

ICOMOS Technical Review

Property	Tower of London
State Party	United Kingdom of Great Britain and Northern Ireland
Property ID	488
Date of inscription	1988
Criteria	(ii)(iv)
Project	Planning applications for high-rise development at 4-26 St. Thomas Street (New City Court)

On 16 May 2022, ICOMOS received information from the State Party, via the World Heritage Centre, regarding plans for development within the setting of the Tower of London, at the site at 4-26 St. Thomas Street in Southwark (New City Court).

This information relates to two separate planning applications for the site, which is currently occupied by a 1980s office building:

- The first proposal dates from 2018 and consists of the demolition of the 1980s building and the erection of a 37-storey building (with a maximum height of 144m).
- The second dates from 2021 and consists of the demolition of the 1980s building and the erection of a 26-storey building (with a maximum height of 108m).

The documentation submitted by the State Party includes a letter to the World Heritage Centre, dated 3 May 2022, which contains links to download full details of the application and supporting information from the council's online planning portal.

In addition, the State Party submitted letters from Historic England, dated 27 March 2019 and 29 July 2021, respectively, regarding each proposal.

The Advisory Body provides its comments on both planning applications below.

Analysis

Firstly, although the State Party's letter indicates that the 2018 planning application was notified to the World Heritage Centre in March 2019, ICOMOS confirms that it has not been previously approached to provide a Technical Review of the proposals.

This planned development can be examined in several ways – however, in the present Technical Review, the primary task is to examine the possible impact of the development proposals on the Tower of London World Heritage property.

With regard to the 2018 application, it is noted that the height of the proposed tower means that it would be visible from within the Inner Ward of the Tower of London, above the roofline of the Grade I listed Queen's House. Moreover, as expressed by Historic England within their March 2019 comments, "*whilst various tall buildings [...] are visible, the proposed development would create a significant cumulative effect that would further encroach on the Tower of London*", harming the setting of the Queen's House and the Outstanding Universal Value (OUV) of the World Heritage property. The cumulative impact of high-rise buildings on the OUV of this World Heritage property has been discussed in previous ICOMOS Technical Reviews and in Reactive Monitoring mission reports.

ICOMOS therefore considers that, given the direct visual impact of the proposed development, which goes against the preservation of the OUV of the World Heritage property, and the contribution that the planned tall building would make to cumulative impact, the proposed scheme would generate an unacceptable impact on OUV.

It is understood that the 2021 application, which was submitted by the same applicant, sought to address concerns regarding the first scheme raised by the local planning authority and others. The letter from the State Party notes that the applicant perceived these concerns “as relating principally to height”. As such, the new proposals include a tower of reduced height which, as indicated in Historic England’s 2021 comments, would “no longer be visually prominent” above the roofline of Queen’s House in views from the Inner Ward of the Tower of London, only rising above it to a small extent.

However, ICOMOS notes that the scheme would nevertheless have considerable adverse impacts on assets of national importance and, overall, on the urban neighbourhood within which it is to be constructed.

The Advisory Body is concerned that the proposals appear not to have taken national and local policy into account, with both applications proposing a high-rise building in an area that is not designated for such development in the council’s draft Local Plan. Furthermore, it is unfortunate that neither application was subject to a Heritage Impact Assessment (HIA) following the 2011 ICOMOS *Guidance on HIAs for Cultural World Heritage Properties*, although the 2021 New London Plan indicates that “development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments”.

Conclusions

ICOMOS fully supports the concerns that Historic England has already expressed on the unacceptable impacts on OUV that the first scheme would generate. It therefore advises that the proposed development project should not be approved.

Although the Advisory Body agrees that the second scheme reduces these impacts on OUV, the proposals would nevertheless have considerable adverse impacts on assets of national importance and, overall, on the urban neighbourhood within which it is to be constructed.

Finally, ICOMOS shares Historic England’s concerns regarding the lack of compliance with national and local policy, including with the council’s draft Local Plan, which does not include New City Court as an area designated for high-rise buildings. It is unfortunate that the proposals, which have been at the planning stage since 2018 and 2021, respectively, were only submitted for review by the Advisory Body in May 2022, and that no HIAs following the 2011 ICOMOS *Guidance on HIAs for Cultural World Heritage Properties* have been submitted for either scheme.

ICOMOS remains at the disposal of the State Party for further clarification on the above or assistance as required.