

Wootton Street Lambeth London SE1 8TP

Heritage Statement

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Executive summary

Homes for Lambeth has commissioned MOLA to carry out a heritage statement in advance of proposed development at Wootton Street in the London Borough Lambeth. The scheme comprises the demolition of the existing building to be replaced by a new build which will step up to 10 storeys in height.

The subject site is currently a single storey brick building, as well as low-grade landscaping, semimature trees and residual parking for local residents.

The site does not lie within a Conservation Area (CA), however there are 5 Conservation Areas within the vicinity of the site. These are the Roupell Street CA, Waterloo CA, Mitre Road and Ufford Street CA, Lower Marsh CA and South Bank CA. The Roupell Street CA is the closest, due north of the site, just north of the Waterloo East viaduct.

This desk-based study assesses the possible impacts of the proposed development on built heritage assets in and around the site.

This heritage statement is required to be submitted with the accompanying planning application.

This report has the following findings:

- The proposed new build will have a positive impact on the site and its surrounding area.
- The new build will improve the quantity and quality of the housing on site and the architecture of the site.
- While the proposed new build will be seen from the surrounding areas, including the nearby Roupell Street CA and Mitre Road and Ufford Street CA and listed buildings within the Roupell Street CA, this will only be in certain directions and only just over the roof tops.

The main recommendation is as follows:

• No details of the materiality or finishing has been provided. These should respond to the local surroundings to maintain a high quality architectural finish.

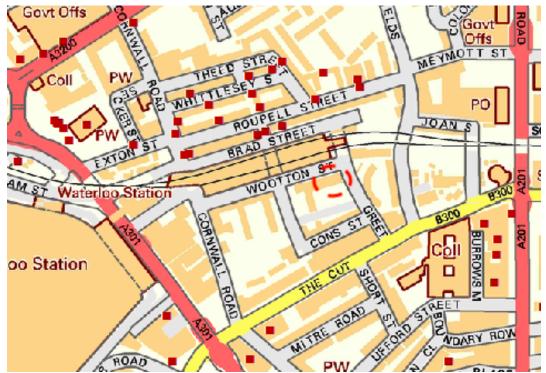


Fig 1 Location of subject site with listed buildings marked as red squares (Source: MOLA ArcGIS)



1.1 Origin and scope of the report

- 1.1.1 Homes for Lambeth has commissioned MOLA (Museum of London Archaeology) to carry out a heritage statement in advance of proposed development at Wootton Street, Lambeth (National Grid Reference 531428 180028: Fig 1). The scheme comprises the demolition of the existing building to be replaced by a new build which will step up to 10 storeys in height.
- 1.1.2 This desk-based study assesses the impact of the scheme on built heritage assets (standing buildings). It forms an initial stage of investigation of the area of proposed development (hereafter referred to as the 'site') and may be required in relation to the planning process in order that the local planning authority (LPA) can formulate an appropriate response in the light of the impact upon any known or possible heritage assets. These are parts of the historic environment which are considered to be significant because of their historic, evidential, aesthetic and/or communal interest.
- 1.1.3 The assessment has been carried out in accordance with the requirements of the National Planning Policy Framework (NPPF) (DCLG 2012, 2014, 2019) and to standards specified by the Chartered Institute for Archaeologists (ClfA Dec 2014a, 2014b), Historic England (EH 2008, 2017), and the Greater London Archaeological Advisory Service (GLAAS 2014). Under the 'Copyright, Designs and Patents Act' 1988 MOLA retains the copyright to this document.
- 1.1.4 Note: within the limitations imposed by dealing with historical material and maps, the information in this document is, to the best knowledge of the author and MOLA, correct at the time of writing. More information about the nature of the present buildings, and/or more detailed proposals for redevelopment may require changes to all or parts of the document.

1.2 Heritage assets

- 1.2.1 The subject site does not contain any nationally designated (protected) heritage assets; such as scheduled monuments, listed buildings or registered parks and gardens nor is the site situated in a Conservation Area.
- 1.2.2 The site does not lie within a Conservation Area, however there are 5 Conservation Areas (CA) within the vicinity of the site. These are the Roupell Street CA, Waterloo CA, Mitre Road and Ufford Street CA, Lower Marsh CA and South Bank CA. The Roupell Street CA is the closest, due north of the site, just north of the Waterloo East viaduct.
- 1.2.3 There are a number of Grade I and Grade II listed buildings within the Roupell Street CA.
- 1.2.4 There is one locally listed building within the vicinity of Tait House on Greet Street.

1.3 Aims and objectives

- 1.3.1 The aim of the assessment is to:
 - identify the presence of any known built heritage assets that may be affected by the proposals;
 - describe the significance of such assets, as required by national planning policy;
 - assess the likely impacts upon the significance of the assets arising from the proposals; and
 - provide recommendations for further assessment where necessary of the historic assets affected, and/or mitigation aimed at reducing or removing completely any adverse impacts upon buried heritage assets and/or their setting.

2 Methodology and sources consulted

2.1 Baseline

- 2.1.1 The baseline for this assessment has been determined primarily through desk-based research into designated and undesignated heritage assets on and near the site of the proposed development. It has been confirmed and extended by a site visit by a MOLA Built Heritage Consultant.
- 2.1.2 The following are the principal sources consulted:
 - MOLA in-house Geographical Information System (GIS) with statutory designations GIS data, the locations of all key indicators of known prehistoric and Roman activity across Greater London, past investigation locations, projected Roman roads and burial grounds from the Holmes burial ground survey of 1896; georeferenced published historic maps; Defence of Britain survey data, in-house archaeological deposit survival archive; and archaeological publications.
 - Historic England information on statutory designations including scheduled monuments and listed buildings, along with identified Heritage at Risk
 - Groundsure historic Ordnance Survey maps from the first edition (1860-70s) to the present day;
 - Homes for Lambeth Second Pre-Application Submission (Stockwool, 31/03/2020);
 - Internet web-published material including LPA local plan, and information on conservation areas and locally listed buildings.

2.2 Significance

- 2.2.1 The assessment considers all structures on or near the site of a proposed development to have potential significance as heritage assets. From this start position, the values and significance of each asset will be determined using criteria set out in Historic England (formerly English Heritage)'s *Conservation Principles, Policies and Guidance* (EH 2008). All structures with a level of significance as heritage assets will be discussed in the report and included as material considerations in the assessment. Structures of negligible value and significance as heritage assets will not be assessed further and will generally be excluded from the report except where there is a need for explanation of their exclusion from the assessment, such as being part of the site.
- 2.2.2 For each built heritage asset to be considered, a description will be provided leading to a statement of significance for that asset. Section 10 sets out the criteria used to determine the significance of heritage assets. This is based on four values set out in Historic England's *Conservation Principles, Policies and Guidance* (EH 2008), and comprise evidential, historical, aesthetic and communal value. The report assesses the likely presence of such assets within (and beyond) the site, factors which may have compromised buried asset survival (i.e. present and previous land use), as well as possible significance.
- 2.2.3 The significance of the asset is derived from its historical, evidential, communal and aesthetic values, these in turn derived from the building's fabric, design, landscape and history.
- 2.2.4 In the case of Conservation Areas, the significance will be primarily found in their character assessments and those aspects of the historic built environment that make positive contributions to them.
- 2.2.5 The methodology for assessing the setting of designated heritage assets follows best practice as covered in Historic England's Good Practice Advice (GPA) document 3 (HE 2017). The basis for this methodology is set out below:

All heritage assets have significance, some of which have particular significance and are designated. The contribution made by their setting to their significance also varies.

Although many settings may be enhanced by development, not all settings have the same capacity to accommodate change without harm to the significance of the heritage asset or the ability to appreciate it. This capacity may vary between designated assets of the same grade

or of the same type or according to the nature of the change. It can also depend on the location of the asset: an elevated or overlooked location; a riverbank, coastal or island location; or a location within an extensive tract of flat land may increase the sensitivity of the setting (ie the capacity of the setting to accommodate change without harm to the heritage asset's significance) or of views of the asset. This requires the implications of development affecting the setting of heritage assets to be considered on a case-by-case basis.

2.2.6 GPA3 sets out this methodology in stages, or steps:

Step 1 - identify the asset(s) likely to be affected and the extent of setting

Step 2 - assess how and to what degree the setting makes a contribution to the significance of the assets

Step 3 - assess the effect of the proposed development on the significance of the asset;

Step 4 - seek to maximise enhancement and minimise harm; and

Step 5 - document and monitor outcomes

2.2.7 Steps 1 and 2 are dealt with in section 4.5, step 3 in section 7.2 and step 4 in sections 8.2 and 8.3. Step 5 is the preserve of the LPA.

2.3 General Planning Advice 3 (GPA3) *The Setting of Heritage Assets* (Historic England 2015)

- 2.3.1 General Planning Advice 3 (GPA3) The Setting of Heritage Assets (Historic England 2015) sets out the broad methodology for assessing the impact of development on the significance of assets. This suggests a staged approach Step 1 being the identification of assets potentially affected; Step 2 being to assess whether, how and to what degree the setting makes a contribution to the significance of the heritage asset(s); Step 3 is to assess the effects of the proposed development, whether beneficial or harmful, on that significance; Step 4 is to explore the ways to maximise enhancement and avoid or minimise harm; and Step 5, which is the preserve of the LPA, is to make and document the decision and monitor outcomes.
- 2.3.2 This report has identified that the heritage assets which could potentially be affected are the Roupell Street Conservation Area (CAs), the Grade II listed buildings within it, the Mitre Road and Ufford Street CA and the locally listed Tait House (Step 1). The other CAs and any listed buildings within them are unlikely to be affected by the proposed development due to their distance from the site and the intervening built and landscape form.
- 2.3.3 In detail, Step 2 considers:

a) the physical surroundings of the asset, including its relationship with other heritage sets;

b) the way the asset is appreciated; and

c) the asset's associations and patterns of use.

2.3.4 Commentary of the various facets of these factors is as follows:

- a) The asset's physical surroundings
 - Topography the area is predominantly flat.
 - Aspect the site faces north onto the railway viaduct of Waterloo East Station. To the west is Windmill House, a block of flats built after World War II, to the south are the Ipsden Flats a Peabody development, and to the east is Greet Street with the locally listed Tait House.
 - Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains) – the are four other CAs within the vicinity of the site: the Waterloo CA, Mitre Road and Ufford Street CA, Lower Marsh CA and South Bank CA.
 - Definition, scale and 'grain' of surrounding streetscape, landscape and spaces the area around the site exhibits a variety of different residential architectural styles including interwar and post war local authority housing as well as more modern developments.
 - Formal design e.g. hierarchy, layout there is no formal design attributed to the subject site.

- Orientation and aspect as above.
- *Historic materials and surfaces* the site is a single storey building of brick construction with white UPVC windows with a flat roof.
- Green space, trees and vegetation the site contains open green space with trees. Further similar open spaces are found to the west and east of the site in front of the other blocks of flats.
- Openness, enclosure and boundaries the site is open to Wootton Street and Greet Street.
- Functional relationships and communications none in particular.
- *History and degree of change over time* the site and the surrounding area have been built up for over 100 years and has changed a little over the last 60 years.

b) Experience of the asset

- Surrounding landscape and townscape character the surrounding area is typical of a residential area in Lambeth, London.
- *Views from, towards, though, across and including the asset* the site faces onto the railway viaduct and Tait House.
- Visual dominance, prominence or role as focal point the viaduct forms a forms a focal point due to its height and length as does Tait House due to its interesting curved shape.
- Noise, vibration and other nuisances none in particular.
- Diurnal changes minor changes as a result of diurnal changes.
- Sense of enclosure, seclusion, intimacy or privacy the site is visible from the street.
- Land use the land is residential and community use.
- Accessibility, permeability and patterns of movement the site is partially private property. There is limited pedestrian traffic along the street and low passing traffic.
- Degree of interpretation or promotion to the public the area is characteristic of its time.

c) Associations

- *The assets associative attributes* the site is representative of the historical development of the area.
- Associative relationships between heritage assets as above.
- 2.3.5 The proposed works are moderate in nature. There will unlikely be any impact on the setting of the conservation area as a result of the proposed development, which is further detailed in section 7 of this report (Step 3).
- 2.3.6 The proposed works are moderate in nature and separate from the nearest designated heritage asset (Step 4).

2.4 Impact

- 2.4.1 Impacts are those actions associated with the proposed development with potential to alter the significance of a heritage asset through affecting the values that contribute to it.
- 2.4.2 For each built heritage asset, the potential impacts of demolition and construction will be assessed in terms of how they may alter these values and, by extension, significance of each.
- 2.4.3 For Conservation Areas, the assessment will focus on the preservation and/or enhancement of their historic character.

2.5 Conclusions and Recommendations

2.5.1 The built heritage assessment will conclude with a list of impacts, potentially ranging from

major adverse to major positive, on built heritage assets in the baseline.

2.5.2 This list is primarily intended to inform mitigation, whether through design or ameliorative archaeological recording of assets in advance of their alteration.

3 Policy Baseline

3.1 Introduction

- 3.1.1 There is potential for the proposed development to impact on the significance of designated and undesignated built heritage assets and Conservation Areas. These impacts will likely take the form of demolition or other physical alteration to buildings, demolition and new construction that may alter the setting of designated heritage assets, and demolition and new construction that may affect the character and setting of Conservation Areas.
- 3.1.2 The following lays out the general criteria upon which the proposed development will be assessed.

3.2 Statutory protection

Listed Buildings and Conservation Areas

3.2.1 The *Planning (Listed Buildings and Conservation Areas) Act 1990* sets out the legal requirements for the control of development and alterations which affect buildings, including those which are listed or in conservation areas. Buildings which are listed or which lie within a Conservation Area are protected by law. Grade I are buildings of exceptional interest. Grade II* are particularly significant buildings of more than special interest. Grade II are buildings of special interest, which warrant every effort being made to preserve them.

3.3 National Planning Policy Framework

3.3.1 The Government issued the *National Planning Policy Framework* (NPPF) in March 2012 (DCLG 2012) and supporting *Planning Practice Guidance* in 2014 (DCLG 2014). The 2012 NPPF was revised and a new NPPF published in July 2018, with minor revisions in February 2019 (MHCLG 2019).

Conserving and enhancing the historic environment

3.3.2 The NPPF section concerning "Conserving and enhancing the historic environment" (section 12 of the NPPF 2012) has been replaced by NPPF 2018 Section 16 (unchanged in February 2019), reproduced in full below:

Para 184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Para 185. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

Para 186. When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

Para 187. Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

Para 188. Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

Proposals affecting heritage assets

Para 189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

Para 190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Para 191. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

Para 192. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

Considering potential impacts

Para 193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Para 194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

Para 195. 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 total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

• d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Para 196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Para 197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Para 198. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

Para 199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Para 200. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

Para 201. Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 195 or less than substantial harm under paragraph 196, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Significance of the Conservation Area or World Heritage Site should be significance and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

Para 202. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

3.4 Greater London regional policy

The London Plan

3.4.1 The overarching strategies and policies for the whole of the Greater London area are contained within the London Plan of the Greater London Authority (GLA March 2016). The current 2016 Plan (The London Plan consolidated with alterations since 2011) is still the adopted Development Plan, but the Draft London Plan is a material consideration in planning decisions.

3.4.2 Policy 7.8 of the adopted (2016) London Plan relates to Heritage Assets and Archaeology:

A. London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B. Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

C. Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D. Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E. New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

F. Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration. G. Boroughs, in consultation with English Heritage [now named Historic England], Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

- 3.4.3 Para. 7.31A supporting Policy 7.8 notes that 'Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see of the benefits of departing from those policies outweigh the disbenefits.'
- 3.4.4 It further adds (para. 7.31B) 'Where there is evidence of deliberate neglect of and/or damage to a heritage asset the deteriorated state of that asset should not be taken into account when making a decision on a development proposal'.
- 3.4.5 Para. 7.32 recognises the value of London's heritage: '...where new development uncovers an archaeological site or memorial, these should be preserved and managed on-site. Where this is not possible provision should be made for the investigation, understanding, dissemination and archiving of that asset'.

The Draft New London Plan showing Minor Suggested Changes

- 3.4.6 The current 2016 consolidation Plan is still the adopted Development Plan. However, consultation on revisions to the Plan closed 2nd March 2018, and the *Draft New London Plan* showing Minor Suggested Changes, which includes clarifications, corrections and factual updates to the Consultation Draft Plan that will help inform the Examination in Public, was published on 13th August 2018 (GLA website, 2017).
- 3.4.7 Policy HC1 "Heritage conservation and growth" of the *Draft New London Plan* (as set out here incorporating published minor changes to the consultation Draft) relates to London's historic environment:

A Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in placemaking
- 2) utilising the heritage significance of a site or area in the planning and design process
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

- 3.4.1 Para. 7.1.8 adds 'Where there is evidence of deliberate neglect of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset should not be taken into account when making a decision on a development proposal'
- 3.4.2 Para 7.1.11 adds 'Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.

3.5 Local planning policy

Local Plan

3.5.1 The Lambeth Local Plan was adopted in September 2015 and sets out the plan for Lambeth for the next 15 years. There are several policies dealing with the historic environment to aid developers in understanding how to preserve Lambeth's rich and varied history.

Policy Q20

Statutory listed buildings

Development affecting listed buildings will be supported where it would:

- (i) conserve and not harm the significance/ special interest;
- (ii) not harm the significance/setting (including views to and from); and
- (iii) not diminish its ability to remain viable in use in the long term.

Policy Q21

Registered parks and gardens

Development proposals affecting parks and gardens on the national register will be supported where they:

(i) Sustain and enhance the significance of landscape and its features of interest (including structures);

(ii) take opportunities to restore original features or do not compromise future restoration opportunities;

- (iii) promote greater accessibility; and
- (iv) protect the setting (including views in and out).

Policy Q22

Conservation areas

(a) Development proposals affecting conservation areas will be permitted where they preserve or enhance the character or appearance of conservation areas by:

(i) respecting and reinforcing the established, positive characteristics of the area in terms of the building line, siting, design, height, forms, materials joinery, window detailing etc;

(ii) protecting the setting (including views in and out of the area).

(b) Façade retention with the demolition of the remaining building is generally not considered appropriate in conservation areas as it results in the loss of historic structures.

Development involving demolition in a conservation area will only be supported if:

(i) the structure proposed for demolition does not make a positive contribution to the character or appearance of the area;

(ii) a suitable replacement has been granted planning permission; and

(iii) a planning condition and/or section 106 agreement has been made that the building shall not be demolished until see a contract for the replacement building has been made.

Policy Q23

Undesignated heritage assets: local heritage list

(a) The council will maintain a list of undesignated heritage assets which is to be of local (or greater) significance. It will be known as the 'local heritage list'. It will include:

(i) archaeology (archaeological priority areas);

(ii) buildings and structures (local list); and

(iii) designed spaces and landscapes (local landscape register).

(b) The objectives of maintaining the local heritage list are to:

(i) raise awareness of these assets and foster a greater appreciation of them;

(ii) sustain or enhance their significance; and

(iii) protect their settings.

(c) The council will:

(i) resist the destruction of assets on the local heritage list and expect applicants to retain, preserve, protect, safeguard and where desirable enhance them when developing proposals that affect them;

(ii) require proper investigation and recording of archaeological remains and publication and archiving of results to advance understanding.

4 Built Heritage Baseline

4.1 History of the site

- 4.1.1 Rocque's map of 1746 (fig 3) shows that the area of the site lies within an area labelled as Tenter Ground as well as some orchards, gardens and buildings. Greenwood's map of 1824 (fig 4) shows the area has been significantly built up with the laying down of several recognisable roads such as The Cut south of the site.
- 4.1.2 The 1st edition OS map of 1875 (fig 5) shows the area has changed considerably by this point. Waterloo Junction Station and its line were opened in 1865 and the whole area has been urbanised. Many new streets have been laid down including Wootton Street. This street, as are all the others, are occupied by terrace houses with small rear gardens.
- 4.1.3 The area changes somewhat by the London County Council Bomb Damage map (fig 6), the western end of Wootton Street appears to have been cleared and Tait House which fronts Greet Street (previously Eaton Street) has been built by this time as has the Ipsden Buildings between Ethelm Street and Cons Street. The remaining terrace house fronting Wootton Street are coloured purple, indicating these have been damaged beyond repair. This would explain why by the 1950 OS map (fig 7) the whole area has been cleared. The blocks of flats on the western portion of Wootton Street have been built by this time.
- 4.1.4 The 1958-1963 OS map (fig 8) shows the presence of a day nursery at the location of the site. There is a playground to the south as well as other open spaces. The site does not change any further after this date (fig 9).

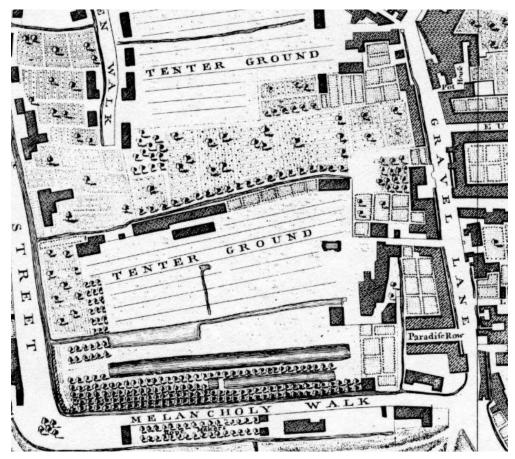


Fig 3 Rocque's map of 1746, not to scale

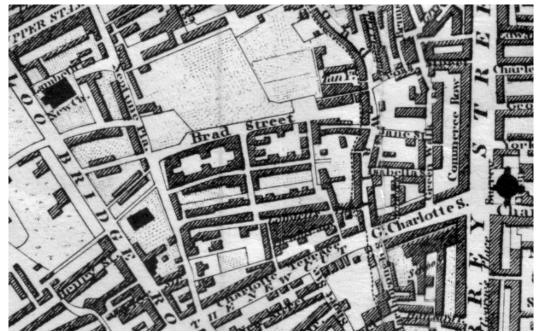


Fig 4 Greenwood's map of 1824, not to scale



Fig 5 1st edition Ordnance Survey map 1875, not to scale

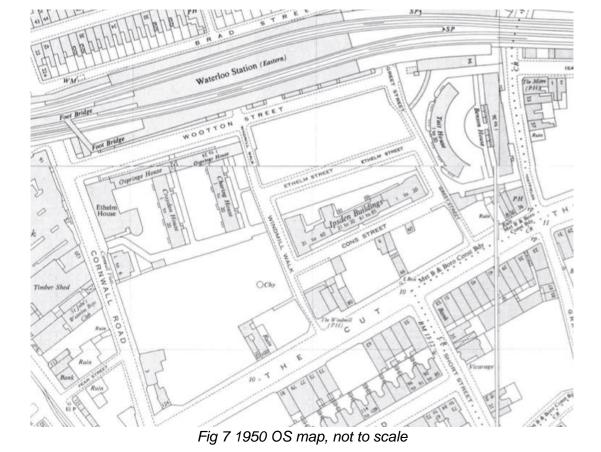


Fig 6 London County Council Bomb Damage map, not to scale



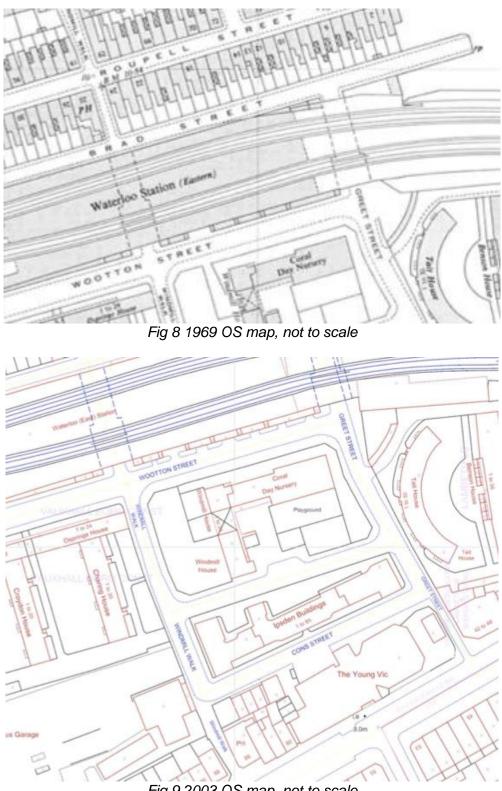


Fig 9 2003 OS map, not to scale

Site description 4.2

- 4.2.1 The site consists of one single storey brick building originally built as a day nursery. There is a playground to the south as well as low-grade landscaping with trees and residual parking for residents.
- 4.2.2 The surrounding area is a mix of architectural styles including blocks of flats from the 1960s such as Windmill House to the west, Tait House to the east built in the interwar period which is noted for its curved shape (locally listed) and the lpsden Flats built at the end of the 19th

century.

- 4.2.3 On the north side of Wootton Street is the Waterloo East railway line and viaduct. The viaduct is equivalent to three storeys in height.
- 4.2.4 The surrounding areas have been subject to multiple new developments including several examples of tall buildings such as the Ibis Hotel on the corner of Meymott Street and Blackfriars Road, north-east of the site. Closer to the River Thames there is the Shell Centre building on Belvedere Road facing the Jubilee Gardens. Between York Road and Belvedere Road there is a large development of several tall buildings of mixed use. Capital Tower is on the corner of Sandell Street and Waterloo Road, to the west of the site. There are several other tower buildings behind Capital Tower that may be associated, these back on to Cornwall Road. South Bank Tower on Upper Ground is almost directly north of the site. All of these have changed skyline and can be viewed from quite a distance.



Fig 10 The site from Wootton Street

4.3 Conservation areas

4.3.1 There are a number of Conservation Areas within the immediate vicinity of Wootton Street (fig 10). To the north immediately beyond Waterloo East Station is the Roupell Street CA, this is surrounded to the north, east and west by the Waterloo CA. To the north beyond the Roupell Street and Waterloo CAs and extending to the west and south-west is the South Bank CA. To the south-west is the Lower Marsh CA and to the south is the Mitre Road and Ufford Street CA.

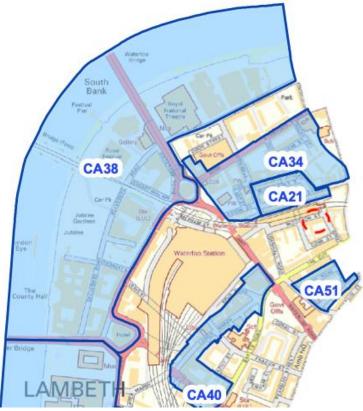


Fig 11 Conservation Areas around Wootton Street

Roupell Street CA Appraisal: designated in 1976 (CA21)

4.3.2 Considered one of the most attractive parts of the Borough as it is an intact survivor of early 19th century housing. There are a number of designated heritage assets within this CA.

Waterloo CA Appraisal: designated in 1980 (CA34)

4.3.3 Special because of its evidence of 19th and early 20th century urban development.

South Bank CA Appraisal: designated in 1982 (CA38)

4.3.4 Different to most CAs as nearly all of the buildings are new but almost all of these are of either national or international importance.

Lower Marsh CA Appraisal: designated in 1984 (CA40)

4.3.5 The area is characterised by 19th and 20th century commercial buildings (shops, offices, workshops, pubs). The older buildings occupy narrow historic plots while the newer buildings are spread over these.

Mitre Road and Ufford Street CA Appraisal: designated in 1998 (CA51)

4.3.6 The area is an example of early 20th century philanthropic housing estate built by the Church Commissioners who owned the land and laid out the existing street plan and houses. These have changed little since their construction.

4.4 Listed buildings

4.4.1 There are a number of Grade II listed buildings north of the railway viaduct within the Roupell Street CA. These are all domestic houses typical of early 19th century urban development.

4.5 Locally listed buildings

4.5.1 Tait House on Greet Street is immediately east of the site. The building was built in the interwar period and is of brick construction with a curved shape. This interesting shape makes it a focal point.

5 Statement of Significance

5.1 Introduction

5.1.1 The subject site does not contain any nationally designated (protected) heritage assets; such as scheduled monuments, listed buildings or registered parks and gardens. There are two neighbouring CAs that may be affected by the development, the Roupell Street CA and the Mitre Road and Ufford Street CA.

5.2 Significance Criteria

- 5.2.1 'Significance' lies in the value of a heritage asset to this and future generations because of its heritage interest, which may be archaeological, architectural, artistic or historic. Archaeological interest includes an interest in carrying out an expert investigation at some point in the future into the evidence a heritage asset may hold of past human activity, and may apply to standing buildings or structures as well as buried remains. Known and potential heritage assets within the site and its vicinity have been identified from national and local designations, HER data and expert opinion. The determination of the significance of these assets is based on statutory designation and/or professional judgement against four values (EH 2008):
 - *Evidential value*: the potential of the physical remains to yield evidence of past human activity. This might take into account date; rarity; state of preservation; diversity/complexity; contribution to published priorities; supporting documentation; collective value and comparative potential.
 - Aesthetic value: this derives from the ways in which people draw sensory and intellectual stimulation from the heritage asset, taking into account what other people have said or written;
 - Historical value: the ways in which past people, events and aspects of life can be connected through heritage asset to the present, such a connection often being illustrative or associative;
 - Communal value: this derives from the meanings of a heritage asset for the people who know about it, or for whom it figures in their collective experience or memory; communal values are closely bound up with historical, particularly associative, and aesthetic values, along with and educational, social or economic values.
- 5.2.2 Table 2 gives examples of the significance of designated and non-designated heritage assets.

Heritage asset description	Significance
World heritage sites	Very high
Scheduled monuments	(International/
Grade I and II* listed buildings	national)
Historic England Grade I and II* registered parks and gardens	
Protected Wrecks	
Heritage assets of national importance	
Historic England Grade II registered parks and gardens	High
Conservation areas	(national/
Designated historic battlefields	regional/
Grade II listed buildings	county)
Burial grounds	
Protected heritage landscapes (e.g. ancient woodland or historic hedgerows)	
Heritage assets of regional or county importance	
Heritage assets and locally listed buildings with a district value or local (ie parish)	Low
value or interest for education or cultural appreciation	(Local)
Historic environment resource with no significant value or interest	Negligible
Heritage assets that have a clear potential, but for which current knowledge is	Uncertain
insufficient to allow significance to be determined	

Table 2: Significance of heritage assets

5.3 Designated heritage assets

5.3.1 There are several Grade II listed buildings in the Roupell Street CA, such buildings and CAs have a high significance baseline. The type of listed buildings in the area are part of the designation and therefore the significance of the listed buildings and CA will be considered together.

Evidential and Historic Value

- 5.3.2 The evidential and historic value of the listed buildings within the Roupell Street CA derives from it providing an example of early to mid 19th century urban development which is well preserved and largely unchanged. Both the CA and the listed building have a high evidential value.
- 5.3.3 Historical value tends to be illustrative or associative. There is no historic association of note that is known for the surrounding area.

Aesthetic Value

5.3.4 The are has a high aesthetic value due to its contribution of historic vernacular architecture which can be appreciated by all in its uniformity. Additionally, the architectural style is unusual in the wider neighbouring locale. Both the CA and the listed building have a high aesthetic value.

Communal Value

5.3.5 As primarily private residences the listed buildings within Roupell Street CA have low communal value. However there several commercial premises as well as public houses which attract passers by which in turn allows for people to view the properties and their historical and aesthetic importance. As such the listed buildings and the Roupell Street CA have a medium communal value.

Summary of Significance

- 5.3.6 Based on the above analysis both the CA and its listed buildings have a high significance.
- 5.3.7 The Mitre Road and Ufford Street CA also has a high significance baseline. The significance of this CA comes from it presenting a very good example of early 20th century philanthropic housing that has not been altered heavily, as such it has high evidential, historic and aesthetic value. It will have a low communal value as it is primarily a residential area. In summary this CA has a high significance.

5.4 Locally listed building

5.4.1 Tait House is a locally listed building and has a low significance baseline.

Evidential and Historic Value

- 5.4.2 The evidential and historic value of this building comes from its construction in the interwar period as an example of philanthropic housing and it was built by architects who built several other examples of philanthropic houses. As such it has a medium evidential value.
- 5.4.3 Historical value tends to be illustrative or associative. There is no historic association of note that is known for the surrounding area.

Aesthetic Value

5.4.4 The building has an interesting curved shape and is prominently situated so that it is a focal view point on the street. As such it has a medium aesthetic value.

Communal Value

5.4.5 As a residential property is has a low communal value.

Summary of Significance

5.4.6 Tait House in summary has a medium significance as a locally listed building.

6 Proposed development

6.1 Proposal

- 6.1.1 The proposal is for the demolition of the existing building on site and the construction of a new build, triangular in shape with rounded corners to soften the façades. The building will step up to 10 storeys. All sides will have curvilinear projecting balconies. The two intervening levels will provide public amenity space on the rooves.
- 6.1.2 The ground floor facing Greet Street will provide workspace and flexible community floorspace creating an active frontage. The existing mature trees will be retained and communal external space will be provided around the building.
- 6.1.3 Materiality and finishes will respond to the surrounding area by creating a clear distinction between the contemporary and the original. This will be achieved used brick banding and powder-coated metalwork.



Fig 12 Ground floor layout for proposed development at Wootton Street (Source: Stockwool)



Fig 13 Aerial view south (Source: Stockwool)

7 Impact of Proposed Development

7.1 Impact on site

- 7.1.1 The proposal will have a positive impact on the site and its surrounding area by increasing the amount of housing but providing it in a well designed build with private and shared garden space.
- 7.1.2 The removal of the existing building and will provide positive benefit given that the current site is in poor condition which detracts from local street scene.
- 7.1.3 Furthermore, the proposal will provide an active street front on Greet Street. Proposals will enhance and benefit the street scene and townscape.
- 7.1.4 The mature trees and green space will be retained.

7.2 Impact on nearby heritage assets

- 7.2.1 The new builds will step up to 10 storeys high, which will be not out of place given the number of tall buildings both north and south of the railway line and that the majority of buildings immediately close to site are apartment buildings. The houses to the north are on other side of viaduct.
- 7.2.2 The triangular shape of the building and the stepping up in height will help reduce the massing of the proposed building. The lowest portion will be in front of Windmill House thus not obscuring views while the tallest will be in the north-east corner facing the railway viaduct.
- 7.2.3 The proposed building will be visible from the two nearby CAs but this will only be indirect views from over the tops of the buildings and from above the viaduct in the case of views from Roupell Street CA. The height of the proposed building will be considerably lower than that of the nearby Capital Towers on Waterloo Road.
- 7.2.4 The benefits delivered from the scheme (notably the delivery of a modern building of high standard of architectural quality, new housing and affordable housing (50%), new community floorspace and other associated benefits) will outweigh perceptible harm on the heritage assets (Roupell Street and Waterloo CAs).
- 7.2.5 Under heritage guidance in the NPPF (paras 193-202), it is judged that in this instance that harm to the significance of the Roupell Street and Waterloo CAs is 'less than substantial' and is outweighed by the delivery of public benefits outlined above.

8 Conclusions and Recommendations

8.1 Conclusions

- 8.1.1 The proposed new build will have a positive impact on the site and its surrounding area.
- 8.1.2 The new build will improve the quantity and quality of housing and the architecture of the site.

8.2 Recommendations

8.2.1 No details of the materiality or finishing has been provided. These should respond to the local surroundings to maintain a high quality architectural finish.

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