2001, which are dressed in flint and stone, provide visitor facilities that include a garden, public courtyard, and improvements in the streetscape on Montague Close, which includes a cobbled highway.
- 5.53 The BHSCAA [CDE.06] notes of the Cathedral that *'once dominant over small lanes and buildings packed around it, it is now crowded by modern structures – the office buildings, railway viaduct and London Bridge approach that surround it'* (BHSCAA 3.4.3) While mature plane trees within the churchyard lend a sense of seclusion to the south, the Guy's Hospital Tower and modern glass towers at London Bridge are all very apparent in the backdrop of views towards the south-east, in the vicinity of the Site – in the views looking towards the Cathedral in this direction from Montague Close. The 2001 additions to the cathedral also have a considerable visual presence in view from this area on the north side of the cathedral.
- 5.54 The BHSCAA notes in the caption to Figure 26 that *'Montague Close provides a quiet, modern setting for the north side of the cathedral'*; all of the prominent buildings in the *foreground*, as well as in the background, with the exception of the Cathedral itself, are modern.

- 5.55 This *'ever-changing environment of its modern setting'* noted by the BHSCAA (paragraph 3.4.3) continues to evolve with the expansion of development around London Bridge, such as the Shard Place project.
- 5.56 The setting of this Cathedral, close to the heart of one of the world's major cities, is very different from that of many of England's famous historic cathedrals such as York or Canterbury – bustling and commercial rather than tranquil and ecclesiastical. Buildings and infrastructure of various kinds, unrelated to the Cathedral, are found all around it in its immediate setting; and larger buildings in its wider setting are prominent from some places close to the Cathedral. The Cathedral's setting does not have any great coherence of urban form, and the quality of the buildings that surround it is variable. Although the Cathedral is an important and highly graded historic building, the extent to which the Cathedral's setting contributes to its heritage significance is therefore rather limited.
- 5.57 The 2018 Scheme is some distance from the Cathedral (over 100m, at its closest point) and separated from it by a rail viaduct, Borough Market and the busy Borough High Street. The Site in its existing state does not form part of the Cathedral's setting and the only significant visual effect of the 2018 Scheme is the effect on views of the Cathedral from points to its north round to its west, that is, from Montague Close.
- 5.58 As noted above, Montague Close is a largely post-war part of the Cathedral's setting. From Montague Close there are good views of the Cathedral, particularly from its north; these are views that were not available until redevelopment north of the cathedral in the 1970s (BHSCAA para 3.4.5) ; before that, this area was densely built up with riverside wharf buildings running to within a few metres of the cathedral (see map at Fig 3.3 in the 2018 TVIBHA, CDA.12). Today a viewer in Montague Close can see the Shard, the News Building, Shard Place and Guy's Hospital Tower in the backdrop of the cathedral (see Figure 9 below).
- 5.59 The Cathedral's setting does not make a major contribution to its significance and much of its setting comprises modern development. The 2018 Scheme's tower will introduce a large new building into the backdrop of the Cathedral in the same general direction from Montague Close, as shown in the TVIA view 56.2.
- 5.60 The new tower will appear in the backdrop of the Cathedral before The Shard as one proceeds west (looking over one's shoulder to the south-east), but the effect is similar – adding a further new building of high quality to the backdrop.



Fig 9. Southwark Cathedral seen from Montague Place, in the context of The Shard, The Place and Guy's Hospital Tower (Source: TTC)

- 5.61 Views are not heritage assets. My assessment of the effect of the 2018 Scheme on the setting of the Cathedral has been informed by the views studies, but it is the effect on the contribution of the setting of the Cathedral considered in the round, to its heritage significance that is the relevant consideration.
- 5.62 Seen from Montague Close, the visual relationship between the Cathedral and the 2018 Scheme changes as one proceeds along the street. TVIA views 55 and 56.1 to 56.6 provide a series of snapshots of the changing effect and show that the tower building passes behind the Cathedral tower where they overlap.
- 5.63 In considering the visual effect it is helpful to consider what a visitor might choose to photograph. View 56.2 and 56.3 as proposed show a visual relationship between the two where they overlap and the result is less visually pleasing than in other views, and the TVIA assesses the effect as adverse in each case (paragraphs 5.716-718, 5.729-731). In view 56.4 both towers can be seen plainly and separately and the TVIA (paragraph 5.742) notes that 'Compared with the two previous views, the view from this viewpoint has more positive pictorial qualities in respect of the relationship between the new and old towers. Unlike the previous two points in this dynamic sequence, one can imagine a visitor stopping to take a photograph of this scene; and it is the kind of relationship between old and new that some people find positive and others do not. The 2018 Scheme is not over dominant from here and the two towers are well balanced in visual terms. On the other hand, the commanding presence of the Cathedral from this particular point is undermined to

some extent.' This is not in my opinion a harmful effect on view 56.4, and the 2018 Scheme as seen here has no effect on the significance of the Cathedral, or the ability of the viewer to appreciate that significance.

- 5.64 There are positive and negative aspects of the effects of the 2018 Scheme on the Cathedral's setting. Most aspects of the Cathedral's setting are unaffected by the 2018 Scheme, but considered in the round, the 2018 Scheme would cause some harm to the heritage significance of this listed building. The degree of harm would be minor, arising mainly from the unsatisfactory visual relationship between the two towers as seen from certain points, which would have a small effect on the viewer's ability to appreciate the cathedral seen clearly against the sky. When one considers that most of the Cathedral's significance subsists in its fabric, that its setting is varied and takes in many large commercial buildings, and that most of its immediate setting is modern, it is apparent that any harm to its significance is minor, and in NPPF terms, considerably less than substantial harm.

Guy's Hospital, St Thomas Street

- 5.65 This grade II* listed 3 storey hospital and chapel dates from 1721-5 and 1728, with 18th century additions, and was partly rebuilt in the later 20th century. The central main block is by Thomas Dance, remodelled by Richard Jupp who also designed the chapel and the west wing. The east wing was by James Steere (rebuilt after World War II). The centre block is in multi-coloured stock brick and Portland stone. The wings are similar, with stucco to the ground floor.
- 5.66 The hospital was founded by benefactor Thomas Guy in light of the overcrowding at St Thomas Hospital, which lay right opposite, on St Thomas Street. It served as a general hospital shortly thereafter. It has significance as one of London's oldest hospitals. The chapel is a unique survival as the only 18th century hospital chapel in England. It was restored in 1980.
- 5.67 The hospital is already located in close proximity to several tall buildings or large scale commercial development and its setting today is the urban landscape of central London. Guy's Hospital Tower and The Shard are very prominent aspects of its immediate setting today, as is the recently completed 26 storey Shard Place on St Thomas Street, which is also situated within the Borough High Street CA (see Fig. 4 above).
- 5.68 The 2018 Scheme would further alter the setting of the hospital, in respect both of views from along St Thomas Street, illustrated in TVIA views 50, 51, and 52, and of views from within the grounds of the hospital itself, as typified by TVIA views 47, 48 and 49. As a consequence, there would some harm to the viewer's ability to appreciate the significance of the hospital principally as a result of the effect on views from the hospital courtyard towards the Site. There will also be tangible, long

term benefits to the setting of the hospital, namely, the new and enhanced local connections to the hospital, and new spaces and high quality public realm provided by the 2018 Scheme. Most aspects of the hospital and its setting would be unaffected by the 2018 Scheme. However, considered in round, the 2018 Scheme would cause some harm to the setting of this listed building. The effect on the setting would be comparable with the effect on the hospital's setting that has resulted from the construction of the Shard and Shard Place. The degree of harm would be considerably less than substantial harm.

Tower of London World Heritage Site

- 5.69 The Tower of London WHS Management Plan sets out a summary statement of significance for the Tower of London, which summarises its outstanding universal value ('OUV') as follows:

'The Tower of London has Outstanding Universal Value for the following cultural qualities:

For both protection and control of the City of London, it has a landmark siting;

The Tower of London was built as a demonstration and symbol of Norman power;

The property is an outstanding example of late 11th century innovative Norman military architecture;

The property is a model example of a medieval fortress palace, which evolved from the 11th to 16th centuries;

The property has strong associations with State Institutions;

As the setting for key historical events in European history'.

- 5.70 The 2018 Scheme would be visible only from limited points within the WHS, which is about 750m from the Site. Looking out from the WHS, from those points where it would be seen, the 2018 Scheme would appear as part of the grouping of late-20th century and modern tall and large scale buildings at London Bridge, providing balance to the composition. The 2018 Scheme would not harm any elements of setting that contribute to the heritage significance or OUV of the WHS. There would be no effect on any of the attributes of OUV noted in the previous paragraph. There would be no harm to the heritage significance of the WHS.

St Paul's Cathedral

- 5.71 The Cathedral Church of St Paul, St Paul's Churchyard is listed grade I. It lies some 1.12km to the north-west of the Site and north of the River Thames. This HA is the rebuilding of a medieval cathedral that burned down in the Great Fire of London, and dates from 1675 to 1710 to designs by Sir Christopher Wren. It is in a Classical style and is mainly of Portland stone, with a central dome and western towers.

5.72 St Paul's has heritage significance as an iconic building of national significance and as one of London's most historic landmarks. Among those attributes of the Cathedral's local setting that contribute to its significance are St Paul's Churchyard; Railings to Churchyard of Cathedral Church of St Paul (grade I); Chapter House of St Paul's Cathedral, St Paul's Churchyard (grade II*); Pump on west side of Chapter House, St Paul's Alley (grade II); Temple Bar, St Paul's Churchyard (grade I); 40 stone posts to forecourt of Cathedral Church (grade II); Four lamp posts outside the western entrance to St Paul's Cathedral (grade II); Statue of Queen Anne in forecourt of St Paul's Cathedral (grade II); Footings of destroyed cloister and chapel house (grade II*); St Thomas à Becket sculpture, St Paul's Churchyard (grade II); K6 Telephone Kiosks at St Paul's Cathedral, St Paul's Churchyard (grade II); Tower of Former Church of St Augustine, St Paul's Churchyard (grade I); St Paul's Cathedral Choir School, New Change (grade II*); and St Paul's Cross, St Paul's Churchyard (grade II).

5.73 Also of importance to the recognition and appreciation of the Cathedral's heritage significance are local, medium and long range views of the Cathedral from all directions, including locations along the South Bank and Thames bridges. Such views are identified in planning guidance issued by the City of London, the Mayor of London, LB Islington and LBS. The TVIA for the 2018 Scheme included a number of these, which informed the assessment of effect on the heritage significance of St Paul's. These included:

1. LVMF 1A.1 and 1A.2 from Alexandra Palace;
2. LVMF 2A.1 and 2B.1 from Parliament Hill;
3. LVMF 3A.1 from Kenwood House;
4. LVMF 4A.1 from Primrose Hill;
5. LVMF 5A.2 from Greenwich Park: the General Wolfe statue;
6. LVMF 6A.1 from Blackheath Point;
7. LBS Borough View 1 from One Tree Hill;
8. LBS Borough View 2 from Nunhead Cemetery;
9. LVMF 15B.1 and LVMF 15B.2 from Waterloo Bridge;
10. LVMF 17B.1 and 17B.2 from Golden Jubilee/Hungerford Footbridges;
11. Islington Local Views 1, 3, and 4 from Farringdon.

5.74 In terms of relevant LVMF views of St Paul's, the TVIA reveals that the 2018 Scheme would be most noticeable in the context of the Cathedral in LVMF 2A.1 from Parliament Hill (TVIA views 3, 3.1) and LVMF 3A.1 from Kenwood (TVIA view 5, 5.1). In LVMF 2A.1, the 2018 Scheme would appear to the right of the western towers of St Paul's and Guy's Hospital Tower, partially obscuring the hospital from view. The 2018 Scheme would not affect one's ability to perceive and appreciate the Cathedral from this location. In LVMF 3A.1, the 2018 Scheme would appear to the right of the dome of St Paul's Cathedral and Guy's Hospital Tower. The 2018 Scheme would appear behind one of the Cathedral's western towers, where the light brick-clad Avondale Estate towers are seen today. The extent of modern development behind

the tower would be greater, but the effect would be to provide a clearer backdrop. The 2018 Scheme would not affect one's ability to perceive and appreciate the Cathedral from this or any other LVMF view assessed.

- 5.75 In terms of the relevant LBS Borough views, the 2018 Scheme would not affect one's ability to perceive and appreciate the Cathedral from either One Tree Hill (TVIA views 9, 9.1) or Nunhead Cemetery (TVIA views 10, 10.1). With respect to views from Farringdon, a small portion of the 2018 Scheme would be glimpsed between the drum of St Paul's and Guy's Hospital Tower (TVIA views 58, 59, 59.1, 60, 61). The glass-clad tower of the 2018 Scheme would be clearly distinguishable from the stone-clad Cathedral. One's ability to perceive and appreciate the landmark from this viewpoint would be unaffected.
- 5.76 The 2018 Scheme would have no effect on those aspects of the Cathedral's setting that contribute to its heritage significance. It would be seen as an addition to the evolving urban landscape, consistent with the character of the existing setting of the Cathedral.

The George Inn, Borough High Street

- 5.77 The George Inn, 77 Borough High Street is listed grade I. This is a 3 storey 17th century, brick building with timber frame, which formed the south range of a coaching inn. The National Heritage scheme description states (extract): 'The west half has 2 tiers of galleries at the 1st and 2nd floors, the lower supported on cantilevered beams and the upper on wooden Doric columns. The wall behind is partly brick and partly timber. There are windows overlooking the gallery and a staircase at the eastern end. The eastern section, with a 9-window range, is chiefly of limewashed bricks with storey bands. A variety of glazing patterns, including flush C18 sashes, sliding sashes, casements and windows with mullions and transoms. Boxed eaves to the brick range; the galleried section terminates in a 4-part fascia. The rear or south is reported to be brick faced and features a large projecting stack. The windows here appear to be the remnants of an earlier phase of construction'.
- 5.78 Cherry and Pevsner note that the Inn is 'only a shadow of what still a hundred years ago, for in 1889 the Great Northern Railway who owned the premises decided to demolish the N wing and centre. So now only a fragment of the typical galleried design remains, the design which conditioned early English theatres and figures so prominently in so many C18 and C19 novels. The galleries have plain balusters, not as elegant as they would have been for a less homely job. The George was built only after the Southwark fire of 1676. To the east of the galleried part is a larger plain brick part with horizontal and a few vertical and segment-headed windows. Some ground-floor rooms still have C18-early C19 fittings, e.g. a sash-windowed bar'

- 5.79 The inn has significance as an important survival of a 17th century coaching inn in London. It partly defines the George Inn Yard, which retains a sense of containment, albeit mostly defined by post-war offices, and with views of the tall buildings at London Bridge beyond. Notwithstanding, no other yards in the Borough High Street CA retain a coaching inn from the 17th century.
- 5.80 Whilst the setting of this building will change noticeably in respect of views from within the yard that it occupies, as typified by TVIA view 46, this will not harm any element of setting that contributes to the heritage significance of this building. Looking in the direction of the Site, The Shard is a very prominent aspect of such views today, above the roofline of the post-war office building defining the northern and eastern edges of this yard. Guy's Hospital Tower is also noticeable from here. The best views of the George Inn are at close range, looking south-west, away from the direction of the Site.

The Monument, Monument Street

- 5.81 The Monument, Monument Street is listed grade I. It is a colossal fluted Roman Doric column of Portland stone on a high base with carved reliefs carved by Edward Pierce. Joshua Marshall was master mason. It stands at 61.5m high. It was designed by Wren and dates from 1671-77. It commemorates the Great Fire of 1666 which began nearby. The capital supports a gallery, with plain iron railing and a later cage of 1842, reached by a spiral staircase of black marble steps round an open well. It has a crowning finial of gilt copper supported on a stone drum. The Monument is also a Scheduled Monument. The Monument's significance derives from its association with Wren and its historic interest as a memorial to the Great Fire of 1666.
- 5.82 The Monument's present situation dates from the 1830s, having been moved from its original position on the site of the destroyed St Margaret Fish Street Hill, close to the house on Pudding Lane where the fire began. It has a modern setting, surrounded on all sides by late 20th / early 21st century office buildings, which do not contribute to its significance. They form the backdrop of views towards The Monument in views south, along Gracechurch Street, in the direction of the Site. The 2018 Scheme would be visible in the context of The Monument from Gracechurch Street, where it would be regarded as part of the evolving urban landscape, consistent with the character of its existing setting. This is illustrated in TVIBHA view 23. The 2018 Scheme would not harm any element of setting that contributes to the heritage significance of this listed building.

St Magnus the Martyr Church, Lower Thames Street

- 5.83 St Magnus the Martyr Church, Lower Thames Street is listed grade I. This church dates from 1671-87, and was completed by Wren but much altered in the 1760s and

later. The steeple was finished in 1705. It is a rectangular, aisled building with a clerestory, and a façade in Portland stone, rubble, and brick. The concealed south elevation is rendered. The east side, recently exposed is of rubble, patched with brick; its single opening blocked. The north elevation is of Portland stone with a modest cornice and blocking and three windows set forward, formerly in the centre, with a pedimented doorway and circular opening above enriched with a carved festoon. The west front is richer with much of the original masonry reset. The Tower is now pierced by an archway to the north and south with pilasters, a pediment and fine doorway to the west. There is multiple pedestal stage above with a bracketed clock dated 1709. The top stage has paired pilasters and a pierced parapet. Above rises a large octagonal lantern of stone, which is arcaded and pilastered. It has a lead-covered dome, a small lantern and spire.

- 5.84 The church has significance as one of Wren's churches, albeit one that he took over from others and which was much altered subsequently. The setting of the church has changed considerably since it was built and does not contribute to its significance. Its west front lies just a few feet from the sheer rear wall of the 20th century Adelaide House. Its immediate context includes post-war and modern office buildings lying on Lower Thames Street. The best views of the church are at close range. Where visible in the context of the church, the 2018 Scheme would be seen as an addition to the evolving urban landscape, consistent with the character of its existing setting.

Nos. 9, 9A and 11-13 St Thomas Street

- 5.85 Nos. 9, 9A and 11-13 St Thomas Street are listed grade II*. No.9a is a brown-red brick building with stone dressings, dating from c.1702-3. The main building is 1 storey high. Its tower rises to 4 storeys. Early craftsmen involved include mason Thomas Cartwright and carver Jonathan Maine. It previously served as Parish Church of St Thomas, chapter house for Southwark Cathedral, and in part as an operating theatre for St Thomas' Hospital. It is now in use as offices and a museum. No. 9 is a 3 storey brown brick building with red brick dressings, dating from c. 1706. It served as Treasurer's house of the old St Thomas's Hospital, part becoming the later Chapter House Annexe, now all offices. Nos. 11 and 13 St Thomas Street are two early 18th century 3 storeys (plus attic) houses in mixed reddish and yellow brick, with stucco bands. They were originally houses for the receiver (no.11), and minister (no.13) of old St Thomas's Hospital. Now, with nos.15, 17 and 19 (not included), they form administrative offices for Guy's Hospital.
- 5.86 Nos. 9 and 9a have significance as part of a rebuilding scheme for old St Thomas's Hospital between 1680 and 1732. Together with nos. 11-13, they form one of the more important survivals of Queen Anne architecture in London.

- 5.87 The complete setting of nos. 9-17 and their forecourt is of special note and it is the respective buildings in this group that represent the most important attributes of setting to contribute to their individual heritage significance (no.17 is not listed or locally listed). As well as the visual strength as a group, the shared association with the old hospital is the most important non-visual aspect of setting that contributes to their individual significance. Beyond this, the contribution of setting to significance is limited; this setting has changed noticeably since they were built. It is located within a local context that includes large scale and tall late 20th century and modern development, namely the tall buildings grouping at London Bridge.
- 5.88 The setting of these listed buildings would be noticeably altered as a result of the 2018 Scheme, as illustrated in TVIBHA views south-east and north-west along St Thomas Street (views 50, 51, and 54). This would not harm any element of setting that contributes to their heritage significance. The best views of these buildings are at close range, from the north side of St Thomas Street looking away from the direction of the Site. The 2018 Scheme would be seen as an addition to the evolving urban landscape, consistent with the character of the existing setting of these listed buildings. That setting includes large scale and tall post-war and modern buildings on St Thomas Street and at London Bridge, including The Shard, The Place, Guy's Hospital Tower and Shard Place.

Church of St George the Martyr, Borough High Street

- 5.89 Church of St George the Martyr, Borough High Street is listed grade II*. This is a 2 storey red brick and Portland stone church with a copper roof over the nave and slate roof over the chancel. It dates from 1734-6 and was built to the designs of John Price, then altered by William Hedger in 1807-1808. Following war damage, it was restored from 1951-2 by TF Ford. In 2005-2006 the building was re-roofed and underpinned. It has recently undergone repairs following decay to cornices and parapets due to 1950s cementitious renders. The Church has significance as an 18th century church with some fine interior features. It is described by Cherry and Pevsner as 'sound, sturdy church, uncommonly well sited, so that from N as well as S its tower appears to advantage' that form a prominent local landmark'.
- 5.90 The Church sits on an island site, overlooking the busy road junction of Borough High Street, Marshalsea Road, and Great Dover Street, a setting that does not contribute to its significance. The list description notes under 'SUBSIDIARY FEATURES' 'attached to south-east, brick wall and pair of square stone dressed gate piers'. The former churchyard, now public gardens, lies to north-east of the church, long separated by a highway, recently pedestrianised. This garden and the grade II listed wall forming its north boundary are attributes of the church's setting that could be said to contribute to its significance (although the wall is not noted as having group value with the church in either list description). The church's local setting includes post-war, late-20th century and modern development. The latter includes tall residential

development at Tabard Square. Its wider setting includes The Shard and Guy's Hospital tower.

- 5.91 The principal views of the church are from junction of Borough High Street, Marshalsea Road, and Great Dover Street. Those that look in the direction of the Site today feature The Shard alongside the church tower, the two landmarks competing for the viewer's attention.
- 5.92 The 2018 Scheme would not harm any element of setting that contributes to the church's heritage significance.

Mary Sheridan House (part) and attached area railings, no. 15 St Thomas Street

- 5.93 This is the remaining part of the terrace of nos. 11-13 (noted above) and the comment on the setting of 11-13 provided above applies to this building as well. It rises to 3 storeys (plus attic). It dates from the early 18th century, with a 19th century extension and is mixed yellow and red brick with stucco bands. It originally served as the house of the apothecary of old St Thomas's Hospital. Now, with nos.11 and 13 and nos. 17 and 19 (not included) it forms administrative offices for Guy's Hospital. The building has significance as part of the original complex of buildings used by old St Thomas's Hospital and as a surviving example of Queen Anne architecture.
- 5.94 The setting of this listed building would be noticeably altered as a result of the 2018 Scheme, as illustrated in TVIA views south-east and north-west along St Thomas Street (views 50, 51, and 54). This would not harm any element of setting that contributes to its heritage significance. The best views of this buildings are at close range, from the north side of St Thomas Street looking away from the direction of the Site. The 2018 Scheme would be seen as an addition to the evolving urban landscape, consistent with the character of no.15's existing setting. That setting includes large scale and tall post-war and modern buildings on St Thomas Street and at London Bridge, including The Shard, The Place, Guy's Hospital Tower and Shard Place.

Bunch of Grapes Public House, no. 2 Thomas Street

- 5.95 Bunch of Grapes Public House, no. 2 Thomas Street is listed grade II. This 3 storey (plus attic) brick building dates from the early 19th century and was converted to a public house in the late 19th century. The building has significance as part of a group of Georgian buildings (with the Site's nos. 4-8 and 12-16 St Thomas Street and attached railings) lining the south side of St Thomas Street. The setting of this listed building would change considerably in respect of views south-east and north-west along St Thomas Street, as typified by TVIA views 50, 51, 53 and 54. The 2018 Scheme

would be seen as an addition to the evolving urban landscape, consistent with the character of the existing setting of this listed building. That setting includes large scale and tall post-war and modern buildings on St Thomas Street and London Bridge, including The Shard, The Place, Guy's Hospital Tower, and Shard Place. This would not harm any element of setting that contributes to its heritage significance.

Kings Head Public House, Kings Head Yard

- 5.96 Kings Head Public House, Kings Head Yard is listed grade II. This 3 storey public house with a 3-window range is in brick with stone dressings and is dated 1881. The National Heritage list description notes its 'Handsome exterior with traceried lights; the principal elevation designed to accommodate a C16 bust fixed to the centre and depicting King Henry VIII'. The significance of this public house derives in large part from its location on King's Head Yard. It is the successor of one of the famous Southwark Inns.
- 5.97 The 2018 Scheme will be seen as an addition to the evolving urban landscape, which includes large scale and tall post-war and modern buildings at London Bridge, including The Shard, The Place, Shard Place, and Guy's Hospital Tower, and the tall commercial buildings of the City of London. This is illustrated in TVIBHA views 40, 43, and 54 from Borough High Street. In respect of the more immediate relation between the Site and this listed buildings, the siting of the new building of the 2018 Scheme improves the setting of the King's Head as a result of the new area of public realm created, allowing it to be appreciated from this new space. The 2018 Scheme will not harm any element of setting that contributes to the heritage significance of this listed building.

Bank Conservation Area (City of London)

- 5.98 The closest boundary of this large CA is located approximately 700m to the north-east of the Site. It sits in the shadow of the City of London's 'Eastern cluster' of tall commercial buildings and includes modern tall office buildings within its boundaries. Visibility of the 2018 Scheme would be restricted to the southern and western boundaries of the CA (Eastcheap and Gracechurch Street). This is illustrated in TVIBHA view 23, from the junction of Gracechurch Street and Lombard Street. There will be no harmful effect on any element of setting that contributes to the heritage significance of this CA.

Trinity Church Square Conservation Area

- 5.99 The closest boundary of this CA lies around 660m to the south-west of the Site. It is situated to the south-east of Borough High Street and south-west of Great Dover

Street. Views towards the CA from the south, on Harper Road, take in The Shard, Guy's Hospital Tower, and the modern residential tower at Tabard Square on Long Lane/Tabard Street. The latter lies only around 300m to the north-east of Trinity Church Square. Where visible from within the CA, the 2018 Scheme would be seen alongside the above-mentioned tall buildings. It would be a high quality addition to the wider context of the CA. There will be no harmful effect on any element of setting that contributes to the heritage significance of this CA.

Other heritage assets

- 5.100 There would be no harm to the heritage significance of any other designated HAs, including the WHS, or any other listed buildings or other conservation areas; including to any element of setting that contributes to their significance.

Cumulative effects

- 5.101 The cumulative schemes considered in the TVIA do not affect any the conclusions concerning the effects of the scheme on heritage significance.

6 How the 2018 Scheme improves the area, meets policy objectives and is consistent with policies on design and heritage

NPPF

- 6.1 The 2018 Scheme brings about significant improvements to the Site and its setting, meets the various design and policy objectives of the NPPF, London Plan and LBS, , and is consistent with relevant policies on design and heritage.
- 6.2 **Paragraph 130 of the NPPF** sets out a helpful set of design considerations against which schemes should be assessed. The 2018 Scheme has been designed with all of these considerations in mind and it succeeds in each of these respects – which, importantly, are not just to do with what the scheme looks like, but also with how it functions and contributes to its location more generally.
- 6.3 Set out below is my assessment against each of the points identified in paragraph 130. The commentary should be read in the context of an important overarching point about the merits of the 2018 Scheme. The existing building on site offers nothing positive to its surroundings. The 2018 Scheme transforms the Site by creating an identifiable new place within the local area, because of the freeing up of the ground plane and the design of new public routes and spaces.
- 6.4 The 2018 Scheme will **function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development**. The existing building on the Site offers nothing positive in the area. The 2018 scheme offers not just high quality new accommodation but also the reordering and restoration of the Georgian terrace and an attractive and much needed new area of public realm that achieves improved connections to the Underground station and relieves pedestrian pressure on the street network.
- 6.5 The 2018 Scheme is **visually attractive as a result of good architecture, layout and appropriate and effective landscaping**. This is an attractive scheme of high quality, designed by a prize winning practice that bears comparison, in the high standard of design achieved, with other high quality projects completed within the immediate setting of the Site in recent years.
- 6.6 The scheme is **sympathetic to local character and history, including the surrounding built environment and landscape setting**. The NPPF notes here that policies and decisions should not ‘prevent or discourage appropriate innovation or change (such as increased densities) and this is clearly a recognition that ‘sympathetic to local character and history’ is not intended to mean that schemes must always conform closely to existing patterns.

- 6.7 The 2018 Scheme establishes **a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.** The improved public realm and the relation between streets, spaces and the new and existing building would create an attractive new place within the conservation that would enhance its quality.
- 6.8 The scheme **optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.**
- 6.9 The scheme holds out the promise of creating a new place – where no identifiable ‘place’ exists at present - that is **safe, inclusive and accessible and which promotes health and well-being, with a high standard of amenity for existing and future users.**
- 6.10 **Paragraph 202 of the NPPF** states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. The HA submitted with the planning application and my evidence submitted for the inquiry identify a certain amount of less than substantial harm to certain heritage assets but this does not necessarily imply a conflict with policy and guidance, since policies allow for the circumstance that benefits outweigh harm.
- 6.11 In line with this NPPF policy, any harm caused by the 2018 Scheme would in my opinion be greatly outweighed by the heritage benefits and the considerable wider benefits the 2018 Scheme will deliver in the local area in the form of urban design and townscape enhancements on Site (wider benefits are set out in the evidence of Chris Goddard). The urban design and townscape improvements benefit the character and appearance of this part of the conservation area and are heritage benefits in respect of the CA; other heritage benefits include the work to the listed terrace on Site and Keats House, and the improved setting to the Kings Head.

London Plan

- 6.12 It follows from the TVIBHA, the HS and from my evidence above that the 2018 Scheme complies with London Plan policies relevant to my evidence.
- 6.13 Policy D3. The 2018 Scheme optimises the capacity of this well connected and central site; it responds to and adds a further contribution to local character and enhances the local context; it provides active frontages and it is of high architectural quality.
- 6.14 Policy D8. The public realm is well-connected and related to the local and historic context.

- 6.15 Policy D9. The Site is in a location identified in the Local Plan as suitable for tall buildings. From the outset of developing the design, attention was paid to long range, mid distance and immediate views of the scheme. The scheme reinforces the spatial hierarchy of the London Bridge area. The architecture is exemplary. The minor harm to heritage significance is significantly outweighed by clear public benefits (which are set out in the evidence of Chris Goddard). There is no effect on the Outstanding Universal Value of the World Heritage Site, nor on the other HAs mentioned by LBS and HE.
- 6.16 Policy HC1. Generally the 2018 Scheme conserves the significance of heritage assets. In two cases, noted above, there is minor harm to heritage significance, outweighed by public benefits (which are set out in the evidence of Chris Goddard).
- 6.17 Policy HC2. The 2018 Scheme has no effect on the Outstanding Universal Value of the WHS.
- 6.18 Policy HC4. The 2018 scheme is in line with the guidance in the LVMF. There is no effect on the on the viewer's ability to recognise and appreciate an identified strategically important landmark in any LVMF view.

The Southwark Plan 2019 to 2036

- 6.19 It follows from the TVIBHA, the HS and from my evidence above that the 2018 Scheme complies with Southwark Plan policies relevant to my evidence.
- 6.20 The 2018 Scheme makes a significant contribution to several of the objectives of the Local Plan's 'Area Vision' for London Bridge area (AV.11). It offers a distinctive, world class environment with inspiring new architecture and restored historic buildings; and high quality public realm that provides improved openness and connectivity. It builds on the fabric of local alleyways and yards to create quiet, green routes with clean air; it strengthens the cultural offer of the area and diversifies activities and shops. As required by policy AV.11, the Shard remains significantly taller and more visible than surrounding buildings as the station's landmark. The scheme improves local accessibility and interchange at the station with enhanced pedestrian routes; and it contributes toward the creation of a vibrant new high street on St Thomas Street.
- 6.21 The scheme is in line with design and heritage related policies set out in the Southwark Plan; the significant points are as follows.
- 6.22 Policy P13 sets out criteria for the 'design of places' - generally concerning the relationship between a scheme and its context. The 2018 Scheme is consistent with these criteria: the height, scale, massing and arrangement respond positively to the existing townscape, character and context; the scheme 'better reveals' local distinctiveness and architectural character and conserves and enhances the

significance of the local historic environment, subject to the minor instances of harm to heritage significance note above; the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; the buildings, the public spaces, open spaces and routes are positioned according to their function, importance and use; public realm and landscape design are of high quality.

- 6.23 Policy P14 relates to the design quality of a scheme. The 2018 Scheme readily meets the standards that are set out, as is demonstrated in the DAS and the evidence of Simon Allford.
- 6.24 Policy P17 concerns tall buildings. The Site lies within an area identified as suitable for tall buildings. The 2018 scheme is consistent with requirements set out for tall buildings. It is located at a point of landmark significance, close to the major junction of Borough High Street and St Thomas Street; its height is proportionate to the significance of the proposed location and the size of the site; it makes a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; it would not cause a harmful impact on strategic views, as set out in the LVMF, or to Borough views; it responds positively to local character and townscape; it provides a functional public space that is appropriate to the height and size of the proposed building; and provides a new publicly accessible space at the upper levels (not at the top but at a good height for views out).
- 6.25 Policy P17 also sets out design criteria for tall buildings; the 2018 Scheme is consistent with these. Its architecture is exemplary; it conserves and enhances the significance of designated heritage assets and makes a positive contribution to wider townscape character.
- 6.26 Policy P17 goes on to state that 'where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required. This appears to equate an effect on significance with a harmful effect, which is not a correct approach to the assessment of effects. However, assuming that it is harmful effects which are referred to, the required justification of minor harm resulting from the scheme is provided in the evidence of Chris Goddard.
- 6.27 Policy P19 on listed buildings and policy P20 on conservation areas make similar stipulations to NPPF policies, and the considerations set out above apply to these policies as well; for the most part the 2018 Scheme does not result in any harm to heritage significance; in the two cases where minor harm would result, this is readily outweighed by the heritage benefits of the scheme.
- 6.28 Policy P22 concerns 'Borough Views'. It states that development should:

- '1. Preserve and where possible enhance the borough views of significant landmarks and townscape; and*
- 2. Ensure the viewing locations for each view are accessible and well managed; and*
- 3. Enhance the composition of the panorama across the borough and central London as a whole'.*

6.29 P22 goes on to identify Borough Views and sets out requirements for developments in a given view. Those noted below are of relevance to this assessment:

'View 1: The London panorama of St Paul's Cathedral from One Tree Hill

- 1. Maintain the view of St Paul's Cathedral from the viewing place on One Tree Hill and not exceed the threshold height of the view's Landmark Viewing Corridor; and*
- 2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St Paul's Cathedral and its setting is maintained. A canyon effect of the view of St Paul's Cathedral must be avoided;*

View 2: The linear view of St Paul's Cathedral from Nunhead Cemetery

- 1. Maintain the view of St Paul's Cathedral from the viewing place within Nunhead Cemetery and not exceed the threshold height of the view's Landmark Viewing Corridor; and*
- 2. Not compromise the sensitive Wider Assessment Area that is located either side of the Landmark Viewing Corridor to ensure the viewer's ability to recognise and appreciate St Paul's Cathedral and its setting is maintained. A canyon effect of the view of St Paul's Cathedral must be avoided.'*

6.30 The effect of the proposal on the view from One Tree Hill is assessed in TVIBHA view 9. It would rise to a similar apparent height as Guy's Hospital Tower in this view, and would expand and consolidate the grouping of tall buildings at London Bridge. It would have not affect one's ability to perceive and appreciate St Paul's Cathedral from this location.

6.31 The effect of the proposal on the view from Nunhead Cemetery is assessed in TVIBHA view 10. Much of it would be concealed from view by trees, and visibility would reduce further in the summer, when those trees are in leaf. It would not affect one's ability to perceive and appreciate St Paul's Cathedral from this location.

6.32 Policy P24 concerns World Heritage Sites. As noted above, the 2018 Scheme has no effect on the OUV of the WHS.

7 Responses / objections to the 2018 Scheme

- 7.1 There were extensive pre application discussions with officers of LBS, and also with HE and other consultees. I attended many of the pre application meetings as well as taking part in internal discussions with the client and design team.
- 7.2 Notwithstanding my reasoning and conclusions as set out in my evidence, the 2018 Scheme gives rise to a number of impacts on heritage significance that have been considered harmful by others, in cases where I have not considered the effects to be harmful. Examples of this emerged in the pre- and post-submission consultation process, during which, unsurprisingly in the case of such a major development on such a prominent and sensitive site, a range of opinions, lay and professional, have been expressed. This is considered further below.

LBS Statement of Case

- 7.3 The LBS Statement of Case (SOC) for the 2018 Scheme dated 16 March 2022 sets out *'likely reasons for refusal'* together with a supporting narrative. The SOC formed the basis of a report to the LBS Planning Committee of 19 April 2022.
- 7.4 At 8.1 the SOC states that *'The proposed development would give rise to less than substantial harm to a number of designated heritage assets, and the harm is not outweighed by public benefits'*.
- 7.5 At paragraph 8.11 the SOC states that there would be less than substantial harm to *'the Outstanding Universal Value of the **Tower of London World Heritage Site** – the proposed tower would be significantly intrusive and distracting in views from the Inner Ward (harming its special enclosed character), in views from the Inner Curtain Wall walkway, and would cause less than substantial harm to the setting of the grade I listed **Queen's House**.'*
- 7.6 I have set out my assessment of the effect on these assets above. A view from the Inner Ward towards the Site is provided at view 27 in the TVIA. It is clearly not the case that the 2018 scheme would be 'significantly intrusive and distracting' as seen from here – it would be a relatively modest addition to the existing group of several tall buildings that can be seen at London Bridge when looking from the Inner Ward, most notable of which is the Shard.
- 7.7 At paragraph 8.11 the SOC states that there would be less than substantial harm to the *'Grade I listed Cathedral Church of St Saviour and St Mary Overie (**Southwark Cathedral**) - the proposed tower would be significantly intrusive and distracting to appreciation of the silhouette and architectural composition of the listed building.'*

- 7.8 I have set out my assessment of the effect on this Cathedral above. The proposed tower building appears in the backdrop of the Cathedral from certain points around Montague Close, and from a few locations the visual conjunction of the tower building and the Cathedral Tower is unsatisfactory. This is comparable with the effect of the Shard on the Cathedral's silhouette as seen from other locations nearby. It is hard to see how this could affect appreciation of the architectural composition of the Cathedral, which is unaffected by the 2018 Scheme.
- 7.9 At paragraph 8.11 the SOC states that there would be less than substantial harm to *'the Grade I listed St Paul's Cathedral – reducing viewer's ability to appreciate the significance of **St Paul's Cathedral** (and to recognise and appreciate the Cathedral as a Strategically Important Landmark) in the Kenwood and Parliament Hill LVMF London Panorama views, and within the borough view from Nunhead Cemetery.'*
- 7.10 I have set out my assessment of the effect on this Cathedral above. If anything the viewer's ability to see the cathedral from Kenwood is improved by the 2018 Scheme, though they would likely need binoculars to appreciate the difference; however this is a very minor aspect indeed of the Cathedral's setting when that is considered in the round, and there is no effect on its contribution to the Cathedral's significance. There is no effect on the ability to recognise and appreciate the cathedral from the Nunhead Cemetery viewpoint.
- 7.11 At paragraph 8.11 the SOC states that there would be less than substantial harm to the *'Grade II listed **Bunch of Grapes Public House** and nos. **4-8 and 12-16 St Thomas Street** – particularly as the height and curved form of the tower's northern façade would loom behind this terrace of grade II listed buildings.'*
- 7.12 I have set out my assessment of the effect on these assets above. The new office tower creates a dramatic juxtaposition with these listed buildings; there is no harm to the Bunch of Grapes, and the overall effect on the terrace is beneficial for the reasons set out above.
- 7.13 At paragraph 8.11 the SOC states that there would be less than substantial harm to the following heritage assets:

Grade I listed The George Inn
Grade I listed The Monument and St Magnus the Martyr Church
Grade II* listed Guy's Hospital
Grade II* listed 9, 9A and 11-13 St Thomas Street
Grade II* listed Church of St George the Martyr
Grade II listed 15 St Thomas Street
Grade II listed Kings Head Public House
Borough High Street Conservation Area
Trinity Church Square Conservation Area
The Bank Conservation Area in the City of London

- 7.14 The SOC does not state in what way harm is caused to these HAs. I have set out my assessment of the effect on these assets above; I do not consider that there is any harm to the heritage significance of any of them, nor to the ability to appreciate their significance.
- 7.15 At paragraph 8.14 the SOC states that 'the Appellant's Environmental Statement does not transparently and reliably identify the likely significant adverse effects of the Planning Application Proposal on built heritage, and thus why it should not be relied on for the purposes of determining the appeal'.
- 7.16 The part of the TVIBHA that addresses the historic environment was discussed with LBS and their advisers after the original submission of the planning application, to address matters raised in of a review of the ES commissioned by LBS. An Addendum to the ES was submitted in June 2020 containing additional information on the historic environment in response to this review [CDA.57].
- 7.17 The statement at paragraph 8.14 in the SOC conflates two different aspects of the discussion about the identification of effects on the historic environment. First, PSC and LBS did not agree about whether effects were harmful or not. Secondly, LBS's advisers considered that PSC's method of assessment was flawed.
- 7.18 On the first point, the question of whether effects are harmful or not is a question of professional judgement, and PSC and LBS are clearly not in agreement.
- 7.19 On the second point, LBS criticised PSC's method of assessment. The method of assessment was the same as that used in the ES prepared by PSC for a nearby project known as 'Edge London Bridge', for the redevelopment of Becket House, about 300m east of the Site in St Thomas Street, submitted in 2020 and subsequently granted planning consent; that ES was accepted as adequate in the report to committee for that project. The ES Addendum sets out PSC's response to the criticisms, which we considered to be unfounded. The documents submitted in support of the planning application identify the heritage significance of the relevant heritage assets in detail. NPPF paragraph 194 requires that 'The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance', and the ES provides a level of detail consistent with this requirement.
- 7.20 The additional work carried out in response to the ES review did not result in the identification of any additional significant effects on heritage significance.
- 7.21 HE have not raised any concerns about the adequacy of the ES or the methodology used, which is the same as on a large number of other ES reports undertaken by PSC and reviewed by HE.

- 7.22 At paragraphs 8.20 and 8.21 the SOC states that 'the scale and design of the proposed development is not appropriate for this site and its surrounding context, resulting in harm to the townscape and local character'; and that 'The proposed tower would have harmful visual impacts due to its location, height, form, massing and materiality.'
- 7.23 From my assessment above it will be apparent that I do not agree with these contentions. The 2018 scheme is an exemplary design which responds to the specific conditions of the Site and its setting, and is appropriate to its context for the reasons I have set out above. In general it would not have harmful visual impacts; I have identified a small number of situations where the visual impact would result in some harm but this does not necessarily make the scheme as a whole unacceptable. I consider that the many positive aspects, both visual and otherwise, outweigh the harm I have identified.
- 7.24 At paragraph 8.23 the SOC sets out a series of points intended to demonstrate that the scheme does not comply with planning policies on tall buildings.
- 7.25 I consider that the 2018 scheme complies with policies on tall buildings, for the reasons set out in the previous section.
- 7.26 One of the LBS contentions on this point merits further comment. They state that the Site is 'not located at a point of landmark significance, being set back from the main street frontages and onto an historic yard.'
- 7.27 The Southwark Plan defines the term in question as follows (p135): 'A point of landmark significance is where a number of important routes converge, where there is a concentration of activity, and which is or will be the focus of views from several directions.' It also refers (p134, paragraph 3) to 'the plan-led emergence of tall buildings and clusters at locations of landmark significance, in our Major Town Centres and regeneration areas, and in close proximity to our public transport stations and interchanges'; and in paragraph 7 on p134, London Bridge is referred to as 'a focus for new tall building development'.
- 7.28 The Site, close to a major road junction and tube entrance, is at a point of landmark significance, within an area designated for tall buildings and in line with the above definitions. The setting back from the street by a few metres in each case does not undermine this since the new tower is successfully integrated with its lower-rise surroundings. In views from mid-distance and further, the location of the junction and station entrance is clearly marked by the new tower, as can be seen in view from a number of directions shown in the TVIA.

Historic England Statement of Case

- 7.29 Historic England's letter to LBS of 29 March 2019 [CDC.05] sets out their response to the planning application. It cross refers to their earlier letter of 9 July 2018 [CDC.04]. The letter states that HE strongly objects to the proposals which they considered caused harm 'bordering on 'substantial'' to a number of designated HAs.
- 7.30 HE's commentary on the 2018 Scheme is developed in their Statement of Case (SOC).
- 7.31 HE states that harm to the Borough High Street CA would result 'particularly from the dramatic contrast in scale between a tall building of 37 or 26 (plus mezzanine) storeys respectively, and the prevalent scale of buildings in the conservation area of mainly four storeys. That jarring juxtaposition would be particularly emphasised by the close proximity of the proposed developments set behind the largely continuous frontages of buildings on Borough High Street and St Thomas Street' and that 'The conservation area would also be harmed by the demolition of the historic south façade of New City Court and the creation of open public realm, in contrast to the continuous frontages with narrow alleyways and yards behind that characterise the area. This change would erode the historic street layout of King's Head Yard, which is illustrative of the historic pattern of yards in the backlands that underpins the overall significance of the conservation area'; and that 'Further erosion of the urban morphology of the conservation area and its authenticity would be caused in both schemes by deconstructing and relocating Keats House (identified as a positive contributor to the character of the conservation area) in a new location.'
- 7.32 The direct effect on the Borough High Street CA is considered in the HS [CDA.18] and in my assessment above. I consider the juxtaposition 'dramatic and striking' rather than 'jarring', and not harmful given the existing character of the CA and its setting - the contrast in scale is comparable with that which results from the presence of the Shard, Shard Place (which is in the CA) and the Guy's Hospital Tower. The addition of the 2018 scheme is consistent with the established character of the CA, of which similar contrasts in scale are already a very obvious aspect. The HS notes (paragraph 7.17) that there are adverse effects on certain views in the CA but that the harm that would result from the 2018 Scheme would be considerably less than substantial harm.
- 7.33 The scheme design has taken considerable care to enhance **King's Head Yard** and in particular the setting of the Old King's Head Public House. At paragraph 7.16 the HS notes that there are significant improvements to the experience of King's Head Yard, with new active frontages and public space replacing the Site's inactive screen wall and vehicular service entrance.
- 7.34 **Keats House** is considered at paragraph 7.9 in the HS which notes that its contribution to the character and appearance of the conservation area will be significantly enhanced as a result of the 2018 scheme.

- 7.35 At paragraph 7.17 the HS notes that the harm to the CA as a result of the effect on certain views would be offset by the many positive qualities of the 2018 scheme which would benefit the conservation area as a whole, both in respect of its heritage significance and in more general terms.
- 7.36 If one considers what could be meant by 'substantial harm' to the significance of this large and varied CA, it is hard to understand how the scheme can be said to cause harm that borders on that level of harm, by adding a large building to an existing group of large buildings one of which, Shard Place has recently been built on a prominent site in the CA close to the Site. Although the 2018 Scheme is within the CA and large buildings referred to, except Shard Place, are not, that is not a distinction that is apparent in views other than those close to the Site.
- 7.37 The construction of the 2018 scheme could not, in my view, plausibly come close to causing the degree of harm to the significance of the CA that is alleged by HE.
- 7.38 **Southwark Cathedral.** HE considers that the visibility of the 2018 scheme in certain views of the Cathedral would affect the 'architectural and landmark qualities of the Cathedral which would cause harm at 'the upper end of the range of less than substantial harm'.
- 7.39 The architectural and landmark qualities of the Cathedral are largely unaffected by the 2018 scheme; HE refers to 'the landmark quality it still retains despite the presence of modern buildings within its wider setting', meaning existing modern buildings rather than the 2018 Scheme, but with the addition of the latter, the point remains. The HS notes at paragraph 7.49 that there are positive and negative aspects of the effects of the 2018 scheme on the Cathedral's setting. Most aspects of the Cathedral's setting are unaffected by the scheme, but considered in the round, the scheme would cause some harm to the heritage significance of this listed building. The degree of harm would be minor and considerably less than substantial harm.
- 7.40 **Guy's Hospital.** HE considers that visibility of the 2018 scheme above the roofline of the west wing of the north courtyard at Guy's Hospital causes harm 'at the upper end of the scale of less than substantial harm'. They state that the scheme would 'appear to rise out of the west wing's central pediment, totally undermining the architectural meaning of its crowning feature, and entirely discordant with the formal composition which can currently be so well appreciated from this vantage point.' The meaning of the whole or the parts of the architectural composition is largely unaffected by the addition in its backdrop of a large new building which is clearly separate and different and has positive qualities of its own - a common type of conjunction found all over central London, with little or no effect on the meaning or significance of existing older buildings.
- 7.41 In their pre-application advice HE noted that the east wing is seen with major development at London Bridge in the backdrop. The HS notes (paragraphs 7.56-7.57)

that the effect on views does cause some harm to the setting of the hospital; that the project provides significant benefits to the setting of this HA as well; and that considered in the round, there is some harm to setting, but that this is considerably less than substantial. The points made above about the possibility of, or proximity to, 'substantial harm' apply here too.

- 7.42 At 6.21 in their SOC, HE states that there is likely to be a harmful effect on the quality of light in the hospital and in particular its chapel, which adjoins the Site. This subject was addressed in a report by heritage specialists KM Heritage [CDA.47] which included a technical study by daylight and sunlight specialists GIA. The KM Heritage report concluded (paragraph 41) that 'the proposed New City Court development will alter the manner in which the stained glass windows of Guy's Chapel are perceived, but it will not reduce their contribution to the special architectural or historic interest of the listed building, nor reduce their ability to be understood and appreciated.' The contrast between a relatively dark interior lit from the side by windows, and an external environment between the chapel and the Site that is open to the sky and therefore considerably brighter, will remain. The effect on the quality of light in the chapel is discussed in more detail in the report prepared by GIA and appended to the proof of evidence of Chris Goddard.
- 7.43 **Tower of London.** HE consider that there would be 'some harm to the significance of the Grade I Queen's House' and 'some harm to the Outstanding Universal Value of the World Heritage Site' as a result of the effect on the sense of enclosure from the outside world when within the Inner Ward. Given the number of large modern buildings that can be seen north and south of the Thames when one is within the Inner Ward, the addition of the 2018 Scheme to the backdrop of certain view makes little or no difference to one's experience of the setting, and if the Shard was deemed an acceptable addition to this backdrop - and like the Inspector in that case I believe it was an acceptable addition - and when one looks at the impact of the growing Eastern cluster of buildings in the City of London - it is hard to see how it can be maintained that the 2018 Scheme is harmful. It can just as readily be maintained that the addition of modern buildings in the backdrop enhances rather than undermines the sense of enclosure from the outside world that is offered by the perimeter defences of the Tower. There is in my view no effect on the OUV of the WHS, and no harm to the setting of the Queen's House.
- 7.44 **St Paul's Cathedral.** HE describes the effect on LVMF view 3A.1 from Kenwood as harmful as the scheme would cause 'notable visual distraction'. This viewpoint is over 10km from the Site and the Cathedral is hard to make out without binoculars. The Cathedral's dome and the towers of the west front are seen against a backdrop of various tall buildings beyond the Cathedral, including the existing tall buildings at London Bridge. The addition of the 2018 Scheme makes no difference to the viewer's appreciation of the Cathedral and has no effect on heritage significance.

Conclusion concerning effects on the historic environment

- 7.45 In cases where the HS found that there is harm to the heritage significance of HAs, this is 'less than substantial' harm. LBS and HE consider there is harm to other HAs where I do not, but in no case do they find 'substantial' harm'. None of the harm alleged by LBS and HE is greater than 'less than substantial harm' as set out in NPPF paragraph 196. In line with this NPPF policy, any harm caused by the 2018 Scheme would in my opinion be greatly outweighed by the considerable heritage and other benefits that the 2018 Scheme will deliver in the local area in the form of urban design and townscape enhancements and works to the listed terrace (wider public benefits are set out in the evidence of Chris Goddard).
- 7.46 I note that HE, as the Government's statutory adviser on the historic environment, does not find that there is any harm to a number of those HAs where LBS considers that there is harm.

8 The 2021 Scheme

- 8.1 This section and the following sections 9 to 12 address the 2021 Scheme. Many of the considerations that inform my assessment of 2021 Scheme concerning the Site and its setting, and the considerations that are relevant to designing a scheme for the Site and for assessing such a scheme, are the same as those stated above that have informed my assessment of the 2018 Scheme; and so generally I have not repeated them.
- 8.2 The assessment that follows draws on the following documents submitted with the planning applications:
1. April 2021 TVIBHA undertaken by PSC [CDB.14];
 2. Heritage Statement ('HS') undertaken by PSC [CDB.15];
 3. Listed Building Heritage Statement undertaken by KMHeritage [CDB.15]; and
 4. July 2021 TVIBHA Addendum undertaken by PSC [CDB.58].
- 8.3 My evidence should be read with the above documents and with the planning application drawings, the Design and Access Statement ('DAS') submitted with the planning applications, and the July 2021 DAS Addendum by AHMM [CDB.43], and with other evidence provided by others in support of the appeal.
- 8.4 The 2021 Scheme would provide:
1. Demolition of the existing 1980s buildings and alterations, sympathetic restoration of listed Georgian terrace buildings along St Thomas Street, and reconstruction of Keats House with retention of existing façade;
 2. Delivery of a 26-storey building (plus mezzanine and two basement levels) extending to 108m AOD, providing 44,312 sqm (GIA) of high-quality office floorspace (Class E);
 3. Introduction of 340 sqm (GIA) of flexible office/retail floorspace (Class E) at ground floor level of proposed office building, activating the proposed public realm;
 4. Provision of 5,017 sqm (GIA) of affordable workspace (Class E) within the Georgian terrace buildings, Keats House and levels 1 and 2 of the proposed office building, representing 10% of the overall office provision;
 5. Delivery of publicly accessible rooftop garden with high quality landscaping and a complementary café and restaurant providing 421 sqm (GIA) food/drink floorspace (Class E);
 6. Delivery of high quality and fully accessible public realm, providing enhanced connectivity through new public routes and a new covered public arcade;
 7. Creation of a new entrance to London Bridge Underground Station; and
 8. Improved onsite servicing strategy to maximise servicing options and minimise impact on the local highway.

- 8.5 The application drawings, the DAS, DAS Addendum and the evidence of Simon Allford provide details of the scheme design, the design process and the design rationale.
- 8.6 I and my colleagues at PSC continued to be actively involved as advisors throughout the development of the design that was submitted in the 2021 planning application, providing advice on townscape and heritage considerations.
- 8.7 The aspects of the design that were most important to our consideration of and advice on the developing scheme were the same as for the 2018 scheme.
- 8.8 The tower building has been designed to respond to these considerations, with a view to achieving a design that was not as tall as the 2021 Scheme, in response to concerns that had been expressed about the height of that scheme.
- 8.9 The plan form of the tower of the 2021 Scheme is based on a parallelogram, which is intended to emphasise the major corners, while reducing the tower's profile when viewed both head on and obliquely. The building has rounded corners to soften the form and to reduce the apparent width of elevations in views. The roof profile of the tower was further refined through stepped levels. To the south-east end of Kings Head Yard, a 4 storey volume was created to follow the footprint of the edge of the yard and meet the archway that leads to Guy's Hospital.
- 8.10 Extensive studies examined the most appropriate townscape scale for the façade grid. The intention was to create an elegant overall proportion for a repeating bay design and avoid a letter box proportion of a wider façade bay. The final design is based on a 6m wide module overall – closely aligned to the scale of both the burgage plots that inform the rhythm of Borough High street, but also the width of the repeating module of the Georgian terrace houses forming a set piece on the southern side of St Thomas Street.
- 8.11 Given the historic context and the relative solidity of both the Georgian terrace to the north and Guy's Hospital to the east, the balance of solid to void across the elevations was refined to ensure the building would appear relatively solid, while ensuring sufficient daylight to, and views out from, the internal office spaces. In order to modulate the appearance of that solidity with increasing height, and to ensure a calm appearance when viewed from a distance, the width of the solid piers reduces with height. These changes occur within three distinct bands to provide visual 'stepping stones' up to roof level, where the public gardens are located.
- 8.12 Given the variation in solar load on the tower's façades, the building's piers are shaped to respond to orientation. On the north, piers are angled back in a V formation to maximise views out and promote daylight availability. On the east and west façades, they are angled to create a deeper reveal to promote self-shading, and on

the south, they are inverted, such that the façade self shades from both directions as the sun tracks from east to west.

- 8.13 A set of greened balconies fold out from the north façade, aligned with the main entry point to the Site, overlooking a new public space between Keats House and the listed terrace. The effect of this vertical green band divides the north elevation into two unequal parts, each intended to read as a more slender column of office space.
- 8.14 With the alignment of the core on the southern elevation, a range of diverse functions take place behind what is designed to be a unified and calm façade. Views out of the office space, lift lobbies and WC lobbies are maximised. Deep recessing to the bays on this elevation is designed to create a play of light and shadow over the course of the day to enhance visual interest. The panels also have an enhanced surface finish to create further variation. Ventilation for on floor plant is concealed behind ornate metal fret work echoing the original balustrades of the medieval coaching inns. The July 2021 amendments included the addition of integrated photovoltaic panels and balconies to this elevation to enhance operational energy strategy and urban greening factor.
- 8.15 The selection of façade materials for the masonry type aesthetic considers embodied carbon and overall weight /material efficiency. The use of glass reinforced concrete, which can accommodate a variety of appearances/ textures is combined with PPC coated aluminium framing and lower iron double glazed glazing panels with integrated solar control coatings. The tower's corner bays use curved glass panels.
- 8.16 Keats House is returned to a standalone building of a more traditional and appropriate construction by removing the unsympathetic and jarring 1980s New City Court building.
- 8.17 The existing grade II listed Georgian terrace on the Site, at nos. 4-8 and 12-16 St Thomas Street, is currently connected to the 1980s building at two points and has lost its plan clarity and original circulation logic. The removal of the intrusive 1980s bolt-on volumes and the creation of breathing space with permeable public north-south routes through to the backs provides the opportunity to undo damage and enjoy previously inaccessible elevations. The proposals involve a substantial recovery of plan form lost in the 1980s.
- 8.18 The 2021 Scheme seeks to maximise the amount of public open space provided on the Site, providing spaces of different scales and identities.
- 8.19 The 2021 Scheme offers two public squares in strategic locations where pedestrian flow rates into and out of the Site are envisaged to be the highest.
- 8.20 St Thomas Street Square is created in the space released by the demolition of the 1980s entrance building to New City Court on St Thomas Street, between the Site's

Georgian terrace and Keats House. It provides the access into the main office building and the wide covered gallery public route to the rear of the Georgian townhouse terraces. The 4 storey tall gallery has been developed to link more directly between the tube station and St. Thomas Street. This space is both open to atmosphere which enjoying daylight and continuous hrs of operation – not a gated route closed out of hours.

- 8.21 King's Head Square, proposed for the western end of the Site, to the east of properties fronting Borough High Street and the south of the Site's Georgian terrace, would provide the largest public space on the Site. It would incorporate south-facing seating with a view of the Old King's Head Public House. The new exit proposed for the London Bridge LUL station to the west will also deliver people into this space.
- 8.22 An original passage through the Georgian townhouses will be re-opened to provide better connections into the Site and restore another element of the historic grain of the Site.
- 8.23 The rooftop public gardens provide both a variety of type of spaces / natural environments, combined with free to use facilities to make the visitors experience more comfortable. In prioritising the roof garden for public use, a separate office user terrace is provided at upper levels accessed separately from the main office core.

9 The 2021 Scheme: assessment of scheme design and effects on townscape and views

The scheme design

- 9.1 The 2021 Scheme would continue the successful story of the regeneration of London Bridge, as envisaged and encouraged by the recently adopted Southwark Plan. The scheme would replace a building that contributes nothing positive to the conservation area or the local townscape with a major new building that transforms the Site and opens it up to public access at ground level.

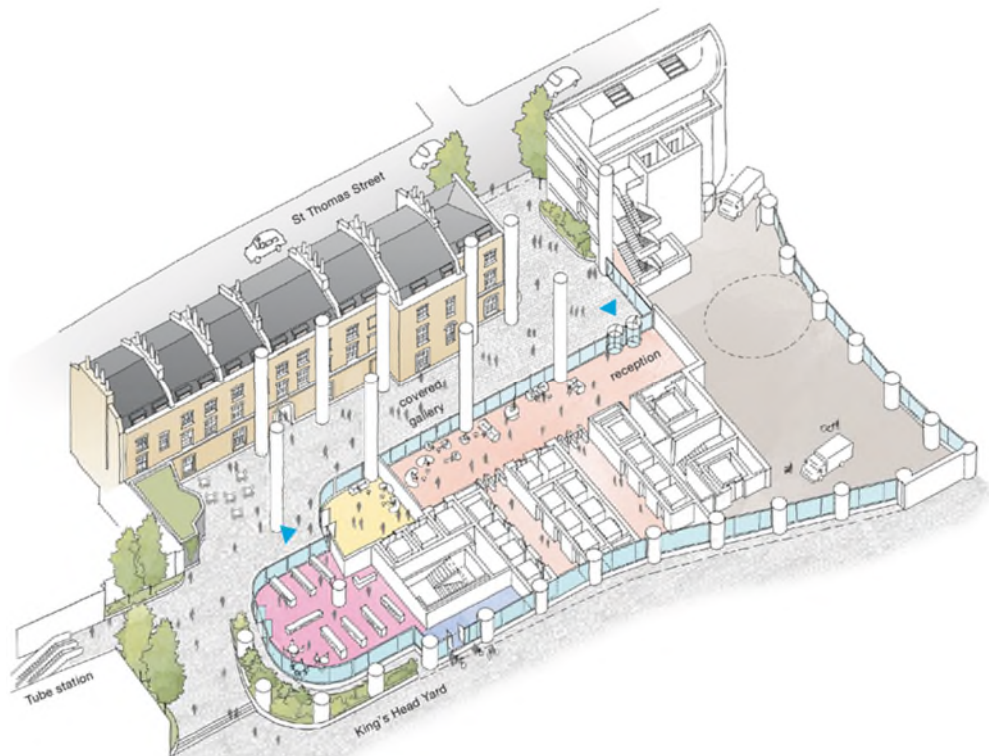


Fig 10. Illustration of proposed public realm (Source: AHMM)

- 9.2 The arrangement of built form and open spaces across the Site would have a strong sense of order and logic. It would open up a Site that is currently cut off from its surroundings, inviting the public to use a wide range of amenities intended to widen both the appeal, and appreciation of, the Borough High Street CA. An important benefit of providing a tall building on this Site over a development that replicates the existing building's model of a land hungry infill development is that it releases a significant portion of the Site for use as public space. The Site diagram maximises permeability across the Site through the creation of linked public spaces and routes that are fully integrated into the surrounding street network. The character of these new spaces and links takes inspiration from the historic context of the Site. They

would prove a vital and viable part of Borough, activated day and night by a constant pedestrian flow, supported by the new entrance provided for London Bridge London Underground Station. The contribution to the public life of the Borough area would be an enduring benefit of the 2021 Scheme.

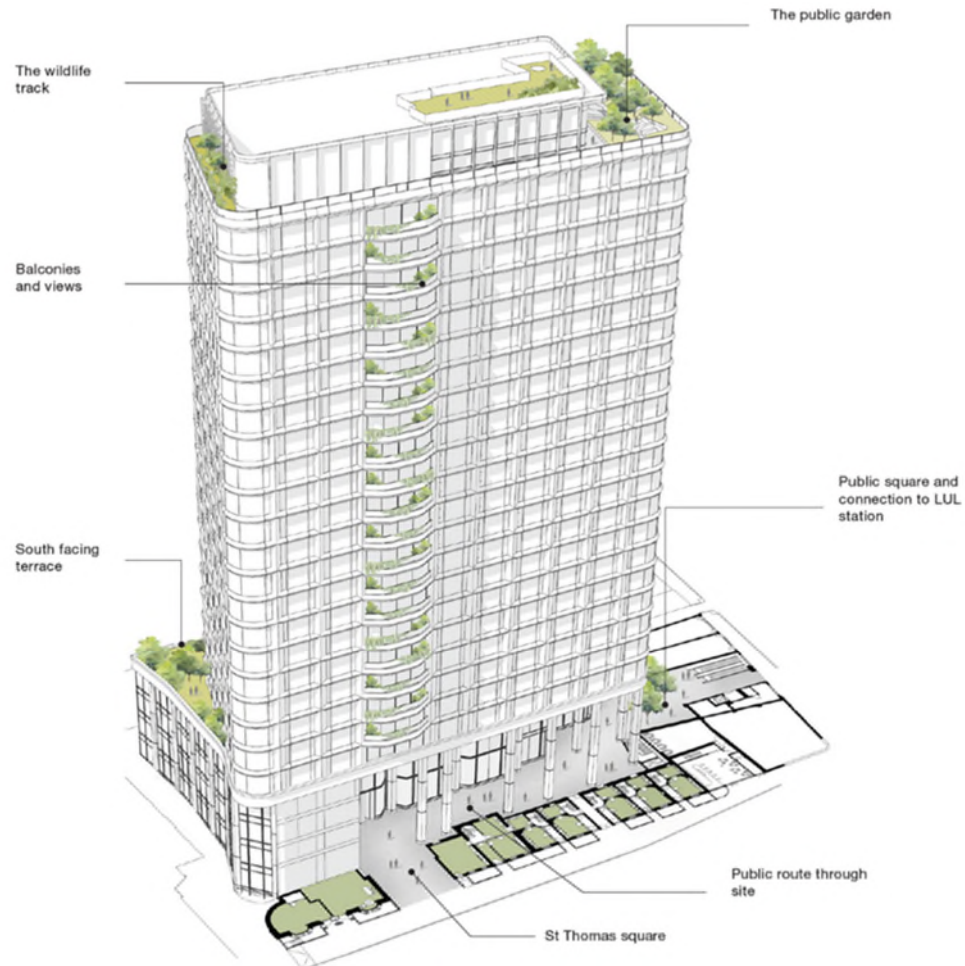


Fig 11.: Location of proposed amenity spaces (Source: AHMM).

- 9.3 The 2021 Scheme's tower building, which would be comparable in height to Shard Place, would mark the western end point of a run of tall buildings situated on or close to St Thomas Street, including Shard Place, The Shard and Guy's Hospital Tower, together with further projects proposed to their east. Development of the height proposed would also help to promote the Site's new public amenities and functions in the area. The difference in scale between the tall building and the historic buildings found in this area would be consistent with the large differences in scale which are already evident within this part of the conservation area, contrasts that provide striking juxtapositions and views, adding richness to the area's character and making it so memorable as a place.

- 9.4 The tower building would have a distinctive form and profile, and highly ordered elevations, with depth and articulation. The manner in which the office building's form, massing and elevations would be articulated both vertically and horizontally would successfully break down its scale. Its expression also makes direct references to the historic warehouse buildings found in this part of the conservation area (and this area of Borough more widely). The top of the building would have a distinctively modelled appearance, concealing roof plant from view. The DAS sets out a thorough and carefully considered design process that has balanced, as any good design must, the requirements of the brief with the requirement to respond appropriately to the particular characteristics of the Site and its setting. The result is a building that is a work of architecture of high quality in its own right that relates successfully to its immediate and wider context.

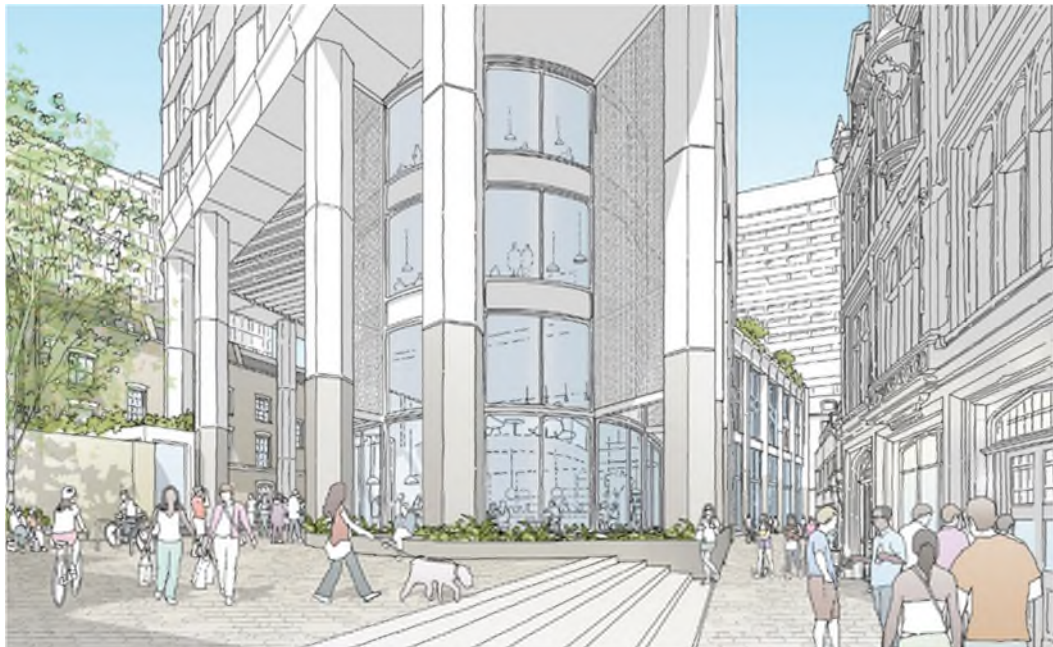


Fig 12. Illustrative view showing the new public realm and the lower levels of the proposed tower from King's Head Yard (Source: AHMM).

The effect of the scheme on views

- 9.5 The TVIBHA provides 'before and after' view images from 56 viewpoint locations agreed with LBS and consultees including HE, together with a narrative and assessment for each view as existing, as proposed, and as proposed when considered in combination with other relevant projects that have been submitted or consented but not yet built ('cumulative' schemes) [CDB.14].
- 9.6 In the long range views illustrated in the TVIA [CDB.14], including LVMF views, the 2021 Scheme would be seen to add coherently to the grouping of large scale and tall buildings at London Bridge, in those cases where it would be seen to any noticeable extent (see TVIA views 1-9). Where visible in conjunction with St Paul's Cathedral, the

2021 Scheme would not affect one's ability to perceive and appreciate that landmark from those locations.

- 9.7 In medium range views to the south/south-west of the Site, opportunities to view the 2021 Scheme would be limited to the few larger open spaces located in the Bermondsey and Newington areas and those streets aligned on the Site (e.g TVIA views 29-32). Where seen, it would be in conjunction with existing tall development at London Bridge, particularly The Shard and Guy's Hospital Tower – and therefore, would not come as a surprise to the viewer.
- 9.8 In medium range views from points to the north of the Site, from the bridges and north bank of the Thames (e.g TVIA views 12, 16, 18), the 2021 Scheme would be recognised as forming part of the grouping of large scale and tall buildings at London Bridge, the main focus of which would remain The Shard. The 2021 Scheme's refined form and massing and high-quality architecture would be seen to complement that of The Shard and the other large scale 21st century buildings that form the 'foothills' to this Southwark landmark.
- 9.9 In medium to close range views from the Borough area (e.g. TVIA views 31-47, 49-54), the 2021 Scheme would be a noticeable, and sometimes prominent, addition to the local townscape. It would form a dramatic contrast with the buildings on surrounding streets, such as St Thomas Street and Borough High Street, in a manner comparable with the relationship between the nearby grouping of large scale and tall buildings located at London Bridge and the lower scale buildings in their immediate vicinity. The closest of these large buildings to the Site, Shard Place, lies within the same conservation area as the 2021 Scheme. This contrast is an established aspect of the part of the conservation area within which the Site lies. The high quality architecture of the tower building, which has been designed to reflect its local context, would be a positive aspect of such views.
- 9.10 In respect of visual impacts, there would be beneficial effects on a number of views in the local and wider townscape (TVIA views 12, 18, 20, 30, 37, 43, 44, 54) – not least the marking of a point of townscape significance at the confluence of two historic main roads, and the strengthening of the London Bridge gateway to Southwark through the consolidation of the existing grouping of tall buildings at London Bridge. In addition, there are significant positive experiential aspects of the 2021 Scheme as noted above, in respect of improvements to local pedestrian routes, the provision of new public realm and elevated views of the conservation area from the proposed public rooftop garden.
- 9.1 It is to be expected that a building of the scale proposed for a Site that lies within a conservation area that features a number of highly graded listed buildings would have some significant effects on the local townscape and views, as has been the case with all the recent tall building projects in central London. The TVIA [CDB.14] notes a small number of those effects on views that are identified as adverse in nature, including

views of Southwark Cathedral, Guy's Hospital, Borough High Street and St Thomas Street (TVIA views 35, 36, 39, 41, 42, 49, 50).

- 9.2 In the few instances where significant adverse effects have been identified, it is not considered that the effect of the 2021 Scheme would be unacceptable. Rather, it is an acknowledgement that the quality of the view affected – which may or may not have a specific pictorial quality today – would be somewhat diminished as a result of the introduction of the 2021 Scheme, but not necessarily to an unacceptable degree. In coming to the conclusion about the overall effect of the 2021 Scheme, adverse effects should be balanced against the substantial beneficial effects the 2021 Scheme would bring.

The effect of the scheme on identified townscape character areas

- 9.3 The 2021 Scheme would reinforce the existing character of TCA 1 (Bankside, Borough and Potters Fields) within which it is located. In places, it would result in a pronounced contrast in height in relation to the lower scale development of the area, echoing similar juxtapositions created by post-war and modern tall development at London Bridge. As a consequence, there would be a limited number of significant adverse effects on individual views within the TCA. The 2021 Scheme would enhance the Site's appearance and amenity value through its contribution to the legibility and composition of the grouping of tall buildings around London Bridge, its distinctive, high quality architecture, and through the provision of new routes and public spaces.
- 9.4 The 2021 Scheme would add coherently to an existing background layer of townscape of central London, as seen from TCA 2 (Newington) and TCA 3 (Bermondsey), in particular, augmenting the grouping of large scale and tall buildings at London Bridge from those viewpoints where the 2021 Scheme would be seen to any noticeable extent (e.g. views 29 and 30) .
- 9.5 The 2021 Scheme would be seen to add recognisably to the existing grouping of large scale and tall buildings marking London Bridge Station from TCA 4 (Tower) and TCA 5 (North Bank). Its high quality architecture would lend it an affinity with the modern buildings in this group – The News Building, The Shard and Shard Place.
- 9.6 The 2021 Scheme would be consistent with national, regional and local planning policy in respect of townscape and design matters as a result of its high quality architecture and urban design. It would not adversely affect any LVMF or Borough Views. A limited number of local views would be adversely affected, though not to an unacceptable degree. Overall, the 2021 Scheme would enhance the skyline of London, and is in line with the London Plan and LVMF.
- 9.7 In conclusion, the 2021 Scheme would transform the Site from a disparate collection of buildings, varied in quality, into a major new development in which the best

buildings are retained, a major and substantial new building of high quality is added, and the buildings are brought together into a coherent whole with a significant new contribution to the public realm of the conservation area which provides useful new routes and connections, and a variety of new landscaped spaces open to all. The 2021 Scheme would encourage more use and enjoyment of King's Head Yard, benefitting the conservation area in which it lies. The 2021 Scheme's tower building would be at a height and scale that would reflect the landmark significance of the Site at the intersection of Borough High Street and St Thomas Street, in close proximity to London Bridge Station. It would take advantage of the townscape opportunities offered by the Site, to the benefit of the local and wider area around it.

Cumulative effects

- 9.8 The TVIA notes that some of the cumulative schemes considered would reduce the visibility of the 2021 scheme. Paragraph 7.4 notes:

'Consented development at Capital House and development submitted for planning approval at Vinegar Yard and Edge London Bridge would change the significance of effect in view 7 from 'minor' to 'no effect'. Consented development at Bankside Yards East and West would change the significance of effect in view 14 from 'minor/negligible' to 'no effect'. Development submitted for planning approval at Colechurch House would change the significance of effect in view 19 from 'minor/negligible' to 'no effect'. In all remaining views the significance of effect is unaffected by cumulative development'.

Cumulative schemes have since been updated for the Inquiry to reflect the Mayor's approval of development at Vinegar Yard, Southwark, SE1 (LBS reference number 18/AP/4171), and the submission of the scheme at Minerva House, 5 Montague Close, Southwark, SE1 (LBS reference number 21/AP/4194). One cumulative view has been updated to illustrate the effect of the approval at Vinegar Yard when seen alongside neighbouring approved schemes on St Thomas Street from the Tower of London World Heritage Site: View 21: Tower of London: Inner Ward, north of the White Tower. Two cumulative views have been updated to include Minerva House where it would be most apparent in the context of the 2021 Scheme: View 12: LVMF 12B.1 Southwark Bridge: downstream – close to the City of London bank; and View 18: London Bridge: upstream – at the City of London bank. Those views are found in Appendix 2 of this proof. The additional cumulative views assessed in Appendix 2 (which include the Minerva House and Vinegar Yard schemes) would not affect the conclusions regarding cumulative assessment of views in the TVIBHA.

- 9.9 The cumulative schemes do not affect the conclusions concerning effects on the TCAs considered.

10 The 2021 Scheme: assessment - heritage

- 10.1 The 2021 Scheme would deliver a carefully considered proposal that is particular to this place and of a high standard of design that is sensitive to heritage assets. PSC was actively involved in the design process, providing advice on potential effects on heritage assets and their settings.
- 10.2 An assessment of the scheme design was set out in the previous section. The quality of the design and the appropriateness of the design to its context important in determining the effect of the 2021 Scheme on the heritage significance of relevant heritage assets. The architectural language and use of materials are respectful of the historic context, with references derived from the warehouse architecture of the area.
- 10.3 At ground level, the arrangement and character of the routes and spaces contribute to an enhanced experience of the part of the Borough High Street CA around the Site, not least King's Head Yard, in terms of new high quality public realm, active uses, and better local connections, supported by the new exit provided to London Bridge LUL Station. The 2021 Scheme would deliver a major new attraction in the conservation area, providing an experience that complements that of Borough Market, the High Street, George Inn Yard, and the recently opened public space in Guy's Hospital courtyard. The 2021 Scheme is uniquely placed to deliver both new and improved connections that are safe and attractive to use, for the wider benefit of the CA.
- 10.4 The Heritage Statement (HS) provides statements of significance for all relevant HAs, and an assessment of the effect of the 2021 Scheme on significance of those assets.
- 10.5 In most cases there is little impact on designated HAs on both sides of the River Thames. The 2021 Scheme's tower building will be viewed in conjunction with The Shard, Guy's Hospital Tower, The Place and Shard Place, as part of the largely post-war and modern grouping of tall buildings located around London Bridge Station. It is of a high quality of architectural design and use of materials and finish and will be positive addition to central London's townscape.
- 10.6 The TVIBHA and HS concluded that there was some 'less than substantial' harm to two designated heritage assets: Southwark Cathedral and Guy's Hospital. The Statements of Case (SOCs) of LBS and HE state that there is less than substantial harm to a number of other heritage assets. The assets in question are:
- a. Less than substantial harm identified in planning application (and by LBS and HE):
 - 1. Guy's Hospital
 - 2. Southwark Cathedral
 - b. Less than substantial harm identified by LBS and by HE:

1. Borough High Street CA
2. Tower of London
3. St Paul's Cathedral

c. Less than substantial harm identified by LBS, not identified by HE:

1. The George Inn
2. The Monument and St Magnus the Martyr Church
3. 9, 9A and 11-13 St Thomas Street
4. Church of St George the Martyr
5. Bunch of Grapes Public House
6. Nos. 4-8 and 12-16 St Thomas Street
7. 15 St Thomas Street
8. Kings Head Public House
9. Trinity Church Square Conservation Area
10. The Bank Conservation Area in the City of London.

All of the heritage assets listed above are considered below. A large number of other heritage assets were considered in the TVIBHA and the HS, which concluded that there was no harm to their heritage significance. These have not been identified by LBS or by HE as being harmed by the 2021 Scheme; they are not considered further below.

Borough High Street CA

10.7 The principal effects of the 2021 scheme on the character and appearance of the CA are as follows:

1. On Site: replacement of some of the existing buildings by new buildings, the remaining buildings being retained; the creation of new routes and spaces and connections; and the opening up of the Site to the public.
2. Kings Head Yard: the replacement of the existing inactive 2 storey screen and four storey office building on the north side of the yard (i.e. the south side of the Site) with the new elevation to the lower part of the new building, and the creation of public space opposite the Kings Head Public House.
3. St Thomas Street: replacement of the 1980s entrance building to no.20 St Thomas Street by new open space, giving access to the Site; sensitive reconstruction of Keats House; reordering of nos. 4-8 and 12-16 St. Thomas Street; and the visibility of the new office tower as seen above the existing street frontage building and across the new entrance square.

4. Remainder of the CA: views from various places in the CA of the upper parts of the new office building.

These effects are considered in turn below.

- 10.8 The Site in its existing arrangement has little in the way of a public face and no public access. The 2021 Scheme opens it up to the public, with new routes and spaces and significant new active frontages. The variety of spaces proposed in the 2021 Scheme, providing both hard and soft landscape, will be located away from traffic, and be well connected with their surroundings in all directions. The planning of these spaces is informed by an in depth analysis of the character of the conservation area, as experienced today, and a study of the historic development of the Site and its surroundings. These spaces would add positively to the conservation area.
- 10.9 Proposed internal spaces include the entrance hall of the new office building, which will have a strong presence – not obviously related to the existing character of the conservation area, but bringing something new and attractive to a varied area, in a manner comparable with the new glazed hall of Borough Market facing Borough High Street. The public roof garden will also bring something new to the conservation area and allowing one to appreciate it from an elevated position.
- 10.10 The character and appearance of Kings Head Yard have informed the design of the south face of the proposed development. The redevelopment of this frontage results in the loss of some historic fabric but the new elevation makes successful reference to the character of the conservation area and provides active frontage. There are new connections from the yard to public spaces on Site to the east and west of the main new building. The effect is to maintain the reading of the historic yard but to make it more attractive and better connected with its surroundings, improving the setting of the Kings Head Public House considerably in the process.
- 10.11 TVIA view 37 illustrates the Site's new relationship with Kings Head Yard. On entering the yard from Borough High Street, there will be a sense of a discovered space and refuge from the trafficked High Street. The cobblestone route and steps and trees will make the threshold into the Site proper, where the new public open space and route are overlooked by the ground floor spaces within the new tower, the route through to St Thomas Street between the new building and the Georgian terrace providing a striking new variant on the theme of the yards – a great improvement on the relation between the 1980s New City Court building on the Site and the 'left-over' spaces around it, and an example of how the presently rather degraded character of some of the other former historic yards off Borough High Street could be improved. .
- 10.12 In St Thomas Street, the principal effects are the work to the listed buildings and Keats House; the loss of the existing 1980s no.20 St Thomas Street frontage building; the opening up of the space in the street frontage between these; and the presence of the new office building seen to the south of these buildings. The proposed works

would result in the relocation of the original façade of Keats House, and the creation of a building of a more traditional and appropriate construction. These works will give Keats House a new life and its contribution to the character and appearance of the conservation area will be significantly enhanced as a result.

- 10.13 The new opening in the street frontage makes a significant difference to the street: a modern analogue of the Guy's forecourt, informal rather than axial in its composition, a new open space leading to a series of open spaces and buildings beyond. As well as being seen through the new opening in the street, the new tower building will be a major new presence in parts of St Thomas Street where it is seen above and beyond street frontage buildings, in a manner comparable with the effect of the Shard, the Guy's Hospital Tower or Shard Place.
- 10.14 The remainder of the Borough High Street CA includes many listed buildings, some of them highly graded. The effects on the settings of these are considered later in this section. In respect of the remainder of the conservation area, the views assessed in the TVIA show that the tower building will be prominent from some streets within the CA, principally from the major main roads, Borough High Street, St Thomas Street and Southwark Street. It will appear as a development of high architectural quality, its expression clearly informed by the character and appearance of the conservation area within which it lies.
- 10.15 In considering the effects of the new main building it is useful to consider the effects of the existing tall buildings in the area. A distinction may be made between Guy's Hospital Tower – a routine building of its time, lacking in architectural quality and admired by almost no one – and the Shard and Shard Place – designed by an eminent architectural practice, of a quality that was recognised by the respective decision makers (the Secretary of State and LBS respectively), and admired by many. As all relevant guidance makes clear, for a tall building to be acceptable, it should be of a high standard of architecture.
- 10.16 As a corollary, if a new building is of a high standard of architecture, it is likely to add positively to views in which it appears. The 2021 Scheme would result in some striking new conjunctions between old and new, and between the small scale of historic buildings and the large scale of new buildings. Such contrasts are not unusual in central London – examples include, in the City of London, the 30 St Mary Axe tower seen in the backdrop of the Grade I listed St Andrew Undershaft church, and, with other recent tall buildings, in the backdrop of the Tower of London (see Figure 7 above); and in Southwark, The Shard seen in the backdrop of many small scale historic buildings, and the Neo Bankside development seen in the backdrop of the Grade II* listed Hopton's Almshouses (see Figure 8).
- 10.17 Although the 2021 Scheme lies within a conservation area, whereas The Shard and Guy's Hospital Tower do not, this does not make a fundamental difference to the nature of the impacts when one is considering the effect on the backdrop of a view –

the addition of a new tall building into what is presently sky space. The visual impact of Shard Place - which also happens to fall within the same conservation area as the Site - would not change if the conservation boundary were altered to exclude that development.

10.18 The character of the conservation area is not just to do with what one sees. It also derives from patterns of activity, use and inhabitation. The existing 1980s buildings on Site are standard office buildings with few positive aspects. The 1980s main entrance building on St Thomas Street offers few clues that there is a large office building behind. By contrast the 2021 Scheme would make major contributions to the life of the conservation area: in providing new public routes, spaces and connections; in the new public and semi-public spaces at upper levels, which will offer new views over the conservation area; and in the connection between the new tower building's entrance hall and St Thomas Street, which by its visibility and accessibility connects the office space much more directly with the life of the streets around it and the wider conservation area. For those who live and work in the area and for those who visit, the association between Borough High Street as a historic commercial artery and the major transport node at London Bridge would be reinforced by the experience of using the Site's new exit to the LUL station as an outlier of the mainline station.

10.19 The effects of the proposed development on the conservation area may be summarised as follows:

10.20 Effects on and close to the Site at the lower levels:

1. Replacement of poor existing office building by a high quality new building, including an elevated public garden terrace from which to appreciate the CA;
2. New, high quality public realm on the Site that is fully integrated with its surroundings, enhancing local connections and offering a safe alternative for pedestrians to the trafficked road junction of the High Street and St Thomas Street, and providing a new entrance to London Bridge LUL Station;
3. Significant improvements to the experience of Kings Head Yard, with new active frontages and public space replacing the Site's inactive screen wall and vehicular service entrance; and
4. Listed buildings on Site, and their immediate settings on Site at ground level and lower levels, reordered and improved.

10.21 Middle distance effects:

1. The new tower building will be seen in the backdrop of the Guy's Hospital main building, and in the backdrop of the existing listed buildings on Site (these buildings are close to the existing London Bridge cluster);
2. The new tower building will be seen in the backdrop of Southwark Cathedral, the George Inn and the Tower of London - as are existing tall buildings at London Bridge; and

3. The new tower building will be seen in the backdrop of various CA views, including from Southwark Street, Borough High Street and St Thomas Street.
- 10.22 The 2021 Scheme will have an adverse effect on some views within the CA – in particular, it may be felt by some that the new building will overshadow smaller historic buildings in such views to an unacceptable degree. Such effects will however be individual incidents within a very large CA, across much of which the 2021 Scheme will have little or no effect. The change to the character and appearance of the CA that is brought about by the 2021 Scheme will be major in its immediate locality but not across the whole of the CA, which is the designated heritage asset under consideration. The TVIA states that there would be adverse effects, as seen in certain views, that would result from the 2021 Scheme but that these do not necessarily mean that the result is unacceptable, but rather that that view as seen before is preferable to the view as proposed, considered as a visual or pictorial composition. The adverse visual effects of this kind should be weighed against the many positive qualities of the 2021 Scheme which would benefit the conservation area as a whole, both in respect of its heritage significance and in more general terms.
- 10.23 Taking into account the fact that tall buildings at London Bridge and in the City are an existing aspect of the character and appearance of the conservation area, the change that will result will not bring about any effects of a kind that are not already present, in respect of the presence of substantial modern buildings which contrast with finer grained, older parts of the conservation area. The high quality of design will be a factor that will tend to result in effects being positive rather than negative.
- 10.24 The balance to be struck in reaching a judgement about the effect of the 2021 Scheme on the CA is comparable with that which applied in determining the planning application for Shard Place, close to the Site and also in the conservation area; the report to committee for that scheme stated at paragraph 107 that ‘Officers are satisfied that this is a point of landmark significance and that the council’s policies in respect of conservation areas can support a proposal that conserves the significance of the conservation area whilst at the same time delivering substantial enhancements to this historic area and its setting.’
- 10.25 The effects of the 2021 Scheme on this CA can be summarised as falling into two main categories: effects on and immediately around the Site, mainly resulting from the public realm proposals and the lower parts of scheme; and effects more widely, mainly resulting from the visual impact of the tower.
- 10.26 The closer-up effects are positive; the benefits for local residents, workers and visitors will include new active ground floor uses, new areas of public realm which will be attractive in their own right and will also relieve pedestrian congestion and provide useful new pedestrian links, relieve pedestrian congestion at the Borough High Street / St Thomas Street junction and provide better and less congested access to the

underground station. All of this improves the character and appearance of this city centre CA.

- 10.27 The 2021 scheme will be prominent from some locations within the CA, principally from the major roads. It will not be visible from street level from most of the CA. The views illustrated in the TVIBHA are chosen for the most part to be representative of those locations from which it will be seen. When seen from some points within the CA the 2021 scheme will be seen as a high quality addition to the existing group of tall buildings; from other locations it will be seen on its own in the backdrop of the existing CA buildings, comparable in its effect with many tall buildings in central London, including the Shard.
- 10.28 Effects on the CA are not limited to visual effects. Most people who experience the visual effects of the tower building as seen in mid distance views within the CA will be people who live or work in the area or who are regular visitors. The tower building will be the marker of the new place that is created by the 2021 Scheme, with its active ground floor uses, access to the underground station, and improved public realm. The tower will be a marker of a place with a positive and attractive quality, rather than just an anonymous office building. The experience of what is seen in a view and the reaction to it is influenced by what the viewer knows about what they are looking at - in this case, a new building that is a high quality work of architecture in its own right, but also a marker of a larger redevelopment which offers significant benefits to the area.
- 10.29 In summary, the effect of the 2021 Scheme on the character and appearance of the conservation area, considered in the round, is positive. There are some minor losses of heritage significance, as a result of adverse effects on the appearance of the CA as seen from a limited number of locations, but these are outweighed by the substantial public benefits, in terms of urban design and townscape improvements to the Site and to the wider area delivered by the scheme, which include significant improvements to the character and appearance of the CA.

4-8 and 12-16 St Thomas Street

- 10.30 The Listed Building Heritage Statement by KMHeritage [CDB.15] considered the effect of the proposed works to this listed Georgian terrace on its special interest (see ES Part 4: Appendices for this report) [CDB.15]. It noted a number of benefits that would result from the proposals, including:
1. The reversal of inappropriate change to the terrace and the reinstatement of plan form, decorative detail and appropriate materials;
 2. The recreation of the passageway from St Thomas Street; and
 3. The provision of suitable uses that would help sustain its significance over the long term.

- 10.31 KMHeritage concluded that the works would preserve or enhance the special architectural or historic interest of the terrace, as well as enhance the character and appearance of the Borough High Street CA.
- 10.32 The TVIBHA also assessed the effect of the proposals on the setting of this listed terrace. It noted that most significant change to setting would be the removal of the 1980s office building on the Site, which adjoins the terrace to the south and east, and the introduction of a tall office building immediately to the south of the terrace, separated by a new public route. A new public space would be located immediately to the east of the terrace on St Thomas Street, where the existing office building's entrance block at no.20 stands today.
- 10.33 The removal of the 1980s office development from the Site would return nos.4-8 and 12-16 St Thomas Street to their original state as a stand-alone terrace. This would better reveal their heritage significance by allowing one to appreciate these buildings from the new public realm proposed on the Site to their south and east.
- 10.34 The proposed tower building would represent a very noticeable change to their immediate context. The tower would be prominent in views of the terrace from the west, at Borough High Street's junctions with St Thomas Street and Bedale Street, where it would be seen to rise above the roofline of the terrace alongside Guy's Hospital Tower. This is apparent from TVIBHA view 45 (Bedale Street) and view 46 (Borough High Street, corner with Bedale Street), where it is apparent that the silhouette of the terrace is seen against Guy's Hospital Tower. Both The Shard and Shard Place are also seen to feature prominently in the view from Borough High Street, located a short distance away on the north side of St Thomas Street.
- 10.35 The tower building would also be prominent in views of the terrace from the east, moving west on St Thomas Street. As illustrated in TVIBHA view 42 (St. Thomas Street, corner with London Bridge Street), one would observe a dramatic contrast in scales, and a clear juxtaposition of the historic and the modern – of a kind that is commonly observable in this northern fringe of the conservation area, close to London Bridge Station. The degree to which the tower dominates the existing street scene from some viewpoints would be considerable, disrupting the coherent quality of the view of the terrace from the corner with London Bridge Street, as TVIBHA view 50 illustrates.
- 10.36 As one moves closer still, one's awareness of the tower above would diminish and one would see the terrace in a new light as a result of the new public space introduced between the building and Keats House, where the 1980s entrance block to no.20 once stood. This is illustrated in TVIA view 43 (St. Thomas Street, opposite Guy's Hospital) and TVIA view 44 (St Thomas Street, outside St. Thomas' Church). That space would draw one into the Site, where one would appreciate the listed buildings from the south from the new route that runs alongside them.

- 10.37 The terrace, as redeveloped, would form an integral part of the proposals. The delivery of significant new external and indoor public space on the Site would enhance the contribution made by the terrace to the conservation area, giving visitors the chance to appreciate its newly revealed south elevation. The re-established pedestrian 'short cut' from St Thomas Street through no.8 will also contribute to the objective of opening up a Site long cut-off from its surroundings through the provision of new and enhanced local connections.
- 10.38 While the 2021 Scheme would have an adverse effect on TVIA view 42, the overall impact on these listed buildings would be a positive one.

Southwark Cathedral

- 10.39 The Site in its existing state does not form part of the Cathedral's setting and the only significant visual effect of the 2021 Scheme is the effect on views of the Cathedral from points to its north round to its west, that is, from Montague Close.
- 10.40 The 2021 Scheme's tower building will introduce a large new building into the backdrop of the Cathedral as seen from Montague Close, as shown in the TVIA view 49.
- 10.41 The new tower will appear in the backdrop of the Cathedral before The Shard as one proceeds west (looking over one's shoulder to the south-east), but the effect is similar – adding a further new building of high quality to the backdrop.
- 10.42 Views are not heritage assets. My assessment of the effect of the 2021 Scheme on the setting of the Cathedral, considered as a whole should be informed by the views studies, but it is the effect on the contribution of the setting of the Cathedral considered in the round, to its heritage significance considered as a whole, that is the relevant consideration.
- 10.43 Seen from Montague Close, the visual relationship between the Cathedral and the 2021 Scheme changes as one proceeds along the street. TVIA views 47 to 53 provide a series of snapshots of the changing effect and show that the tower building passes behind the Cathedral tower where they overlap.
- 10.44 In considering the visual effect it is helpful to consider what a visitor might choose to photograph. Views 49 and 50 as proposed show a visual relationship between the two where they overlap and the result is less visually pleasing than in other views, and the TVIA assesses the effect as adverse in each case (paragraphs 5.605-607, 5.618-5.620). In view 51 both towers can be seen plainly and separately and the TVIA (paragraph 5.631) notes that 'Compared with the two previous views, the view from this viewpoint has more positive pictorial qualities in respect of the relationship between the new and old towers. Unlike the previous two points in this dynamic sequence, one

can imagine a visitor stopping to take a photograph of this scene; and it is the kind of relationship between old and new that some people find positive and others do not. The 2021 Scheme is not over dominant from here and the two towers are well balanced in visual terms. On the other hand, the commanding presence of the Cathedral from this particular point is undermined to some extent. This is not in my opinion a harmful effect on view 51, and the 2021 Scheme as seen here has no effect on the significance of the Cathedral, or the ability of the viewer to appreciate that significance.

- 10.45 There are positive and negative aspects of the effects of the 2021 Scheme on the Cathedral's setting. Most aspects of the Cathedral's setting are unaffected by the 2021 Scheme, but considered in the round, the 2021 Scheme would cause some harm to the heritage significance of this listed building. The degree of harm would be minor, arising mainly from the unsatisfactory visual relationship between the two towers as seen from certain points, which would have a small effect on the viewer's ability to appreciate the cathedral seen clearly against the sky. When one considers that most of the cathedral's significance subsists in its fabric; that its setting is varied and takes in many large commercial buildings, and that most of its immediate setting is modern, it is apparent that any harm to its significance is minor, and in NPPF terms, considerably less than substantial harm. The Chapter of Southwark Cathedral have given their support to the 2021 scheme (see CDC.016).

Guy's Hospital, St Thomas Street

- 10.46 The 2021 Scheme would alter the setting of the hospital, in respect both of views from along St Thomas Street, illustrated in TVIA views 42, 43 and 44, and of views from within the grounds of the hospital itself, as typified by TVIA views 39, 40 and 41. As a consequence, there would be some harm to the setting of the hospital. However, there will also be tangible, long term benefits to the setting of the hospital, namely, the new and enhanced local connections to the hospital, and new spaces and high quality public realm provided by the 2021 Scheme. Most aspects of the hospital and its setting would be unaffected by the 2021 Scheme. However, considered in round, the 2021 Scheme would cause some harm to the setting of this listed building. The degree of harm would be considerably less than substantial harm.

Tower of London World Heritage Site

- 10.47 The 2021 Scheme would be visible only from limited points within the WHS. Looking out from the WHS, from those points where it would be seen, the 2021 Scheme would appear as part of the grouping of late-20th century and modern tall and large scale buildings at London Bridge, providing balance to the composition. The 2021 Scheme would not harm any elements of setting that contribute to the heritage significance

or OUV of the WHS. There would be no effect on any of the attributes of the OUV of the WHS. There would be no harm to the heritage significance of the WHS.

10.48 Historic Royal Palaces raise no objection to the 2021 Scheme (see CDC.017).

St Paul's Cathedral

10.49 The TVIBHA for the 2021 Scheme included a number of LVMF views, which informed the assessment of effect on the heritage significance of St Pauls. These included:

1. LVMF 1A.1 and 1A.2 from Alexandra Palace;
2. LVMF 2A.1 and 2B.1 from Parliament Hill;
3. LVMF 3A.1 from Kenwood House;
4. LVMF 4A.1 from Primrose Hill;
5. LVMF 6A.1 from Blackheath Point;
6. LBS Borough View 1 from One Tree Hill;
7. LBS Borough View 2 from Nunhead Cemetery;
8. LVMF 15B.2 from Waterloo Bridge;
9. LVMF 17B.2 from Golden Jubilee/Hungerford Footbridges;
10. Islington Local View 1 from Farringdon.

10.50 In terms of relevant LVMF views of St Paul's, the TVIA reveals that the 2021 Scheme would be most noticeable in the context of the Cathedral in LVMF 2A.1 from Parliament Hill and LVMF 3A.1 from Kenwood. In LVMF 2A.1, the 2021 Scheme would appear to the right of the western towers of St Paul's Cathedral and Guy's Hospital Tower, partially obscuring the hospital from view. The 2021 Scheme would not affect one's ability to perceive and appreciate the Cathedral from this location. In LVMF 3A.1, the 2021 Scheme would appear to the right of the dome of St Paul's Cathedral and Guy's Hospital Tower. The 2021 Scheme would appear behind one of the Cathedral's western towers, where the light brick-clad Avondale Estate towers are seen today. The extent of modern development behind the tower would be greater, but the effect would be to provide a clearer backdrop. The 2021 Scheme would not affect one's ability to perceive and appreciate the Cathedral from this or any other LVMF view assessed.

10.51 In terms of the relevant LBS Borough views, the 2021 Scheme would not affect one's ability to perceive and appreciate the Cathedral from either One Tree Hill or Nunhead Cemetery.

10.52 The 2021 Scheme would have no effect on those aspects of the Cathedral's setting that contribute to its heritage significance. It would be seen as an addition to the evolving urban landscape, consistent with the character of the existing setting of the Cathedral.

The George Inn, Borough High Street

- 10.53 Whilst the setting of this building will change noticeably, in respect of views from within the yard that it occupies, as typified by TVIA view 38, this will not harm any element of setting that contributes to the heritage significance of this building. Looking in the direction of the Site, The Shard is a very prominent aspect of such views today, above the roofline of the post-war office building defining the northern and eastern edges of this yard. Guy's Hospital Tower is also noticeable from here. The best views of the George Inn are at close range, looking south-west, away from the direction of the Site.

The Monument, Monument Street

- 10.54 The 2021 Scheme would be visible in the context of The Monument from Gracechurch Street, where it would be regarded as part of the evolving urban landscape, consistent with the character of its existing setting. This is illustrated in TVIA view 17. The 2021 Scheme would not harm any element of setting that contributes to the heritage significance of this listed building.

St Magnus the Martyr Church, Lower Thames Street

- 10.55 Where visible in the context of the church, the 2021 Scheme would be seen as an addition to the evolving urban landscape, consistent with the character of its existing setting. It would not harm any element of setting that contributes to the heritage significance of this church.

Nos. 9, 9A and 11-13 St Thomas Street

- 10.56 The setting of these listed buildings would be noticeably altered as a result of the 2021 Scheme. This would not harm any element of setting that contributes to their heritage significance. The best views of these buildings are at close range, from the north side of St Thomas Street looking away from the direction of the Site. The 2021 Scheme would be seen as an addition to the evolving urban landscape, consistent with the character of the existing setting of these listed buildings. That setting includes large scale and tall post-war and modern buildings on St Thomas Street and at London Bridge, including The Shard, The Place, Guy's Hospital Tower and Shard Place.

Church of St George the Martyr, Borough High Street

- 10.57 The 2021 Scheme would be seen in conjunction with other modern towers in the backdrop of some views of the church from the High Street (e.g. TVIA views 28 and 31). The 2021 Scheme would not harm any element of setting that contributes to the church's heritage significance.

Mary Sheridan House (part) and attached area railings, no. 15 St Thomas Street

- 10.58 The setting of this listed building would be noticeably altered as a result of the 2021 Scheme. This would not harm any element of setting that contributes to its heritage significance. The best views of this buildings are at close range, from the north side of St Thomas Street looking away from the direction of the Site. The 2021 Scheme would be seen as an addition to the evolving urban landscape, consistent with the character of no.15's existing setting. That setting includes large scale and tall post-war and modern buildings on St Thomas Street and at London Bridge, including The Shard, The Place, Guy's Hospital Tower and Shard Place.

Bunch of Grapes Public House, no. 2 Thomas Street

- 10.59 The setting of this listed building would change considerably in respect views south-east and north-west along St Thomas Street, as typified by TVIA views 42, 43, 45 and 46. The 2021 Scheme would be seen as an addition to the evolving urban landscape, consistent with the character of the existing setting of this listed building. That setting includes large scale and tall post-war and modern buildings on St Thomas Street and London Bridge, including The Shard, The Place, Guy's Hospital Tower, and Shard Place. This would not harm any element of setting that contributes to its heritage significance.

Kings Head Public House, Kings Head Yard

- 10.60 The 2021 Scheme will be seen as an addition to the evolving urban landscape, consistent with the character of the existing setting of this listed building. That setting includes large scale and tall post-war and modern buildings at London Bridge, including The Shard, The Place, Shard Place, and Guy's Hospital Tower, and the tall commercial buildings of the City of London. The 2021 Scheme will not harm any element of setting that contributes to the heritage significance of this listed building.

Bank Conservation Area (City of London)

- 10.61 Visibility of the 2021 Scheme would be restricted to the southern and western boundaries of the CA (Eastcheap and Gracechurch Street). This is illustrated in TVIA view 17, from the junction of Gracechurch Street and Lombard Street. There will be

no harmful effect on any element of setting that contributes to the heritage significance of this CA.

Trinity Church Square Conservation Area

- 10.62 Where visible from within the CA, the 2021 Scheme would be seen alongside the above-mentioned tall buildings. It would be a high quality addition to the wider context of the CA. There will be no harmful effect on any element of setting that contributes to the heritage significance of this CA.

Other heritage assets

- 10.63 There would be no harm to the heritage significance of any other designated HAs, including the WHS, or any other listed buildings or other conservation areas; including to any element of setting that contributes to their significance.

Cumulative effects

- 10.64 The cumulative schemes considered in the TVIA do not affect any the conclusions concerning the effects of the scheme on heritage significance.

11 How the 2021 Scheme improves the area, meets policy objectives and is consistent with policies on design and heritage.

NPPF

- 11.1 The 2021 Scheme brings about significant improvements to the Site and its setting, meets the various design and policy objectives of the NPPF, London Plan and LBS, and is consistent with relevant policies on design and heritage.
- 11.2 **Paragraph 130 of the NPPF** sets out a helpful set of design considerations against which schemes should be assessed. The 2021 scheme has been designed with all of these considerations in mind and it succeeds in each of the respects identified – which, importantly, are not just to do with what the scheme looks like, but also with how it functions and contributes to its location more generally.
- 11.3 Set out below is my assessment against each of the points identified in paragraph 130. The commentary should be read in the context of an important overarching point about the merits of the 2021 scheme. The existing building on site offers nothing positive to its surroundings. The scheme transforms the Site by creating an identifiable new place within the local area, because of the freeing up of the ground plane and the design of new public routes and spaces.
- 11.4 The 2021 Scheme will **function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.** The existing building on the Site offers nothing positive in the area. The 2021 scheme offers not just high quality new accommodation but also the reordering and restoration of the Georgian terrace and an attractive and much needed new area of public realm that achieves improved connections to the Underground station and relieves pedestrian pressure on the street network.
- 11.5 The 2021 Scheme is **visually attractive as a result of good architecture, layout and appropriate and effective landscaping.** This is an attractive scheme of high quality, designed by a prize winning practice, that bears comparison, in the high standard of design achieved, with other high quality projects completed within the immediate setting of the Site in recent years.
- 11.6 The 2021 Scheme is **sympathetic to local character and history, including the surrounding built environment and landscape setting.** The NPPF notes that policies and decisions should not ‘prevent or discourage appropriate innovation or change (such as increased densities) and this is clearly a recognition that ‘sympathetic to local character and history’ is not intended to mean that schemes must always conform closely to existing patterns.

- 11.7 The 2021 Scheme established a **strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.** The improved public realm and the relation between streets, spaces and the new and existing building would create an attractive new place within the conservation area that I am confident would come to be seen as enhancing its quality.
- 11.8 The 2021 Scheme **optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.**
- 11.9 The 2021 Scheme holds out the promise of creating a new place – where no identifiable ‘place’ exists at present - that is **safe, inclusive and accessible and which promotes health and well-being, with a high standard of amenity for existing and future users.**
- 11.10 **Paragraph 202 of the NPPF** states that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. The HA submitted with the planning application and my evidence submitted for the inquiry identify a certain amount of less than substantial harm to certain heritage assets but this does not necessarily imply a conflict with policy and guidance, since policies allow for the circumstance that benefits outweigh harm.
- 11.11 In line with this NPPF policy, any harm caused by the 2021 Scheme would in my opinion be greatly outweighed by the heritage benefits and the considerable wider benefits the 2021 Scheme will deliver in the local area in the form of urban design and townscape enhancements on Site (wider benefits are set out in the evidence of Chris Goddard). The urban design and townscape improvements benefit the character and appearance of this part of the conservation area and are heritage benefits in respect of the CA; other heritage benefits include the work to the listed terrace on Site and Keats House, and the improved setting to the Kings Head.

London Plan

- 11.12 It follows from the TVIBHA, the HS and from my evidence above that the 2021 Scheme complies with London Plan policies relevant to my evidence.
- 11.13 Policy D3. The 2021 Scheme optimises the capacity of this well connected and central site; it responds to and adds a further contribution to local character and enhances the local context; it provides active frontages' and it is of high architectural quality.

- 11.14 Policy D8. The public realm is well-connected and related to the local and historic context
- 11.15 Policy D9. The Site is in a location identified in the Local Plan as suitable for tall buildings. From the outset of developing the design, attention was paid to long range, mid distance and immediate views of the scheme. The scheme reinforces the spatial hierarchy of the London Bridge area. The architecture is exemplary. The minor harm to heritage significance is significantly outweighed by clear public benefits, as explained in the evidence of Chris Goddard. There is no effect on the Outstanding Universal Value of the World Heritage Site
- 11.16 Policy HC1. Generally the 2021 Scheme conserves the significance of heritage assets. In two cases, noted above, there is minor harm to heritage significance, outweighed by public benefits.
- 11.17 Policy HC2. The 2021 Scheme has no effect on the OUV of the WHS.
- 11.18 Policy HC4. The 2021 scheme is in line with the guidance in the LVMF. There is no effect on the on the viewer's ability to recognise and appreciate an identified strategically important landmark in any LVMF view.

The Southwark Plan 2019 to 2036

- 11.19 It follows from the TVIBHA, the HS and from my evidence above that the 2021 Scheme complies with Southwark Plan policies relevant to my evidence.
- 11.20 The 2021 Scheme makes a significant contribution to several of the objectives of the Local Plan's 'Area Vision' for London Bridge area (AV.11). It offers a distinctive, world class environment with inspiring new architecture and restored historic buildings; and high quality public realm that provides improved openness and connectivity. It builds on the fabric of local alleyways and yards to create quiet, green routes with clean air; it strengthens the cultural offer of the area and diversifies activities and shops. As required, The Shard remains significantly taller and more visible than surrounding buildings as the station's landmark. The scheme improves local accessibility and interchange at the station with enhanced pedestrian routes; and it contributes toward the creation of a vibrant new high street on St Thomas Street.
- 11.21 The scheme is in line with design and heritage related policies set out in the Southwark Plan; the significant points are as follows.
- 11.22 Policy P13 sets out criteria for the 'design of places' - generally concerning the relationship between a scheme and its context. The 2021 Scheme is consistent with these criteria: the height, scale, massing and arrangement respond positively to the existing townscape, character and context; the scheme 'better reveals' local

distinctiveness and architectural character and conserve and enhance the significance of the local historic environment, subject to the minor instances of harm to heritage significance noted above; the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths; the buildings, the public spaces, open spaces and routes are positioned according to their function, importance and use; public realm and landscape design are of high quality.

- 11.23 Policy P14 relates to the design quality of a scheme. The 2021 Scheme readily meets the standards that are set out, as is demonstrated in the DAS and the evidence of Simon Allford.
- 11.24 Policy P17 concerns tall buildings. The Site lies within an area identified as suitable for tall buildings. The 2021 scheme is consistent with requirements set out for tall buildings. It is located at a point of landmark significance; its height is proportionate to the significance of the proposed location and the size of the site; it makes a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and does not cause a harmful impact on strategic views, as set out in the LVMF, or to Borough views; it responds positively to local character and townscape; it provides a functional public space that is appropriate to the height and size of the proposed building; and provides a new publicly accessible space at the upper levels ().
- 11.25 Policy P17 also sets out design criteria for tall buildings; the 2021 Scheme is consistent with these. Its architecture is exemplary; it conserves and enhances the significance of designated heritage assets and makes a positive contribution to wider townscape character.
- 11.26 Policy P17 goes on to state that 'where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required.' This appears to equate an effect on significance with a harmful effect, which is not a correct approach to the assessment of effects. However, assuming that it is harmful effects which are referred to, the required justification of minor harm resulting from the scheme is provided in the evidence of Chris Goddard.
- 11.27 Policy P19 on listed buildings and policy P20 on conservation areas make similar stipulations to NPPF policies, and the considerations set out above apply to these policies as well; for the most part the 2021 Scheme does not result in any harm to heritage significance; in the two cases where minor harm would result, this is readily outweighed by the benefits of the scheme, which include heritage benefits and also wider public benefits as set out in the evidence of Chris Goddard.
- 11.28 Policy P22 concerns 'Borough Views', of which two are relevant to the 2021 Scheme:

- a. The effect of the proposal on the view from One Tree Hill is assessed in TVIA view 8. It would expand and consolidate the grouping of tall buildings at London Bridge. It would not affect one's ability to perceive and appreciate St Paul's Cathedral from this location.
 - b. The effect of the proposal on the view from Nunhead Cemetery is assessed in TVIA view 9. Much of it would be concealed from view by trees, and visibility would reduce further in the summer, when those trees are in leaf. It would not affect one's ability to perceive and appreciate St Paul's Cathedral from this location.
- 11.29 Policy P24 concerns World Heritage Sites. The 2021 Scheme has no effect on the OUV of the WHS.

12 Responses / objections to the 2021 Scheme

LBS Statement of Case

- 12.1 The LBS Statement of Case for the 2021 Scheme dated 16 March 2022 sets out 'likely reasons for refusal' together with a supporting narrative. The SOC formed the basis of a report to the LBS Planning Committee of 19 April 2022.
- 12.2 At 8.1 the SOC states that *'The proposed development would give rise to less than substantial harm to a number of designated heritage assets, and the harm is not outweighed by public benefits'*.
- 12.3 At paragraph 8.11 the SOC states that there would be less than substantial harm to *'the Outstanding Universal Value of the **Tower of London World Heritage Site** – the proposed tower would be significantly intrusive and distracting in views from the Inner Ward (harming its special enclosed character), in views from the Inner Curtain Wall walkway, and would cause less than substantial harm to the setting of the grade I listed **Queen's House**.'*
- 12.4 I have set out my assessment of the effect on these assets above. A view from the Inner Ward towards the Site is provided at view 21 in the TVIBHA. It is clearly not the case that the 2021 Scheme would be 'significantly intrusive and distracting' as seen from here - it would be a relatively modest addition to the existing group of several tall buildings that can be seen at London Bridge when looking from the Inner Ward, most notable of which is The Shard.
- 12.5 At paragraph 8.11 the SOC states that there would be less than substantial harm to the *'Grade I listed Cathedral Church of St Saviour and St Mary Overie (**Southwark Cathedral**) - the proposed tower would be significantly intrusive and distracting to appreciation of the silhouette and architectural composition of the listed building.'*
- 12.6 I have set out my assessment of the effect on this Cathedral above. The tower building appears in the backdrop of the Cathedral from certain points around Montague Close, and from some locations the visual conjunction of the office tower and the Cathedral Tower is unsatisfactory. This is comparable with the effect of The Shard on the Cathedral's silhouette as seen from other locations nearby. It is hard to see how this could affect appreciation of the architectural composition of the Cathedral, which is unaffected by the 2021 Scheme.
- 12.7 At paragraph 8.11 the SOC states that there would be less than substantial harm to *'the Grade I listed **St Paul's Cathedral** – reducing viewer's ability to appreciate the significance of St Paul's Cathedral (and to recognise and appreciate the Cathedral as a Strategically Important Landmark) in the Kenwood and Parliament Hill LVMF London Panorama views, and within the borough view from Nunhead Cemetery.'*

- 12.8 I have set out my assessment of the effect on this Cathedral above. If anything the viewer's ability to see the Cathedral from Kenwood is improved by the 2021 Scheme, though they would likely need binoculars to appreciate the difference; however this is a very minor aspect indeed of the Cathedral's setting when that is considered in the round, and there is no effect on the Cathedral's significance. There is no effect on the ability to recognise and appreciate the Cathedral from the Nunhead Cemetery viewpoint.
- 12.9 At paragraph 8.11 the SOC states that there would be less than substantial harm to the *'Grade II listed **Bunch of Grapes Public House** and nos. 4-8 and 12-16 St Thomas Street – particularly as the height and curved form of the tower's northern façade would loom behind this terrace of grade II listed buildings.'*
- 12.10 I have set out my assessment of the effect on these assets above. The new tower building - which unlike the 2018 Scheme does not have a curved northern façade - creates a dramatic juxtaposition with these listed buildings; there is no harm to the Bunch of Grapes, and the overall effect on the terrace is beneficial for the reasons set out above.
- 12.11 At paragraph 8.11 the SOC states that there would be less than substantial harm to the following heritage assets:
- Grade I listed The George Inn
 Grade I listed The Monument and St Magnus the Martyr Church
 Grade II* listed Guy's Hospital
 Grade II* listed 9, 9A and 11-13 St Thomas Street
 Grade II* listed Church of St George the Martyr
 Grade II listed 15 St Thomas Street
 Grade II listed Kings Head Public House
 Borough High Street Conservation Area
 Trinity Church Square Conservation Area
 The Bank Conservation Area in the City of London
- 12.12 The SOC does not state in what way harm is caused to these HAs. I have set out my assessment of the effect on these assets above; I do not consider that there is any harm to the heritage significance of any of them, nor to the ability to appreciate their significance.
- 12.13 At paragraph 8.14 the SOC states that 'the Appellant's Environmental Statement does not transparently and reliably identify the likely significant adverse effects of the Planning Application Proposal on built heritage, and thus why it should not be relied on for the purposes of determining the appeal'.

- 12.14 This point has been addressed in relation to the 2018 scheme and my response in the case of the 2021 is the same; I consider that our assessment is proportionate and adequate, and the differences between the parties are matters of professional judgement.
- 12.15 At paragraphs 8.20 and 8.21 the SOC states that 'the scale and design of the proposed development is not appropriate for this site and its surrounding context, resulting in harm to the townscape and local character'; and that 'The proposed tower would have harmful visual impacts due to its location, height, form, massing and materiality.'
- 12.16 From my assessment above it will be apparent that I do not agree with these contentions. The 2021 scheme is an exemplary design which responds to the specific conditions of the Site and its setting, and is appropriate to its context for the reasons I have set out above. In general it would not have harmful visual impacts; I have identified a small number of situations where the visual impact would result in some harm but this does not make the scheme as a whole unacceptable given the many positive aspects, both visual and otherwise.
- 12.17 At paragraph 8.23 the SOC sets out a series of points intended to demonstrate that the scheme does not comply with planning policies on tall buildings.
- 12.18 I consider that the 2021 scheme complies with policies on tall buildings, for the reasons set out in the previous section.

Historic England Statement of Case

- 12.19 HE's Statement of Case (SOC) provides the particulars of the case that HE will make in its evidence to the inquiry. They provide a combined SOC for the 2018 and 2021 Schemes and some comments on the 2021 Scheme are made with reference to comments on the 2018 Scheme.
- 12.20 **The Borough High Street CA.** HE state '*Although the Second Scheme is lower than the First, the contrast between it and the historic buildings along St Thomas Street would also be extremely marked, especially because in the Second Scheme the development's northern edge would be brought closer to the rear of these buildings*' and that '*The conservation area would also be harmed by the demolition of the historic south façade of New City Court and the creation of open public realm, in contrast to the continuous frontages with narrow alleyways and yards behind that characterise the area. This change would erode the historic street layout of King's Head Yard, which is illustrative of the historic pattern of yards in the backlands that underpins the overall significance of the conservation area*' and that '*Further erosion of the urban morphology of the conservation area and its authenticity would be caused in both schemes by deconstructing and relocating Keats House (identified as a positive contributor to the*

character of the conservation area) in a new location.' They consider that the harm would be broadly similar for both schemes.

- 12.21 The direct effect on the Borough High Street CA is considered in the HS and in my assessment above. I consider that the juxtaposition not harmful given the existing character of the CA and its setting - the contrast in scale is comparable with that which results from the presence of the Shard, Shard Place (which is in the CA) and the Guy's Hospital Tower. A contrast that is 'extremely marked' is not necessarily harmful - the contrast between the Shard and nearby listed buildings is an example of that. The addition of the 2021 scheme is consistent with the established character of the CA, of which such contrasts in scale are already a very obvious aspect. The HS notes that there are adverse effects on certain views in the CA but that the harm that would result from the 2021 Scheme would be considerably less than substantial harm.
- 12.22 In my view the scheme design has taken considerable care to enhance **King's Head Yard** and in particular the setting of the Old King's Head Public House. At paragraph 7.16 the HS notes that there are significant improvements to the experience of King's Head Yard, with new active frontages and public space replacing the Site's inactive screen wall and vehicular service entrance.
- 12.23 **Keats House** is considered at paragraph 7.9 in the HS which notes that its contribution to the character and appearance of the conservation area will be significantly enhanced as a result of the 2021 Scheme.
- 12.24 At paragraph 7.17 the HS notes that the harm to the CA would be offset by the many positive qualities of the Development which would benefit the conservation area as a whole, both in respect of its heritage significance and in more general terms.
- 12.25 If one considers what could be meant by '*substantial harm*' to the significance of this large and varied CA, it is hard to understand how the scheme can be said to cause harm that borders on that level of harm, by adding one more large building to an existing group of large buildings one of which, Shard Place has recently been built on a prominent site in the CA close to the Site. Although the 2021 Scheme is within the CA and large buildings referred to, except Shard Place, are not, that is not a distinction that is apparent in views other than those close to the Site.
- 12.26 The construction of the 2021 scheme could not, in my view, plausibly come close to causing the degree of harm to the significance of the CA that is alleged by HE.
- 12.27 **Southwark Cathedral**. HE compares the 2021 Scheme with the 2018 Scheme and considers that the 2021 Scheme would 'break the Cathedral roofline, again pitting it in direct visual competition with the Cathedral's dominant crossing tower, albeit to a lesser extent. We consider that the harm to Southwark Cathedral would, in that scheme, be located in the middle of the range of less than substantial harm.'

- 12.28 In my view the architectural and landmark qualities of the Cathedral are largely unaffected by the 2021 scheme, as with the 2018 Scheme; HE refers to *'the landmark quality it still retains despite the presence of modern buildings within its wider setting'*, meaning existing modern buildings rather than the 2021 Scheme, but with the addition of the latter, the point remains. The HS notes at paragraph 7.49 that there are positive and negative aspects of the effects of the 2021 scheme on the Cathedral's setting. Most aspects of the Cathedral's setting are unaffected by the scheme, but considered in the round, the scheme would cause some harm to the heritage significance of this listed building. The degree of harm would be minor and considerably less than substantial harm.
- 12.29 **Guy's Hospital.** HE considers that visibility of the 2021 scheme above the roofline of the west wing of the north courtyard causes harm *'at the upper end of the scale of less than substantial harm'*. They state that the scheme would *'appear to rise out of the west wing's central pediment, totally undermining the architectural meaning of its crowning feature, and entirely discordant with the formal composition which can currently be so well appreciated from this vantage point.'* In my view the meaning of the whole or the parts of the architectural composition is largely unaffected by the addition in its backdrop of a large new building which is clearly separate and different and has positive qualities of its own - a common type of conjunction found all over central London, with little or no effect on the meaning or significance of existing older buildings.
- 12.30 In their pre-application advice HE noted that the east wing is seen with major development at London Bridge in the backdrop. My view, set out in the HS (paragraphs 7.56-7.57), is that the effect on views does cause some harm to the setting of the hospital; that the project provides significant benefits to the setting of this HA as well; and that considered in the round, there is some harm to setting, but that this is considerably less than substantial. The points made above about the possibility of, or proximity to, *'substantial harm'* apply here too.
- 12.31 HE also refers to the question of the effect on the quality of light in the chapel; I have addressed this above and the same points apply to the 2021 Scheme.
- 12.32 **Tower of London.** HE considers that there would be some harm to the Tower of London but at a 'very low level' compared with the 2018 Scheme. The points that I made above in relation to the 2018 Scheme apply to the 2021 Scheme, to a correspondingly greater degree given the reduced extent of visibility from the Tower. There is in my view no effect on the OUV of the WHS, and no harm to the setting of the Queen's House.
- 12.33 **St Paul's Cathedral.** HE describes the effect on LVMF view 3A.1 from Kenwood as harmful as the scheme would cause *'notable visual distraction'*. This viewpoint is over 10km from the Site and the cathedral is hard to make out without binoculars. The Cathedral's dome and the towers of the west front are seen against a backdrop of

various tall buildings beyond the Cathedral, including the existing tall buildings at London Bridge. The addition of the 2021 Scheme makes no difference to the viewer's appreciation of the Cathedral and has no effect on heritage significance.

Conclusion concerning effects on the historic environment

- 12.34 In cases where the HS found that there is harm to the heritage significance of HAs, this is '*less than substantial*' harm. LBS and HE consider there is harm to other HAs where I do not, but in no case do they find '*substantial*' harm'. None of the harm alleged by LBS and HE is greater than 'less than substantial harm' as set out in NPPF paragraph 196. In line with this NPPF policy, any harm caused by the 2021 Scheme would in my opinion be greatly outweighed by the considerable heritage and other benefits that the 2021 Scheme will deliver in the local area in the form of urban design and townscape enhancements and works to the listed terrace (wider public benefits are set out in the evidence of Chris Goddard).
- 12.35 I note that HE, as the Government's statutory adviser on the historic environment, does not find that there is any harm to a number of those HAs where LBS considers that there is harm.

13 Summary and conclusions

- 13.1 In section 2 of my evidence I noted that the Site's location at London Bridge is one where large recent commercial developments of good quality have been built cheek by jowl with historic buildings and areas, resulting in striking but successful juxtapositions, and that these contrasts are now characteristic of central London more generally.

2018 Scheme

- 13.2 Section 4 of my evidence notes that:
1. the site is at a point of landmark significance, and close to an established cluster of large and tall buildings;
 2. the existing building contributes nothing positive to the area;
 3. the 2018 Scheme transforms the Site, making it permeable and opening it up to public access;
 4. the scale of building proposed sits well with other large developments nearby; and
 5. the design is a work of architecture of high quality that relates successfully to its immediate and wider context.
- 13.3 Effects on views:
1. In the long range and mid distance views, the 2018 Scheme would add coherently to the grouping of large scale and tall buildings at London Bridge.
 2. In closer views the tall building would in some cases result in striking contrasts of scale with smaller, older buildings; these juxtapositions are generally positive and consistent with the existing character and appearance of the area.
 3. In a few cases the view as proposed is less satisfactory visually than the view as existing, but not to an unacceptable degree.
- 13.4 Effects on townscape: the scheme would reinforce the existing character of the townscape character area within which it is located and other nearby townscape character areas, by adding a large new building of high quality to the group of other recent large new buildings.
- 13.5 Section 5 provides an assessment of the effects on relevant heritage assets.
1. Effects on Borough High Street CA. The Scheme will enhance the significance of the CA and deliver substantial public benefits in terms of urban design and townscape improvements to the wider area, enhancing the character and appearance and significance of the CA.

2. Effects on 4-8 and 12-16 St Thomas Street. The works to the terrace would preserve or enhance its special architectural interest. The remainder of the scheme proposals create benefits to the setting of the terrace. The scheme would have an adverse effect on TVIBHA view 50 but the overall impact on these listed buildings is positive.
3. Effects on Southwark Cathedral. There are positive and negative aspects of the effects of the 2021 Scheme on the Cathedral's setting. Most aspects of the Cathedral's setting are unaffected by the 2021 Scheme. Harm to its significance is minor, and in NPPF terms, considerably less than substantial harm. The Chapter of Southwark Cathedral support the 2021 Scheme.
4. Effects on Guy's Hospital. Most aspects of the hospital and its setting would be unaffected by the scheme. The 2018 Scheme would cause some harm to its setting. The degree of harm would be considerably less than substantial harm.
5. Effects on other relevant heritage assets are assessed in Section 5. There is no harm to the heritage significance of St Paul's Cathedral. There is no harm to the heritage significance of the Tower of London World Heritage Site and no effect on its Outstanding Universal Value. There is no harm to any other HAs.

13.6 Section 6 explains that the scheme is consistent with policies of the NPPF, the London Plan and the Southwark Plan that concern design and the historic environment. With regard to the question of those aspects of the scheme where 'less than substantial' harm to heritage significance has been identified, my evidence explains that any harm is greatly outweighed by heritage benefits and urban design and townscape improvements that have been identified.

13.7 Section 7 provides a commentary on the SOC's of LBS and HE. In the case of the LBS SOC, I explain why I disagree with the comments made about effects on some of the heritage assets listed in the SOC; and I explain why I do not agree with the LBS criticisms of the PSC assessments, which were not shared by HE. In the case of the HE SOC, I explain why I disagree with the comments made about effects on the heritage assets listed in the SOC, where HE identify 'less than substantial' harm.

13.8 In cases where the HS found that there is harm to the heritage significance of HAs, this is 'less than substantial' harm. LBS and HE consider there is harm to other HAs where I do not, but in no case do they find 'substantial' harm. Any harm caused by the scheme would be very greatly outweighed by the considerable heritage and other benefits in the form of urban design and townscape enhancements and works to the listed terrace (wider public benefits are set out in the evidence of Chris Goddard). HE, as the Government's statutory adviser on the historic environment, does not find that there is any harm to a number of those HA's where LBS consider that there is harm.

2021 Scheme

- 13.9 All of the above points made in relation to the 2018 Scheme are general points which necessarily summarise the more detailed points made in my evidence. All of these general points made about the 2018 Scheme also apply to the 2021 Scheme. Although the two schemes are significantly different from each other in their height, their form and in their architecture, most of what can be said about their relationship with their context is the same for both schemes.

Conclusions

- 13.10 In the case of the 2018 Scheme and the 2021 Scheme:
1. The scheme is an exemplary design of a high standard of architecture, designed by a leading and award winning London practice.
 2. Existing 1980s buildings of poor quality are replaced by a new building which provides a striking contrast with its historic setting, in a manner comparable with other recent projects at London Bridge and in the City of London and the City fringe.
 3. The Site is opened up to public access with a public realm scheme of high quality, providing new routes and spaces fronted by active uses, with a new entrance to the Underground station, the whole scheme relieving pressure on overcrowded local pavements.
 4. The effect on the Borough High Street conservation area is positive.
 5. The scheme results in some 'less than substantial' harm to the setting of Southwark Cathedral and Guy's Hospital; this harm should be weighed against the heritage and public benefits delivered by the scheme.
 6. There is no harm to any other heritage asset.
- 13.11 The character and appearance of the area would in my view be enhanced by either of the appeal schemes; any adverse effects are very greatly outweighed by the many and varied benefits that either scheme would bring.
- 13.12 Effects on the historic environment are for the most part beneficial; any minor 'less than substantial' harm is justified by, and greatly outweighed by, benefits.
- 13.13 'Less than substantial' harm is considered by others to be caused to the heritage significance of the CA. I disagree; I consider that the effect is beneficial. The character and appearance of the CA that are the principal aspects of the CA that are to be preserved or enhanced, and these aspects are in all cases either preserved or enhanced.

- 13.14 'Less than substantial' harm is considered by others to be caused to the heritage significance of other heritage assets. In these cases (other than the Borough High Street CA) it is effect on setting that is said to be harmful.
- 13.15 The NPPF definition of the setting of heritage assets states that 'Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'
- 13.16 The question of whether or how significance can be appreciated is more subjective than the question of effect on significance per se. Different people will have different way of appreciating listed buildings and conservation areas. The settings of Southwark Cathedral and Guy's Hospital are as described and characterised in the TVIBHA, the SOCGs and in my evidence. Most people visiting the CA, the Cathedral or the hospital will see and experience the rich multi-layered townscape of the area and will appreciate that variety and contrast characterise the area. The addition of either of the appeal schemes will bring about a great improvement to the Site and the wider area but in my opinion it will not, for the most part and for most people, have any effect on the ability to appreciate the heritage assets that have been discussed in my evidence.
- 13.17 Many of the considerations in my evidence are comparable with those that were relevant to the decision in the case of the Shard project, and several of the points in the Inspector's Report for that case [CD.X] are relevant to the 2018 Scheme and the 2021 Scheme. The Shard is seen, and the 2018 Scheme or the 2021 Scheme would be seen, within or in the setting of those HA's considered in my evidence, most notably the CA, Guy's Hospital, Southwark Cathedral, the Tower of London and St Paul's Cathedral. As the Shard is over twice as tall as the 2018 Scheme and about three times as tall as the 2021 Scheme, its visual impact is generally greater; and while the Site is within the CA and the Shard is not, the latter is immediately adjacent to the CA, and is prominent from within the CA.
- 13.18 The reasoning set out in the Inspector's Report for the Shard is comparable with the reasoning in my evidence concerning the effects on the HA's that have been considered, most notably Guy's Hospital, the listed buildings in St Thomas's Street, Southwark Cathedral and the CA. The Inspector noted, at 16.97 in his report, that 'modern development, including the existing London Bridge cluster, is already a feature of the settings of most of the listed buildings and conservation areas'.
- 13.19 My evidence has set the 2018 Scheme and the 2021 Scheme in the context of a 21st century global city which is like no other in its dramatic contrasts of old and new. Large scale new development, meeting the needs of a world financial centre, has in recent decades taken place across much of central London, particularly in the City and London Bridge. These are both now established as historic areas with many listed buildings intermingled with large recent commercial buildings. At London Bridge, the

merits of this rich mix are endorsed in the aspirations of LBS's policy AV.11, which opens its set of goals for the area with the aspiration to attract global commerce.

- 13.20 Inevitably large new development contrasts with small scale historic fabric – this is now characteristic of central London, and beneficial rather than harmful where new buildings are of high quality and carefully considered in relation to their context. This has been notably achieved close to the Site in the case of the Shard; in my view it would be achieved by both of the schemes considered in this appeal.
- 13.21 I consider that with regard to the effects on the character and appearance of the Site and its setting, and the effects on the historic environment, there is no reason why either scheme should not be granted planning permission and listed building consent.

Appendix 1- APP/2/A/1

Character and appearance

- 1.1 This Appendix addresses the character and appearance of the Site and its setting.

Location

- 1.2 The Site lies in the London Borough of Southwark, in a densely developed part of the Borough, close to London Bridge Station and The Shard. The Site is bounded by St Thomas Street to the north; King's Head Yard to the south; Guy's Hospital to the east; and properties fronting Borough High Street to the west. The Site lies in the Borough High Street Conservation Area ('BHSCA').



Fig A1: The Site and its setting (Site boundary identified by the dashed red line) (Source: AHMM)

The Site and its immediate context

- 1.3 The Site is broadly rectangular in plan. It is currently occupied by a reconstructed late 19th century 4 storey property at nos.24-26 St Thomas Street (Keats House); a part 2, 4, and 5 storey late 20th century office building at no. 20 St Thomas Street (New City Court) that incorporates a heavily altered late 19th century frontage to King's Head

Yard; and a 4 storey grade II listed Georgian terrace of early 19th century houses at nos. 4-8 and 12-16 St Thomas Street. The Site incorporates a private central courtyard to the rear of the listed St Thomas Street terrace. A non-public pedestrian route runs through the Site from St Thomas Street to King's Head Yard. A service yard to no.20 is located at the north-west end, accessed from King's Head Yard.

- 1.4 The offices at no. 20 St Thomas Street, which occupy the majority of the Site, were designed c.1980 by The Halpern Partnership and constructed c.1982-1984. The building is in three parts: a small street frontage building located on St Thomas Street, linked to a larger block behind which is set behind a lower frontage to King's Head Yard. The St Thomas Street building, which serves as the main entrance, is a 4 storey yellow brick-clad building with a colonnaded ground floor and a band of smoked glass windows that follow a curved corner. Dormer windows are located on the attic storey. The main building rises to 5 storeys (plus plant). Its façades employ bands of white cladding panels and smoked glass. Dormer windows are located on the courtyard elevations. Its design is unremarkable – there is little, if anything, of architectural merit in this building. While largely concealed from view from St Thomas Street, its upper levels are seen from King's Head Yard, set behind the lower frontage to the yard. This comprises a 2 storey late 19th century brick and stucco pedimented frontage, most of which appears to have been heavily modified in the 1980s when the Site was redeveloped; together with a plain 4 storey brick elevation at the east end of the yard frontage, also 1980s¹.
- 1.5 To the north of the Site, the north side of St Thomas Street is formal in character, containing some high quality Georgian and Regency houses as well as the former St Thomas' Church.
- 1.6 To the east of the Site, one finds the early Georgian buildings of Guy's Hospital. Those buildings are overlooked by both Guy's Hospital tower and The Shard, which lie on the south and north side of St Thomas Street respectively. Shard Place and the News Building (the office building formerly known as The Place) on London Bridge Street form part of this group of tall buildings and are a very noticeable aspect of the immediate setting of these historic buildings. The Shard marks the location of London Bridge Station, which lies just to its north.
- 1.7 Borough High Street, a busy commercial thoroughfare, and Borough Market, lie to the west/north-west of the Site. The railway bridge into London Bridge Station cuts across the north end of the street and over the market. Southwark Cathedral (grade I) lies just beyond railway viaduct, to the west of High Street.
- 1.8 To the south of the Site, King's Head Yard, White Hart Yard, George Inn Yard, Queen's Head Yard all lie to the east of Borough High Street and are a distinctive aspect of this

¹ Refer to the Heritage Statement (2018) by KMHeritage [CDA.22] for more information on this modified frontage.

part of the conservation area. Most are now through routes defined by 19th and 20th century buildings.

Historical development of the area

- 1.9 The historical development of the area has informed its townscape to date. Maps, both current and historic, of the Site and the area around it can be found in the DAS for the 2018 Scheme [CDA.06].
- 1.10 The development of this part of London came about not long after the Roman invasion of 43 A.D. and the founding of Londinium where the City of London stands today. The construction of the first permanent bridge across the Thames, a short distance from the modern London Bridge, led to the convergence of the two main southern Roman roads – Watling Street and Stane Street – close to where St. George the Martyr’s Church on Borough High Street stands today. A settlement on the southern bridgehead soon followed.
- 1.11 Borough – or ‘Burgh’ as the area was identified in 910 – has hosted both a market and hospital in the vicinity of the Site since the Middle Ages. The Domesday Book records St Thomas’ Hospital, which was founded by the Priory of St. Mary Overie – modern Southwark Cathedral – where London Bridge Station stands today. The cathedral itself dates from 12th century. The origins of Borough Market can be traced back to the 1200s when a market was located on the Old London Bridge, later moving to Borough High Street. The latter also accommodated inns during this time.
- 1.12 By the mid-1500s Southwark’s role in supporting the continuing development of the City of London was well established. Trading in commodities such as hops and leather, and small scale manufacturing like glass-making took hold. It also became the City’s playground, with bear and bull-baiting later followed by theatrical performances in riverside theatres, such as the Globe.
- 1.13 The 1700s saw the rapid expansion of coach travel with Borough serving as base for coaches travelling south from London. This prompted the substantial growth in the number of coaching inns along Borough High Street. These typically included long yards that were accessed through carriage arches from the street. They include King’s Head Yard, which has changed alignment over the centuries. Much of the Site was occupied by a brewery, its building line on St Thomas Street set further forward than the current line. Two alleys ran from this street into the Site, one towards the brewery, the other located to its east providing access to a church and small burial ground in the south-east corner of the Site. The C18 maps below show another development of significance local to the Site – Guy’s Hospital, founded in 1725. The quads of St Thomas’ Hospital are seen on the north side of St Thomas Street.

- 1.14 The Horwood map shows much of the Site to be clear of development, although the churchyard/burial ground remain and buildings continue to define King's Head Yard (see chapter 2 of the 2018 Scheme DAS [CDA.06]). The Site backs onto a shop terrace on Borough High Street and terraces of St Thomas Street. The latter did not survive the road widening that took place in the 19th century, shown to have commenced in a map of 1819 where the cleared interior of the Site is partially exposed to the street.

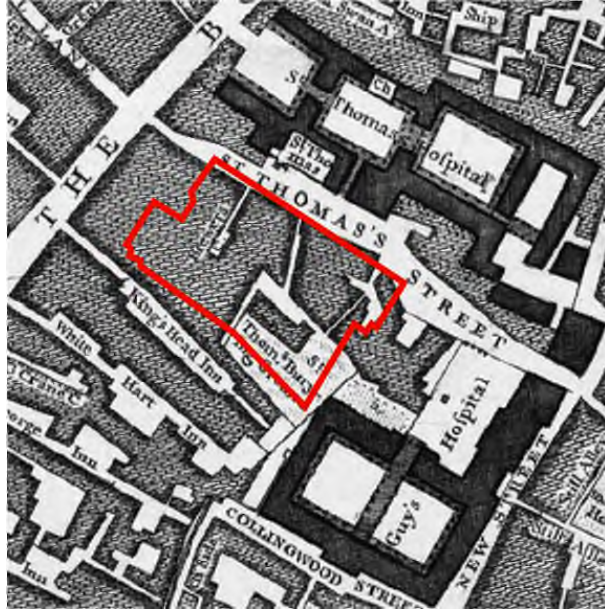


Figure A2: Rocque map of 1746 with approximate Site outline in red

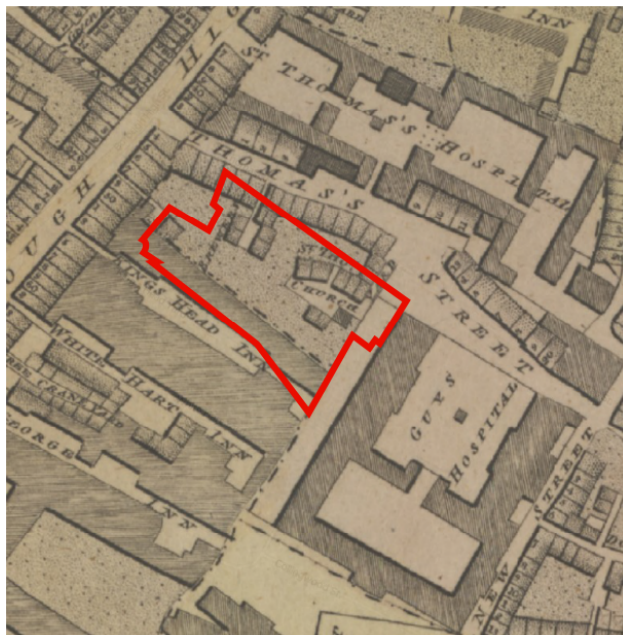


Figure A3: Horwood map of 1799 with approximate Site outline in red

- 1.15 The opening of central London's first railway terminus at London Bridge in 1836 on the site of St Thomas' Hospital immediately to the north of the Site had wider reaching consequences. This signalled the end of the coaching era, and the closure of many of the inns along Borough High Street soon followed. Railway viaducts cut across the High Street and Southwark Street, permanently changing the local townscape.
- 1.16 The OS map from 1880 (Figure A4) shows the Site's new frontage to St Thomas Street in place with the widening of St Thomas Street complete. Infill development is shown to the rear of this. The map also reveals the erosion of the Site's frontage to King's Head Yard, with a break introduced beside the churchyard. The remainder of the original frontage was replaced at the end of the 19th century by commercial buildings. Elements of the south elevation of these buildings, on the north side of the yard, remain today, in a heavily modified form. The OS map of 1916 (Figure A5) shows their new alignment and the widening of the yard at the expense of the buildings to the south. Those buildings, which are shown in a photograph of 1881 to use the typical balustraded gallery model for coaching inns, were cleared and a new connection made to White Hart Yard to the south. The Old King's Head public house that stands today was built in 1885 and can be identified on this map, as can the Site's burial site that functioned as a garden at the time.

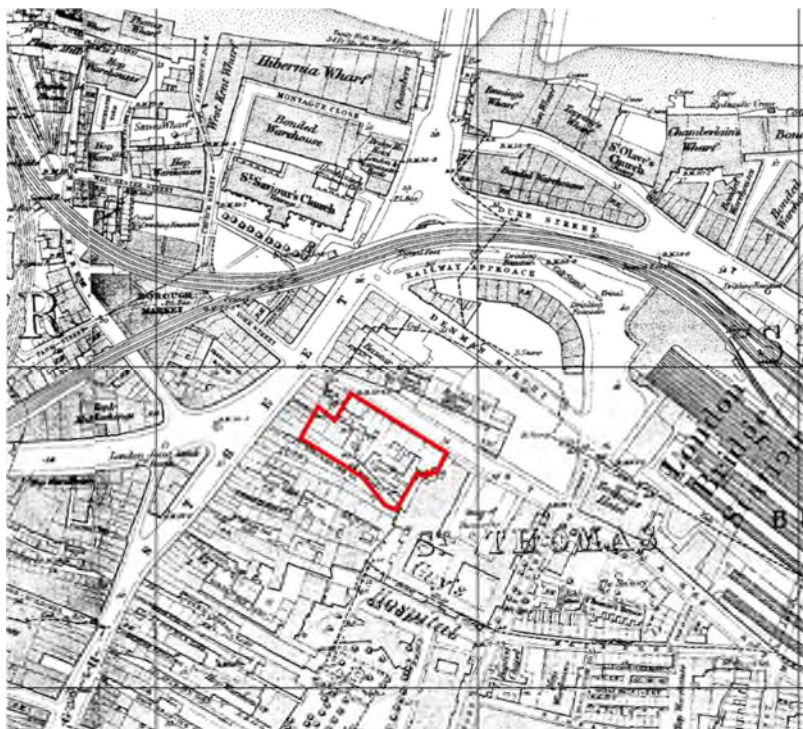


Figure A4: 1880 OS map with approximate Site outline in red
(©Crown Copyright and Landmark Information Group Limited 2018)

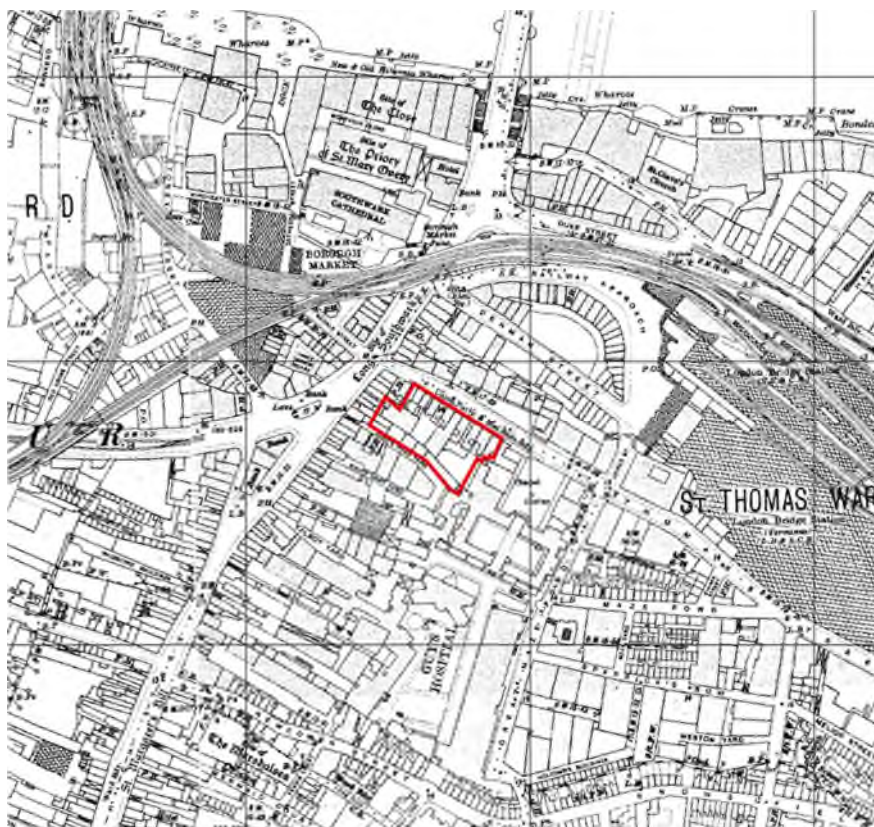


Figure A5: 1916 OS map with approximate Site outline in red
(©Crown Copyright and Landmark Information Group Limited 2018)

- 1.17 The Survey of London volume for Bankside records that ‘Practically the whole of the buildings in King’s Head Yard and the houses on either side of it were destroyed by enemy action in 1940’. Rebuilding took place in the mid-20th century and during this period the alley between nos.8 and 10 St Thomas Street, which had provided access to a courtyard to the rear, was closed. By 1973 the Site’s infill development had been cleared and nos.18-22 St Thomas Street (which incorporated the other alley) demolished in preparation for the construction of the existing office building on the Site.
- 1.18 The postwar period also saw the development of several tall buildings local to the Site, just outside the conservation area but prominent from points within it. These included New London Bridge House at London Bridge Station (demolished in 2010 and replaced with the building known today as the News Building); Southwark Towers, a 1970s office tower (demolished in 2009 and replaced by The Shard in 2012); and Guy’s Hospital tower. Standing at just under 149m, the latter is claimed to be the world’s tallest hospital building.
- 1.19 Just to the north of this lies Western Europe’s tallest building, The Shard, designed by Renzo Piano Building Workshop. Opened in 2013, this mixed-use glass-clad tower stands at just under 310m high, dominating views in the local area and visible from

many parts of London. Also forming part of the London Bridge Quarter is the News Building, by the same practice as The Shard. It was completed in late 2013. A new 26 storey tower named Shard Place has recently been built on the site formerly occupied by Fielden House, on London Bridge Street, which lies within the Borough High Street Conservation Area. These tall modern buildings now form part of the immediate setting of the listed Georgian terrace on the Site, the listed Guy's Hospital buildings, as well as the listed Georgian buildings lying on the north side of St Thomas Street; they are also a significant aspect of the setting of the BHSCA and other nearby CA's conservation areas, and in the case of Shard Place, an aspect of the character and appearance of the BHSCA itself.

Townscape character areas

- 1.20 A characterisation of the townscape character areas ('TCAs') around the Site is set out below. The definition of these TCAs has taken into account the boundaries of designated heritage assets such as conservation areas (and relevant adopted documents describing and assessing the character or significance of these areas) as well as LB Southwark's SPDs for the area. The character and appearance of conservation areas considered in this statement, as relevant to their heritage significance, is discussed in Section 5 and 6 below.
- 1.21 The five townscape character areas are:
1. Bankside, Borough, and Potters Fields
 2. Newington
 3. Bermondsey
 4. Tower
 5. North Bank
- 1.22 The boundaries of these various areas are not always clearly defined as the townscape character may gradually change along the length of a street between areas of distinct townscape character.

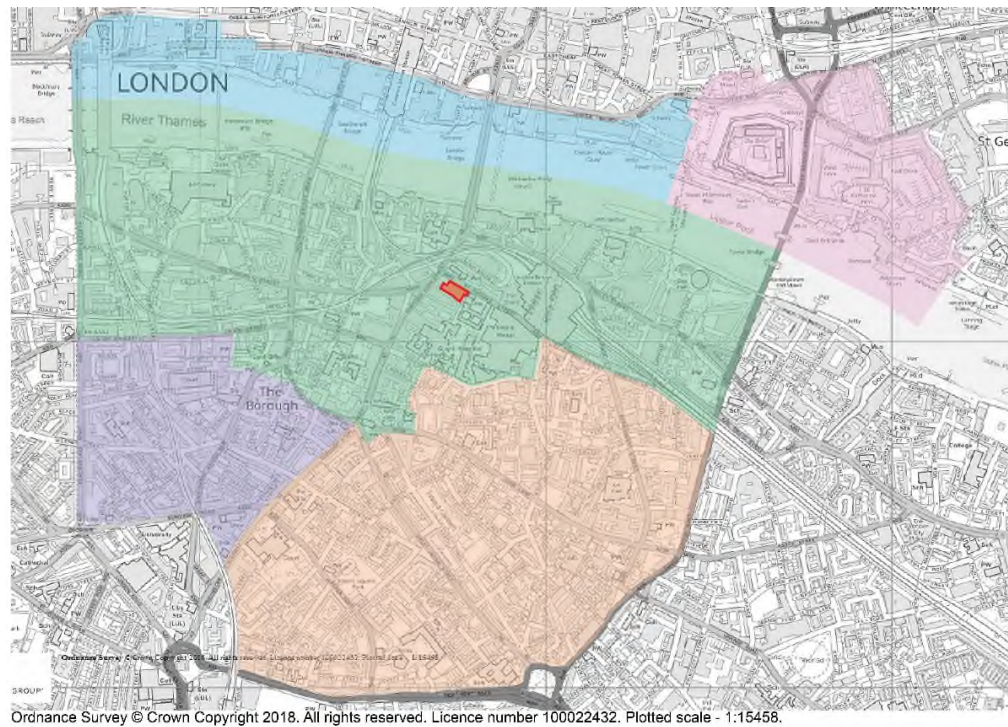


Figure A6: Townscape Character Areas (Site boundary marked in red for indicative purposes)
(Source: 2018 TVIBHA Fig. 3-4)

Townscape Character Area 1 – Bankside, Borough, and Potters Fields

- 1.23 This character area, which includes the Site, takes in the areas of Bankside, Borough, London Bridge, and Potters Fields/More London. It is a dense urban area, situated in the north-west corner of the borough of Southwark. The Thames marks the northern boundary of this TCA. It is bounded to the east by Tower Bridge/Tower Bridge Road and to the west by Blackfriars Bridge/Blackfriars Road. Its southern boundary extends as far as Union Street, Marshalsea Road, Long Lane, Tanner Street, Newcomen Street, Snowfields, St Thomas Street, Crucifix Lane and the railway viaduct. It includes several conservation areas and a number of highly graded listed buildings. It is also home to the tallest building in Western Europe, The Shard, at London Bridge.



Figure A7: Borough High Street, looking in the direction of the Site (Source: TTC)



Figure A8: Borough Market, looking south-east from Cathedral Street (Source: TTC)

Townscape Character Area 2 – Newington

- 1.24 This TCA lies to the south of TCA 1. It is bounded by Blackfriars Road to the west, Borough Road to the south, Newington Causeway to the south-east, Marshalsea Road to the north-east, and the railway viaduct leading to London Bridge to the north. The TCA is bisected by the viaduct carrying Thameslink and Southeastern trains into and out of Blackfriars Station, which lies to its north. Kings Bench Conservation Area cuts across the viaduct. Another conservation area is also found within this TCA – Liberty

of the Mint, which extends from Borough High Street in the west, to Great Suffolk Street in the south, Marshalsea Road in the north, and Sudrey Street in the west. The TCA includes a number of listed buildings.



Figure A9: St George the Martyr (Grade II*) on Borough High Street (Source: TTC)

Townscape Character Area 3 – Bermondsey

- 1.25 This TCA lies to the south-east of TCA 1 and east of TCA 2. It is largely residential in character, and is similar to most of the character areas in that it includes a mixture of development of varying ages and quality. The area has many housing estates of the early 20th century, with post-war infill development and some pockets of surviving 19th century buildings, some of which are listed. The TCA includes several conservation areas and a number of listed buildings.



Figure A10: View from Bermondsey Street looking towards London Bridge (Source: TTC)

Townscape Character Area 4 –Tower

- 1.26 This TCA is focussed on the Tower of London World Heritage Site and its immediate environs. It includes the majority of L.B Tower Hamlets' Tower Conservation Area. The area includes a number of listed buildings, some highly graded.
- 1.27 The Tower of London was built as a fortress and is surrounded by a defensive wall. This gives it a contained townscape character, distinct from its surroundings. To the east and north it is cut off from its context by busy roads which detract from the townscape quality of the area and isolate this historic site from its hinterland. The LBTH's Appraisal acknowledges the opportunities to enhance the tower's setting.



Figure A11: View into Trinity Church Square CA from Bath Terrace/ Harper Road (Source: TTC)

- 1.28 A The Tower's immediate setting is dominated by the major traffic gyratory and the Local Setting Study acknowledges the general poor townscape of the area. It notes 'Today, Tower Bridge Approach dominates the character of the area in architectural terms as well as because of the high volumes of traffic that it carries across the Thames. The raised level of the footpath provides interesting views across the moat, but, conversely, it has created a dark narrow street at a lower level on the east side (St Katharine's Way)'.
- 1.29 High quality modern buildings are located in the immediate vicinity of the Tower of London. These include the 9 storey Citizen M Hotel, defining the northern edge of Wakefield Gardens. A 10 storey hotel has recently been constructed on the site of the former London Guildhall University building (no.100 Minories).
- 1.30 This TCA also includes the area to the east of the Tower and St Katharine's Way, which comprises the St Katharine Docks complex up to London Docks to the east. It falls within the Tower of London Conservation Area and contains a number of listed buildings. It is an inward looking area with a self-contained character, distinct from that of the Tower of London.



Figure A12: Tower of London from The Queen's Walk (Source: TTC)



Figure A13: View looking east along a highly trafficked Tower Hill (A100). The Tower of London is visible on the left side of the photo. (Source: TTC)

Townscape Character Area 5 – North Bank

- 1.31 This TCA is focussed on the stretch of London's north bank running between Tower Hill and Blackfriars. The local road network was transformed into an east/west traffic artery by the North Bank Development Scheme (1972-80) and the Blackfriars Underpass (begun 1963). Extensive rebuilding in the mid to latter 20th century cleared Upper Thames Street's pre-war warehouses to provide big office blocks in the 1970s-80s. As those post-war blocks have been redeveloped in recent years, they have started to improve access to and enjoyment of the riverside. However, the experience of the Thames Path here still pales in comparison to that of the South Bank. The TCA includes several conservation areas and a number of listed buildings.



Figure A14: View of the north bank from Bankside (Source: TTC)



Figure A15: View of Church of St Benet (grade I) from Queen Victoria Street (Source: TTC)

Existing townscape context: summary

- 1.32 The noticeably varied character of the Borough High Street Conservation Area is a reflection of the wide range of functions and uses that coexist within a relatively confined area. Many of these, such as Southwark Cathedral, Borough Market and Guy's Hospital have been in existence for centuries and their settings within the conservation area have changed decade by decade as the modern world has grown around them. This has created striking juxtapositions and views, which have added richness to the area's character. The railway viaducts that cross Borough High Street and Southwark Street – part Victorian and part 21st century – are cases in point and are a memorable feature of the Borough area.
- 1.33 While there are parts of the conservation area in good condition, much is in no better than middling condition, and some of it is run down and in need of investment.
- 1.34 Tall buildings have been built immediately next to the conservation area from the 1960s onwards (New London Bridge House, completed in 1967, predated its designation) and because of their size and prominence they are, as noted above, an established aspect of the character and appearance of the conservation area, particularly its north-east part, within which the Site lies. The extent of these tall buildings continues to increase. Shard Place, a new tall building which lies within the conservation area, sits alongside the News Building, Guy's Tower and The Shard, consolidating that group of towers. Other consented tall building projects such as Capital House, a 39 storey tower at 42 Weston Street, east of the conservation area, will if constructed also appear in views of the conservation area. Further tall buildings in the City are prominent in views north along Borough High Street.
- 1.35 In summary, the key elements that define the townscape in the area immediately surrounding the Site are as follows. The area surrounding the Site conforms to a typical hierarchy of routes with a primary road network and generally secondary and tertiary routes within. Borough High Street is a major main road and busy commercial thoroughfare. St Thomas Street, is also a main road but less trafficked. The pattern of the arrangement of street blocks, plots and their buildings in the area immediately surrounding the Site is relatively small and frequent. King's Head Yard is one of a number of historic yards located off the High Street, to the south of the Site. Most now form through routes.
- 1.36 The area around the Site is densely built up, containing a rich variety of uses and activities, as described above. There are a very limited number of open spaces of any appreciable scale near the Site, the closest being Guy's Hospital main courtyard off St Thomas Street, now a hard landscaped public space. Building scale, in terms of height and massing, is relatively consistent on the east side of Borough High Street, comprising buildings from different periods on narrow plots, all of a comparable

height of around 3-5 storeys. However, as noted above, the modern buildings around London Bridge, a short distance to the north, are of a significantly greater scale and footprint.

- 1.37 In terms of building appearance, the area has a variety of materials and details. In the main, building stock dates to the 18th, 19th and early 20th century. Classical architecture is the main inspiration for these buildings. Brick is the most common construction material, often embellished with stone details, stucco, terracotta or rubbed brick decorations. At ground level, one usually finds rusticated or arcaded elevations, and painted timber shop-fronts. The cast iron market structures and steel railway viaducts also make a very important contribution to the character of the area local to the Site. Modern buildings around London Bridge tend to be curtain wall glazed. Shard Place, on St Thomas Street, just to the west of The Shard, continues this trend.