



Historic England

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Our ref: PL00083712

15 May 2017

Dear Mr Glasgow

**Re: MALT STREET REGENERATION ENVIRONMENTAL IMPACT ASSESSMENT (EIA) SCOPING REPORT**

Thank you for your letter of 28 April 2017 consulting us about the above EIA Scoping Report in relation to a proposed residential and commercial development near the Old Kent Road in the London Borough of Southwark.

We confirm that the development site contains no designated heritage assets. However, the Report indicates that the proposed scheme would include tall buildings of up to 40 storeys in height (p9), which would represent a substantial increase in height to the existing townscape. We consider that this substantial change in townscape character could have a significant and far-reaching impact on the historic environment.

Historic England commented on your Council's Draft Old Kent Road Area Action Plan (AAP) Consultation in November (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 <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>.”*

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.



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If these proposals are to be pursued prior to the adopting the AAP, we would expect any application to be supported by a detailed visual assessment which identifies and assesses the impact of the development on the historic environment.

Whilst the Zone of Theoretical Visual Influence study will help identify the extent of visibility of the proposed development, the Conservation Areas immediately to the west of the development site, namely Cobourg Road, Trafalgar Avenue, and Glengall Road, should be included as part of any future assessment. Views from within the forecourt of the Grade II listed Caroline Gardens, to the south-east of the site should also be tested.

Regarding more distant views, the development site appears to be located on axis with the view from Nunhead Cemetery (Grade I Registered Park) towards St Paul's Cathedral. Despite the Scoping Report's recommendation, we would strongly advise that this view is tested as part of any future application.

Also, the development site appears to be located in the background area of the London Panorama views from Parliament Hill and Kenwood House towards Central London, in particular towards St Paul's Cathedral (LVMF Views 2 and 3). Although some distance away, we recommend that these views are considered as part of any future assessment.

Finally, the Report makes reference to Historic England guidance, namely *Conservation Principles* (2008), *Managing Significance in Decision-Taking in the Historic Environment* (2015) and *The Setting of Heritage Assets* (2015). We recommend that any future application also refers to the aforementioned Historic England *Tall Buildings* guidance (Advice Note 4, 2015).

I hope this advice is helpful and please and we look forward to further consultation in due course. If you would like clarification on any of the points raised, or would like to discuss the issues further at this stage, please contact me.

Yours sincerely,

Alasdair Young

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