



Historic England

TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 78

AND

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

PROOF OF EVIDENCE

ALASDAIR DUNN MORTON YOUNG MA MSc

(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**

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1 INTRODUCTION

- 1.0 My name is Alasdair Young. I am a historic built environment and heritage specialist and am currently employed by Historic England.
- 1.1 I have an undergraduate degree (MA, 2:1) in history with history of art from the University of Aberdeen, and a master's degree (MSc) in architectural conservation from the University of Edinburgh.
- 1.2 I have been employed in the heritage sector since 2006 and have been providing professional advice on the historic built environment for eleven years. In 2011 I became a Heritage Management Officer at Historic Scotland, in which I provided advice on managing change to the historic environment on behalf of the Scottish Government. I covered casework in the north of Scotland where I frequently assessed the impact of wind turbine developments on the setting of heritage assets as a key aspect of their significance. The impact of such development proposals on The Heart of Neolithic Orkney World Heritage Site was an especially important aspect of my casework.
- 1.3 In 2013 I joined English Heritage as an Assistant Inspector of Historic Buildings and Areas. I was promoted to Inspector of Historic Buildings and Areas in 2016. In these roles I provide advice both at pre-application and application stages to developers and local authorities on development proposals that affect the historic environment. My work includes a caseload of consultations and notifications on applications affecting Grade I and Grade II* listed buildings, substantial alterations to Grade II listed buildings, and

large developments affecting conservation areas, Registered parks and gardens, and world heritage sites.

- 1.4 I have provided detailed advice on numerous tall building development proposals affecting the historic environment across London, including within Southwark. Of particular relevance to these appeals was my involvement in the now approved development at the nearby Landmark Court site (ref: 19/AP/0830) which is partially located within the Borough High Street Conservation Area. Through negotiations directly with the architect team and with Southwark Council, I helped secure a lower scale of development which reduced the harm and improved the scheme's relationship with the conservation area.
- 1.5 The evidence which I have prepared in this proof of evidence is true, and I confirm that the opinions I express are my true and professional opinions.

2 ROLE OF HISTORIC ENGLAND

- 2.0 The role of Historic England has been set out in detail in the Rule 6 statement and is not repeated here.

3 SCOPE OF EVIDENCE

3.0 This Proof of Evidence concerns two sets of applications made to the Council of the London Borough of Southwark (hereafter 'the Council') by Great Portland Estates (St Thomas Street) Limited ('the Appellant') at the New City Court site, 4-26 St Thomas Street, London, SE1 9RS. These are:

- Application 18/AP/2039 for full planning permission and associated listed building consent application 18/AP/4039 (hereafter the 2018 Scheme); and
- Application 21/AP/1361 for full planning permission and associated listed building consent application 12/AP/1364 (hereafter the 2021 Scheme).

3.1 My evidence is structured as follows.

Section 4: Background to the proposals and Historic England's involvement

Section 5: Decision making context

Section 6: Approach to the assessment of significance and impact of the appeal schemes

Section 7: Borough High Street Conservation Area

Section 8: Guy's Hospital

Section 9: Southwark Cathedral

Section 10: Tower of London WHS

Section 11: St Paul's Cathedral

Section 12: Summary of harm

Section 13: Public benefits claimed by the Appellant

Section 14: Policy implications

Section 15: Overall conclusions

- 3.2 In forming my assessment, I have focussed on the heritage-related information included within the documentation supporting the Appeal Schemes, with a particular attention to the submitted Townscape, Visual Impact and Built Heritage Assessments (TVIBHA) for both schemes (CDA.12 and additional submitted information for the 2018 Scheme, and CDB.14 and additional submitted information for the 2021 Scheme).
- 3.3 In accordance with the latest tall buildings advice note from Historic England (CDF.07, p37), 3D models of both schemes were provided by the Appellant at application stages. I was able to access these models using the townscape modelling software, VU.CITY, which greatly supported my assessment of the impacts of the proposed tall buildings on the historic environment. However, permission has not been granted by the Appellant to use these models as part of this inquiry, and consequently they are not mentioned in my evidence.
- 3.4 My evidence has also not taken account of non-heritage related townscape and visual impacts, non-heritage related public benefits, non-heritage planning policies or the overall planning balance.
- 3.5 Both schemes will be considered within this one proof.

4 BACKGROUND TO THE PROPOSALS AND HISTORIC ENGLAND'S INVOLVEMENT

SITE DESCRIPTION

4.0 The Appeals Site is located to the south of London Bridge in Southwark and is entirely within the Borough High Street Conservation Area (BHSCA). Its location is shown on plans at (CDA.167 and CDB.161). A description of the appeals site is contained in section 2 of Historic England's Statement of Case and is not repeated here.

THE PROPOSALS: THE 2018 SCHEME, REFS: 18/AP/4039 AND 18/AP/4040 (LBC), AND THE 2021 SCHEME, REFS: 21/AP/1361 AND 21/AP/1364 (LBC)

- 4.1 The descriptions of development applied for within the 2018 and 2021 schemes are set out in paragraphs 1.2 and 1.3 of Historic England's statement of case (CDI.05). The most significant differences between the proposals are that the 2021 Scheme is lower (26 storeys plus mezzanine instead of 37 storeys) and broader, and adopts a markedly different architectural design. Full details of the two schemes are contained in the Appellants' Design and Access Statement (CDA.06 and CDB.08).
- 4.2 Both schemes also require listed building consent (LBC) for works to the listed terrace at 4-8 and 12-16 St Thomas Street. The LBC applications are similar for both schemes save that the 2018 Scheme would involve the provision of shopfronts which would create an active frontage to the public

realm at the rear.

HISTORIC ENGLAND'S INVOLVEMENT

4.3 Historic England has been involved in assessing the Appellant's proposals and providing advice to the Appellant and to the Council since February 2018. The various stages of Historic England's involvement are set out in section 5 of the Statement of Case and are not repeated here. Our position has consistently been that the proposals would cause very serious harm to a range of heritage assets, some of which benefit from very high levels of statutory protection. Accordingly we formally objected to both schemes in strong terms.

5 DECISION-MAKING CONTEXT

INTERNATIONAL CONTEXT

The World Heritage Convention

- 5.0 The Convention concerning the Protection of the World Cultural and Natural Heritage (1972) sets out the duties of State Parties in identifying and protecting World Heritage Sites. By signing the Convention, the UK Government pledged to do all it can to protect, conserve, present and transmit its World Heritage Sites ('WHS') "to the utmost of its own resources" (Article 4).
- 5.1 The UK's international obligations are fulfilled through the implementation of the domestic planning system.
- 5.2 The processes and procedures for the inscription, protection and conservation of WHSs are set out in UNESCO's Operational Guidelines (CDF.014). These state that Outstanding Universal Value of each WHS, including the conditions of integrity and/or authenticity at the time of inscription, should be "sustained or enhanced over time" (CDF.014, para 96, p25). The Guidelines require each WHS to have an appropriate management plan "which must specify how the OUV of a property should be preserved" (CDF.014, para 108, p27). The management plan for the Tower of London WHS is CDF.09.
- 5.3 The Guidelines refer to 'attributes', which are the features or relationships that convey the Outstanding Universal Value ('OUV') of a WHS, as identified in the Statement of OUV ('SOUV'). In order to understand potential impacts on

OUV and the ability to appreciate it, the International Council on Monuments and Sites ('ICOMOS'), in its Heritage Impact Assessment Guidelines, encourages practitioners to focus their analysis on the attributes of a WHS.

- 5.4 The Planning Practice Guidance ('PPG') clarifies that despite the differing terminology, "The cultural heritage within the description of the (Outstanding Universal Value) OUV will be part of the WHS's heritage significance and NPPF policies will apply to the OUV as they do to any other heritage significance they hold" (CDD.011, para 031).

NATIONAL CONTEXT

Statutory duties

- 5.5 Statutory duties relating to proposals affecting listed buildings and conservation areas are contained in the Planning (Listed Buildings and Conservation Areas) Act 1990 (CDH.01), in particular s. 16 (listed building consent) s. 66(1) (planning decisions affecting listed buildings) and s. 72(1) (planning decisions affecting conservation areas). These are well known and are not repeated here.

National Planning Policy Framework (NPPF)

- 5.6 The latest version of the NPPF was published in July 2021. This document will be familiar to all parties and I do not consider it appropriate to quote extensively from it here. The key policies so far as the historic environment is concerned are in Chapter 16. Of particular relevance are paragraphs 189, 199, 200, 202, 206 and 207.

Planning Practice Guidance

- 5.7 The PPG informs the correct application of policy. The chapter on the Historic Environment (CDD.011) contains relevant explanation on setting (paragraph 013), the assessment of harm (paragraph 018), public benefit (paragraph 020) and World Heritage Sites (paragraphs 026-038).

National Design Guide

- 5.8 The National Design Guide ('NDG') (CDD.020) was published in 2019 and updated in 2021. It illustrates how good design can be achieved in practice. It explains that the various components of the design process come together to create character, which is then broken down into ten characteristics, of which 'context' is most relevant to heritage.

- 5.9 In relation to context, well-designed places are:

- *based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design;*
- *integrated into their surroundings so they relate well to them;*
- *influenced by and influence their context positively; and*
- *responsive to local history, culture and heritage (CDD.020, para 40)*

- 5.10 Specifically, the Guide notes that "Well-designed places and buildings are influenced positively by:

- *the history and heritage of the site, its surroundings and the wider area, including cultural influences;*
- *the significance and setting of heritage assets and any other specific features that merit conserving and enhancing..." (CDD.020, para*

Historic England guidance

- 5.11 Historic England publishes Historic Environment Good Practice Advice in Planning (GPA) documents and Historic Environment Advice Notes (HEANs) which give guidance on good decision-making affecting heritage assets and principles of how national policy and guidance can be applied. In this case the key documents are GPA 2 (Managing Significance in Decision-Taking in the Historic Environment, 2015, CDF.03), GPA 3 (The Setting of Heritage Assets, 2017, CDF.04), HEAN 1 (Conservation Area Appraisal, Designation and Management, 2019, CDF.05) and HEAN 4 (Tall Buildings, 2022, CDF.07).
- 5.12 GPA3 gives advice on understanding the setting of a heritage asset and how it may contribute to its significance. Historic England recommends the following broad approach to assessment undertaken as a series of steps that apply proportionately to the complexity of the case:
- *Step 1: Identify which heritage assets and their setting are affected;*
 - *Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;*
 - *Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;*
 - *Step 4: Explore ways to maximise enhancement and avoid or minimise harm;*
 - *Step 5: Make and document the decision and monitor outcomes.*

On page 11, GPA3 provides an Assessment Step 2 checklist (non-exhaustive) of potential attributes of a setting that may help to elucidate its contribution to significance. Page 13 includes an Assessment Step 3 checklist of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset. These checklists are referenced within the significance and impact sections of my evidence.

LOCAL CONTEXT

The London Plan (2021)

- 5.13 The latest London Plan was published in 2021 (CDD.021). Key policies for the determination of these applications are D3 (Optimising site capacity through the design-led approach), D4 (Delivering Good Design), D9 (Tall Buildings), HC1 (Heritage conservation and growth), HC2 (World Heritage Sites) and HC4 (London View Management Framework). Policy on designated views is further contained in the LVMF SPG (CDD.024). Key panoramas relevant to this case are View 2A (St Paul's Cathedral from the summit of Parliament Hill) and 3 (St Paul's Cathedral from Kenwood Gazebo).

Southwark Plan

- 5.14 The Southwark Plan was adopted by the Council Assembly in February 2022 (CDE.01). Key policies for the determination of these applications are P13 (Design of places), P14 (Design quality), P17 (Tall buildings), P19 (Listed Buildings and Structures), P20 (Conservation Areas), and P24 (World Heritage Sites).
- 5.15 Southwark Council adopted the Borough High Street Conservation Area

Appraisal in 2006 (CDE.06) and this is key in understanding the significance of the conservation area.

6 APPROACH TO THE ASSESSMENT OF SIGNIFICANCE AND THE IMPACT OF THE APPEAL SCHEMES

- 6.0 In the following sections I consider in turn each of the heritage assets affected by the appeal schemes, providing for each an assessment of their significance including the contribution made by their setting. I then assess the impact of the appeal schemes on this significance, separating out the 2018 and 2021 Scheme where there is a noticeable change in impact.
- 6.1 The bulk of my assessment will focus on the Borough High Street Conservation Area (BHSCA), which I consider to be the heritage asset most affected by these proposals. The BHSCA contains many listed buildings which contribute to its significance. In the interests of proportionality, I have not assessed the majority of these in their own right but have instead considered them within the context of the BHSCA. Guy's Hospital (Grade II*) and Southwark Cathedral (Grade I) are, however, separately assessed due to their importance and the high magnitude of change to their settings which impacts on their significance.
- 6.2 Further afield, I have included St Paul's Cathedral (Grade I) and the Tower of London (World Heritage Site) in my assessment due to their exceptional interest and international reputation.
- 6.3 Due to the scale of the proposed tall buildings, which would make them visible over a wide area, and the quality of the historic environment, these appeal schemes will affect a far greater range of heritage assets than will be

covered in my evidence. In light of the circumstances in which we are notified and consulted upon applications affecting the historic environment, and taking a proportionate approach, I will prioritise the above heritage assets. However, I note that Southwark Council's heritage witness will consider other heritage assets affected by both appeal schemes.

7 BOROUGH HIGH STREET CONSERVATION AREA

INTRODUCTION

- 7.0 Borough High Street lies at the heart of the BHSCA within the ancient Borough of Southwark, also known traditionally as The Borough. It has a very high degree of significance as one of the oldest roads in London, and the main arterial route out of the City since Roman occupation.
- 7.1 The high street has a long history as a pilgrimage and trading route leading to Canterbury and Continental Europe, reflected in the rich and varied historic character of its buildings and former burgage plots. This character encompasses the remains of coaching inns and breweries, and, following the arrival of the railways, the commercial buildings and market halls, many of which were associated with the hop trade of South East England.
- 7.2 The highly influential role of the high street in shaping the character and appearance of the BHSCA is set out in the Borough High Street Conservation Area Appraisal (hereafter the 'CAA'). It states that “the importance of Borough High Street as the primary route into the City of the London from the south for 2000 years is the most powerful influence on the physical evolution of the Conservation Area, and this street still forms the spine of the area” (CDE.06, para 2.21 p15).
- 7.3 Southwark’s early Christian sites have also played a crucial role in its evolution and development. From its origins as an Augustinian Priory, Southwark Cathedral is one of only three monastic churches that survive in

London. It founded one of the city's earliest hospitals – St Thomas's. Both Southwark Cathedral and the hospital buildings along St Thomas Street are highly important aspects of the BHSCA's character.

- 7.4 The BHSCA was originally designated in 1968, only a year after the introduction of conservation areas under the Civic Amenities Act (1967). This makes it one of the earliest designated conservation areas in England and reflects the long-standing recognition of its special interest.
- 7.5 While the BHSCA has a “clear overall identify” (CDE.06, para 1.2.7, p6) evolving from its ancient high street, it is divided into four sub areas as set out in the CAA (CDE.06, p4, fig 01). These are:
- i. Sub Area 1: Borough High Street central area: focus of activity and vitality in the conservation area;
 - ii. Sub Area 2: Borough High Street south and St. George's: continuation of historic street and inns, with a focus on the church of St. George the Martyr;
 - iii. Sub Area 3: The Riverside, based around the Cathedral and separated by the railway viaducts; Borough Market
 - iv. Sub Area 4: St. Thomas Street and Guy's Hospital, primarily a Georgian street and the Medical School precinct.

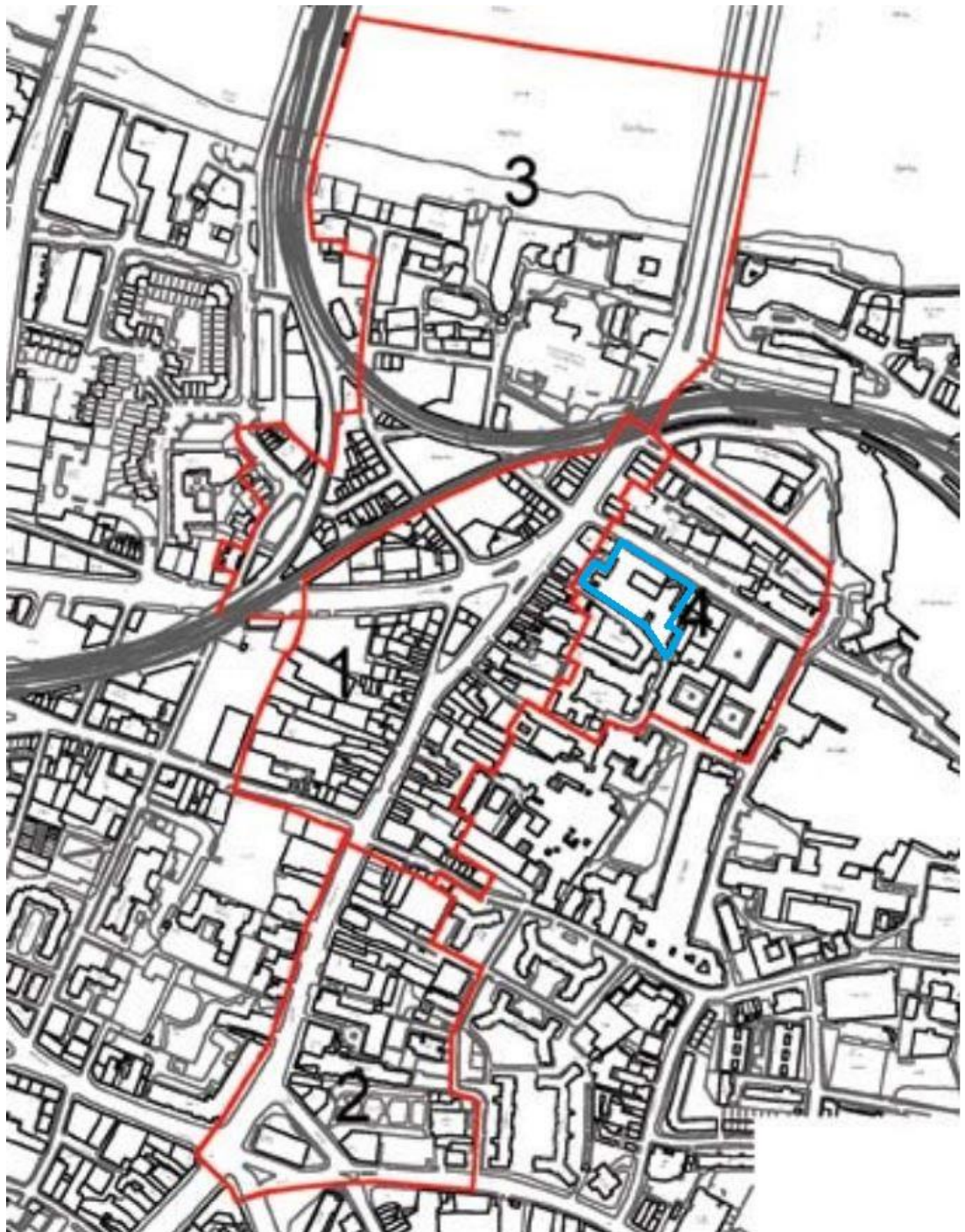


Fig 01| Extract from the CAA, (p4) annotated to include approximate location of the Appeals Site (in blue) (Appendix 01)

- 7.6 The Appeals Site is entirely within Sub Area 4, which is noted for its formal and largely Georgian architecture. However, its partial location within the backland of the High Street and next to King's Head Yard (characteristic of Sub Area 1) means that it is within in a “zone of transition [with] blurred edges” (CDF.05, para 61, p28), and its historic development has been influenced by both sub areas.

7.7 Due to the complex, transitional nature of the Appeals Site and the different characteristics of the sub areas of the BHSCA, the following assessment considers significance by reference to the two main sub areas which are relevant to the Appeals Site:

- i. Borough High Street (within Sub Area 1) which considers the significance of the high street buildings and the evolution of its tight urban grain. This assessment will focus on the area of the high street roughly between the railway bridge at the north, and war memorial to the south, which is identified in the CAA as “the centre of the conservation area” (CDE.06, para 1.2.9, p7).
- ii. St Thomas Street (within Sub Area 4) which considers the significance of the more formal, institutional and mainly Georgian built environment which evolved from St Thomas’s Hospital and then later Guy’s Hospital.

SIGNIFICANCE OF BOROUGH HIGH STREET (WITHIN SUB AREA 1)

Urban Morphology of the High Street - from Coaching Inns to Hops

7.8 Borough High Street “has the longest urban tradition of the inner areas of South London” (Appendix 19, *The Buildings of England, London: Volume 2: South London*, Pevsner, 1983, p586). The earliest complete map of London (Civitas Londinium, 1560, London Metropolitan Archives) demonstrates that by the mid-16th century, ‘Southwarke’ was a dense suburb, centred around the high street and more built up than any other part of London beyond the City walls.

- 7.9 Southwark escaped the Great Fire of 1666; however, the high street was extensively damaged by its own Great Fire in 1676. Although “almost nothing remains of this date, the medieval and Tudor pattern of tall narrow buildings with courts and alleys opening off is still easily recognisable” (Appendix 19, Pevsner, *South London*, p586).
- 7.10 The high street broadly follows its original Roman alignment, but its well-preserved and distinctive urban grain evolved from the long and thin burgrave plots of the medieval period. From the earliest times of which we have any knowledge, Borough High Street was “well supplied with inns for the convenience of travellers” (Appendix 21, *Survey of London* Vol 22, Bankside (the parishes of St. Saviour and Christchurch Southwark, LCC, 1950, p9), as a result of its proximity to the City, and location on the pilgrimage route from London to the shrine of St Thomas in Canterbury Cathedral. The proximity of the high street to the old Globe Theatre and other entertainments around Bankside that flourished in the Tudor period also contributed to the popularity of inns and hostelries in the area (Appendix 22, *Old and New London: Volume 6*, Edward Walford, Cassell, Petter & Galpin, London, 1878, p76). By the 18th century, transport by coach had become a major feature of commercial life, and many of the coaches travelling south from London set off from Borough (CDE.06, para 2.1.2, p11).
- 7.11 This pattern of use resulted in a prevalence of galleried coaching inns, which had a profound impact on the organic development and street pattern of the high street. Rocque's map of *London, Westminster and Southwark* (1746) reveals that the street pattern was characterised by long narrow plots in a ‘herringbone’ form, with enclosed alleyways leading to yards containing the inns which were set behind frontage buildings. This distinctive pattern of

development is quite unlike any other part of London included in the map.

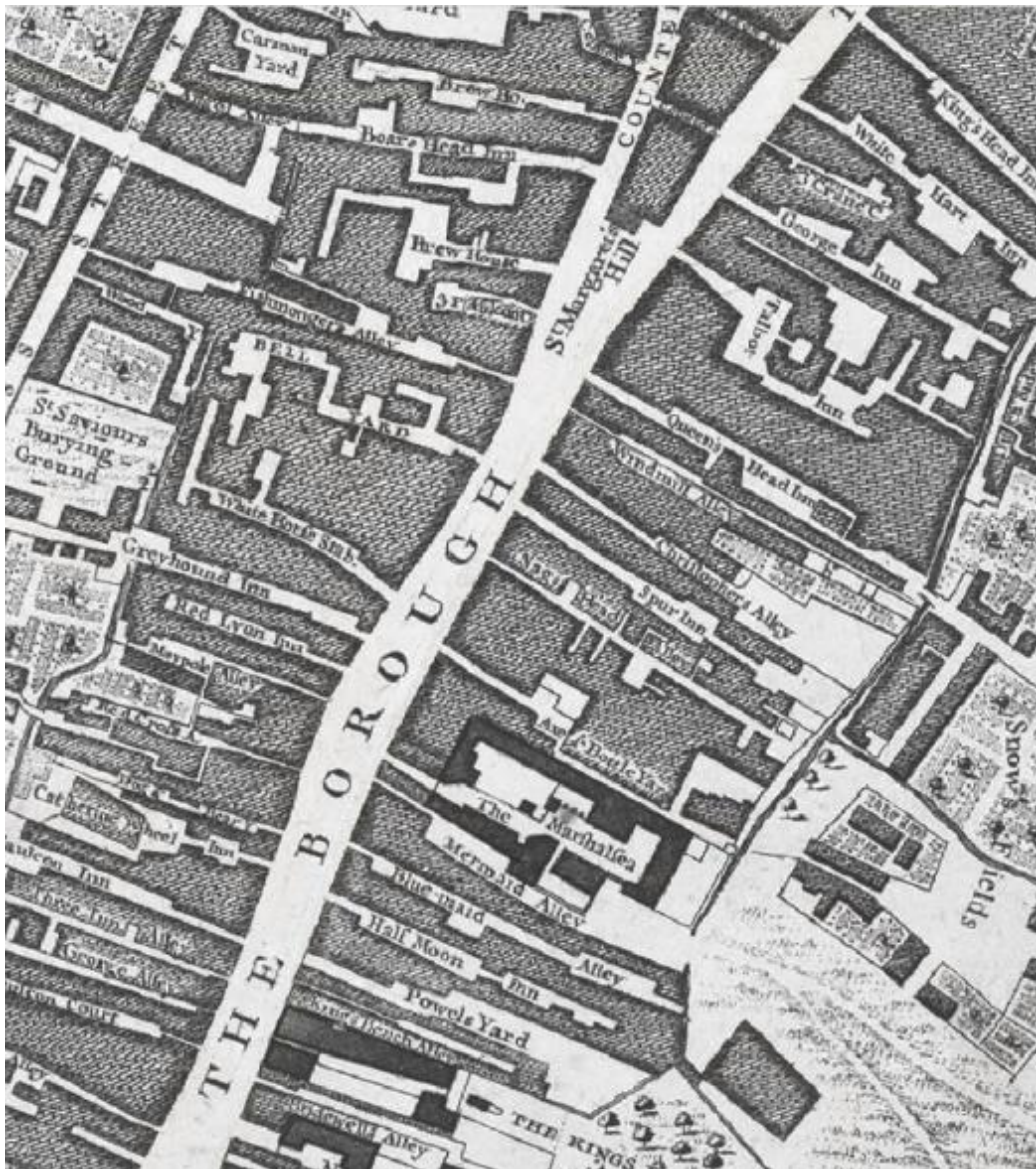


Fig 02 | Extract from John Rocque's map of London, Westminster and Southwark (1746)
(Appendix 02)

- 7.12 The 19th century saw a decline in the fortunes of Borough High Street's coaching inns, due to the arrival of the railways in 1836. The railways also brought about significant physical change to the high street, most notably the introduction of viaducts which annexed the northern part of the high street.
- 7.13 The railways also facilitated rapid commercial expansion, which had a profound influence on the character of the area. Borough Market, which was established in the 13th century, developed large market halls on the west side

of the high street in the 1850s, where it remains to this day. Southwark Street was subsequently completed in 1864 to provide infrastructure to cope with this rapid growth and to accommodate large-scale warehouses and other commercial buildings.

- 7.14 The most distinguished of these buildings was the Hop and Malt Exchange, now listed at Grade II. The hop trade had been a major part of Southwark's commercial activity for centuries due to Borough High Street providing the sole access point to the City from the hop gardens of Kent until the opening of Westminster Bridge in 1750. However, the trade became significantly more prevalent during the Victorian period "with many hop merchants' warehouses in the area" (CDE.06, para 2.1.11, p13). Merchants included W.H. & H. LeMay, whose Hop Factors were located at 76 Borough High Street, which is also now listed at Grade II. The surge in popularity of the hop trade was largely due to the increased ease of transporting hops by rail from Kent to the nearby Bricklayers Arms goods station next to the Old Kent Road.
- 7.15 These Victorian and subsequent changes to the high street have had a major impact on its townscape character, and indirectly resulted in the loss of all but one of the historic coaching inns - the Grade I listed George Inn which is located to the south of the Appeals Site. Nonetheless, the distinctive urban form characterised by yards, alleys and long narrow plots associated with the coaching inns survives in the existing street pattern, much of which was repurposed for commercial activity, rather than being entirely overlaid with larger forms.
- 7.16 In summary, the fine urban grain of the high street and its rich layering of Southwark's historic development is fundamental to the character of Sub Area 1 (and parts of Sub Area 2) of the BHSCA.

Urban Morphology – the Appeals Site

7.17 Whilst the Appeals Site is entirely located outside Sub Area 1, it has a strong association with the urban morphology of Borough High Street, being located just behind its street frontage and abutting King's Head Yard at its south end. King's Head Yard is a long narrow passageway that runs along the south end of the Appeals Site from Borough High Street.

7.18 From at least the medieval period, the south side of this passage was occupied by the King's Head - one of Borough High Street's distinctive and famous galleried coaching inns. "The inn was destroyed in the Borough fire of 1676, but part of the building erected after the fire survived until 1885" (Appendix 21, *Survey of London* Vol 22, p15).

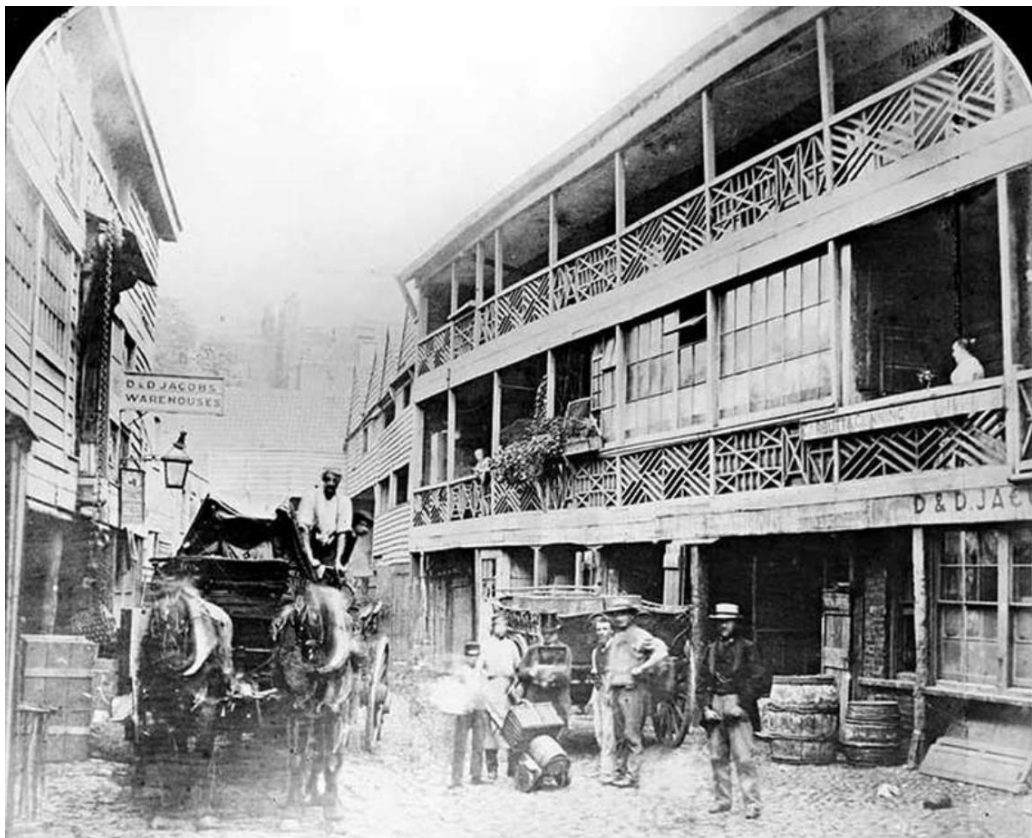


Fig 03 | *The King's Head Inn, 1885* (Historic England Archive ref: bb61/01089) (Appendix 03)

7.19 The inn was replaced by the current public house in c.1881, also on the south side of the alleyway. It is a narrow three-storey brick building with

tracery windows and a central bust of King Henry VIII, which is believed to date from the 16th century. The public house was listed at Grade II in 1972.

- 7.20 The north side of King's Head Yard, largely within the present Appeals Site, accommodated various industrial and commercial businesses by the late 19th century. Facing the King's Head public house and running most of the length of the alleyway were hop sample rooms (fig 04), an increasingly common use for the backlands of Borough High Street from the late 19th century and well into the 20th.

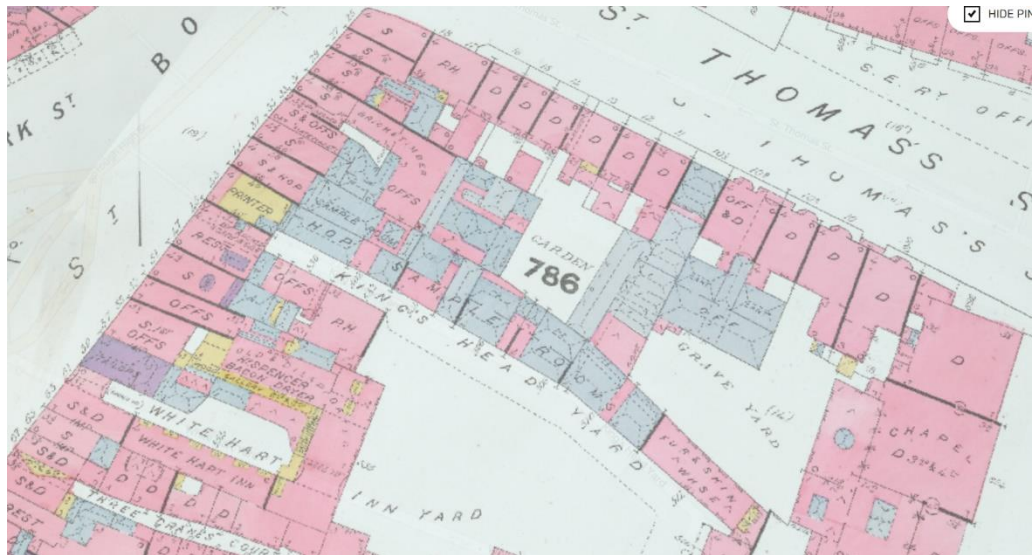


Fig 04 | Extract from the Goad map (1887) (Appendix 04)

- 7.21 Records appear to indicate that the hop sample rooms were damaged during WWII, and research undertaken by the Survey of London for the volume on Bankside which was published in 1950, concludes 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” (Appendix 21, *Survey of London* Vol 22, p15).
- 7.22 This is questionable, however, given that the King’s Head pub and the buildings flanking it do not appear to have been rebuilt following the Second World War. Similarly, the south elevation of the hop sample rooms, which was retained as part of the redevelopment of New City Court in the 1980s (fig

05), possesses a strong sense of its original Victorian character despite the comprehensive redevelopment behind its frontage (fig 05) and some post-war recreation.



Fig 05 | Hop sample rooms (1968 and 1980, London Picture Archive) (Appendix 05)



Fig 06 | *King's Head Yard looking west (my photo) (Appendix 06)*

7.23 The long, two-storey classical façade evokes the robust, yet decorative architectural character of many commercial buildings of Victorian London. It comprises sets of broad, rendered piers at ground floor, evenly distributed by bays with (modern) windows. The red-brick upper floor reflects the proportions below, but with greater embellishment – piers become pilasters and each bay is crowned with a pedimented window. The westernmost pediment incorporates a decorative cartouche which appears to be original (fig 07). Some of the detailing has been rendered over, but delaminated sections reveal that stonework survives beneath (fig 08).



Figs 07 & 08 | Cartouche detail (left) and Stonework (right) (Appendices 07 & 08)

7.24 Therefore, despite only the altered façade remaining, this long stretch of retained wall is a characterful part of King’s Head Yard, which complements the Victorian architecture of the King’s Head Public House, the buildings flanking it, and the 19th century entrance building at 47-49 Borough High Street. These buildings collectively exemplify the commercial repurposing of these yards in the 19th century, knitted into the urban grain of medieval origin. Moreover, the retained south wall serves as a reminder of the hop trade which played such a key role in Southwark’s commercial activity and remains an important part of BHSCA’s character and appearance.

Architectural Character of the High Street

7.25 The rich layering of Southwark’s history within the urban grain of the high street is reinforced by the unusually high degree of survival of three-to-four storey historic buildings on both sides of the high street. This is recognised in the CAA (fig 09, CDE.06, p42), which identifies all buildings along Sub Area 1 of the high street as being either positive contributors to the BHSCA or listed. The listed buildings along the high street relevant to the Appeal Schemes are set out in CDF.02-1, CDF.02-2, CDF.02-3 and shown in fig 09.

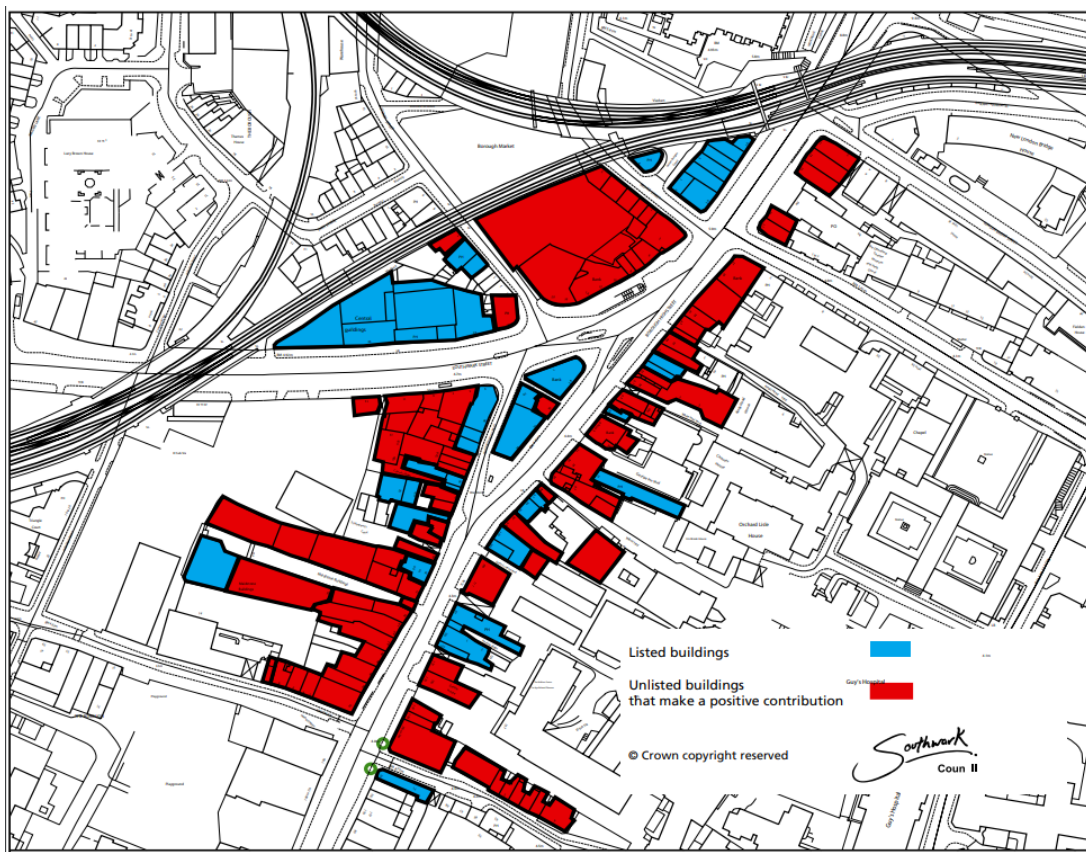


Fig 09 | Extract from the CAA (p42, Sub Area 1) indicating the quality of the buildings along Borough High Street and the east end of Southwark Street and survival of the historic street pattern (nb some buildings at north end were demolished in c2010 as part of rail improvements) (CDE.06, p42)

7.26 Whilst some of the high street buildings have been replaced since the CAA was adopted, this ancient high street retains its integrity and rich architectural character. It is a remarkable physical survival given the significant development pressures of inner London over the years.

7.27 The ability to appreciate the individual and collective architectural quality and character of the high street buildings, their scale, spatial arrangement, and the grain of the street within this urban environment is key to understanding the significance of BHSCA. The CAA explains that the “roof level” is particularly important as it reveals the “inherited characteristics of burgage plots and the controlled variety they introduce” (CDE.06, fig 17, p26).

7.28 The rich character of the streetscape can be appreciated in views. The CAA explains that “the linear character of the Borough High Street creates contained vistas rather than broad prospects [and that the] most notable

views focus on landmark locations, generated by the angles of street intersections” (CDE.06, para 3.2.10, p27).

- 7.29 Of relevance to these appeal schemes are the views towards Borough High Street from Southwark Street, where “pubs, shops, banks and many fine commercial buildings create a city-centre quality” (CDE.06, para 1.2.9, p7). Approaching Borough High Street, the fine grain of high-quality historic buildings on the high street are framed by the more consistent commercial scale of buildings on Southwark Street. This is evident at the junction with Stoney Street where the first views of the high street can be seen on the arrival from the more enclosed environs of Borough Market (CDB.14, View 36, fig 10).



Fig 10 | View 36: Southwark Street / Stoney Street (CDB.14)

- 7.30 The high street buildings in these views include 53/53A and 55 Borough High Street, which are both listed at Grade II due to their early 18th and late 17th century origins respectively. Both buildings were re-fronted in the 19th and 20th centuries; however, their modest scale and the plain tile roof of No. 55 reveals their early origins. Views that take in the low scale and historic

roofline of these buildings within the wider townscape contribute to an appreciation of their architectural and historic interest as listed buildings and component parts of the conservation area.

- 7.31 Another important view in which this group of high street buildings can be appreciated is from the junction at the southern end of the 'island' on Borough High Street. The 'island' contains a group of listed buildings, including the Southwark War Memorial, listed at Grade II*, and the former Town Hall Chambers which is a visually prominent tall Italianate building, listed at Grade II (CDB.14, View 35). Views from the southern end of the 'island' take in these listed sites in the foreground, with the historic high street buildings behind.
- 7.32 In all these views, tall building development around London Bridge can be seen. This includes 'The Shard', designed by Renzo Piano and completed 2012, which at 72 habitable storeys, is the tallest building in western Europe and one of London's most visually dominant buildings. English Heritage strongly objected to the development proposals for The Shard and took part in the related public inquiry in 2003. The Shard is the centrepiece of a cluster of tall buildings around London Bridge Station known as The Shard Quarter, which also includes the 26-storey Shard Place and the 17-storey News Building, both also designed by Piano in a similar architectural style. To the south of the cluster is the 34-storey Guy's Tower which was completed in 1974.
- 7.33 These buildings are visible above the historic streetscape (fig 11) and create a conspicuous visual distraction¹. This undermines the appreciation of the

¹ GPA3: Experience of the asset: Visual dominance, prominence or role as a focal point, p11

individual and collective architectural quality of the high street buildings, their varied scale and spatial arrangement – which are all important characteristics of the BHSCA as well as the streetscape setting of the component listed buildings. The presence of these much taller buildings above the roofline is extremely damaging and has caused harm to the BHSCA and component listed buildings along this stretch of the high street.



Fig 11 | Borough High Street looking east from Southwark Street (my photograph) (Appendix 09)

- 7.34 Nevertheless, the human-scale architectural character of the high street remains exceptional, and the distance between it and the tall buildings helps moderate their impact. This ‘breathing space’ behind the high street frontage, which is much more perceptible in person than in photographs, preserves an appreciation of the depth of the urban grain derived from medieval burgage plots, and the visual subservience of backland development.
- 7.35 Views of the backland and the enclosed yards and alleyways from the high street through openings within the frontage buildings and between buildings are also key to appreciating the BHSCA’s character. This aspect of significance can be appreciated in glimpses of the yards, either through

archways or narrow slots in the street frontage, which provide a sense, if not the physical remains, of the original arrangement of the coaching inn. The CAA explains that “glimpses into the numerous alleys and yards that open off Borough High Street are part of its visual interest and a reminder of Borough’s historic legacy” (CDE.06, para 3.2.11, p27). Southwark Council’s Characterisation Study for the area also mentions these glimpsed views with specific reference King’s Head Yard in its section on Borough High Street. It states that “views through a low archway open up to reveal glimpses of the cobbled yards beyond” (CDE.013, p87).



Fig 12 | *King's Head Yard (my image) (Appendix 10)*

7.36 The CAA captures this sense of enclosure and separateness of the alleyways from the high street in a view towards King's Head Yard (CDE.06, fig 3, p8) (my image used in fig 12 due to the low quality of the CAA image). In views from the high street, the narrow alleyway is framed by a decorative and deep archway from which "Old King's Head" signage is suspended upon metalwork. The narrow, cobbled alleyway draws the eye down to the King's Head Public House, which is just visible. The retained hop sample rooms façade completes the composition in an architectural style consistent with the

character of the alleyway buildings. The alleyway's enclosed spatial arrangement and architectural character also contribute to the significance of the Grade II listed King's Head Public House as an important aspect of its setting².

- 7.37 The sense of enclosure is of course also experienced within the surviving alleyways and yards themselves, where the sense of separation and sanctuary from the high street can be felt. I consider this to be a key aspect of BHSCA's special character and appearance.
- 7.38 The current presentation of King's Head Yard is not, however, pristine, with elements that detract from the character of the BHSCA and the immediate setting of the Grade II listed public house. The creation of a service route to New City Court, within the western bays of the south elevation, allows views towards the large utilitarian large service yard behind and unattractive façade of the office building. The associated security gates, ventilation grilles and bins add clutter to the space³. Not only has this arrangement eroded the sense of enclosure of King's Head Yard, but it has also created an uninviting environment which conflicts with the more positive aspects of the alleyway's character.
- 7.39 While these are undesirable aspects, they largely relate to land use, and the presentation of the alleyway and its setting could be enhanced by improved management and maintenance. The CAA notes the potential for these yards and alleys to have a "more active use" (CDE.06, para 3.2.8, p26).
- 7.40 A more permanent impact is that of Guy's Tower, which abruptly terminates

² GPA 3: The asset's physical surroundings: Definition, scale and 'grain' of surrounding streetscape, landscape and spaces, historic materials and surfaces, functional relationships and communications.

³ GLA 3: Experience of the asset: Land use.

the eastward views along King's Head Yard and has eroded the sense of enclosure and separation from the outside world, in so doing harming the special character of the alleyway. The 1980s office block at New City Court is visible above the retained Victorian façade particularly on the approach from the east (fig 06), and also diminishes the sense of enclosure and character of the yard. However, it is set well back from the frontage and not visually intrusive on the highly important first glimpses into the yard from the High Street.

SIGNIFICANCE OF ST THOMAS STREET (SUB AREA 4)

Introduction

- 7.41 Sub Area 4, in which the Appeals Site is located, owes much of its distinctive institutional character to St Thomas's Hospital, which moved from nearby St Mary Overie to the north side of St Thomas Street in the 13th century (Appendix 19, Pevsner, *South London*, p360). The hospital remained there until its relocation to Lambeth in 1862.
- 7.42 The planned redevelopment of St Thomas's Hospital from 1693 set in motion a transformation of the built environment, inherited by Guy's Hospital in the 18th century, that embraced continental ideals of classically inspired building forms and orderly street patterns and largely disregarded the area's organic development.
- 7.43 This formal Georgian architectural and institutional character remains the defining attribute of this part of the BHSCA, quite distinct from the organic development of the high street, which provide the area with a "conservative,

established tone” (CDE.06, para 3.5.1, p37).

Overall Character

- 7.44 Sub Area 4 of the BHSCA is defined by the coherent and orderly scale of the townscape owing to its predominantly Georgian architectural character, which can be appreciated against a clear sky in south and west-facing views. Almost every building in Sub Area 4 is of a broadly consistent scale of approximately four-storeys and consequently there is a deep sense of formality and an institutional character⁴.
- 7.45 The strong sense of order and polite architecture of Sub Area 4 provides a distinct urban environment sandwiched between the busy and organic character of Borough High Street to the west and the emerging high-density developments to the north and east. This is particularly evident on the arrival from London Bridge Station, where St Thomas Street provides a human scale and historic character to the area, in stark contrast to the ultra-modern environment around the Shard Quarter.
- 7.46 The Shard Quarter, Guy’s Tower, and the emerging tall buildings further to the east along St Thomas Street have harmed the historic character of this part of the BHSCA. They undermine the sense of formality provided by the predominantly Georgian buildings and their consistent scale. However, there remains a clear distinction between the growing cluster of tall buildings around London Bridge Station and the well-defined character of Sub Area 4.
- 7.47 The 26-storey Shard Place, which recently replaced a 1980s building called Fielden House, is just within BHSCA. Its location “at the very edge of the

⁴ GPA3: Experience of the asset: Cultural associations, The asset’s physical surroundings: Formal design.

conservation area [and the] unique opportunity to complete... [and] cement the cluster of tall buildings around the Shard of Glass" (CDH.15, Fielden House Committee Report, 14_AP_1302, 4 November 2014) supported Southwark Council's decision to approve that development.

7.48 Shard Place clearly shares an architectural language with, and is a component part of, the Shard Quarter buildings, which are all centred around the public piazza outside the upper concourse of London Bridge Station and outside the conservation area. It does not relate in any way to the character and appearance of the BHSCA. In my view this building should no longer be included within the boundary of the BHSCA.

7.49 Apart from Shard Place, there are no tall buildings defined by Southwark Council as being over 30 metres (CDE.01, p137) in this part of the BHSCA, or along the high street.

Buildings Associated with St Thomas's Hospital

7.50 The historic buildings directly opposite the Appeals Site on St Thomas Street are a fragment of the St Thomas' Hospital complex and represent one of the most intact stretches of early 18th terraced housing found anywhere in London. These buildings include Nos 9-13 St Thomas Street (odd numbers) listed at Grade II*, and No. 15 which is listed at Grade II.

7.51 The terrace widens at its east end and is terminated by 17 St Thomas Street, an unlisted Victorian building which preserves the architectural character of the terrace. As mentioned, Shard Place terminates this east-facing view along St Thomas Street. However, the L-shape of No 17 provides a clearly defined and appropriate edge to the BHSCA which encloses the historic view

along St Thomas Street, as set out in the CAA (CDE.06, 3.5.8 and fig 38, p39).

- 7.52 The terrace is terminated at its west end by the former Church of St Thomas at 9A St Thomas Street (now a museum and restaurant). The building was constructed on the site of an earlier church in c1702-3 in the Queen Anne style and is listed at Grade II*. The church's four-storey tower rises slightly above the prevailing building height and provides a visual focus in west-facing views along St Thomas Street (fig 13). For these reasons, it is identified as a "landmark" in the CAA (CDE.06, para 4.3.30, p50).



Fig 13 | West-facing view of St Thomas Street with 'landmark' tower of St Thomas's Church to the right (my image) (Appendix 11)

4-8 and 12-16 St Thomas Street

- 7.53 A residential terrace was developed in 1819 along the south side of St Thomas Street for St Thomas's Hospital. The terrace is now Grade II listed, and forms part of the Appeals Site at 4-8 and 12-16 St Thomas Street (and is the subject of the LBC applications). No. 10 is missing from the group as it was merged with No. 8 in the 1930s. The terrace also originally included No

2 St Thomas Street which is now separately listed at Grade II as the Bunch of Grapes Public House and is outside the Appeals Site.

- 7.54 The terrace was extensively altered internally and to the rear during the 1980s when it was incorporated within the New City Court office development. The work involved the introduction of an office corridor which cuts through the entire length of the terrace and significantly erodes the original domestic plan form of each house. Internally, few features of interest survive apart from a restored fireplace at No 4, principal staircases at 4 and 8, and another particularly fine open-well curved staircase at No 14.
- 7.55 The significance of the listed terrace is therefore principally derived from the architectural interest and townscape value of its frontage, which generally remains in very good condition. It comprises a row of four-storey yellow stock brick houses with consistent proportions, restrained architectural detailing to the facades, and shallow lightwells with iron railings. The terrace complements the early 18th century Queen Anne and Georgian buildings on the opposite side of the street, which share its domestic scale, and restrained classical architecture.
- 7.56 The terrace frontage benefits from a clear sky setting in views along St Thomas Street, which contributes to its architectural interest as a listed building⁵ and also its contribution to the conservative, established tone of this part of the BHSCA.

New City Court

- 7.57 Next to the listed terrace to the east is the 1980s entrance to New City Court,

⁵ GPA3: The asset's physical surroundings: Formal design e.g. hierarchy, layout.

which leads to the rest of the office development to the rear of the Appeals Site. Overall, the office development has harmed the character of the conservation area by introducing a building that bears no relation to its historic context, with very unsympathetic junctions with the historic buildings it incorporates. However, its impact is relatively modest in relation to Sub Area 4, as its backland massing is concealed behind the historic street frontage. Additionally, although the entrance building is not contextual in its architectural design, it does adhere to the scale and proportions of the historic buildings lining St Thomas Street (fig 14), which helps to preserve the formal and orderly character of this part of the BHSCA.



Fig 14 | *St Thomas Street looking west (my image) (Appendix 12)*

Keats House

7.58 Between the entrance to New City Court and Guy's Hospital is Keats House at 24-26 St Thomas Street, which is identified as a positive contributor to the character of the BHSCA in the CAA. Keats House comprises two

symmetrical, four-storey houses and was built in 1863 in an Italianate style, in red brick with decorative stonework. While most of the building behind its frontage was lost when New City Court was developed in the 1980s, what survives remains a striking and authentic composition, comprising a highly decorative front and partial flank elevation, double portico and associated lightwell walkway, iron railings, and coal vaults. Its distinctive use of materials and florid decoration set it apart from the restrained architectural character of the Georgian and Queen Anne buildings along St Thomas Street. Yet its scale and proportions are very much in keeping with the streetscape.

- 7.59 Keats House is physically connected to the rear elevation of Guy's Hospital's west wing and historically provided accommodation for medical students. It therefore has a strong connection to the institutional character of this part of the BHSCA and relates successfully to the townscape character whilst being an architecturally distinguished building in its own right.

Guy's Hospital

- 7.60 The most significant listed building within Sub Area 4 of the BHSCA is Guy's Hospital (listed at Grade II*), which is located immediately to the east of the Appeals Site on the south side of St Thomas Street. The significance of the hospital as a listed building is covered in a later section, so here it is considered only in terms of its contribution to the significance of the conservation area.
- 7.61 Described in the CAA as "the focus of St Thomas Street" (CAA para 4.3.32), the striking ensemble of Guy's Hospital's three principal ranges, entrance gate and gatepiers, and forecourt with a statue of Thomas Guy at its centre, provides an arresting first impression of the conservation area on arrival from

London Bridge Station. It embodies the defining characteristics of Sub Area 4 in terms of its scale, proportions and architectural character.

- 7.62 The hospital's east wing (Boland House) was recently converted to a museum. The work included significant improvements to the presentation of the forecourt including general repairs and new surface treatments, and improved public access through the site, including access to the hospital chapel. These works have significantly enhanced the historic character of this part of the BHSCA.

IMPACT OF PROPOSALS ON BOROUGH HIGH STREET (SUB AREA 1)

Juxtaposition of Scale

- 7.63 A major impact on the BHSCA's significance would arise from the introduction of a tall building in the backland of Borough High Street. The 37 or 26 storey buildings of the appeal schemes would each form a massive and incongruous presence, dwarfing the three to four storey buildings along Borough High Street. The stark juxtaposition of scale would be experienced from many vantage points and not just in the assessed views (fig 15 to fig 18), although these fixed-point views (which are specifically identified in the CAA as locations from which the high street grain can be appreciated) clearly illustrate the profoundly harmful effects of the schemes.



Fig 15 | View 44: Southwark Street / Stoney Street (cumulative), 2018 Scheme CDA.12, p235, Fig 16 | View 36: Southwark Street / Stoney Street (cumulative), 2021 Scheme, CDB.14, p19



Fig 17 | View 43: CDA.12, p229, Fig 18 | View 35: St Saviours Southwark War Memorial, CDB.14, p203

7.64 The ability to appreciate the individual and collective architectural quality of the high street buildings and the “controlled variety” (CAA) of the historic roofline would be seriously undermined by both tall building proposals due to their comparatively vast scale⁶.

7.65 The jarring juxtaposition would be particularly emphasised by the very close proximity of the proposed developments, set just behind the largely continuous frontages of buildings on Borough High Street⁷. This would

⁶ GPA3: Form and appearance of development: Competition with or distraction from the asset. Wider effects: Change to skyline.

⁷ GPA3: Location and siting of development: Proximity to asset.

fundamentally erode the perception of the high street buildings as evolving from ancient burgage plots and invert the hierarchy of the plots by introducing a radically taller building in the backland behind smaller frontage buildings.

- 7.66 While the Shard Quarter buildings and Guy's Tower have harmed these views, they appear at greater distance from the frontage buildings, preserving the 'breathing space' which allows the depth of the urban grain and subservience of backland development to be understood and appreciated. Therefore, these existing tall buildings do not have the same profound effect on the high street as would the proposed tall building developments in its backland.
- 7.67 The tall building of the 2021 Scheme would harm the BHSCA to a similar degree in these views, but for slightly different reasons. It would appear somewhat less extreme due to its lower height. However, it would still be substantially taller than the prevailing three-to-four storey scale of the high street buildings. Its increased footprint and more solid elevational treatment when compared with the 2018 Scheme would mean that it would appear wider and more conspicuous above the historic roofline, which would negate the potential mitigations of its lower height.
- 7.68 Should either Appeal Scheme be allowed, this would be the first tall building introduced in the backland of Borough High Street. It would represent a radical shift in scale of development, and one fundamentally at odds with the particular character of this historic London streetscape. If approved, this could set a precedent for other similar development proposals further along the high street.

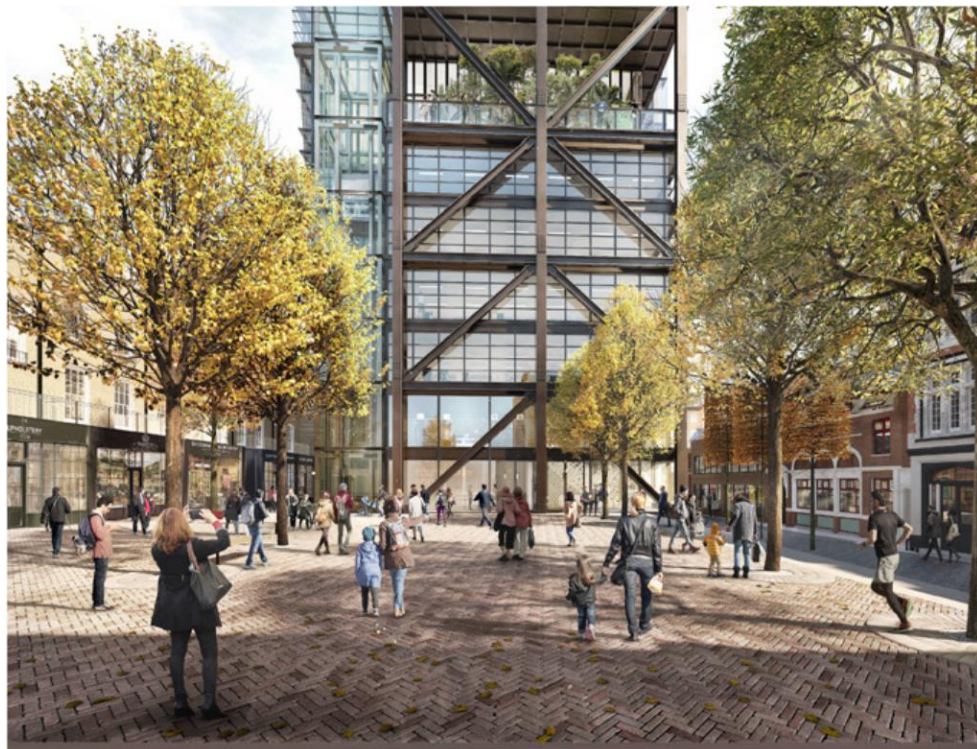
- 7.69 In both schemes, the BHSCA would also be affected by the alterations within the backland of the high street. The demolition of the south façade of the former hop sample rooms would erase a vestige of the hop trade infrastructure which was such a key part of Borough's commercial activity in the 19th century and remains a visible and characterful presence within the BHSCA.
- 7.70 The demolition of the south façade would also reduce the Victorian character of King's Head Yard, eroding an appreciation of the commercial repurposing of the ancient yards in the 19th century. This Victorian character not only contributes to the significance of the conservation area, but, as previously highlighted, also contributes to the significance of the Grade II listed King's Head pub in terms of its Victorian architectural similarities with the south façade⁸. The loss of historic fabric would therefore harm both the character of the conservation area, and the significance of the listed pub as a result of change in its setting.

Loss of Urban Grain

- 7.71 Harm would also result from the creation of a broad opening and piazza-style public realm, particularly in the 2018 Scheme (fig 19), which would pay no regard to the continuous frontages with narrow alleyways and yards behind that characterise the area. Improved pedestrian movement through the Appeals Site could enliven this part of the BHSCA. However, this opportunity is undermined by the creation of open space in a form which is at odds with the narrow, enclosed character of the yard and the contribution it makes to

⁸ GPA3: The asset's physical surroundings: Other heritage assets

the important urban grain of the high street. Instead, the opening-up of the yard as proposed in both Appeal Schemes would distort and significantly erode the 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.



Illustrative view looking through Underground station concourse towards new public realm

Fig 19 | *D&A Statement, AHMM, 7/12/18, CDA.06, p126*

7.72 It would also erase the sense of separateness and enclosure of the yard, which currently contrasts with more dynamic activity of the high street. The opening up of King's Head Yard to new public realm would distort the appreciation of these distinct urban experiences which makes the BHSCA so rich and fascinating.

7.73 The 2021 Scheme seeks to retain a sense of the enclosure of King's Head Yard through the incorporation of a four-storey podium level to the south

elevation of the proposed building and a reduction in open space resulting from its increased footprint. In static views (fig 20) the visual information does appear to present a greater sense of continued enclosure with the building footprint responding to the historic grain. However, these efforts would be negated by the visual dominance of the proposed tall building, which would loom above King's Head Yard and the pub, and the grand four-storey entrance, which would detract from, rather than preserve or enhance, the special character of this part of the BHSCA.



Illustrative view approaching King's Head Yard

Fig 20 | 2021 D&A extract showing retention of a screen wall along the north end of King's Head Yard, CDB.08, p13

IMPACT OF PROPOSALS ON ST THOMAS STREET (SUB AREA 4)

Juxtaposition of Scale and Character

7.74 Both appeal schemes would have a major adverse impact on Sub Area 4.

The bulk of the 1980s office building, which is largely concealed in views

along St Thomas Street, would be replaced by a very tall building directly behind St Thomas Street's historic frontage in both schemes. This would fundamentally change the character of this key part of the BHSCA, derived from the orderly and formal character of its architecture and spaces, causing significant harm.

- 7.75 The assessed views looking west along St Thomas Street (fig 21 and 22) demonstrate that the proposals would be a major visual distraction on the approach from London Bridge Station. It would destroy the sense of arrival at the conservation area, and its almost uniform human-scale of architecturally distinguished, and predominantly listed, historic buildings quite distinct from the high-density built environment to the north and east.



Fig 21 | View 50, CDA.12, p259



Fig 22 | View 42, CDB.14, p233

- 7.76 The proposed tall buildings would entirely fail to respond to the clearly defined character and prevailing four-storey scale of Sub Area 4. They would instead respond to the tall buildings around London Bridge. This encroachment of high-density development into the centre of the BHSCA would cause major and permanent harm to its character and appearance.
- 7.77 The proximity of the proposed tall buildings behind the frontages in views

along St Thomas Street would also cause harm to the special interest of the listed terrace at 4-8 and 12-16 St Thomas Street by rising significantly above its uninterrupted roofline and starkly contrasting with its orderly and consistent architectural character.

- 7.78 The lower height of the 2021 Scheme would be no less harmful in these views than the 2018 Scheme, due to the entirely alien scale it would present in views along the streetscape. The harm resulting from the 2021 Scheme would, in fact, be slightly greater due to the closer proximity to the St Thomas Street buildings and the greater sense of solidity and visual competition it would present in these views (fig 23 and fig 24).



Fig 23 | View 54: Borough High Street / Bedale Street, p159 (CDA.12) Fig 24 | View 45: Bedale Street / Borough Market, p245 (CDB.14)

- 7.79 In the assessed views from Borough High Street looking east along St Thomas Street, the proposed development of both schemes can be seen within the context of the existing and consented tall building developments around the Shard Quarter. The ability to appreciate the formal and institutional historic character of St Thomas Street in these east-facing views from the high street has already been compromised, causing harm to the

BHSCA. However, the cumulative impact presented by the tall building development of both schemes would be particularly stark, appearing as a wall of development along the entirety of St Thomas Street just behind the historic street frontage. This would create the impression of the historic townscape, which incorporates various listed buildings, being merely a façade to tall building development. Again, the 2021 Scheme would present a greater level of visual impact and resulting harm due to its increased width and sense of solidity when compared to the 2018 Scheme.

Demolition of Keats House

- 7.80 The demolition and reconstruction of Keats House in a new location to provide service access would further disrupt the streetscape and harm the BHSCA. Its reconstruction in a new location would be inauthentic, no longer presenting a truthful reflection of its contribution to the historic development of St Thomas Street. The functional elements of Keats House, such as the lightwells which would have provided a service area for the collection of coal, would be reinstated as entirely superficial elements without the coal vaults, further eroding authenticity and integrity.
- 7.81 Furthermore, the reconstruction of Keats House as a standalone building in both schemes would expose the flank elevations in views along the streetscape. The west elevation would be constructed in a relatively contextual albeit simplified manner in both schemes, and the glass and lattice brick infill of the 2018 Scheme (fig 25) could (subject to details) be a modest addition to the east side. However, changes to the service arrangements in the 2021 Scheme would require a large opening to the east of the rebuilt Keats House, and a noticeable curve to its east elevation to provide sufficient

space for vehicle access (fig 26). This would create a jarring architectural juxtaposition, exposing the facadism of Keats House which is currently concealed. This would detract from the architectural character of the building frontage and the formal geometry of the streetscape in some views along St Thomas Street.



Fig 25 | View 51, CDA.12,p51 (cropped) Fig 26 | View 43 (CDB.14), p237 (cropped)

- 7.82 Both schemes propose to reinstate Keats House's historic fabric apart from some of the brickwork. This aspect of the proposals has been informed by a brief assessment by conservation specialists, PAYE. However, there is no clear indication of whether the materials could be deconstructed and reconstructed convincingly and without significant damage or loss to the fabric. Consequently, there remain significant unjustified risks associated with the salvaging and reuse of Keats House.

Alterations to 4-8 and 12-16 St Thomas Street

- 7.83 Both schemes propose extensive alterations to the Grade II listed terrace at 4-8 and 12-16 St Thomas Street, which is subject to LBC as well as forming part of the applications for planning permission.

7.84 The proposed work to the terrace is described in the LBC applications as “restoration, rebuilding and refurbishment”. The proposals seek to remove the intrusive 1980s additions to the rear and reinstate a standalone terrace. The work proposes to reinstate a sense of the original domestic plan form to each house comprising front and back rooms with a side hall and staircase, incorporating the surviving features of interest. No 16, which suffered the greatest degree of alteration in the 1980s, would be the exception to this restorative approach, remaining relatively open plan.

7.85 Both schemes propose to reopen the blocked arched alleyway between No 8 and (the former) No 10, which would provide public access from St Thomas Street to the rear of the site and the London Bridge Underground Station entrance. The one significant difference between the two appeal schemes is the proposal in the 2018 Scheme to incorporate shopfronts to the rear elevation of the terrace (fig 27).



View of the southern Georgian elevation

Fig 27 | *D&A Statement 2018 Scheme, p98*

7.86 While Historic England raised some issues with this particular aspect of the 2018 Scheme, neither LBC application when considered in isolation to the planning applications raised serious issues. Our strong objection to both schemes related to the planning applications. Therefore, the following section

on impact only addresses the proposed alterations to the listed terrace which are subject to planning permission. The works subject to LBC for both schemes are briefly considered under a later section entitled 'Public Benefits Claimed by the Appellant'.

- 7.87 As previously explained, the significance of the listed terrace is principally derived from the architectural interest and townscape value of its frontage rather than its internal plan and features of interest which have largely been lost. The frontage is in good condition, and the building is not at risk. Therefore, the opportunities to enhance these key aspects of the listed building's significance are relatively modest.
- 7.88 Nonetheless, the reopening of the arched alleyway between Nos 8 and (formerly) 10 St Thomas Street would offer a small enhancement the significance of the listed building by reinstating an interesting feature of its architectural interest. The improved public access and permeability through the site via a historic alleyway would be of additional enhancement to the listed building and the BHSCA. It is likely that the building frontage would be further enlivened by improved access through the front doors of the individual houses, as opposed to the 1980s office entrance which currently provides the main point of access.
- 7.89 Whilst these aspects of both schemes offer some enhancement to the listed terrace and the BHSCA, the introduction of shopfronts to the rear in the 2018 Scheme would invert the hierarchy of the terrace house plan form and in so doing cause harm to the significance of the listed building. The shopfronts have the potential to enliven part of the BHSCA. However, as set out above, the creation of a large public square in the backland would cause harm, and the shopfronts, as a component part of the square, would offer no meaningful

enhancement to the BHSCA.

7.90 Taking all this into account, the proposals for the listed terrace subject to planning permission for the 2018 Scheme would offer some very modest enhancement to the BHSCA and the listed building. The level of enhancement offered would be slightly greater in the 2021 Scheme due to the omission of the shop front proposals from those plans.

7.91 However, these aspects of both schemes subject to planning permission must be considered within the context of the wider proposals. As previously set out, the proposed tall building of both schemes would dominate the listed terrace in views from St Thomas Street, diminishing its architectural value and townscape presence which are important aspects of its significance. The limited enhancements proposed would therefore be negated by the harm caused by the wider development proposals.

CONCLUSION ON HARM TO THE BHSCA

7.92 The impact of the proposed developments on the character of the BHSCA, taking the impacts of the scheme on both sub areas 1 and 4 together, would be profoundly harmful. It is the designated heritage asset most harmed by the Appeal Schemes, due to their complete failure to preserve the attributes of either Borough High Street or St Thomas Street that contribute fundamentally to the significance of the BHSCA. To a large degree, the harm would be due to the damaging impact consequent on the development of a tall building so fundamentally at odds with the particular architectural and historic character of the area, and at odds especially with the character of

Borough High Street itself. This harmful impact would be compounded by the destruction of the integrity of King's Head Yard, Keats House and the disruption of the character of St. Thomas's Street which would also flow from the developments.

- 7.93 Considered with reference to the National Planning Policy Framework, this harm would be "less than substantial". That term, however, is a broad one, and the harm consequent on these proposals would lie at the upper end of the spectrum of less than substantial harm, given that it would seriously affect various aspects of the conservation area's essential characteristics. This conclusion applies to both Appeal Schemes, as their impacts on the conservation area would be broadly similar.

8 GUY'S HOSPITAL

INTRODUCTION

- 8.0 Guy's Hospital is located immediately to the east of the Appeals Site. It is a fine example of a Georgian hospital complex, with carefully composed architecture and site planning. The hospital has a distinctly collegiate and intimate character, expressed by its multiple interlinked courtyards and numerous memorials.
- 8.1 The Hospital has long been a centre for education, since its conversion to a teaching institution with St Thomas' Hospital in 1768. It is used today by King's College London as a science and medical campus and has strong communal value due to its role as a renowned institution which has been hugely important to Southwark's community for almost 300 years.
- 8.2 The historic and architectural interest of Guy's Hospital is reflected in its listing at Grade II*. Today, it is under the custodianship of the Guy's and St Thomas' NHS Foundation Trust and forms part of Kings College London's medical and science campus.

ASSESSMENT OF SIGNIFICANCE

Historic Development

- 8.3 The hospital was founded in 1721 by Thomas Guy, who was a governor and benefactor of the neighbouring and ancient St Thomas's Hospital. Guy

established the hospital to treat ‘incurables’ discharged from St Thomas’s Hospital, although it quickly became a general hospital. The hospital complex is of substantial historic interest as a particularly rare and important survival of a purpose-built institution associated with the emergence of healthcare provision in 18th century London.

- 8.4 Prior to the 18th century, ‘hospitals’ usually meant almshouses which were set up by the church and later charitable institutions to provide housing for those who could not pay rent, particularly the elderly. The grandest and best-known London examples of these were the Chelsea Hospital and Greenwich Hospital.
- 8.5 Whilst three hospitals, in the modern sense of the word, existed before the 18th century (St Bartholomew’s, Bethlehem, and St Thomas’s), a number of London’s principal modern hospitals were founded and first built between 1720 and 1760. After St Bartholomew’s, of 1730, Guy’s Hospital is the most intact of these Georgian hospital complexes.
- 8.6 The hospital’s founder, Thomas Guy, was a notable figure of the period as a bookseller, philanthropist and member of parliament (though his investment in the South Sea Company is now seen as controversial). He is commemorated with a statue which is located at the centre of the main forecourt (separately listed at Grade II). The hospital chapel also contains a monument to Guy in white marble by John Bacon, dating from 1779. Several other historic memorials are displayed within the chapel and around the inner courtyards of the listed building which contribute to its intimate and contemplative character.

Architectural Interest

- 8.7 Guy's Hospital is of substantial architectural interest for its formal composition, reflecting the style of important public and institutional buildings, and particularly hospital buildings, of the period. Its architecture is characteristic of early to mid-18th century English Palladianism in its strict symmetry, its proportions and its austere architectural manner. The hospital comprises a series of long interconnected ranges, which are formally arranged in a series of courts.
- 8.8 Its formal composition provides an important insight into the approaches to architecture and planning specific to hospital complexes of the early to mid-Georgian period. The original building, designed by Thomas Dance and built in 1721-25, comprised two symmetrical four-sided ranges of single-piled wards, with arcaded courtyards and a grand-north-facing forecourt (fig 28). The central range separating the two courtyards was raised above an open colonnade, providing a cloister-like arrangement within each court. This arrangement survives, although the arcades beyond the central colonnade have been infilled.



- 8.9 This arrangement reflects the late 17th century hospital plan at St Thomas's in which the courts and their galleries served as "*promenoirs* for their patients" (Appendix 23, *Medicine and Magnificence*, Christine Stevenson, Yale University Press, 2000, p128), creating a palatial environment that would not only be impressive but would foster "collegiality" (ibid). As a hospital for 'incurables', the interlinked courts and enclosed plan at Guy's also provided an airy and spacious yet secure environment for the wellbeing of its patients.
- 8.10 The ranges flanking the forecourt were added later – the east wing in 1738-41 by James Steere, and the west wing in 1774-7 by Richard Jupp, a prolific architect of the Georgian period. Jupp also remodelled the north face of the original central range in a striking Palladian style comprising a stone-faced frontispiece with ionic pilasters set below a decorative pediment and flanked by sculptures within niches. Although these ranges were built in phases, there was clearly an overall desire to create a unified formal composition.
- 8.11 The centrepiece of the hospital is the large and visually prominent forecourt which follows the *cour d'honneur* pattern of a central block with two secondary wings projecting forward. The forecourt is accessed from St Thomas Street via a centrally positioned decorative entrance comprising wrought-iron gates and overthrow flanked by Portland stone piers with central niches and ball finials.
- 8.12 At the centre of the forecourt, and on axis with the entrance gates, is a bronze statue of Thomas Guy set upon a later stone plinth and surrounded by square wrought-iron railings. It was designed by the renowned Dutch sculptor Peter Scheemakers and dates from 1734. Both the statue and the

entrance gates are separately listed at Grade II, but they also are a key architectural component of the forecourt arrangement. This striking composition has been reproduced in various engravings (fig 29) and remains well-preserved (fig 30).



Fig 29 | Guy's Hospital Engraving, William Woolnoth, c1820 (London Metropolitan Archives) (Appendix 14)



Fig 30 | CDA.18, Fig 1-23, p65

- 8.13 The Hospital suffered significant damage during WWII, particularly the forecourt east wing (known as Boland House), which was sympathetically reconstructed in the 1960s. The roof structures of most of the ranges were

extensively rebuilt around this time. The one exception is the forecourt west wing which is the sole part of the listed complex which retains its historic roof form. Despite these post-war alterations, the listed building complex strongly retains its Georgian architectural character, which has been enhanced by recent public realm improvements as part of the conversion of the east wing to a public gallery.

Contribution of Setting to Significance

- 8.14 The courtyards and forecourt are key elements of the Georgian hospital plan. However, for the avoidance of doubt, they are treated in this evidence as part of the setting of the listed buildings, from which their architectural and historic interest can be appreciated.
- 8.15 The entrance from St Thomas Street towards the forecourt provides the best location from which to appreciate the building complex as a whole and its carefully composed formal architectural arrangement based on Palladian principles. The main entrance gates, statue and frontispiece of the central range are deliberately intervisible and aligned to provide a focal point and evoke a sense of order, hierarchy and grandeur⁹. The central frontage, which is crowned by a decorative pediment, provides a dominant visual terminus along this axis.
- 8.16 The formal architectural character of the listed building can also be well appreciated from within the forecourt area where other focal points of the hospital complex's Neoclassical architecture come to the fore¹⁰. The

⁹ GPA3: The asset's physical surroundings: Other heritage assets, Formal design e.g. hierarchy, layout, Orientation and aspect.

¹⁰ GPA3: Experience of the asset: Visual dominance, prominence or role as focal point.

crowning pediments to both the east and west wings provide focal points beyond the central range and align with the centrally positioned statue. The roof forms of the forecourt ranges are deliberately restrained so as not to distract from the commanding presence, proportions and detailing of the principal elevations.

- 8.17 The enclosed and collegiate qualities of the campus, which aids the understanding of the hospital plan as originally conceived, are very apparent on the approach from the busy London Bridge Station, which markedly contrasts with the hospital forecourt's sense of calm. Even more enclosed and secluded are the original, arcaded courtyards, particularly the west courtyard, where in many views the outside world is entirely hidden¹¹.
- 8.18 The ability to appreciate these attributes of the hospital's setting that contribute to its significance has been eroded by the introduction of some much larger-scale development in its immediate vicinity. Since the arrival of the Terminus Hotel at 1861, Guy's Hospital's setting has been affected by taller building development at London Bridge Station. The hotel rose approximately 5 storeys above the roofline of the neighbouring Boland House (fig 31) creating a noticeably larger scale of development than the hospital buildings to the south and west.

¹¹ GPA3: Experience of the asset: Sense of enclosure, seclusion, intimacy or privacy



Fig 31 | *Old St Thomas's Hospital with London Bridge Station and Terminus Hotel – 1860, Guy's Hospital visible to the right (Wellcome Collection) (Appendix 15)*

The hotel was destroyed by WWII bomb damage and replaced by the 25-storey Southwark Towers (TP Bennett, completed 1975) which was demolished to make way for the Shard Quarter buildings.

- 8.19 The existing tall buildings, including Guy's Tower, loom over the hospital complex in views looking east and especially north from the forecourt, where the Shard Quarter appears as a wall of development (fig 32). Whilst these changes have damaged the setting of the listed hospital complex, the highly significant views of the hospital from the main entrance are far less affected, with only Guy's Tower appearing on the periphery to the east. From the main entrance, and within the forecourt, the roofline of the central range and west wing can still be appreciated against a clear skyline as originally conceived (fig 33).



Fig 32 | CDA18 Fig 1-10, p37 Fig 33 | CDB.14, p226

The Hospital Chapel

- 8.20 The west wing, which is of particular relevance to the appeal schemes, contains the hospital chapel at its centre. It is a unique survival as the only 18th century hospital chapel in England, and is amongst the most architecturally significant parts of the interior of Guy's Hospital.
- 8.21 The chapel interior features a central aisle surrounded by a three-sided gallery which is supported by columns beneath groin vaults. At the east end is a sculpture of Thomas Guy by John Bacon. The sanctuary is opposite at the west end, which was remodelled in 1959 but remains the visual focus of the interior, partly due to its three large round-arch stained-glass windows (fig 34). These were designed as “memorial windows to William Hunt” (Appendix 21, *Survey of London* Vol 22, p39), a governor of the hospital who died in 1829, and were therefore installed after this date.



Fig 34 | Chapel interior looking west (my photo) (Appendix 16)

- 8.22 The chapel interior is not brightly lit by natural light, but the changing quality of light throughout the day contributes to its character and ambience which

are aspects of its architectural interest. The stained-glass windows above the sanctuary, which are specifically mentioned in the list description for Guy's Hospital and in the Survey of London, make an important contribution to this character. Positioned at the west end of the chapel, the windows were intended to be seen from the interior in sunlight, casting patterns of light and colour onto the walls and floor (Appendix 18, HE Stained Glass Windows guidance, p1).

- 8.23 Whilst the 1980s office building at New City Court has slightly reduced the amount of natural light into the chapel, the windows remain an important part of the interior, contributing to the architectural interest of the chapel and the special environmental qualities of the interior.
- 8.24 The filtering of natural light through the stained glass, and the resulting ethereal effect, also contributes to the communal value of the listed hospital as a place for quiet contemplation and reflection.

IMPACT OF THE PROPOSALS ON GUY'S HOSPITAL

Undermining architectural composition

- 8.25 The proposed tall building in both schemes would have a major and permanent effect on the significance of Guy's Hospital, causing serious harm to its significance through changes to its setting. This harm would flow from the combination of the height of the tall building, its proximity to the Hospital and the radical contrast in nature between the tall building's architecture and that of the Hospital.



Fig 35 | View 41, CDA.12 ,p255



Fig 36 | View 41, CDB.14, p229

- 8.26 The proposed tall building in both schemes (fig 35 and fig 36) would dominate views from the forecourt towards the west wing. The location of the development site, in very close proximity to the Grade II* listed Guy's Hospital¹² is such that the tall building in both schemes would appear to rise out of the west wing's central pediment, totally undermining the architectural meaning of its crowning feature¹³. This is entirely discordant with the formal composition which can currently be so well appreciated from this vantage point.
- 8.27 In the highly significant views from the main entrance to Guy's Hospital from St Thomas Street, the hospital forecourt would be flanked by tall buildings, leaving only the central range clear of development. This would further undermine the formal composition which can be appreciated from this viewpoint despite the presence of Guy's Tower, enclosing the Grade II* complex with high-density development¹⁴.
- 8.28 Within the original western quadrangle, the proposed tall building in both schemes would also loom over the roofline of the ranges which are currently

¹² GPA3: Location and siting of development: Proximity to asset, Position in relation to key views to, from and across.

¹³ GPA3: Form and appearance of development: Competition with or distraction from the asset.

¹⁴ GPA3: Wider effects of the development: Change to general character.

read against a clear skyline on the approach from the central cloistered range (fig 37 – nb the panorama does not accurately reflect what the human eye sees in this view as the Shard Quarter buildings are not visible from the south and east ends of the quad). This would seriously erode the formal and restrained classical architecture of the hospital and its collegiate character. The proposed tall buildings would also reduce the sense of seclusion and separation which forms part of its significance, and depends on the absence of incongruous development from the hospital's setting¹⁵.



Fig 37 | Cumulative panorama from west quad: View 47 from 2018 Scheme (left) CDA.12
View 39 from 2021 Scheme (right) CDB.14

- 8.29 Whilst the tall building of the 2021 Scheme would be lower, the supporting visualisations demonstrate that this would not lessen the impact on Guy's Hospital when compared with the 2018 Scheme. As with the impacts on the conservation area, the larger massing and white cladding of the 2021 Scheme would slightly increase the level of harm in these views due to the building's increased depth and solidity.

Reduced light to interior of the chapel

- 8.30 The proposed tall building in both schemes, being positioned immediately to

¹⁵ GPA3: Form and appearance of development: Prominence, dominance or conspicuousness.

the west of Guy's Hospital, would also reduce the natural light within the complex. The projected impact on the interior of the highly significant hospital chapel at the centre of the west wing resulting from both appeal schemes is set out in the submitted daylight impact assessments (CDA.38 and CDA.47). The assessments conclude that there would be an average of 43% loss to overall light levels in the 2018 Scheme, rising to 46% in the second.

- 8.31 This loss of light within the chapel would damage its internal character and ambience. This would be particularly felt at the west end, the focal point for worship, where the loss of light and colourful illumination through the significant stained-glass windows would reduce the appreciation of the high-quality interior. The light reduction would also erode the environmental qualities that make the chapel such a special and important place for contemplation and reflection, particularly as a functioning hospital chapel.
- 8.32 The loss of light into the chapel resulting from both appeal schemes would consequently result in some harm to the significance of the listed building, due to the adverse effects on the architectural and communal values of the chapel interior.

CONCLUSION ON HARM TO GUY'S HOSPITAL

- 8.33 The proposed development, in either of the schemes presented, would severely harm the significance of the Georgian buildings of Guy's hospital. The stark juxtaposition between them and the vast scale of the tall building would fundamentally comprise the formal architectural composition of the 18th century buildings, and especially that of the west wing. It would also violate

the ordered tranquillity of the hospital's courts. Both of these are essential components of the hospital's significance.

8.34 Further harm would be caused by the loss of natural light within the chapel, one of the finest parts of the interior of this Grade II* listed building.

8.35 Considered with reference to the NPPF, this harm would again be "less than substantial". It would, however, lie in the upper range of the spectrum of less than substantial harm, given that the proposals would markedly affect the hospital's significance. This conclusion applies to both Appeal Schemes, as their impacts on the hospital would be broadly similar.

9 SOUTHWARK CATHEDRAL

INTRODUCTION

- 9.0 The Cathedral Church of St. Saviour and St. Mary Overie is a rare and enduring symbol of Old Southwark, and one of the oldest standing buildings in the whole of London. Apart from Lambeth Palace, it is the most important medieval monument in South London (Appendix 19, Pevsner, *South London*, p558). The exceptional architectural and historic interest of the cathedral is recognised in its listing at Grade I – one of only four buildings in the borough to be afforded this level of protection.
- 9.1 The area of concern relating to Southwark Cathedral is the impact of the Appeal Schemes on the significance it derives from its setting.

ASSESSMENT OF SIGNIFICANCE

Historical and architectural interest

- 9.2 Southwark Cathedral was founded in the 12th century as the Augustinian Priory of St. Mary Overie and was inaugurated as an Anglican cathedral in 1905. The priory was rebuilt from 1220 and has been subject to various alterations and additions over time. The lower stage of the tower dates from the 14th century and two upper stages to the 14th-15th centuries. The distinctive pinnacles to the tower were added by George Gwilt in the early 19th century as part a wider programme of restoration. Further extensive

restoration of the fabric was undertaken by Sir Arthur Blomfield and the present nave was erected in 1890-97.

- 9.3 The cathedral is of substantial historic interest for its ancient origins, rare within a London context, and role as a prominent inner London place of worship for over 800 years. It is a striking architectural statement due its scale and distinctive architectural form, despite now being set amongst a more varied townscape. For these reasons, it is also a major landmark within the BSHCA, being the defining architectural feature of Sub Area 3.

Contribution of setting to significance

- 9.4 The cathedral has been a religious landmark and focal point for the area since the medieval period¹⁶. Its careful siting at the crossing point of the Thames, and the large scale of the tower and its later gothic finials were intended to present imposing visual spectacle and religious statement on Southwark's skyline (fig 38).



Fig 38 | *General Views of London (c1690) – Southwark Cathedral in foreground (London Metropolitan Archives) (Appendix 17)*

¹⁶ GPA3: Experience of the asset: Visual prominence or role as a focal point.

- 9.5 The cathedral's setting has changed over time, most notably from the early-mid 19th century when Southwark's industrial and commercial activity escalated significantly around the riverfront. However, it remains visually prominent in a wide range of views and is the "major landmark" within the northern part of the BHSCA (CAA para 3.4.18), presenting a powerful reminder of Southwark's ancient origins and religious past and present¹⁷.
- 9.6 The immediate setting of the cathedral provides some of the best locations to appreciate architectural grandeur of the building in its entirety. This includes from Borough Market to the north, Winchester Walk to the east, and Montague Close to the south. In these views, the cathedral, and especially its square tower, can be read against clear sky.
- 9.7 The cathedral is also visually prominent in "certain long views from outside the area" (CDE.06, 3.4.18, p37), including from London Bridge, where the creation of Montague Square in the 1980s opened up cross-river views of the cathedral that had been lost through the industrialisation of the riverfront.
- 9.8 In some of these views, tall building development around London Bridge, particularly the Shard Quarter buildings, encroaches upon the cathedral's setting, undermining its visual prominence and harming its significance as a historic landmark.

IMPACT OF THE PROPOSALS ON SOUTHWARK CATHEDRAL

- 9.9 The proposed tall building in each scheme would cause harm to the significance of Southwark Cathedral through development within its setting.

¹⁷ GPA3: The asset's physical surroundings: Historic and degree of change over time.

The impact would be particularly noticeable in the assessed views from Montague Close and London Bridge, where the architectural and landmark qualities of the Cathedral can be appreciated against clear sky despite visual encroachment of the Shard Quarter buildings and Guy's Tower.

- 9.10 The 2018 and 2021 schemes would have different impacts on Southwark Cathedral and so are addressed separately in this section.

2018 Scheme

- 9.11 Both the tower and nave roof are currently read against a clear sky in dynamic views along Montague Close. This is a crucial factor in allowing the cathedral's architecture to be appreciated mostly unchallenged by visual distraction. This clear sky particularly allows the tower to rise above its surroundings, giving it prominence and contributing to the landmark quality it still retains in these views, despite the presence of modern buildings within its wider setting. The 2018 Scheme would appear conspicuously above the nave roof and behind the tower in the two assessed views from Montague Close (fig 39 and 40) visually competing with the cathedral's architecture and landmark qualities¹⁸.

¹⁸ GPA3: Location and siting of development: Position in relation to key views, Form and appearance of development: Prominence, dominance, or conspicuousness.



Fig 39 | View 56.3, CDA.12, p291,



Fig 40 | View 56.4, CDA.12, p295

9.12 The wider landmark presence of the cathedral would also be compromised in longer-range views, particularly from the assessed view from London Bridge (fig 41). Whilst the Shard is now the dominant feature in this view, the cathedral tower remains clearly visible as the sole historic landmark to the right of the bridge. The proposed tall building would terminate the vista south and draw attention away from Southwark Cathedral by rising significantly above its tower in this view. These impacts would seriously affect the ability to appreciate the landmark role of the cathedral in these longer views and the significance of its riverside setting.



Fig 41 | View 24, CDA.12, p99

9.13 The proposed tall building of the 2018 Scheme would seriously undermine these elements of the Cathedral's significance and would cause serious harm

towards the upper end of 'less than substantial' in NPPF terminology.

2021 Scheme

- 9.14 The proposed tall building in the 2021 Scheme would also break the Cathedral roofline in the assessed views from Montague Close, again pitting it in direct visual competition with the Cathedral's dominant crossing tower and its entire silhouette in dynamic views. The reduction in height of the proposed tall building by around 10 storeys would mean that it would occupy less sky space around the cathedral in these views, but it would still be visually distracting.



Fig 42 | View 50, CDB.14, p265,



Fig 43 | View 51, CDB.14, p269

- 9.15 In views from London Bridge, the lower height of the tower would be less assertive when compared with the 2018 Scheme. Nonetheless, the additional bulk and massing presented by the tall building would remain visually distracting and continue to create the impression of tall building sprawl towards the cathedral.



Fig 44 | View 18, CDB.14, p137

9.16 The harm caused by the tall building in the 2021 Scheme would therefore be lower than that of the 2018 Scheme, towards the middle of the range of 'less than substantial', but still harmful to a historic building of exceptional interest.

10 TOWER OF LONDON WORLD HERITAGE SITE

INTRODUCTION

- 10.0 The Tower of London is located across the Thames, approximately 730 metres to the north east of the Appeals Site. It is a monument of exceptional historic and architectural importance and international significance, as recognised in its designation as a World Heritage Site (WHS).
- 10.1 The WHS contains multiple highly graded heritage designations within its boundary, reflecting its significance and statutory protection. The following assessment focusses on those assets relevant to the impact of the Appeal Schemes on the WHS, namely the White Tower (Grade I) and the Inner Curtain Wall (Grade I) which includes the Queens House and the Beauchamp Tower. Given that the nature of the impacts will be the same, I have not separately assessed the impacts on any individual listed building within the Tower complex.

ASSESSMENT OF SIGNIFICANCE

Attributes expressing OUV

- 10.2 The international significance of the WHS is rooted in the survival of its central White Tower, which is the example *par excellence* of an 11th century Norman castle and thought to be the oldest surviving royal palace in Europe. It stands as a symbol to the successful invasion of England by William the

Conqueror, illustrating the architectural innovation that flowed from those tumultuous times. With its layer of later defences and associated palace buildings, the Tower of London is also a major reference for the history of European military and royal architecture. For these reasons it was considered to meet the highest international standards of significance required to be a UNESCO World Heritage Site.

10.3 The WHS designation is supported by a Statement of Outstanding Universal Value ('SOUV') which sets out the cultural qualities that give the site international importance. The site's 'attributes' are the features or relationships that express its OUV as identified in the agreed SOUV. These attributes are set out in the World Heritage Site Management Plan (Historic Royal Palaces, 2016, CDF.09). Seven attributes are identified as expressing OUV; however, three are of particular relevance to these proposals. These are:

- i. The *concentric defences* around the White Tower;
- ii. The *surviving medieval remains*; and
- iii. The *physical dominance [of the White Tower]*

Concentric defences

10.4 As set out in the WHSMP, the concentric defences were constructed in the later 13th and 14th centuries and represent a model example of the development of a medieval fortress palace. Pevsner described the concentric defences as "equally important" with the Norman phase of work at the Tower, stating that together they represent "the most important work of military architecture in England (Appendix 20, *The Buildings of England, London*:

Volume 1, Pevsner, p207).

- 10.5 Key components contributing to this attribute are “the visible structure and three-dimensional form of the concentric defences (walls, including gates, towers and bulwarks; earthworks, including the moat and its retaining walls), the walls, towers and moat” (CDF.09, p44, para 3.4.15).
- 10.6 The Inner Curtain Wall (Grade I listed) is the innermost of these concentric defences which enclose and protects the Inner Ward from the City beyond. The Inner Curtain Wall incorporates 13 towers around its perimeter. Most relevant to these Appeal Schemes is the Beauchamp Tower, located on the west side of the Inner Ward, and built around 1281 during the reign of Edward I. It was restored in 1851-3. In views from the north and west of the White Tower within the Inner Ward, the Beauchamp Tower has a commanding presence. Its robust military character comprising solid ragstone elevations and crenellated square turrets provide the clearest visual reference to the Concentric Defences as an aspect of OUV in these views.

Surviving medieval remains

- 10.7 Another attribute of OUV relevant to these proposals is the *surviving medieval remains*, which include buildings of the early modern period (CDF.09, para 3.4.16, p44). Within the defences, there are substantial parts of the ensemble of royal buildings that evolved from the 11th to 16th centuries.
- 10.8 These buildings include the previously referenced Beauchamp Tower, as well as the Queen's House (included within the list entry for the Inner Wall), which is located at the south-western corner of the Inner Ward and attached to the Inner Curtain Wall. The Queen's House was built in 1540 incorporating

pieces of the former Constable's Lodgings, and is the finest timber-framed building to survive the Great Fire of London of 1666 (CDF.09, p13).

- 10.9 The Queens House is of substantial architectural and historic interest as a rare and unique collection of late 16th century timber-framed buildings with distinctive gabled roofs, all of which form an important and distinctive historic corner at the south-west of the Inner Ward.
- 10.10 These buildings possess a domestic character and intimate scale which provide an insight into the unique living community at the Tower and its former use as a barracks. This character is noted in the Tower of London Local Setting Study 2010, which states that "views from the Inner Ward illustrate the living tradition of the Tower, its rich ceremonial life and unique sense of place set apart from the modern City outside its walls" (CDF.10, p80).
- 10.11 The Beauchamp Tower on the west side of the Inner Curtain Wall is a prominent and imposing presence in views from Tower Green. The structure contributes significantly to the enclosed setting of the Inner Ward provided by the layering of concentric defences around the White Tower, protecting it from the world beyond¹⁹. It reinforces the sense of exclusion from the outside world, which was so crucial for the Tower's defensive role²⁰.
- 10.12 In relation to the Queens House, these views allow the surviving medieval remains of the WHS to be appreciated. The modest-scale and timber-frame construction of the Queens House provides a sense of the domestic character of the Inner Ward, which was designed to keep the Tower's

¹⁹ GPA3: The asset's physical surroundings: Functional relationships and communications.

²⁰ GPA3: The asset's physical surroundings: Enclosure and boundaries, Experience of the asset: Sense of enclosure.

inhabitants protected from the threats beyond its boundary²¹. This sense of separation from the outside world contributes to the Tower's historical value, and the ability to gain a rare glimpse into its domestic life, an important aspect of its OUV.

Physical dominance [of the White Tower]

10.13 The WHSMP in dealing with the attributes of OUV explains that “the White Tower expressed the power of the Norman conquerors through domination of its environs. Its dual role, of both protecting and providing a defence against the City, was evident: it literally ‘towered’ over its surroundings until the 19th century” (CDF.09, para 3.4.10, p43). This attribute is expressed in the property's form and design, materials and substance and location and setting” (CDF.09, para 3.4.11, p43).

10.14 Key components contributing to this attribute of the Tower's OUV include “its iconic silhouette against the sky from within its local setting” (CDF.09, para 3.4.12, p43). Locations where this attribute of OUV can be appreciation include from outside the Grade I listed Royal Mint to the east of the WHS boundary (View 8: Royal Mint, Tower of London Local Setting Study, CDF.10, p98). From here, the dominance of the White Tower can be appreciated particularly at night when it is illuminated, “enhancing its prominence in the view” (ibid). From this location “the Tower appears as a solid artillery fortress and the viewer is able to appreciate the many ‘layers’ which make up the Tower site, from the Outer Curtain Wall, through to the White Tower at the centre” (ibid). For these reasons, the Concentric

²¹ GPA3: Experience of the asset: Sense of enclosure

Defences of the WHS as a separate attribute of OUV can also be appreciated in these views.

Contribution of setting to significance and threats

- 10.15 The WHS has been harmed by tall building development across central London encroaching upon its setting. In views from the Royal Mint, this largely relates to the Shard which rises above the silhouette of the White Tower, detracting from its Physical Dominance in this view and the appreciation of the Concentric Defences, harming both of these attributes of OUV.
- 10.16 In views from the Inner Ward, this harm is the result of a group of tall buildings to the north-west of the WHS within the City of London's Eastern Cluster, but also the tall buildings around London Bridge Station across the Thames. These buildings appear in many views from the Inner Ward which has drawn attention away from the more modestly scaled buildings that frame this space, diminishing the sense of separation from the city.
- 10.17 The encroachment of tall building development on the Tower of London is a serious issue for the WHS and has received considerable attention in recent years. The Statement of Outstanding Universal Value when addressing threats to Integrity, states that "there are few threats to the Property itself, but the areas immediately beyond the moat and the wider setting of the Tower, an ensemble that was created to dominate its surroundings, have been eroded" (CDF.011).
- 10.18 In response to these threats, UNESCO and ICOMOS undertook a joint Monitoring Mission to the WHS in 2011. They stated in their associated

report (Report of the Joint UNESCO-ICOMOS Reactive Monitoring Mission to the Tower of London and to Westminster Palace, Westminster Abbey and Saint Margaret's Church [United Kingdom], 5-8 December 2011) that:

- 10.19 “As regards the overall state of the conservation of the properties and their visual integrity, the mission recommends that further build-up of the area surrounding the Shard of Glass, on the other side of the London Bridge, be tightly regulated to avoid the further construction of tall buildings that could exceed the height by which they would become visible above the on-site historic buildings of the Tower complex. The development of more tall buildings that would become visible would destroy the visual integrity and seriously damage the Tower's Outstanding Universal Value, possibly beyond repair” (p12). This recommendation is reflected in the WHSMP (CDF.09, 7.3.28, p102).
- 10.20 A specific viewpoint from the Inner Ward looking towards the Queen's House and Beauchamp Tower is used in the report (Annex 1, p15) to illustrate where further visibility of development of the area surrounding the Shard should be avoided. This viewing location is very similar to View 27 of the 2018 Scheme (CDA.12, p111) and View 21 of the 2021 Scheme (CDB.14 p149).
- 10.21 The WHS is supported by a Local Settings Study which seeks to define the local setting of the WHS in order to ensure that future development respects the setting of the WHS and enhances the appreciation of its OUV. Whilst part of the South Bank is included within the boundary of the local setting of the WHS, the Appeals Site is located beyond this area (fig 45).

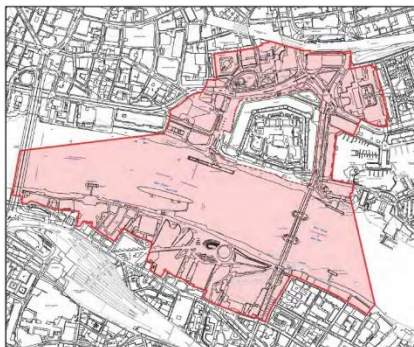


Fig 45 | *The local setting of the Tower (CDF.09, p23)*

10.22 The issue of defining the wider setting of the WHS has been a source of debate between the UK Government and UNESCO as noted in the WHSMP (CDF.09, para 2.4.7, p22). However, the WHSMP describes the wider setting of the Tower as comprising “buildings and areas beyond the local setting that are inter-visible with the Tower, or which could (if redeveloped) have an effect on its setting” (CDF.09). The WHSMP concludes that the wider setting area is therefore “not fixed, and is proportionate to the scale of development in the vicinity of the Tower, and the taller the development, the further its visual impact will extend” (ibid). Due to the visibility of both appeal schemes from the Inner Ward and from the entrance to the Royal Mint, which will be covered in the following section, the Appeals Site is considered to be within the wider setting of the WHS.

IMPACT OF THE PROPOSALS ON THE TOWER OF LONDON WHS

10.23 The proposed tall buildings of both schemes would cause some harm to the significance and OUV of the WHS through development within its wider setting. This is due to the visibility of both appeal schemes above the roofline of the Queen’s House in views from Inner Ward. At approximately 730

metres to the south west of the WHS boundary, the tall buildings of both schemes would be seen at a slight distance, and clustered with other tall building developments around London Bridge Station.

10.24 Further harm would arise from the visual intrusion of the proposed tall building of the 2018 Scheme behind the WHS in the Local Setting Study view from the Royal Mint (View 8).

The 2018 Scheme

10.25 The proposed tall building of the 2018 Scheme would be clearly visible above the roofline of the Grade I listed Queen's House in views from the Inner Ward (fig 46). Although a number of tall building are already visible, the proposed development would create a significant cumulative effect that would further encroach upon the WHS²².

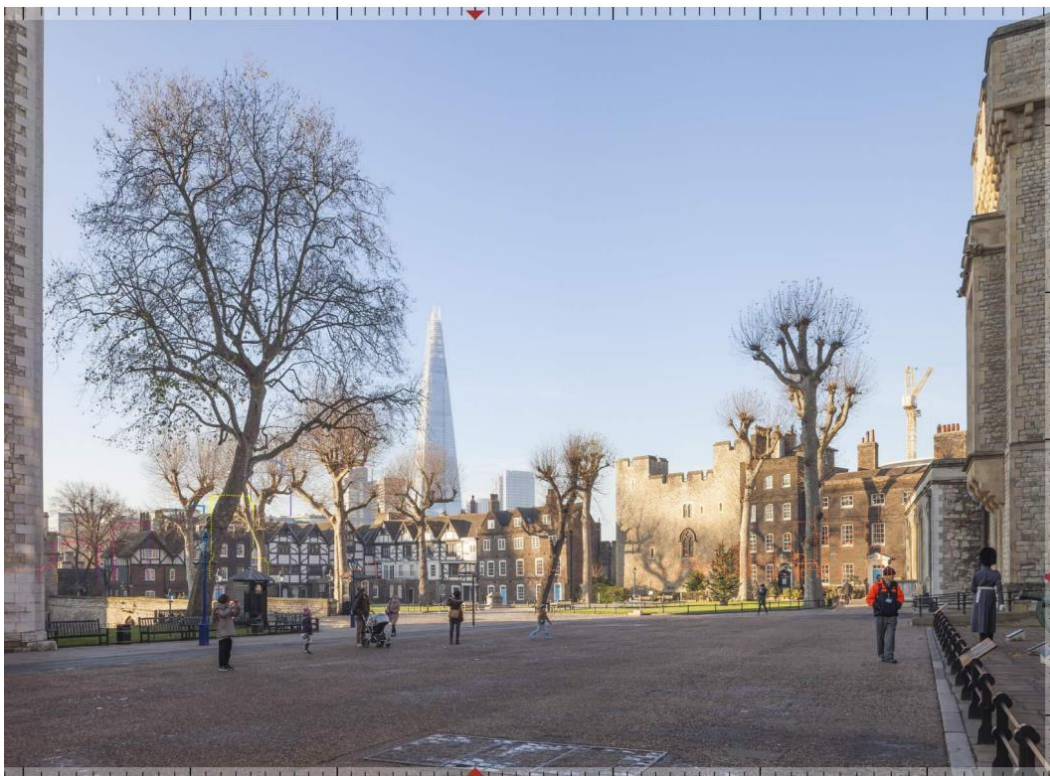


Fig 46 | View 27: Tower of London: Inner Ward, north of the White Tower (Cumulative),

²² GPA3: Wider effects of the development: Change to skyline.

- 10.26 It would undermine the sense of enclosure of the Inner Ward, which is a characteristic that contributes to two attributes of OUV, namely the concentric defences, and the surviving medieval remains of the WHS. It would undermine appreciation of the protective function of the concentric defences as exemplified by the Beauchamp Tower by creating a visual distraction from the Inner Ward²³ and by adding to the encroachment of the world beyond its boundary.
- 10.27 Similarly, the proposed tall building would erode the architectural interest and domestic character of the Queens House by appearing as a distracting element above its roofline²⁴. This would reduce the ability to appreciate the Queens House as a component of the surviving medieval remains that are an attribute of OUV.
- 10.28 The further encroachment of the world beyond the walls and structures of the Inner Ward would compromise the unique historic character of this space and the individual significance of the buildings that enclose it, such as the Beauchamp Tower and the Queens House. For these reasons, the 2018 Scheme would cause harm to the OUV of the WHS and the significance of the Grade I listed Beauchamp Tower and Grade I listed Queens House.
- 10.29 Some harm, of a very low level, would also result from the impact of the proposed tall building in the Local Setting Study view from the Royal Mint (View 8: Royal Mint, Tower of London Local Setting Study, CDF.10, p98). In this view, the proposed tall building can be seen above the roofline of the Waterloo Block to the right of the White Tower. Whilst not nearly as

²³ GPA3: Form and appearance of development: Prominence, conspicuousness

²⁴ GPA3: Form and appearance of development: Competition with or distraction from the asset

conspicuous as The Shard which appears directly behind the White Tower and rises significantly above the height of its silhouette, the addition of the proposed tall building would have an undesirable cumulative effect. Its appearance in this view would further diminish the appreciation of the White Tower's Physical Dominance as an attribute of OUV, particularly after dark (fig 48)²⁵.



Fig 47 | View 29 (wireline, cropped), CDA.57, p13 Fig 48 | 29n (rendered, cropped), CDA.57, p17

10.30 As a location from which the Concentric Defences of the WHS can be appreciated, the addition of the proposed tall building in the Royal Mint view would be a visual distraction, undermining the appreciation of their protective function. Some additional harm to this attribute of OUV would therefore arise from the impact in this view.

10.31 Within the context of the existing impacts presented by tall building development in the surroundings of the WHS, and the distance of the Appeals Site from the WHS boundary, the harm would be towards the lower end of the range of 'less than substantial harm'. However, the harm would be to multiple designated heritage assets of the highest possible significance.

²⁵ GPA3: Form and appearance of development: diurnal change, Wider effects of the development: Change to skyline, silhouette.

The 2021 scheme

10.32 The proposed tall building of the 2021 Scheme would be approximately 10 storeys lower, and as a result would not be visible in views from the Royal Mint, nor would it be visually prominent in views from the Inner Ward. It would only just appear about the roofline of the Queens House in the assessed view from the Inner Ward, approximately consistent with the perceived height of Shard Place.



Fig 49 | View 21: Tower of London: Inner Ward, north of the White Tower Proposed view from Inner Ward (cumulative), CDB.14 p149

10.33 Within the context of other large-scale developments around London Bridge Station, the tall building would not be visually distracting in the assessed views, nor would it noticeably encroach upon the enclosed setting of the Inner Ward. Its effect on the OUV of the WHS and the setting of its component listed buildings would be very limited, causing only a very low level of harm.

10.34 Nonetheless, the visibility of the proposed tall building above the “on-site

historic buildings of the Tower complex” would mean that both schemes would fail to heed UNESCO and ICOMOS’s very serious concerns about the threats to the WHS.

11 ST PAUL'S CATHEDRAL

INTRODUCTION

- 11.0 The Cathedral Church of St Paul (St Paul's Cathedral) is located just over a kilometre to the north west of the Appeals Site. St Paul's 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. Conceived by Sir Christopher Wren in 1673 and completed in 1711, it is a masterpiece of English Baroque design, by one of England's greatest architects. The exceptional architectural and historic interest of the cathedral is reflected in its listing at Grade I.
- 11.1 The setting of the cathedral would be affected by the appeal schemes due to the intrusive nature of the proposed tall buildings, particularly evident in protected views. This impact would cause harm to the significance of the cathedral through development within its setting.

ASSESSMENT OF SIGNIFICANCE

Architectural and historical interest

- 11.2 St Paul's Cathedral was established in approximately its current location in 604AD by Mellitus, Bishop of London. It is of substantial historic interest as a centre for Christian worship for over 1,400 years which has witnessed the growth of London from a Saxon settlement to a great metropolis. The current

building which formed the centrepiece of an extensive programme of rebuilding after the Great Fire in 1666, and survived the Blitz during WWII, is a symbol of resurrection and resilience which can be thought of both theologically and metaphorically to the very essence of London.

- 11.3 The cathedral is defined by its massive size which, at 110 metres, made it the tallest building in London until it was surpassed by the Millbank Tower in 1963. Its architectural interest is rooted in its classicism which marked a radical stylistic shift from the gothic character of its predecessor towards the influences of continental Europe.
- 11.4 Wren's adoption of Portland stone also marks the beginnings of the use of this material for many high-status public and religious buildings which remains a defining characteristic of London's built environment.
- 11.5 The architectural character of the cathedral is expressed externally by two distinct elements which comprise its iconic silhouette – its colossal dome and elegant west towers.
- 11.6 The dome, which sits upon a peristyle and drum and is crowned with an octagonal lantern, is the most recognisable component of the cathedral's silhouette. However, Pevsner describes the west towers as "the most Baroque of all Wren's spires, broader and more substantial than any of the others" (Appendix 20, *The Buildings of England, London: Volume 1*, Pevsner, p130). Pevsner also emphasises the importance of the architectural contrast between these two elements which combine to create a harmonious whole. He states that "Wren, just as he relished variety in his City churches, could consciously develop this contrast between Baroque dynamics and an ultimate end in peace and harmony" (ibid).

Contribution of setting to significance

- 11.7 The ability to appreciate St Paul's Cathedral's distinctive and iconic silhouette within its physical surroundings is fundamental to understanding its architectural interest and its role as a dominant landmark on London's skyline²⁶.
- 11.8 The enormous scale of St Paul's Cathedral, its deliberate siting at the highest point in the City of London on Ludgate Hill, and the varied topography of London allow its architecture and landmark character to be seen and appreciated over a wide area and a considerable distance²⁷.
- 11.9 While development in the late 20th century, and especially recently, has reduced St Paul's former dominance of London's cityscape, the City of London Corporation's 'St Paul's Heights' policy exists to protect the critical aspects of the cathedral's presence in the cityscape.
- 11.10 Additionally, the cathedral provides a focus for many of London's protected views as set out in the London's London View Management Framework (LVMF, Mayor of London, 2012). Of relevance to the Appeal Schemes are two Protected Vistas from the north where the Appeals Site sits within the Wider Setting Consultation Area behind St Paul's Cathedral as a Strategically Important Landmark. These views are identified in the LVMF as:
- i. View 2A.1: Parliament Hill: the summit – looking toward St Paul's Cathedral; and
 - ii. View 3A.1: Kenwood: the viewing gazebo – in front of the orientation

²⁶ GPA3: Experience of the asset: Visual dominance, prominence or role as a focal point.

²⁷ GPA3: The asset's physical surroundings: Topography, Experience of the asset: Surrounding landscape or townscape character.

board.

The Viewing Locations for both protected views are themselves within heritage assets; the former being located within a Grade II* Registered Park and Garden at Kenwood, and the latter within the Hampstead Conservation Area. In both protected views, tall building development appearing behind the cathedral has compromised and harmed the ability to appreciate the dome and west towers from these locations.

11.11 From Parliament Hill, the Shard appears directly behind the dome and rises significantly above it, and both Shard Place and Guy's Tower appear partially behind the west towers.

11.12 From Kenwood, the Shard appears directly behind the dome and west towers, rising significantly above it and visually severing the relationship between the two component architectural features. Shard Place also appears behind the west towers, creating a harmful cumulative effect. Despite these harmful impacts, the cathedral can still be appreciated from these viewpoints, and the LVMF provides specific guidance which seeks to preserve the clarity with which the silhouette of the cathedral can be distinguished from its background (LVMF SPG, CDD.024, para 102 and 121).

IMPACT OF THE PROPOSALS ON ST PAUL'S CATHEDRAL

2018 Scheme

11.13 The proposed tall building of the 2018 Scheme would appear in the background of St Paul's Cathedral from the two LVMF Viewing Locations identified above. In View 3A.1 from Kenwood (fig 50), the tall building would

appear directly behind the north-western tower of the cathedral, which can currently be read against the more distant South London townscape²⁸. It would also appear attached to, and rise above, Guy's Tower to the left, creating the sense of a monolithic mass directly behind the cathedral, and adding to the visual severing of the dome from the west towers²⁹.



Fig 50 | LVMF View 3A.1 – Kenwood: the viewing gazebo – in front of the orientation board | *Telephoto (5.1, cumulative, TVIBHA, 2019, p39), CDA.48*

11.14 By appearing directly behind the west tower, the tall building would reduce the ability to appreciate the cathedral's distinctive silhouette as a defining symbol of London from this viewpoint, causing harm to its significance. The important relationship between the dome and west towers would also be harmed by the visual severing of these two fundamental components of the cathedral's architectural composition.

11.15 The proposed tall building, by appearing alongside Guy's Tower as a monolithic mass and rising above the horizon, would draw the eye towards it and away from the cathedral.

²⁸ GPA3: Location and siting of development: Position in relation to key views.

²⁹ GPA3: Wider effects of the development: Change to skyline, silhouette.

11.16 Taking account of the mixed townscape appearing behind the cathedral in these views, the harm would be cumulative, and of a moderately low level. Nonetheless, the harm would be to a heritage asset of exceptional interest, which benefits from additional protection as a Strategically Important Landmark in this protected view.

11.17 In View 2A.1 from Parliament Hill (fig 51), the proposed tall building would be less visually intrusive due to its appearance to the right of the cathedral and beyond its protected silhouette. It would also be buffered from the cathedral by Guy's Tower to which it would again appear visually attached.



Fig 51 | Telephoto 2A.1 (cumulative) TVIBHA Addendum June 2019, p27 CDA.48

11.18 The tall building would again break the horizon in this view and appear amalgamated with Guy's Tower, becoming a conspicuous element on the skyline³⁰, and adding to the visual distraction presented by existing tall buildings. This would cause a small degree of cumulative harm to the significance of St Paul's Cathedral by further reducing the ability to appreciate its landmark qualities and visual prominence in this view.

³⁰ GPA3: Form and appearance of development: Competition with or distraction from the asset.

2021 Scheme

11.19 The tall building of the 2021 Scheme would also be visible in these two protected views. In View 3A.1 from Kenwood (fig 52), the tall building would again appear directly behind the west tower and appear as a consolidated mass with Guy's Tower. It would again reduce the ability to appreciate the silhouette of St Paul's Cathedral as a whole, adding to the visual severing of the dome from the west towers.



Fig 52 | LVMF 3A.1: Kenwood: the viewing gazebo – in front of the orientation board, 2021 cumulative (rendered), p77, CDB.14

11.20 The light-coloured masonry elevations and squatter form of the 2021 tall building would reduce the visibility of the west towers to a slightly greater extent than the 2018 Scheme in this view. However, overall, the lower height of the 2021 tall building, which would no longer break the horizon from this viewpoint, would have a less visually distracting presence and cause slightly less harm than the 2018 Scheme.



Fig 53 | LVMF 2A.1: Parliament Hill: the summit – looking towards St Paul's Cathedral

11.21 The proposed tall building of the 2021 Scheme would again sit below the horizon from View 2A.1 (fig 53), appearing to the right of the cathedral. It would enlarge the group of tall buildings around London Bridge Station and slightly aggravate their impact. However, would have very little effect on the clarity with which the silhouette of the Cathedral could be distinguished from its background, and would cause no harm to its significance.

12 SUMMARY OF HARM

12.0 In the following table, my judgements of harmful impacts caused by the proposed developments to the significance of heritage assets are summarised. In every case, with reference to paragraph 202 of the NPPF, the harm would be less than substantial.

12.1 ‘Less than substantial harm’ covers a broad spectrum of harm which is only just perceptible right up to harm which is almost, but not quite, reaching the high threshold of ‘substantial’. Therefore, I have sought to assist the Inspector by providing a broad indication of whether I consider the harm would be high, medium or low within that spectrum.

2018 Scheme		
Heritage Asset	Asset / Grade	Harm
Borough High Street Conservation Area	Conservation Area	High
Guy’s Hospital	Grade II*	High
Southwark Cathedral	Grade I	High
Tower of London	World Heritage Site	Low
St Paul’s Cathedral	Grade I	Low

2021 Scheme		
Heritage Asset	Asset / Grade	Harm
Borough High Street Conservation Area	Conservation Area	High
Guy’s Hospital	Grade II*	High
Southwark Cathedral	Grade I	Medium
Tower of London	World Heritage Site	Low
St Paul’s Cathedral	Grade I	Low

13 PUBLIC BENEFITS CLAIMED BY THE APPELLANT

INTRODUCTION

- 13.0 Paragraph 202 of the NPPF states that in cases where development would cause less than substantial harm to the significance of a designated heritage asset, “this harm should be weighed against the public benefits of the proposal”.
- 13.1 Whilst it is not Historic England’s role to provide a view on public benefits in general, the PPG explains that public benefits can include heritage benefits (CDD.011, para 020). I have limited my consideration to such heritage-related benefits.
- 13.2 The submitted Heritage Assessments (KM Heritage – 2018: CDA.12, p16 and 2021: CDB.14, p16) set out the elements of the scheme that are considered by the Appellant to be of heritage benefit. These are addressed below in turn.

THE ALTERATIONS TO THE GRADE II LISTED TERRACE AT 4-8 AND 12-16 ST THOMAS STREET

- 13.3 These proposals subject to LBC for both schemes, are claimed as a heritage benefit. The original domestic plan form has been greatly compromised by

the 1980s alterations, and whilst some internal features survive, the significance of the listed terrace is principally derived from the architectural interest and townscape value of its frontage which benefits from a clear sky setting in views along St Thomas Street.

- 13.4 Some parts of the listed building proposals would offer enhancement to those external aspects of significance. These include the reopening and provision of public access through the alleyway between 8 and 10 St Thomas Street. As previously set out, this would reveal an interesting architectural part of the terrace that historic maps suggest provided access between St Thomas Hospital and the backland, enhancing both the historic and architectural interest of the terrace, as well as the character of the BHSCA.
- 13.5 Additionally, the provision of access to the terrace houses via their front doors, which are currently inactive, would enliven the terrace and BHSCA with a use consistent with their historic function. This would offer some modest heritage benefit to both heritage assets.
- 13.6 The internal alterations, which seek to reinstate aspects of the original plan form, are less clear cut in terms of benefit. The interior is largely lost, apart from three staircases, one fireplace, and sparse decoration. I consider that heritage benefits could arise from the scholarly restoration of the houses where sufficient original features survive to retain a sense of authenticity. However, this applies to, at best, only three out of the seven houses. I also note that No 16 would remain open plan and would not have its historic configuration reinstated.
- 13.7 There are other elements of both schemes that suggest that a scholarly restoration would not be delivered. This is particularly evident in the 2018 Scheme where shopfronts to the rear of the terrace would invert the

hierarchy of the plan form. Additionally, there would be a number of connecting doors between the houses in both schemes which would similarly prevent a scholarly reinstatement of the original plan form.

- 13.8 While it is reasonable to conclude that these works subject to LBC for both schemes would deliver some heritage benefits, these are not dependant on the appeal schemes, and could be realised without them. Moreover, they should attract, at best, negligible weight when considered against the degree of harm caused to the architectural interest of their highly significant frontage in both schemes through the highly intrusive development within their immediate setting.

KEATS HOUSE AND KING'S HEAD YARD FAÇADE

- 13.9 The claimed heritage benefits also include “the repair of the Keats House façade (and) rectification of defects” as well as “the removal of ‘largely modern’ screen wall to King’s Head Yard to create a yard at the base of the tower”. As set out in the earlier significance section, both these parts of the Appeals Site contribute to the character of the BHSCA and their demolition would cause harm (NPPF, CDD.01, para 207) rather than provide heritage benefits.

- 13.10 The opening up of King’s Head Yard, particularly the large public realm proposed in the 2018 Scheme would also cause harm to the enclosed character of this part of the BHSCA and the enclosed setting of the Grade II listed King’s Head pub. These elements of the scheme should not be treated as a heritage benefit for either scheme.

CONCLUSION

13.11 Taking all this into account, I consider that the heritage benefits offered would be very minor, and undermined by the serious harm resulting from both appeal schemes. They should therefore carry only very limited weight in the planning balance.

14 POLICY IMPLICATIONS

INTRODUCTION

- 14.0 Due to the harm identified in my evidence, and the failure to respond positively to the character and appearance of the BHSCA and preserve the significance of various heritage assets, I consider that both Appeal Schemes would (or may, following weighing of benefits) fail to comply with various policy tests, guidance and other relevant documentation. These are considered thematically in the following sections.

PRESERVING AND ENHANCING THE HISTORIC ENVIRONMENT

- 14.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 requires decision makers to have “special regard to the desirability of preserving” listed buildings, and their settings, and to pay “special attention... to the desirability of preserving or enhancing the character or appearance” of conservation areas (CDH.01, s 66(1), s 72(1)). The NPPF provides Government guidance on how to carry out these duties. At the heart of the framework is a presumption in favour of ‘sustainable development’, where protecting and enhancing the historic environment is an environmental objective (CDD.01, para 8, Part C).
- 14.2 When considering development proposals, “great weight” should be given to the conservation of a designation heritage asset (CDD.01, para 199), and that “any harm to the significance of a designated heritage asset (from its

alteration or destruction, or from development within its setting), should require clear and convincing justification” (CDD.01, para 200).

- 14.3 Statutory duties and national policy are echoed in Policy HC1 (Part C) of the London Plan and policies P19 and P20 of the Southwark Plan. Each of these policies seeks to conserve/preserve and enhance the significance of heritage assets. The Southwark Plan policies also state that any harm to listed buildings or conservation areas must be robustly justified. Both P19 and P20 also require a focus on important views. (CDD.021, p279, CDE.01, p138 and 140).
- 14.4 In my view, for the reasons set out earlier in this proof of evidence, neither appeal scheme would preserve or enhance the character or appearance of the BHSCA. Instead, they would cause serious harm to its significance.
- 14.5 The harm resulting from both tall building proposals to Guy’s Hospital, Southwark Cathedral, St Paul’s Cathedral, and other listed buildings within the BHSCA and complexes of Guy’s Hospital and the Tower of London as previously described, would conflict with the requirement to conserve/preserve and enhance listed buildings in Policy HC1 (Part C) and Policy P19. The harm to the BHSCA would conflict with the same aspects of Policy HC1 (Part C) and P20.
- 14.6 Therefore, I conclude that these policies will be breached, subject to the decision-maker’s view on whether the harm is 'robustly justified' by the benefits put forward, and taking account of the great importance and weight that should be given to the conservation of designated heritage assets in accordance with the NPPF.

TALL BUILDINGS

- 14.7 Historic England's recently revised Tall Buildings advice note (CDF.07) supports an evidence-based and plan-led approach for the development of tall buildings. It encourages development plans to include "specific tall building policies to support areas/sites identified as appropriate for tall buildings" (Checklist 1, p11). This is echoed in the London Plan, which has a specific policy relating to tall building development (D9). The Policy requires Boroughs to identify appropriate locations and heights for tall buildings and provides that "Tall buildings should only be developed in locations that are identified as suitable in Development Plans" (CDD.21, p138).
- 14.8 Policy P17 of the Southwark Plan identifies the entire Central Activities Zone, in which the Appeals Site is located, within the tall buildings map (CDE.01, fig 4, p137). This is a substantial portion of the borough that stretches along the Thames from the western borough boundary with Lambeth to Shad Thames in the east and down to Elephant and Castle. A number of site allocations are included within the Southwark Plan and some of these are identified as potentially suitable for tall building development. New City Court is not included within the site allocations.
- 14.9 Whilst policy P17 does not provide a clear indication of the potential suitability of tall building development within the Appeals Site, it is clear that proposals must meet the other policy criteria in paragraphs 2 and 3. Tall buildings *must* "have a height that is proportionate to the significance of the proposed location and the size of the site" (para 2(2)) and "respond positively to local character and townscape" (para 2(5)). The design of tall buildings will

be required to “conserve and enhance the significance of designated heritage assets and make a positive contribution to wider townscape character”, and any harm requires “clear and convincing justification in the form of public benefits” (para 3(2)).

14.10 This is echoed in policy D9 of the London Plan which states that there should be an “appropriate transition in scale between the tall building and its surrounding context” (CDD.21, Part C (1)(a)(iii)). In addition, “proposals should take account of, and avoid harm, to the significance of London’s heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification.” (CDD.21, Part C(1)(d))

14.11 The NDG also emphasises the special consideration required for tall buildings in terms of their “relationship to context; impact on local character, views and sight lines (which) need to be resolved satisfactorily in relation to the context and local character.” (CDD.20, Para 71).

14.12 The tall buildings of the 2018 and 2021 schemes would be approximately 33 and 22 storeys (respectively) taller than the almost entirely consistent three-to-four storey scale of the buildings surrounding the site on all four sides. This would conflict with paragraphs 2(2) and (5) of P17 and part C(1)(a)(iii) of D9 (quoted in the preceding paragraphs).

14.13 The schemes would cause considerable harm to a wide range of heritage assets, and accordingly would conflict with paragraph 3(2) of P17 and Part C(1)(d) of D9 - subject to whether this harm can be clearly and convincingly justified.

14.14 The principle of a tall building on site will ultimately be a matter for the decision-maker. However, in my view, the acceptability of a tall building within any part of the BHSCA, much less a part of it that is central to its

character and appearance where it would cause considerable harm, should be strongly resisted.

DESIGN

14.15 NPPF Paragraph 130(c) (CDD.01) states that planning decisions should ensure that developments “are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change”.

14.16 The PPG and National Design Guide (NDG) both emphasise that responding to context is a fundamental characteristic of good design. The NDG in particular emphasises that well designed places are “integrated into their surroundings so they relate well to them; influenced by and influence their context positively; and responsive to local history, culture and heritage” (CDD.20, p10).

14.17 It is my view that the introduction on the Appeals Site of any tall building (defined as 30 metres or above in the Southwark Plan) or any building significantly taller than the prevailing scale of buildings in this part of the BHSCA, would fail to respond to the human-scale historic context, and would consequently cause harm. This is because it would fail to preserve the special character of the predominantly three-to-four storey scale of buildings that contribute positively to the BHSCA and which would equally fail to preserve the contribution that setting makes to the significance of nearby listed buildings.

14.18 Historic England’s Tall Buildings Advice Note emphasises that “there will be locations where the existing qualities of the place are so distinctive and the

level of significance of heritage assets are so great that tall buildings will be too harmful, regardless of the perceived quality of the proposal's design and architecture" (CDF.07, para 3.2).

14.19 This advice reflects the Secretary of State's decision on the Chiswick Curve, supported by the High Court, which found that it is entirely possible for a proposal to comply with design policies in the narrow sense, while also relating badly to its surrounding context as a result of its scale and massing, and therefore not to be good design in the wider sense (CDH.14).

14.20 It is the proposed scale and massing of development within the Appeals Site which makes both appeal schemes so harmful to the historic environment, and design quality would offer no meaningful mitigation measure.

14.21 In these ways both appeal schemes would conflict with NPPF130(c) and guidance on context within the NDG (CDD.020, p10). They would also conflict with up-to-date London Plan Policies regarding design, specifically Policy D3 (Part D1, 11) (CDD.021) and Southwark Plan design policies P13 (Part 1,2,3) and P14 (Part 2,4,6) (CDE.01).

TOWER OF LONDON WORLD HERITAGE SITE

14.22 Although the harm that the appeal schemes would cause to the Tower of London would be relatively low, given its status as a World Heritage Site the harm should be afforded the greatest weight in accordance with NPPF 199. There is also established information about the Tower's significance and effective management, and much related policy and guidance which has provided a strong evidence base for reaching a conclusion about the harm

resulting from both schemes.

- 14.23 Both the London Plan and Southwark Plan have policies about World Heritage Sites. Policy HC2 Part B of the London Plan requires that development proposals in the settings of World Heritage Sites “should conserve, promote and enhance their Outstanding Universal Value... In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes”.
- 14.24 Policy D9 (Part e) also specifically mentions World Heritage Sites, explaining that “buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it” (CDD.21, p139).
- 14.25 This position is similar in policy P24, para 1 of the Southwark Plan (CDE.01, p.149), which requires OUV to be “sustained and enhanced”, including “views into, out of and across the sites”.
- 14.26 In harming OUV, both schemes would also fail to comply with policy HC2, D9 and P24. These are policies which, as the Tulip report explains, have strengthened the weight that should be afforded to the preservation of World Heritage Sites in planning decisions (CDH.10, para 14.17, p140).
- 14.27 The recent Secretary of State’s decision on the “the Tulip” proposals is also relevant to these Appeal Schemes due to the dismissal of the appeal partly on the grounds of harm to the OUV of the Tower of London.
- 14.28 The Inspector’s report, upheld by the Secretary of State, concluded that the protection of WHSs set out in the WHSMPs “has now been strengthened in the New London Plan” with and that this “marks a shift in policy on heritage in

general and WHSs in particular”. “These important differences in planning policy provide another reason why little or no weight should be given to the previous permissions, or their justifications, as setting a binding precedent” (CDH.10, para 14.17, p140).

14.29 Therefore, the existing impacts presented by tall building development, particularly in this case the Shard and other tall buildings around London Bridge Station in views from the Inner Ward, does not mean that further tall buildings are acceptable.

LVMF GUIDELINES

14.30 The harm identified to St Paul’s Cathedral in both Appeal Schemes, and particularly the 2018 Scheme, conflicts with the Mayor of London’s guidelines for the preservation of LVMF views 2A.1 and 3A.1.

14.31 In View 2A.1, the 2018 Scheme would fail to “preserve or enhance the clarity with which the silhouette of the Cathedral can be distinguished from its background” in terms of their form and materials (CDD.024, para 102, p47).

14.32 In View 3A.1, by appearing behind the cathedral’s west towers, neither scheme would enhance “the setting of the Strategically Important Landmark, and the ability to recognise and appreciate it when seen from the Assessment Point” (CDD.024, para 121, p56).

14.33 The harm identified and the failure of both schemes to preserve the viewer’s ability to recognise and appreciate the Strategically Important Landmark, would also give rise to conflict with the London Plan, specifically HC4 A, B, and F(3).

15 OVERALL CONCLUSIONS

- 15.0 I conclude that both schemes would cause serious harm to a range of heritage assets, some benefitting from the highest levels of statutory protection. A great deal of the proposals' harmful impacts are attributed to their height, which makes them visible in views across a considerable distance and creates a stark and damaging juxtaposition in scale in the immediate vicinity.
- 15.1 It is the heritage assets closest to the Appeals Site that I consider would be most profoundly affected because of the scale and massing of the proposed tall buildings, which by their very nature would be entirely alien to the very rich and modest-scale heritage of this central part of historic Southwark.
- 15.2 There would also be harm to more distant heritage assets, including some of the country's most cherished historic places. Whilst the harm I have identified to these assets is lower than that which would occur in the immediate vicinity of the Appeals Site; as set out in national planning policy, the greater the significance of a heritage asset, the greater the weight that should be accorded to its conservation. Conservation of assets as significant as World Heritage Sites and Grade I listed buildings should be accorded very considerable weight in the planning balance.
- 15.3 Historic England recognises that tall buildings have a place in London. We only raise serious concerns in a very small percentage of cases (7% - Appendix 24, Node report on assessing the impact of tall buildings on the historic environment, Nov 2021, p5). However, tall buildings must be appropriately located, and proposals should be informed by the evidence of

the local context as advised in the London Plan and our Tall Buildings guidance. In my view, neither scheme has been informed by the local context. The Appeals Site is therefore not an appropriate location for a tall building in my opinion.

- 15.4 Overall, the 2021 Scheme would be *slightly* less harmful than the 2018 Scheme because of the reduced visibility of the proposed tall building in relation to the Tower of London, St Paul's Cathedral, and Southwark Cathedral, which are the most highly designated heritage assets considered in my evidence. Nonetheless, both schemes would cause serious harm, and whilst the harm is considered to be 'less than substantial', this does not amount to a less than substantial objection.
- 15.5 On the basis of the harm I have identified to heritage assets of exceptional significance, I consider that the proposed developments would conflict with aspects of various NPPF policies, as well as up-to-date London Plan Policies and Southwark Plan policies relating to the historic environment. I also consider that the heritage component of any public benefit offered would be minor and should carry very limited weight in the planning balance.
- 15.6 I recommend that the Appeal Schemes are refused, unless the decision-maker 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 serious harm to one of London's most remarkable conservation areas and to some of the city's finest historic sites.