

Elephant 2: Note in response to objection from Metropolitan Tabernacle 16 June 2017

1.0 Introduction

1.1 The townscape and heritage objection from the Metropolitan Tabernacle cover three areas:

- Impacts on the fabric of the listed building;
- Impacts on the setting of the listed building from the proposed cultural venue; and
- Impacts on the setting of the listed building from the tall building W2 Tower 3

1.2 The objection is informed by an appraisal of the heritage impact of the proposals prepared by Alan Baxter Associates dated March 2017. The appraisal draws the conclusion that the Proposed Development would cause 'substantial harm' (as defined by the NPPF) to the setting of the listed building. This response refutes that assertion and includes commentary on new close rendered views of the Tabernacle seen from Elephant and Castle junction produced by GMJ at LBS's request.

2.0 Relevant planning policy context

National Planning Policy Framework (NPPF) (2012)

2.1 In order to assess the nature and degree of potential effects on the significance of heritage assets, the NPPF requires *"an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting."* (para 128). As the Glossary (Annex 2) defines it, 'significance' is *"the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting"* (p. 56).

2.2 When assessing the potential effect of a Development, *"great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting"* (para 132). Substantial harm to or loss of a Grade II listed building, park or garden should be exceptional.

2.3 Paragraph 133 of the NPPF states that *"Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss".* 'Less than substantial' harm *"should be weighed against the public benefits of the proposal"* (para. 134).

- 2.4 The PPG on **Conserving and enhancing the historic environment**, supports section 12 of the NPPF. Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential effect and acceptability of development proposals. Significance derives not only from a heritage asset's physical presence, but also from its setting therefore an assessment of the effect on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 2.5 In considering assessment of substantial harm, Paragraph 017 of the guidance states: "*In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed.*"

3.0 Significance of the Grade II listed Metropolitan Tabernacle

- 3.1 The Alan Baxter Associates assessment considers the significance of the Grade II listed building to derive from:
- Its historic role as an internationally renowned church, which has, and continues to attract, very large congregations and has been home to prominent preachers including C H Spurgeon;
 - Its architectural and artistic interest, derived from the principal east façade incorporating the impressively monumental portico as a visually striking design, well-crafted in Bath stone ashlar with finely carved 1950s lettering, which is the most distinguished part of the building; the plainer 1950s rear parts of the exterior of the building are refined and well-crafted, which integrate some of the coursed rubble stonework from the 1861; a well preserved 1950s auditorium complete with original fittings: "*Taken as a whole the building represents an interesting example of post-war reconstruction, due especially to the unusual approach taken with the portico and its relationship to a major urban reconstruction project.*"; and
 - The setting, as a key landmark in a busy London centre that is otherwise typified by modernist architecture.
- 3.2 The Alan Baxter Associates assessment notes the contribution made by setting to the significance of the Tabernacle: "*as originally built in 1861 and as reconstructed in the 1950s,*

the east front of the building was designed to dominate its setting”; “The moderate height of the flanking buildings helps to ensure the prominence of the façade and its monumental portico, making a positive contribution to significance”; and “the projecting portico commands a prominent position at a busy Inner London junction; its visibility from a wide range of angles and locations aids in its appreciation and makes a positive contribution to the significance. “

- 3.3 As the submitted THVIA notes, the Tabernacle is of architectural and historic interest as one of few remaining pre-war buildings in the centre of Elephant and Castle, and the development of the building reflects the history and growth of the Elephant and Castle area. It is significant as one of the largest and most popular churches of its day and its association with popular and prolific Baptist preacher, Charles Haddon Spurgeon (1843-1892).
- 3.4 The listing description states that the Tabernacle is listed for the eastern façade and that the rear parts of the building rebuilt after WWII are not of special interest. While the rear parts of the church are included in the listing and may have some architectural interest, it is considered unlikely that they would be seriously considered for listing on their own merits and it is the eastern façade that is of special interest.
- 3.5 The Metropolitan Tabernacle objection overstates the contribution that the existing setting makes to the significance of the Tabernacle. The well-established traffic-dominated close modern setting of the Tabernacle in fact makes a limited contribution to the significance of the listed building. The existing setting includes only isolated remnants of the townscape that formed the Tabernacle’s pre-war setting. The existing setting does not materially aid in the observer’s appreciation of the historic or architectural interest of the building: since WWII, the setting of the Tabernacle on the traffic-dominated junction has been extremely poor and only recently, with improvements to the public realm and pedestrian crossings, and redevelopment of the former leisure centre site, has this been improved. Key views that contribute most to the observer’s appreciation of the principal eastern façade are those from the east side of Newington Butts, opposite the Tabernacle, from the narrow and congested public realm outside the existing shopping centre; these views are already characterised by the dramatic contrast between the classical stone façade and portico and the bold functional post-war redevelopments and more recent tall 21st century buildings that surround it. In longer views on approaches from the north and south, the Tabernacle forms a minor element of the wider scene set within the large scale and grain of the busy modern traffic gyratory. In approaches from the north the principal eastern elevation of the Tabernacle is seen against a backdrop of taller modern buildings – One The Elephant and the 360 development under construction. The Tabernacle does not dominate its existing setting on the Elephant and castle junction.

4.0 Impact on the fabric of the listed building

- 4.1 Historic maps show the Tabernacle to have been a standalone building prior to the clearance and rebuilding that followed the extensive WWII bomb damage of Elephant and Castle. Therefore the disengagement of the northern flanking building from the northern elevation of the Tabernacle is considered entirely appropriate and beneficial to the setting of the listed building. As stated in the THVIA, *“Demolition of the existing LCC studio block as part of the Proposed Development on the West Site would re-expose the northern end of the reconstructed listed façade. The condition of the stone cladding behind it is unknown and would be assessed following the demolition... The ashlar stone cladding to the northern elevation would be repaired or replaced as necessary and the moulded detail of the façade at the upper levels would be reinstated to return the façade to its original condition.”*

5.0 Commentary on new close townscape views

- 5.1 The Alan Baxter Associates assessment notes that rendered views would be useful to further understand the level of impact of the Proposed Development on the setting of the Tabernacle. Three new close verified rendered views were requested by LBS to demonstrate the changes to the close setting of the Tabernacle. These renders show a revised stone-clad facade the Cultural Venue. Townscape commentary on each follows:

View 41: From the southern end of Elephant and Castle opposite One The Elephant

- 5.2 The existing view is taken from the east pavement of the junction opposite One The Elephant and provides oblique views of the Grade II listed Metropolitan Tabernacle’s principal eastern elevation in the context of the recently completed One The Elephant to its south and the existing London College of Communication (LCC) development of 1964 to its north. The pavilion building of One The Elephant complements the scale of the Tabernacle’s eastern elevation. The One The Elephant residential tower rising out of the view as its dominant feature on the left is set back from the frontage that defines the east side of the junction. Out of view further left is the 360 development which is currently under construction. While the LCC studio block fronting the west side of the junction to the north (right) of the Tabernacle continues the streetscape datum set by the Tabernacle and the pavillion building at a similar scale, its modernist architectural treatment and horizontal emphasis contrasts with the classical composition of the Tabernacle. The curtain wall clad 13-storey tower of the LCC development, which is set back from the Elephant and Castle frontage is visible rising behind the portico of the Tabernacle.
- 5.3 The proposed Cultural Venue, clad in stone now rather than Corten steel, would replace the LCC studio block with a new well defined street frontage at an equivalent scale to the existing studio block and the eastern façade of the Tabernacle. The vertical emphasis of its façade composition would complement both the One The Elephant pavilion building and the

Tabernacle to integrate the Tabernacle within an enhanced street frontage. As at One The Elephant the proposed new tall buildings on the West Site are set back from the Elephant and Castle streetscape. While they are clearly much taller than the existing LCC tower, their scale is equivalent to other existing and consented tall buildings, including One The Elephant on the left of the view, that are forming an emerging cluster of tall buildings encircling the Elephant and Castle junction. The tall buildings are read behind the legible shoulder datum created by the Tabernacle and Cultural Venue. The tall buildings on the West Site would have a restrained fine grained and familial architectural treatment that would provide a modest recessive backdrop to the eastern façade of the Tabernacle. This treatment would contrast with the solidity and larger scale architectural articulation of the Tabernacle to preserve its integrity and legibility within the streetscape of Elephant and Castle.

View 42: From the east side of Elephant and Castle, outside the shopping centre

- 5.4 The existing view is taken from the east pavement of the junction opposite the Grade II listed Metropolitan Tabernacle providing close views of the Tabernacle's principal eastern elevation. To the south (left) is the recently completed residential development One The Elephant which replaced the leisure centre of 1980. To the north is the existing London College of Communication (LCC) development of 1964. The pavilion building of One The Elephant complements the scale of the Tabernacle's eastern elevation and preserves its detached streetscape. The One The Elephant residential tower rising out of the view as its dominant feature on the left is set back from the frontage that defines the east side of the junction. The studio block of the LCC fronting the west side of the junction to the north (right) of the Tabernacle is joined to the north flank of the Tabernacle. While the LCC studio block continues the streetscape datum set by the Tabernacle and the pavilion building at a similar scale, its projecting cantilevered stair, modernist architectural treatment and horizontal emphasis contrast with the solidity and classical composition of the Tabernacle. The curtain wall clad 13-storey tower of the LCC development, which is set back from the Elephant and Castle frontage, is visible rising behind the studio block to the right of the Tabernacle.
- 5.5 The proposed Cultural Venue, clad in stone now rather than Corten steel, would replace the LCC studio block with a new well defined street frontage at an equivalent scale to the existing studio block and the eastern façade of the Tabernacle. Its southern end would be pulled away from the northern flank of the Tabernacle to recreate its pre-war detached setting. The vertical emphasis of the Cultural Venue's façade composition would complement the architectural treatment of the One The Elephant pavilion building, and its tall windows would echo the proportions of the Tabernacle's portico with a simple bold composition appropriate to a public building and which characterise's the best of Elephant and Castle's post-war architecture. As at One The Elephant the proposed new tall buildings on the West Site are set back from the Elephant and Castle streetscape. While they are clearly much taller than the existing LCC

tower, their scale is equivalent to other existing and consented tall buildings, including One The Elephant on the left of the view, that are forming an emerging cluster of tall buildings encircling the Elephant and Castle junction. The tall buildings are read behind the legible shoulder datum created by the Tabernacle and Cultural Venue. Although visible directly behind the northern part of the Tabernacle's eastern façade, the proposed tall buildings would not rise directly behind the Tabernacle's portico in this view. The tall buildings would have a restrained fine grained and familial architectural treatment that would provide a modest recessive back drop to the eastern façade of the Tabernacle. This treatment would contrast with the solidity and larger scale architectural articulation of the Tabernacle to preserve its integrity and legibility within the streetscape of Elephant and Castle.

View 43: From Faraday Memorial

- 5.6 The existing view is taken from the northern end of Elephant and Castle junction on the newly created public realm of the peninsula at the Grade II listed Faraday Memorial, providing oblique views on the approach to the Tabernacle from the north. On the right of the view beyond the Faraday Memorial is the existing London College of Communication (LCC) development of 1964. To the south of the Tabernacle is the newly completed residential development of One The Elephant whose pavilion building complements the scale of the Tabernacle's eastern elevation. The studio block of the LCC fronting the west side of the junction to the north (right) of the Tabernacle is joined to the north flank of the Tabernacle and projects beyond it. While the LCC studio block continues the streetscape datum set by the Tabernacle and the pavilion building of One The Elephant at a similar scale, its projecting cantilevered stair, modernist architectural treatment and horizontal emphasis contrast with the solidity and classical composition of the Tabernacle. The curtain wall clad 13-storey tower of the LCC development, is visible well to the right of the studio block. The recently completed residential tower of One The Elephant, rising out of the view as its dominant feature, is set back from the pavilion building frontage that defines the east side of the junction and, from this viewing position, is visible behind the portico of the Tabernacle.
- 5.7 The proposed Cultural Venue, clad in stone now rather than Corten steel, would replace the LCC studio block with a new well defined street frontage at an equivalent scale to the existing studio block and the eastern façade of the Tabernacle. Its southern end would be pulled away from the northern flank of the Tabernacle to recreate its pre-war detached setting. The vertical emphasis of the Cultural Venue's façade composition would complement the One The Elephant pavilion building and its tall windows would echo the proportions of the Tabernacle's Portico with a simple bold composition appropriate to a public building and which characterise's the best of Elephant and Castle's post-war architecture. As at One The Elephant the proposed new tall buildings on the West Site are set back from the Elephant and Castle streetscape. While they are clearly much taller than the existing LCC tower, their scale is equivalent to other

existing and consented tall buildings, including One The Elephant on the left of the view, that are forming an emerging cluster of tall buildings encircling the Elephant and Castle junction. Although visible directly behind the Tabernacle's eastern façade in views from the east and south-east as demonstrated by views 41 and 42, when viewed on the approach from the north and north-east they would be set well away from the Tabernacle's façade and would not be seen in direct relation to it.

Conclusions on the commentary on new views

- 5.8 Taller development on the West Site would be set back behind the lower shoulder of a proposed new Cultural Venue that would replace the existing studio block of the LCC building. The material palette of the Cultural Venue has been amended since submission of the application replacing the Corten steel with stone to match the pavilion block of One The Elephant. The proposed new Cultural Venue would, with the pavilion building of One The Elephant, integrate the façade of the listed building within a coherent streetscape of a complementary scale and materiality, further enhanced by the disengagement of the new façade to the north of the Tabernacle's north flank to recreate a balanced detached condition to both sides of the Tabernacle.
- 5.9 While they are clearly much taller than the existing LCC tower, the scale of the tall buildings proposed on the West Site is equivalent to other existing and consented tall buildings that form an emerging cluster of tall buildings encircling the Elephant and Castle junction, including One The Elephant seen close to the south of the Tabernacle. Tall buildings on the West Site of the Proposed Development, although visible in relation to the listed Tabernacle's eastern façade would not rise directly behind the Tabernacle's portico seen on axis in close views from the east on Newington Butts. In oblique views of the Tabernacle from the southern end of the junction proposed tall buildings on the West Site would be visible behind the eastern facade – as One the Elephant and the 360 development (under construction) are in oblique views from the northern end. The proposed tall buildings would have a restrained fine grained and familial architectural treatment that, where visible behind the Tabernacle facade would provide a modest recessive back drop to the listed building. This treatment would contrast with the solidity and larger scale architectural articulation of the Tabernacle to preserve its integrity and legibility within the streetscape of Elephant and Castle.

6.0 Impacts on the setting of the listed building

Proposed design of the east façade of the Cultural Venue

- 6.1 The Metropolitan Tabernacle objection to this element of the proposed change to its setting is on the basis that it would “*challenge the dominance of our façade, in such a way that we anticipate will detract from its setting and architectural interest. This is in contrast with the*

design of the Pavilion building at One the Elephant, which we consider to be designed to be subservient to our Grade II Listed Building.”

- 6.2 The Alan Baxter Associates assessment states: *“The proposed new cultural venue north of the Tabernacle is designed with a façade of corten steel, articulated by tall openings that are comparable in scale to the portico of the Tabernacle. How successful the relationship between the stone and corten façades will be in visual terms is hard to determine at present and it is important to test this relationship using rendered views and other useful means. The scale and rhythm of the fenestration should not compete with the scale and townscape presence of the listed building.”*
- 6.3 In our view it is clear that the Tabernacle does not dominate the townscape of Elephant and Castle junction. At most it could be said that the architectural interest of the Tabernacle is perhaps accentuated by its contrast with the uncompromising taller 20th century existing setting. The architecture of post-war Elephant and Castle, which forms its setting, is bold and confident; there is little consistency in architectural approach or materiality within the built form and there is great variation in scale. Tall buildings including the post-war Draper House and Metro Central Heights (Grade II), and the more recent Strata SE1 and One The Elephant encircle the junction. Buildings in the close setting of the Tabernacle, with the possible exception of the recently completed lower block of One The Elephant, have not been designed to be subservient to the Tabernacle. The subservience of its setting does not therefore make a material contribution to the significance of the Tabernacle.
- 6.4 As demonstrated by the new rendered views described in Section 5, the proposed Cultural Venue, clad in stone now rather than Corten steel, would replace the LCC studio block with a new well defined street frontage at an equivalent scale to the existing studio block and the eastern façade of the Tabernacle. Its southern end would be pulled away from the northern flank of the Tabernacle to recreate its pre-war detached setting. The vertical emphasis of the Cultural Venue’s façade composition would complement the vertical rhythm of the façade of One The Elephant’s pavilion building. Its tall openings would echo the proportions of the Tabernacle’s portico and the solidity of the Tabernacle’s eastern elevation, with a simple bold composition appropriate to a public building, reinforcing the legibility of the building’s use and helping to ground the townscape of Elephant and Castle with streetscape buildings of visual solidity and robustness.

Proposed scale and location of W2 Tower 3

- 6.5 The Metropolitan Tabernacle objection states that *“the proposed siting and height of W2 Tower 3 would cause a significant level of harm to the setting of our Listed Building, particularly from the key view, which is from the east across Newington Butts, looking directly at our portico.”.*

- 6.6 The Alan Baxter Associates assessment notes: *“The proposed ‘W2 Tower 3’ would rise up immediately behind the ‘cultural venue’ and would therefore appear very close to and/or directly above the Tabernacle in important views from the east. In this way it is likely to challenge the dominance of the portico and have a negative effect on the significance of the listed building... Much of the building’s significance arises from its relative grandeur within the streetscape: how it dominates the street and the wider Elephant & Castle urban realm. Therefore, where the proposed development dominates the building or detracts from a perception of it as the dominant building within the streetscape, there is a resulting loss of significance.”*
- 6.7 As noted in the THVIA the setting of the church has been considerably altered by the post-war highway infrastructure and tall buildings of the post-war redevelopment and more recent early 21st century regeneration at Elephant and Castle that surround it. The existing setting, of the Tabernacle, as described in paragraph 4.4, is characterised by tall post-war and early 21st century buildings in close proximity. The London College of Communication (LCC) studio block encloses the main façade to its north, and the newly completed One The Elephant development reintegrates its facade in a similar relationship to the south. Key views that contribute most to the observer’s appreciation of the eastern façade are close views from the east side of Newington Butts opposite the portico. However as noted in paragraph 3.5, the close setting of the Tabernacle has been until recently extremely poor in quality and the key views of the Tabernacle are from the narrow congested public realm outside the shopping centre.
- 6.8 As demonstrated by new views 41, 42 and 43, taller development on the West Site would be to the north of the Tabernacle set back behind the lower mass of a proposed new Cultural Venue that would replace the existing studio block of the LCC building with a low block matching the scale of One The Elephant’s pavilion building. The material palette of the Cultural Venue has been amended since submission of the application replacing the Corten steel with stone to match the pavilion block of One The Elephant. The proposed new Cultural Venue on Plot W2 would, with the pavilion building of One The Elephant, integrate the façade of the listed building within a coherent streetscape of an complementary scale and materiality. Tall buildings on the West Site of the Proposed Development, although visible in relation to the listed Tabernacle’s eastern façade in the context of other tall buildings (including One The Elephant, the 360 development, under construction and the consented Skipton House), would not rise directly behind the Tabernacle’s portico seen in close views from the east on axis with the portico– as demonstrated by view 42 from the east side of Newington Butts. In oblique views of the Tabernacle from the southern end of the junction (view 41) proposed tall buildings on the West Site would be visible behind the eastern facade – as One the Elephant and the 360 development (under construction) are in oblique views from the northern end (view 43).
- 6.9 As described in paragraphs 3.5 and 6.3, setting makes a limited contribution to the appreciation of the Tabernacle’s heritage significance and the existing and emerging setting of the Tabernacle is characterised by the taller post-war and 21st redevelopment at Elephant and Castle. Its close streetscape setting, which has been improved by the development of One The

Elephant's pavilion building would be further enhanced by the change in the relationship of the Tabernacle to its northern neighbour which would restore the 19th century detached condition of the building frontage to Newington Butts. As demonstrated by new view 42, a close view of the listed facade on axis from the eastern pavement of Newington Butts would not be harmed: tall development on the West Site of the Proposed Development, although visible directly behind the northern part of the Tabernacle's eastern façade, would not rise directly behind the Tabernacle's portico in this view. Opposite, the Proposed Development on the East Site would create high quality public realm on the east side of the junction and new views towards the Tabernacle from within the East Site. Tall buildings on the East and West Sites would consolidate the existing taller modern character of the Tabernacle's setting without harming those elements that contribute to the significance of the listed building's eastern façade.

Conclusions on impacts on setting

- 6.10 The contribution made by setting to the significance of the Tabernacle is limited. The Tabernacle does not dominate its existing setting and a perception of dominance does not therefore contribute to its significance. As the existing setting of the Tabernacle is characterised by the presence of tall modern buildings encircling the junction, the visibility of additional tall buildings is not considered to be inherently highly significant or harmful to the quality of the setting of the listed building but rather to consolidate the established and emerging local distinctiveness of the Elephant and Castle town centre. The proposed change to the setting of the Tabernacle would not adversely and seriously affect a key element of the special architectural or historic interest of the Grade II listed Tabernacle and would therefore not result in 'substantial harm' to the significance of the designated heritage asset. We do not consider there to be likely harm, 'substantial' or 'less than substantial', to the significance of the listed building as a result of the proposed changes to its setting. If LBS officers however consider there to be harm, then given the limited contribution that the tall modern setting makes to the significance of the Tabernacle, this would undoubtedly be slight – certainly 'less than substantial' – harm that would be outweighed by the direct townscape benefits to the Tabernacle of its enhanced streetscape setting created by the proposed Cultural Venue to its north and the ability to view and appreciate the Tabernacle at close range from the east within dramatically improved public realm on the east side of the junction and in new views from within the proposed new shopping centre, and the other considerable indirect public benefits of the Proposed Development.