



Historic England

LONDON OFFICE

Ms Sarah Parsons  
Southwark Council  
Chief Executive's department, Planning Division  
Development Management, (5th Floor - hub 2)  
PO Box 64529  
London  
SE1P 5LX

Direct Dial: 020 7973 3763

Our ref: P00862810

25 May 2018

Dear Ms Parsons

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015  
RUBY TRIANGLE SITE, LAND BOUNDED BY OLD KENT ROAD, RUBY STREET AND SANDGATE STREET, LONDON SE15 1LG  
Application No 18/AP/0897**

Thank you for your re-consultation of 21 May 2018 regarding the proposed redevelopment of the site referred to above. These proposals are for the demolition of the existing buildings on site and the erection of a large mixed-use development including three tall building, the tallest of which would rise to 48 storeys in height.

**Historic England's Advice**

This application is the latest in a succession of tall building proposals along the Old Kent Road, and this of growing concern to Historic England. As set out in our Tall Buildings guidance (Advice Note 4, December 2015), tall building development should follow a plan-led approach rather than a reaction to speculative development applications. However, we note that there is not currently an adopted policy for tall building development along the Old Kent Road.

Historic England commented on your Council's Draft Old Kent Road Area Action Plan (AAP) Consultation in November 2016 (our ref: PL00018375). With regards to the Draft Building Heights Strategy (Policy AAP10), we recommended that the document would benefit from:

*"a greater assessment of the potential impacts on the historic environment through more clearly defined mapping of the core areas and an urban design framework which will ensure that sites are appropriately assessed in respect of the relative impacts of tall buildings. The failure to define upper limits will potentially give rise to potentially harmful impacts over a wide area. We would refer the Council to our advice on Tall Buildings (Advice Note 4)"*



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA  
Telephone 020 7973 3700  
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.



## LONDON OFFICE

As the AAP is still at draft stage, we would continue to recommend that any tall building proposal within the Old Kent Road area is informed by a clear strategy, taking into consideration the existing townscape character and its heritage interest, to prevent development which could cause serious harm to the historic environment across the Borough and beyond.

Nonetheless, taking this application into consideration on its own merits, it is clear from the submitted Accurate Visual Representations (AVR, Environmental Statement Volume 2: Appendix 16.1) that the development would have major townscape impact in a wide range of views, many of which we consider to be harmful to the historic environment. We would point out that the cumulative impacts assessed in the AVRs mainly include the Malt Street site proposals (ref: 17/AP/2773) which as we understand it have not yet been determined and so have not influenced our assessment.

On the basis of the AVRs, I address the most significant impacts below:

### Cobourg Road Conservation Area

Cobourg Road is a small conservation area with a residential character comprising of Georgian town houses, many of which are Grade II listed, as well as Victorian terraces. These exemplify the many terraces which were destroyed and cleared following WWII in what is now known as Burgess Park. These tree-lined houses alongside the Grade II listed former Church of St Mark (now the New Peckham Mosque) and the Cobourg Primary School form an attractive and somewhat picturesque composition in views across the lake within the Park.

Despite some visibility of distant towers along the Old Kent Road, certain views from the Park towards the Conservation Area remain relatively unspoilt. This is represented in View 05 of the AVR assessment. The wireline assessment demonstrates that the proposed development would rise substantially above the existing tree and roofline resulting in a dominant intrusion on the skyline. This, in our opinion, would undermine the attractive and picturesque qualities of the conservation area in views from Burgess Park, and therefore cause harm to the character of the Conservation Area, and to the setting of the Grade II listed townhouses in this particular view.

### Glengall Road Conservation Area

Glengall Road also survived WWII damage, and is almost entirely characterised by pairs of Grade II listed stuccoed villas dating from c1843-1845. Glengall Terrace, also within the Conservation Area, contains a contemporary Grade II listed stuccoed terrace along the south side of the street.





## LONDON OFFICE

Again, whilst some large residential and commercial buildings around the Old Kent Road are visible in certain locations within the Conservation Area, both Glengall Road and Glengall Terrace retain their historic roofline without significant obstruction in streetscape views. This is clearly demonstrated in View 08.

The wireline assessment reveals that the proposed development would break the unobstructed roofline at the corner of Glengall Road and Glengall Terrace which would detract from the historic streetscape. We conclude that this impact would constitute harm to both the character of the Conservation Area and the setting of these Grade II listed houses.

### Caroline Gardens Conservation Area

Caroline Gardens is an extensive Grade II listed almshouse complex dating from 1827-33 and is arranged in a grand orthogonal plan. The planned geometric arrangement of buildings evoke a stately character and provide the Conservation Area with a relatively enclosed setting. Despite this, a number of tower blocks are visible from the forecourt area, in particularly the Ledbury Estate buildings.

View 12 from the Caroline Gardens Conservation Area demonstrates this existing visual impact at the corner of the central and north range of the almshouse complex. The overlaid wireline indicates that the proposed development, although peripheral to important views would exacerbate the existing impact presented by the existing tower blocks. We consider that this cumulative impact would further detract from the formal orthogonal plan and enclosed setting of Caroline Gardens, and therefore cause some harm to the character of the Conservation Area and the setting of the Grade II listed almshouse buildings.

### Parliament Hill (LVMF 2A.1)

LVMF view 2A.1 provides a panoramic view across London from the summit of Parliament Hill. At the centre of this view is the Grade I St Paul's Cathedral which remains a commanding feature within the cityscape despite the dominance of The Shard and the proximity of the Guy's Hospital Tower Wing.

As set out in View 34, the proposed development, whilst peripheral to the central viewing corridor, would add to the existing tall buildings which currently encroach on the dome of St Paul's Cathedral in this important view. Whilst not a major impact in our opinion, we consider that this would result in some incremental harm to the setting of St Paul's Cathedral.

### **Recommendation**

Historic England considers that the proposed development would cause harm to the conservation areas and listed buildings as set out in this letter. Whilst we do not consider the level of harm to any individual designated heritage asset to be





LONDON OFFICE

'substantial' in NPPF terms, the cumulative impact of the development on the wide range of designations in the vicinity is of concern to Historic England. We also have concerns about the consideration of this application in the absence of an adopted strategy for the area which conflicts with our own tall buildings guidance as well as Paragraph 196 of the NPPF.

In determining this application, we would remind your Council of your duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special regard to the desirability of preserving listing buildings including their setting (Section 66) and preserving or enhancing the character of conservation areas (Section 72). In our view, this scheme fails to preserve both the setting of the listed buildings and the character of the conservation areas identified in this letter.

Please contact me if we can be of further assistance. We would be grateful to receive a copy of the decision notice in due course. This will help us to monitor actions related to changes to historic places.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

Yours sincerely

**Alasdair Young**

Inspector of Historic Buildings and Areas

E-mail: [alasdair.young@HistoricEngland.org.uk](mailto:alasdair.young@HistoricEngland.org.uk)



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA  
Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.*

*Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*