



Historic England

LONDON OFFICE

Ms Kiran Chauhan  
London Borough of Southwark  
Regeneration and Neighbourhoods  
Planning and Transport  
PO Box 64529  
London  
SE1P 5LX

Direct Dial: 020 7973 3763

Our ref: P00653730

28 September 2017

Dear Ms Chauhan

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015  
MALT STREET REGENERATION SITE, LAND BOUNDED BY BIANCA ROAD, LATONA ROAD, HAYMERLE ROAD, FRENHAM STREET AND MALT STREET, LONDON SE1  
Application No 17/AP/2773**

Thank you for your letter of 28 August 2017 notifying Historic England of the above hybrid application which seeks detailed planning permission for a large tower development, and outline planning for the wider masterplan development, which includes further towers.

### **Historic England's Advice**

Historic England provided advice to your Council on this proposed scheme at scoping stage, and I attach a copy of our letter for your information. As you will note, we advised that a full visual assessment is provided with the application which takes into account a wide range of designated heritage asset. This assessment has now been provided in the submitted TVIA Report (Appendix 12.5 Par 2 - Accurate Visualisation Representations, PBA, 11/07/17).

This study demonstrates that the proposed masterplan would result in a major change to the surrounding townscape, which we consider would have a harmful impact on the setting of a multitude of heritage assets, particularly those in the local vicinity. I address these in turn 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



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





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 VP03 of the TVIA Report (p8-9). The wireline assessment demonstrates that the proposed masterplan 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.

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 VP07.

The wireline and rendered visuals provided reveal that the proposed masterplan, and particularly the tower subject to detailed planning permission, 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 09 (p24-25) 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 and rendered visualisation indicates that this impact would be significantly exacerbated by the proposed masterplan development. We consider that this cumulative impact would further detract from the formal orthogonal plan and enclosed setting of Caroline Gardens, and therefore cause harm to the character of the Conservation Area and the setting of the Grade II listed almshouse buildings.





### Distant Heritage Assets

As we recommended, views of the proposed development from the Grade II\* listed Nunhead Cemetery have been provided (VP16, p42-43). The study indicates that the proposed development would be well screened by trees, and it therefore appears unlikely that there would be a significant impact on the setting of the Cemetery and its visual relationship with St Paul's Cathedral.

Despite our recommendation at scoping stage, it does not appear that any assessment of the LVMF views from Parliament Hill and Kenwood House towards Central London (LVMF Views 2 and 3) have been provided. Although the development site is some distance away, we continue to recommend that a basic wireline assessment is undertaken to identify whether there would be any significant visibility from these designated strategic views.

### **Historic England's Recommendation**

We note that the Area Action Plan for the Old Kent Road remains at draft stage. As expressed at scoping stage, we 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. Historic England is therefore disappointed that these proposals have been submitted in advance of any adopted policy for development within this part of Southwark.

Nonetheless, taking this hybrid application into consideration on its own merits, we would conclude that the proposed development would cause a significant amount of harm to the conservation areas and listed buildings set out in this letter. Whilst we do not consider the level of harm to any individual designated heritage asset to be 'substantial' in NPPF terms, the cumulative impact of the development on the wide range of designations in the vicinity is of much concern to Historic England.

Regarding the proposed tower subject to detailed planning permission, the supporting visual information indicates that it would appear relatively isolated in a number of key views, and would therefore not appear to form a coherent part of the proposed masterplan development. It is important to note that in all three views in which we have identified harm, the impact of the proposed masterplan development represents a significant departure from the more modest scale of the Old Kent Road Local Development Study massing (outlined in green). This apparent lack of a coherent masterplan, and departure from the emerging strategy, is of much concern to us.





Historic England

LONDON OFFICE

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, and we therefore recommend that this application is refused.

Yours sincerely

**Alasdair Young**

Inspector of Historic Buildings and Areas

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

Cc Sarah Parsons, London Borough of Southwark



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

