



Historic England

**TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 78**

**AND**

**TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000**

**SUMMARY OF PROOF OF EVIDENCE**

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**(HISTORIC ENGLAND)**

**Applications by Great Portland Estates (St Thomas Street) Limited**

**New City Court, 4-26 St Thomas Street, London SE1 9RS**

**Local Planning Authority refs: 18/AP/4039 & 18/AP/4040, 21/AP/1361 & 21/AP/1364**

**PINS refs: APP/A5840/W/22/3290473; APP/A5840/Y/22/3290477; APP/A5840/W/22/3290483 &  
APP/A5840/Y/22/3290490**

## **Introduction**

- 1.0 Historic England has a statutory role in the planning process regarding the historic environment and is the Government's principal adviser on the historic environment and the lead body for the heritage sector. It is appearing as a Rule 6 Party at this Inquiry because of the significance of the assets that would be affected by these developments and the degree of harm which would be caused to this exceptional heritage.
- 1.1 Historic England has advised on both appeal schemes since pre-application stages, from February 2018 and March 2021 respectively. Our advice has consistently called attention to the harm, of varying degrees, to a number of heritage assets, including some of the highest significance.
- 1.2 Our strong objection to both these appeal schemes relates to the development of a tall building, which would fail to preserve the significance of the Borough High Street Conservation Area (BHSCA) by causing a serious level of harm. It also relates to the impact of both appeal schemes on the setting of a wide range of heritage assets, some of the highest possible grades of statutory protection, in ways that would harm their significance. These include the Guy's Hospital (Grade II\*) and Southwark Cathedral (Grade I), both of which are listed buildings within the BHSCA. To the north of the Thames, these include the Tower of London World Heritage Site and St Paul's Cathedral (Grade I), two of England's most important historic sites.

## **Borough High Street Conservation Area**

- 1.3 The Appeals Site is located within the BHSCA which is one of London's most remarkable conservation areas. The appeal schemes would seriously harm

two sub-areas of the BHSCA that define its significance.

- 1.4 Borough High Street itself forms the spine of the conservation area, and has very high significance as the main arterial route out of the City since Roman occupation. The distinctive urban grain of the high street comprising long and narrow plots, has been largely shaped by the yards and alleyways associated with coaching inns that lined the high street from at least the medieval period. It is a remarkable survival and quite unlike anything else in London.
- 1.5 King's Head Yard, abutting the Appeals Site at its south end, evolved from one of these ancient coaching inns - the King's Head. Whilst nothing is left of the Inn, this ancient character survives in the street pattern of King's Head Yard and its enclosed, and largely Victorian surroundings.
- 1.6 This high street is framed on both sides by a high percentage of historic buildings of varied forms and architectural styles, but with a prevailing height of between three-to-four storeys. The historic roofscape which characterises this part of the BHSCA has been harmed by tall building development around London Bridge Station. However, these appear at slight distance and the high street itself remains free from tall building development.
- 1.7 The second sub-area is St Thomas Street, which is defined by the predominantly Georgian and slightly earlier buildings which are a product of the hospital institutions established to the east of the high street. The townscape has a formal and restrained character arising from the classically inspired architecture and layout of its institutional and domestic buildings. In this area, the three-to-four storey scale found along the high street is maintained. Whilst Victorian and modern buildings provide some architectural diversity, these do not disrupt this clearly defined conservative character.

- 1.8 The north side of the street contains various Grade II\* and Grade II listed buildings that related to St Thomas's Hospital, which was occupied this area from the 13<sup>th</sup> to the mid-19<sup>th</sup> century. These include the former hospital chapel (Grade II\*) at 9A St Thomas Street. Built in the Queen Anne style, its tower provides a focal point in streetscape views.
- 1.9 The south side of the street contains a clean run of Grade II listed terraced houses at 2, 4-8, and 12-16 St Thomas Street. With the exception of No. 2, which was converted to a pub in the late 19<sup>th</sup> century, the terrace forms part of the Appeals Site. A decorative symmetrical pair of Victorian houses known as Keats House form the eastern end of the Appeals Site along St Thomas Street. These historic buildings with the Appeals Site were extensively altered behind their frontages when the New City Court office scheme was built in the 1980s, but retain their high-quality and characterful façades.
- 1.10 The greatest level of harm caused by the appeal schemes would be to the BHSCA, due to the development of a 37 or 26-storey tall building directly behind the 3 to 4-storey historic buildings along Borough High Street and St Thomas Street. This would create a major distraction above the historic roofline in views along both the high street and St Thomas Street. Further harm would be caused to the BHSCA in the destruction of the surviving street pattern and historic fabric along Kings Head Yard. The creation of open public realm, and the introduction of a tall building in the backland of both schemes, would distort and invert the hierarchy of the high street plots of medieval origin, where development to the rear is subservient to the frontage buildings.

### **Guy's Hospital**

- 1.11 Guy's Hospital is listed at Grade II\* and is located immediately to the east of

the Appeals Site. It is a fine example of a Georgian hospital complex, built from 1721, comprising a series of classical blocks arranged around two quadrangles to the south, and a large forecourt facing St Thomas Street to the north. Whilst nearby tall building development has a harmful impact on the significance of the listed building, the hospital preserves a sense of separateness and tranquillity when experienced from its courtyards. In many of these views, the architectural quality of the complex can also be appreciated against a clear skyline, mainly to the south and west.

- 1.12 The tall buildings of both schemes would cause serious harm to Guy's Hospital due to the major imposition on its west wing in views from the forecourt. This would seriously undermine the appreciation of its carefully composed classical architecture which can currently be appreciated against a clear sky. The looming presence of the proposed tall buildings would harm the sense of separateness and tranquillity provided by the hospital courtyards. The reduced daylight into the hospital chapel at the centre of the west wing created by both appeal schemes would further harm this sense of tranquillity.

### **Southwark Cathedral**

- 1.13 Beyond the railway lines to the north west of the Appeals Site is Southwark Cathedral, a former Augustinian priory and Anglican cathedral since 1905. Rebuilt from 1220, the cathedral is of substantial historic interest as one of London's oldest standing buildings, an enduring symbol of Southwark and reminder of its ancient origins. The cathedral is a major historic landmark, and its striking Gothic architectural composition, particularly its square tower of medieval origin, can be appreciated from various locations within the BHSCA and in cross-river views.

1.14 Southwark Cathedral's architectural grandeur and landmark status in the BHSCA would be seriously undermined by the visual intrusion created by both tall building developments. This impact would be most pronounced in views from Montague Close where the proposed tall building would appear directly behind the cathedral, but also from London Bridge where it would visually distract from the cathedral's riverside setting. These visual impacts on Southwark Cathedral would cause a significant level of harm in the 2018 Scheme, which would be slightly reduced in the 2021 Scheme due to the lower height of that development.

### **Tower of London WHS**

1.15 Across the Thames, approximately 720 metres to the north of the Appeals Site, is the Tower of London World Heritage Site (WHS). Built from c1067, its international significance is rooted in the survival of its central White Tower (Grade I listed), thought to be the oldest surviving royal palace in Europe. The physical dominance of the White Tower as expressed by its iconic silhouette in views within its local setting, is an attribute of the WHS's Outstanding Universal Value (OUV).

1.16 The Tower is enclosed by its Inner Curtain Wall, which incorporates various structures including the Beauchamp Tower (c.1281) and the Queen's House (c.1540) (group listed at Grade I). The wall and its associated structures provide a sense of protection from the world beyond, and the domestic character and intimate scale of the enclosed buildings offer an insight into unique living community at the Tower. These additional attributes of OUV can be appreciated in views from the Inner Ward. However, tall building development around Central London can be seen in some views from the

Inner Ward, and of the White Tower, which has caused harm to these attributes.

- 1.17 Views from the Inner Ward of the Tower of London would be affected by both tall building proposals. By rising above the roofline of the Queens House, the proposed tall buildings of both schemes would undermine the sense of enclosure and protection afforded by the WHS, causing harm to its OUV. This harm would be of a low level in the 2018 Scheme and a very low level in the 2021 Scheme due to the lower height of proposed tall building, but to a designated heritage asset of the greatest possible importance.
- 1.18 Further harm to OUV would result from the tall building of the 2018 Scheme appearing behind the WHS from outside the Royal Mint within its local setting. The modest visual distraction created by the tall building development would slightly undermine the appreciation of the physical dominance of the White Tower and the protective function of the concentric defences.

### **St Paul's Cathedral**

- 1.19 The Appeals Site is also located in the Background Assessment Area of two protected views of the Grade I listed St Paul's Cathedral (LVMF View 2A.1 and 3A.1). The cathedral is one of the world's most recognisable religious buildings and has remained a commanding landmark on London's skyline for over 300 years. In many of London's protected views, the cathedral's distinctive silhouette comprising a colossal classical dome and elegant baroque west towers can be appreciated. However, tall building development appearing behind the cathedral has harmed the ability to appreciate its commanding landmark presence in the following particular views.

- 1.20 Both schemes would harm the cathedral's architectural interest and landmark status by appearing behind its west towers in LVMF 3A.1. The tall building of the 2018 Scheme would also slightly encroach upon the cathedral's setting in LVMF View 2A.1 causing a very low level of harm to its significance.

### **Assessment of harm caused**

- 1.21 All harm identified would be 'less than substantial' in NPPF terminology. It would nonetheless be of a very high level in relation to the BHSCA and Guy's Hospital for both schemes, and Southwark Cathedral in the 2018 Scheme (reduced to medium in the 2021 Scheme). The harm would be towards the lower end of 'less than substantial' regarding St Paul's Cathedral and the Tower of London WHS. However, due to their high levels of significance, their conservation should be afforded very great weight in planning decision in accordance with the NPPF.
- 1.22 The related listed building consent applications raise no serious issues when considered in isolation.

### **Public benefits**

- 1.23 The NPPF requires any harm to the significance of designated heritage assets to be clearly and convincingly justified and weighed against the public benefits of a proposal. Public benefits can include heritage benefits. The proposed heritage benefits, which largely related to the refurbishment of the Grade II listed terrace within the Appeals Site, are not dependant on the appeal schemes and are very minor. They would also be undermined by the harm caused by both appeal schemes.

### **Policy implications**



1.24 Due to the harm identified (and subject where appropriate to balancing the harm against public benefits) the appeal schemes would conflict with up-to-date London Plan heritage policies HC1, HC2 and HC4, and Southwark Plan heritage policies P19, P20 and P24. In failing to preserve the significance of designated heritage assets and the character of the townscape with the BHSCA, both schemes would conflict London Plan and Southwark Plan policies on Tall Buildings (D9 and P17 respectively), and Design (D3 of the London Plan and P13 and P14 of the Southwark Plan).

### **Conclusion**

1.25 Both appeal schemes should therefore be refused unless the Inspector concludes that either of them is supported by clear and convincing justification, and that the public benefits that would be delivered would be so great as to outweigh the serious harm to one of London's most remarkable conservation areas and to some of the city's finest historic sites.