



Heritage Statement

2-10 Ossory Road,
Southwark,
London,
SE1 5AN.

August 2021 | Project Ref 5524A



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1. Introduction

- 1.1** This Heritage Statement has been prepared by HCUK Group on behalf of Pocket Living in relation to a proposal for the redevelopment of Nos. 2-10 Ossory Road, Southwark, SE1 5AN, with an 11-storey mixed-use building containing 117 of residential units. Industrial floorspace is proposed at ground level. The determining authority for the application is Southwark Borough Council (SBC).
- 1.2** This report has built on an earlier report submitted in 2019 for an earlier iteration of this application, which was refused (heritage was not raised as an issue). The decision notice (as of August 2021) has not been issued. The current scheme has undergone further liaison with the local authority and minor changes to the appearance of this block. This report has been updated to accompany the new submission for determination. Since the last application adjacent property at nos 14-22 Ossory Road has received a resolution to Grant subject to the agreement of the Section 106. This consent will see the large scale development of properties to the south of this Site, reflecting the accepted principle of greater intensity of development on Ossory Road.

Assets considered

- 1.3** There are no statutorily or locally listed buildings on the Site and it is not within a conservation area. It is however in the setting of several designated and non-designated heritage assets (DHA & NDHA), all located to the west of the Site. To the east, are low rise retail stores including an Asda supermarket. Directly to the south and west are industrial warehouses, including a locally listed bottling plant factory. Directly north is a modern three-storey residential development.
- 1.4** Glengall Road, to the west of the Site, includes a group of nine identical, grade II listed, two-storey semi-detached classical villas, which date from the mid-19th century, attributed to the architect Amon Henry Wilds. These heritage assets, highlighted in **Figure 1**, with Nos. 24-28 on the west side of Glengall Road, were

first listed in September 1972. Their shared list description - reproduced below - was most recently amended in September 1998:

2 houses. c1843-1845. Probably by the Brighton architect, Amon Henry Wilds. Stucco with hipped slate roof with overhanging eaves. 2 storeys and rusticated semi-basement, 2 bays each. Giant fluted Ionic pilasters rise through ground and 1st floors, flanking inner bay of each house and supporting segmental arches above 1st-floor windows. Outer entrance bays slightly recessed with steps up to square Ionic porch with deep entablature and corresponding pilasters flanking door. Sash windows, those to inner bays segmental-headed, those above porch round-headed in shallow round-arched recess. String course above basement. INTERIOR: not inspected. SUBSIDIARY FEATURES: cast-iron area railings. Pair of houses in row of 9 identical, semi-detached pairs facing similar row of 4; Nos 1-35 (odd) & 24-38 (even) (qqv) form a group.

1.5

Given that Nos. 1-35 and 24-38 Glengall Road share a common architect and list description, they are treated in this assessment as a group. The setting of these listed buildings is likely to undergo change as a result of development of the scale proposed on this Site given that the Site forms the backdrop to views eastwards from Glengall Road towards the front elevations of these assets. The grade II listed assets further west and south-west of the Site, including at 1-9 Glengall Terrace and Trafalgar Avenue have been scoped out of this assessment, considering the proximity, intervening topography and the potential effect on views; any potential change to their setting resulting from the scheme would be demonstrably less than the effect on the grade II listed group noted above.

1.6

The Site is also within the setting of the Glengall Avenue and Trafalgar Avenue Conservation Areas (**Figure 2**), both were first designated in February 1980. The special interest of these conservation areas is derived principally from the character of early and mid-19th century residential houses laid out in orderly terraces and semi-detached developments. The Trafalgar Road Conservation area represents some of the earliest residential development of Peckham and although it is set further away from the Site is considered here. The Glengall Road Conservation Area includes the locally listed water bottling factory immediately west of the Site and its access lane from Ossory Road, the Site shares a boundary with the eastern edge of this conservation area.

1.7 This Heritage Statement assesses the effect of the proposal for the redevelopment of 2-10 Ossory Road on the setting and significance of the grade II listed group Nos. 1-35 and 24-38 Glengall Road, the locally listed water bottling factory, and upon the setting of the Trafalgar Avenue Conservation Area. This brings the assessment in line with paragraph 189 of the National Planning Policy Framework (NPPF; 2019). The report should be read in conjunction with the full drawn submission and Design and Access Statement prepared by Hawkins Brown, the rendered 3D model views produced by Cityscape Digital, and the Townscape and Visual Impact Assessment prepared by Landscape Collective. This assessment has been informed by a combination of desk-based historical research and a site visit undertaken in November 2019.

The Site

1.8 The 0.11 hectare site is comprised of a low-rise industrial building which is approximately 35 years old. Until circa 2013 it was occupied by a ceramic tile retailer/wholesaler. Historic cartographic evidence indicates that the Site was developed in the mid-19th century through the construction of 'Buttler's Terrace', a row of five dwellings which were demolished in the second half of the 20th century. The existing building is constructed of a steel framed structure and is approximately 6m at the eaves and 8m to the ridge.

Pre-Application Discussions

1.9 The previous scheme was the subject of extensive Pre-Application meetings with the Greater London Authority (GLA) on the 11th of December 2018 and 4th of March 2019. The GLA's assessment following the Pre-Application meetings was received by email on the 24th of April 2019 (GLA/4949/01/KR). These discussions remain relevant.

1.10 The proposal submitted for Pre-Application discussions was for a: 'Residential-led mixed-use development comprising 102 residential units with industrial units at ground and first floor.' With regards to urban design, the GLA's response noted that the scheme should be compliant with the policies contained within the London Plan and that given its 'location within an Opportunity Area, there would be no in

principle objection to a higher density development, subject to compliance with other planning policy objectives, especially design quality.'

1.11 The response stated that the positioning of the residential entrance on Ossory Road is welcomed but it was suggested that moving the loading bay away from this area to consolidate servicing with the neighbouring SIL site in the future (granted resolution to consent, 2021). It was noted that the public realm and landscaping should work to deliver for both industrial and residential uses and the facade should contribute to a continuous active frontage for Ossory Road. It was also posited that the applicant should consider reducing the roof plant services so that they are not visible from the view looking onto the adjoining Conservation Area, from Burgess Park. High quality and sensitive facade detailing were noted as being important considerations in the context of the conservation area.

1.12 The conclusion of the GLA's response dated 24th of April 2019 has been reproduced below:

'GLA officers welcome the opportunity to engage with the applicant at an early stage. The principle of the mixed-use redevelopment of this site, including the re-provision of industrial floorspace and residential development at the scale proposed would be supported in strategic terms.'

'Any future planning application will need to address the issues raised in this report on principle of development, housing and affordable housing, urban and inclusive design, environment and transport as part of the application submission to ensure that the development complies with the London Plan.'

1.13 The Planning Committee met to consider the original application on 6 October 2020. The Planning committee report discussed the impacts and effects arising on heritage assets from page 31 onwards. The following quote from pages 37-38 presents the conclusion of the committee with respect to heritage assets.

'Historic England and the Greater London Authority raised no objection to any of the viewpoints assessed. The development is considered to improve the appearance of the subject site, creates an active frontage along Ossory Road, and produces a design that successfully moulds the contrasting materiality of the scheme with the visual amenity of the surrounding area. Special regard needs to be given to preserving the setting and special character and appearance of the listed buildings along Glengall Road. Whilst the development is acknowledged as causing some harm due to its visibility in the setting of those buildings, given that this is relatively limited it considered to cause some less than substantial

harm to the setting of the listed buildings on Glengall Road which is considered to be offset by the benefits of the scheme. Overall it is therefore considered that the benefits of the scheme outweigh the limited harm from the proposed development to the surrounding area. (Committee Report, Pages 37-38)

1.14 The above statement aligns with the assessment and conclusion explored in more detail within this report.



Figure 1: Historic England Asset Mapping

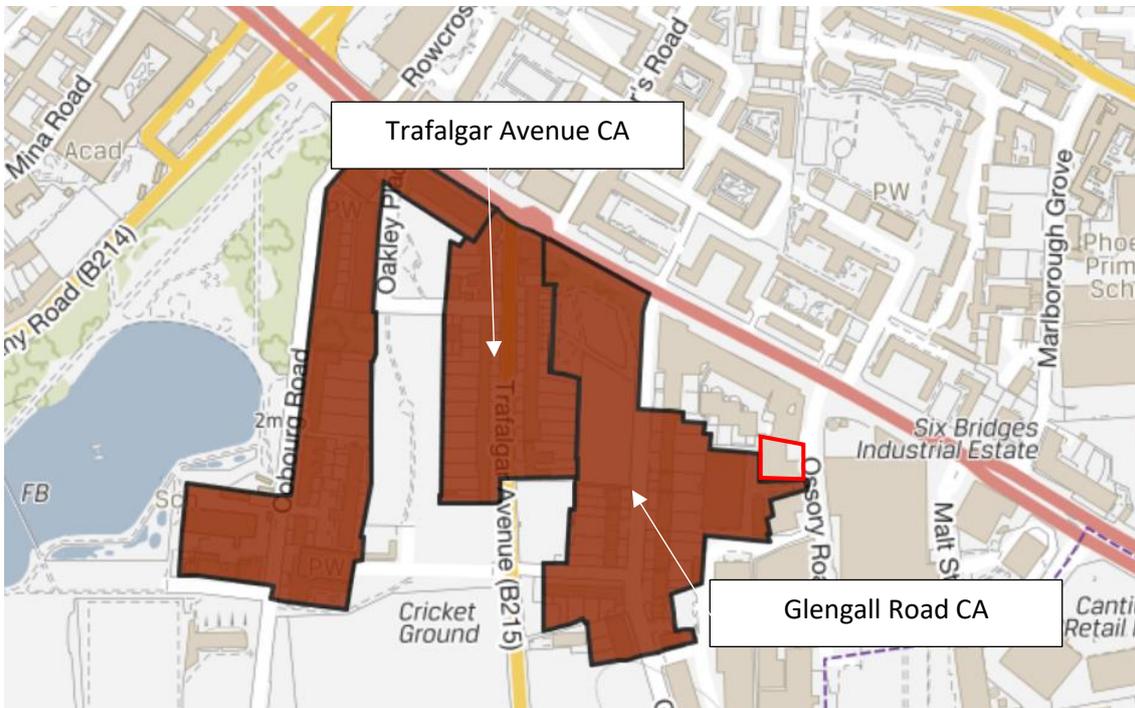


Figure 2: Nearby Conservation Area boundaries in relation to the Site



Figure 3: 2D Satellite Image of the Site and surrounding context

(Google Earth)



*Figure 4: 3D Satellite Image of the Site and surrounding context – facing east
(Google Earth)*



Figure 5: View towards the site from junction of Old Kent Road with Ossory Road

2. Heritage Legislation, Policy and Guidance

National Heritage Legislation

- 2.1** The decision maker is required by sections 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.¹
- 2.2** There is a broadly similar duty arising from section 72(1) of the Act in respect of planning decisions relating to development within conservation areas.
- 2.3** For the purposes of this statement, preservation equates to an absence of harm.² Harm is defined in paragraph 84 of Historic England’s Conservation Principles as change which erodes the significance of a heritage asset.³
- 2.4** The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.
- 2.5** The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting

¹ Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137. This principle has recently been confirmed, albeit in a lower court, in R (Wyeth-Price) v Guildford Borough Council.

² South Lakeland v SSE [1992] 2 AC 141.

³ Conservation Principles, 2008, paragraph 84.

may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

2.6 Historic England has produced guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance encourages the use of a stepped approach to the assessment of effects on setting and significance, namely (1) the identification of the relevant assets, (2) a statement explaining the significance of those assets, and the contribution made by setting, (3) an assessment of the impact of the proposed development on the setting and significance of the assets, and (4) consideration of mitigation in those cases where there will be harm to significance.

2.7 The NPPF requires the impact on the significance of the designated heritage asset to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁴ The Scale of Harm is tabulated at Appendix 1.

2.8 Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit.⁵ Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

2.9 Paragraphs 199 and 200 of the NPPF state that great weight should be given to the conservation of a designated heritage asset when considering applications that

⁴ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁵ The balancing exercise was the subject of discussion in *City and Country Bramshill v CCLG and others* [2021] EWCA, Civ 320.

affect its significance, irrespective of how substantial or otherwise that harm might be.

2.10 Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

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.

2.11 Paragraph 203 of the NPPF is relevant to the Old Mineral Water bottling Factory at 12 Ossory Road. It was added to the local list in 2018.

Historic England Advice Note 4: Tall Buildings

2.12 Historic England's updated Advice Note 4: Tall Buildings was published in December 2015 and seeks to provide guidance for projects involving tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. This guidance has been fully considered in the preparation of this application.

Local Policy

2.13 London Plan (2021) Policy HC1 Heritage Conservation and Growth covers the requirements for local boroughs to develop evidence on London's historic environment and put in place procedures by which heritage factors are considered early on in any development project.

2.14 The Main modifications to the New Southwark Plan were published for consultation in August 2021.

2.15 Southwark has a number of 'saved policies' from the Southwark Plan (2007) which were saved in April 2013. Of relevance to this application area 'saved policies' 3.15 and 3.17. Policy 3.15 deals with conservation of the Historic Environment and states that development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural

significance. Planning proposals that have an adverse effect on the historic environment will not be permitted.

2.16 Saved Policy 3.18 deals with the setting of listed buildings, conservation areas and World Heritage Sites and states that permission will not be granted for developments that would not preserve or enhance:

- The immediate or wider setting of a listed building; or
- An important view(s) of a listed building; or
- The setting of the Conservation Area; or
- Views into or out of a Conservation Area; or
- The setting of a World Heritage Site; or
- Important views of /or from a World Heritage Site.

Old Kent Road Area Action Plan (AAP)

2.17 This document sets out how the best of the Old Kent Road, including its thriving businesses and arts and cultural communities, can be nurtured and developed over the next 20 years (the 'plan period'). Of relevance to this application are Policies AAP8: Tall building strategy and AAP9: Character and Heritage.

2.18 Policy AAP 8: Tall building strategy states that in order to achieve 'tall buildings in the right places to make significant contributions to economic growth and the regeneration of the Old Kent Road while delivering considerable public benefits', the Council will implement the 'Stations and Crossings' strategy for the distribution of tall buildings, to reinforce the proposed hierarchy of buildings, places and streets and define a clear pattern of development that will ensure a coherent, legible and well articulated townscape and skyline. In general, tall buildings will be avoided around the edges of the masterplan, where new development will meet existing, lower height housing.

2.19 The design of tall buildings will be required to:

- *Carefully consider their impact on the skyline and their relationships with the surrounding context, including their relationship to existing and proposed tall*

*buildings on neighbouring sites and to conservation areas and listed buildings;
and*

- *Be of exemplary design; and*
- *Make a positive contribution to the local and strategic skyline; and*
- *Optimise air quality and pedestrian comfort at ground level; and*
- *Pay due regard to protected borough views from One Tree Hill and Nunhead Cemetery, and the London View Management Framework.*

2.20

Policy AAP 9 deals with character and heritage and states that Southwark: will transform the existing areas of large warehouses, car parks and industrial buildings into new residential and employment neighbourhoods that are safe and easy to move around because they are well connected. These new neighbourhoods will integrate new development to retain positive aspects of the area's historic commercial and industrial character. The use of urban features such as the alignment of the Surrey Canal as a new linear park and the retention of locally important historic buildings will protect and enhance heritage by retaining features that positively contribute to the area and integrate them with the new development.

2.21

Development must:

- *Preserve or enhance listed buildings, conservation areas and their settings; and*
- *Preserve or enhance locally important historic buildings set out in the sub area guidance; and*
- *Conserve and enhance the significance of sites of archaeological interest; and*
- *Ensure that the layout of new buildings and blocks enable people to easily walk and cycle through the new neighbourhoods and local area; and*
- *Use high quality, durable and robust building materials that contribute to a sense of quality and place, which is unique to Old Kent Road, as set out in sub area guidance.*

3. Historical Background and Heritage Significance

Historical Background

3.1 The Site is south of Old Kent Road and is accessed from Ossory Road towards its northern end. Cartographic evidence from the early 19th century (**Figure 6**) illustrates how, prior to the construction of Buttler’s Terrace in the middle of the 19th century, the Site previously formed a small part of a parcel of undeveloped land to the south of Gloucester Place, between ‘The Retreat’ and Lower Sussex Place.



Figure 6: C. and J. Greenwood map of London; surveyed 1824-1826; published 1828

3.2 The area in the 1840s and 1850s underwent substantial change, with the construction of numerous speculative terrace and semi-detached developments as shown in **Figure 7**. The railway terminal at the Bricklayers Arms became a vast goods station in this era and by the 1860s horse-drawn trams begun running along

Old Kent Road, replaced by electric trams by the end of the century. The whole area became one of vibrant industry, commerce and housing.

3.3 The development of the Trafalgar Road Conservation Area mirrors that of the wider Old Kent Road area. Trafalgar Avenue was one of the first new streets off the Old Kent Road to be laid out and developed for middle class housing, begun around 1820, it was more or less complete by 1870.

3.4 On Ossory Road, which is not named as such on Greenwood’s early 19th century map, two small terrace developments - Nos. 2-10 and 14-22 Buttler’s Terrace - are depicted on the west side of the street by the 1871, each property having a small front and rear garden. To the west, on Glengall’s Grove, the developments were more generous and were laid out as semi-detached 2-storey classical villas, being afforded more substantial plots at both front and rear. Glengall Mews was positioned to the north-west end of the development, while the surviving Glengall Terrace was located at the south-west end.



Figure 7: London LVI OS map; surveyed 1871; published 1875

3.5 Between 1871 and 1913 the area underwent further change with the development and infilling of much of the land fronting Ossory Road to the south and south-east of the Site. Many more terraces were constructed at the end of the 19th century, with Ann’s Avenue and Aulay Street sandwiched between Ossory Road and the Brewery and what became Malt Street.

3.6 Also constructed in this period to the west of the Site was the ‘Mineral Water Works’ shown on **Figures 8-12**. This structure was built between 1871 and 1899 on the large undeveloped rectangular plot depicted in **Figure 7**. At the turn of the century (**Figure 8**) the building is indicated as the ‘Mills & Sons Mineral Water Factory’ and was comprised of a central bottling factory flanked by stores on either side and adjoined to stables at the rear (west). This structure is now a locally listed building.

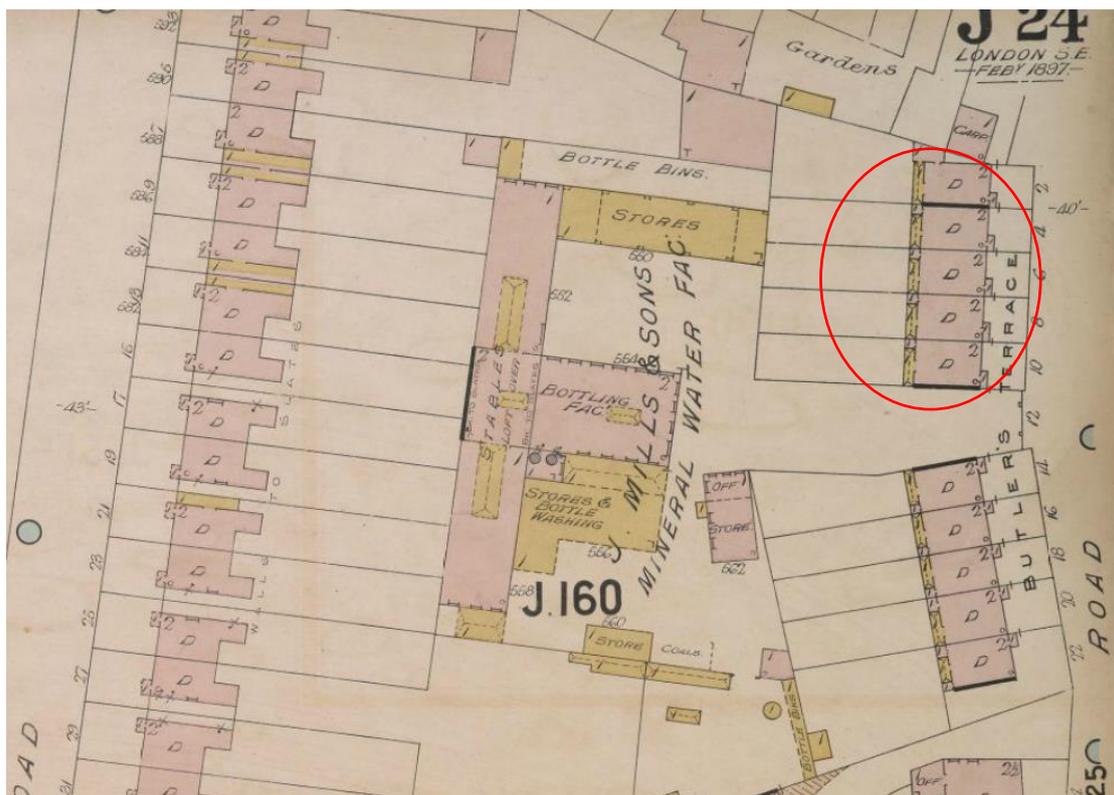


Figure 8: Goad plan - London South East Vol. J: sheet 24; 1897



Figure 9: London IX.3 OS map; revised 1913 to 1914; published 1916

3.7 **Figure 10** highlights that the Mineral Water Works was evidently damaged during WWII as the range closest to the Site is highlighted in red. Following WWII, the LCC's Abercrombie Plan proposed clearing a large area (220 acres) of bomb-damaged and slum buildings in North Camberwell to create a new public space: Burgess Park. Construction began in 1951 and was finally completed to its present 56-hectare area by 1995. The construction of Burgess Park included the loss of houses to the south of Trafalgar Avenue, and the streets to the east between Glengall Avenue and the west to Cobourg Road.

3.8 **Figures 10-11** indicate that the demolition of Nos. 2-10 Buttler's Terrace where the Site is now located took place in the second half of the 20th century in order to construct the existing industrial building proposed to be demolished under the new scheme.

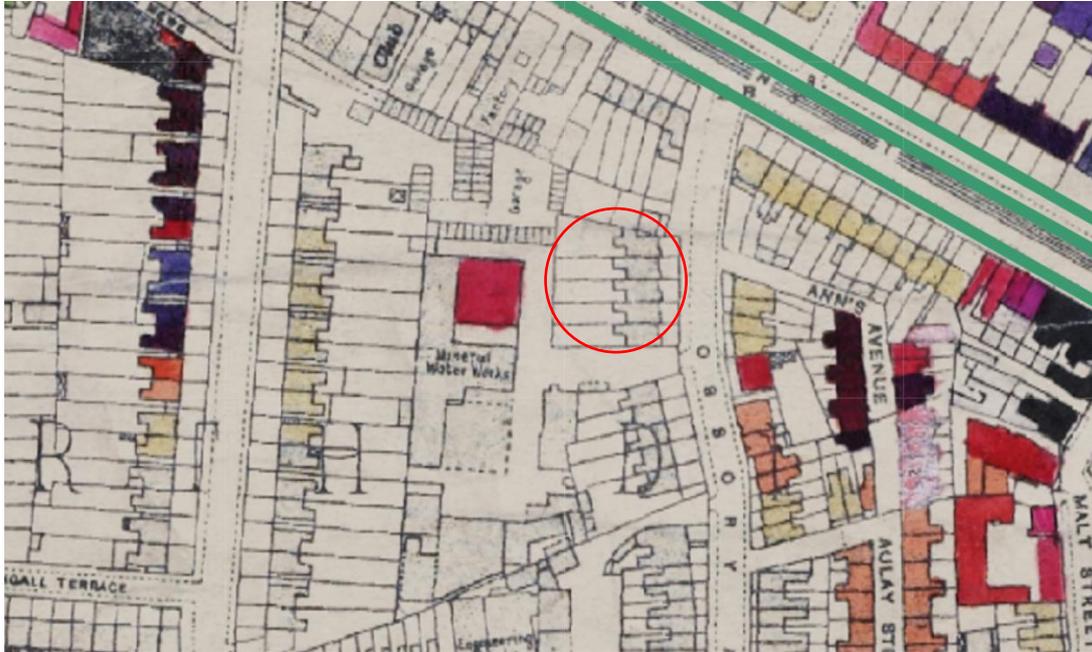


Figure 10: London bomb damage map; 1945



Figure 11: London OS map; revised 1950 to 1951; published 1955

Heritage Significance

Nos. 1-35 and 24–38 Glengall Road (II)

- 3.9** The group of grade II listed buildings forming Nos. 1-35 and 24-38 Glengall Road have heritage significance because of their historic and architectural values, having stood as physical reminders of the past for the best part of the last two centuries. Architectural significance is derived from the surviving fabric, features and detailing which are on display externally which include many architectural devices characteristic of the period. Any internal survivals within individual houses such as planform, decorative or historic functional surviving features will also contribute to the listed buildings' values (internal inspections have not been made).
- 3.10** Common elements of the buildings which contribute particularly to their architectural significance include the predominant use of stucco for the front elevations in combination with hipped slate roofs and overhanging eaves. The giant fluted Ionic pilasters, round-headed sash windows, prominent chimney stacks and string courses all contribute to the architectural and aesthetic values of the listed buildings, forming integral parts of the compositions when viewed from Glengall Road.
- 3.11** A subsidiary feature noted within the list description as forming part of the significance of the assets are the cast-iron railings which demarcate the boundaries to the properties and are characteristic of the period in which they were built. A further facet of the architectural significance, and one that also makes up associative historic values, of the listed buildings is their likely connection to the Brighton architect, Amon Henry Wilds, who is attributed as the designer of these terraces and others in the area. He was a Brighton based architect working throughout the Regency period.
- 3.12** The scale of the villas is also an important component of their significance, with the raised two-storey with basement arrangement and subservient side extensions providing interest. In addition, the classical architectural ethos which is inherent to the compositions is another core part of their significance, aided by the symmetrical arrangement of semi-detached villas with giant ionic pilasters dividing the ordered

fenestration, which gives the impression of a refined classical composition. Rustication is a further classical device used to tie the buildings together.

3.13 The ability to read, appreciate and understand the listed buildings as a uniform and coherent group is another part of their significance, as noted in the list descriptions. While around half of the semi-detached villas, which were located on the west side of Glengall Road, have now been demolished the remaining listed villas are read in the context of one another, clearly having been designed and built at the same time as a group.

3.14 There is no known artistic significance relating to the listed buildings. Archaeological significance is beyond the scope of this report.



Figure 12: '21-27 Glengall Road east side: front elevations'; 1952 (London Metropolitan Archives)



Figure 13: '5-11 Glengall Road, east side: front elevations'; 1968; (LMA)



Figure 14: '13-19 Glengall Road, east side: front elevations'; 1968; (LMA)



Figure 15: Photograph of grade II listed buildings nos 8 and 9 on Glengall Road, looking east towards the Site (November 2019)

Contribution of Setting to Significance

3.15 The setting of these listed buildings includes their own domestic curtilages, the street on which they sit and to an extent other neighbouring streets, particularly to the west where other contemporary developments and Burgess Park enable an appreciation within the wider townscape of the development of the area south of Old Kent road at this time. Glengall Road, Glengall Terrace and Burgess Park offer varied means to see and appreciate this historic group of domestic properties in a meaningful way that pertains to their history. Views from these areas looking east towards the terrace, or along the streets are positive aspects of the listed buildings’ setting.

3.16 The Site at 2-10 Ossory Road makes no meaningful contribution to the significance of the grade II listed buildings on Glengall Road and offers no real opportunities to see or understand these buildings and their unique heritage values. The current built form on the Site is just appreciable in some views through the gaps between the northern houses of the terrace at Nos. 1-30 Glengall Road when looking directly

east between the buildings but to an exceptionally minor degree. There is no historic or contextual links between the redeveloped industrial buildings on the site and those listed buildings on Glengall Road. Though the site is comparatively close to these listed buildings, it makes no contribution to significance and is considered a broadly negative aspect of the wider setting.

Glengall Road Conservation Area

3.17 This small and compact conservation area is focussed on Glengall Road and Glengall Terrace. In 2019 it was extended east to include the Old Mineral Water Factory adjacent to the Site at no. 12 Ossory Road and north to include Burgess Park to the north west.

3.18 The special interest of the conservation area is succinctly summarised within the available appraisal document as follows:

- *"A good example of early residential development off the Old Kent Road.*
- *Fine intact cohesive mid-19th-century terraced and semi-detached properties with largely unaltered exteriors attributed to the notable Regency architect Amon Henry Wilds.*
- *Typical middle class later 19th-century terraced houses with fine detailing, again with largely unaltered exteriors.*
- *Although not the original context, picturesque open space to the south, with mature trees and parkland setting.*
- *Historic trees lining Glengall Road, Glengall Terrace and Burgess Park."*

3.19 The map of the area within the appraisal document identifies key views within the conservation area. These are primarily the linear views along the streets and their period buildings, as well as an eastward looking view out of Burgess Park towards the listed buildings on Glengall Road. This latter view is towards the Site. The area to the east of the site is distinctly modern in character and affords no means to see or experience the main aspects of this residential suburb. It is considered that the view from Ossory Road towards the Old Mineral Water Bottling Factory is an important view to understand this aspect of the conservation area.

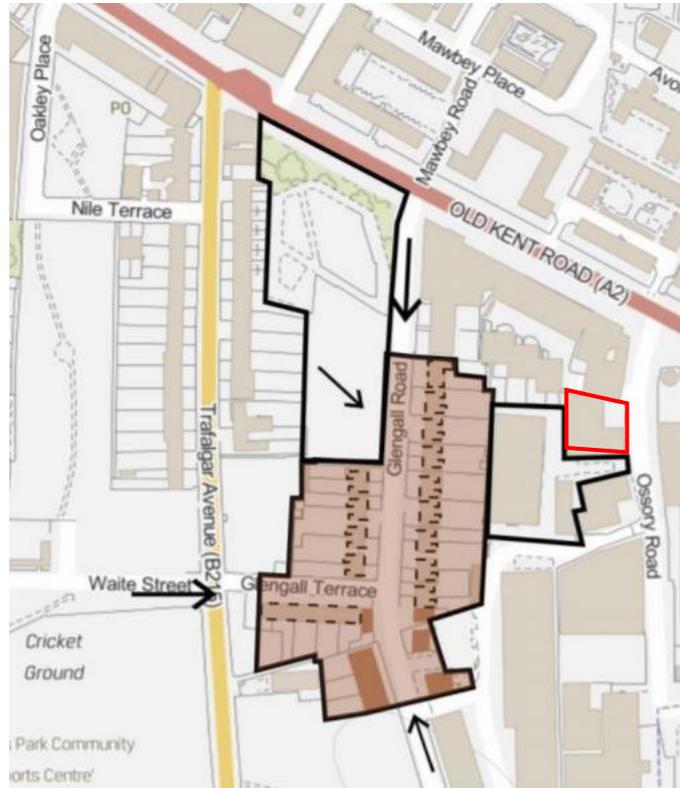


Figure 16: Map of the Glengall Conservation Area with its extensions Site location marked (plan from Glengall Road Conservation Area Appraisal, SBC figure 1)

3.20 The Site lies directly adjacent to this conservation area. Its redeveloped large scale and industrial nature means that it makes no contribution to the significance of the area. There is no historic architectural values that are reflected or mirrored on the site that would better reveal or enhance those values within the conservation area.

3.21 The site does offer means to experience and understand the Old Mineral Water Factory, which lies directly next door and is accessed via a cobbled lane off Ossory Road. The Site is firmly within the setting of the conservation area but as a neutral area of modern development.



Figure 17: view from Ossory Road down the cobbled drive past the site (right) towards the former Mineral Water Bottling Factory.

Trafalgar Avenue Conservation Area

3.22 The Trafalgar Avenue Conservation Area (TACA) is of heritage significance on account of its architectural and historical interest, relating principally to the 19th century development of the area. The TACA has historic significance with origins as one of the earliest 18th century residential suburbs to be developed along the Old Kent Road. Development began with small commercial properties facing Old Kent Road and led to the development of Ormond House at the northern end of the street before leading to terraces extending along a former rural paths south of the street. This formalised a well used movement corridor and resulted in a formal street leading from the Old Kent Road to Peckham. Later 19th century developments of uniform terraces and semi-detached villas characterise the conservation area. Unlike much of historic Old Kent Road (which has been largely cleared) this area, as well as the adjacent Glengall Road, remains as a typical Victorian suburb with its surviving built stock largely unaltered.

3.23 Architectural significance is derived from the surviving historic buildings which cast light on the building practices and architectural styles which flourished in London

suburbs during the 18th and 19th centuries as the environs of the city began to swell. With regards to the layout and form of development within the conservation area, the grid iron street plan form - much altered by formation of Burgess Park - is of heritage interest. The grid iron plan lined by the coherent rows of terrace and semi-detached townhouses creates a uniformity and historic quality to the character and appearance of the area. Unique individual properties within the conservation area include the former Ormond House, first built in 1720 with its stucco front facing south over large gardens, now divided, while the commercial buildings fronting Old Kent Road including the Lord Nelson Public House also positively contribute to the conservation area.

3.24 A summary of the special architectural and historic interest of the conservation area, taken from the Appraisal has been reproduced below:

- *"A good example of an early residential suburban development off the Old Kent Road;*
- *Commercial development which fronts the Old Kent Road, leading to terraced streets behind;*
- *A small amount of detached and semi-detached 19th-century fine villas;*
- *Fine intact early 19th-century terraced properties with largely unaltered exteriors; front and rear gardens behind a formal boundary;*
- *Typical middle class mid-19th-century terraced houses with fine detailing, again with largely unaltered exteriors; and*
- *Although not the original context, open space to the south with mature trees and parkland setting."*

3.25 Burgess Park is identified as an important element of the setting of this conservation area, which also transitions this pattern of early 19th century domestic houses into the slightly later houses on Glengall Road.

Views

3.26 Views form an important element of the conservation area, illuminating the historic character and appearance of the area in addition to the core elements of its

significance. **Figure 18** below depicts vistas within the conservation area which have been highlighted as important. It is evident from the map that the vistas are centred on Trafalgar Avenue, which forms the centrepiece of the conservation area. It is also considered that linear views along Trafalgar Avenue whereby the fronts of the buildings in this area are appreciated are particularly important.

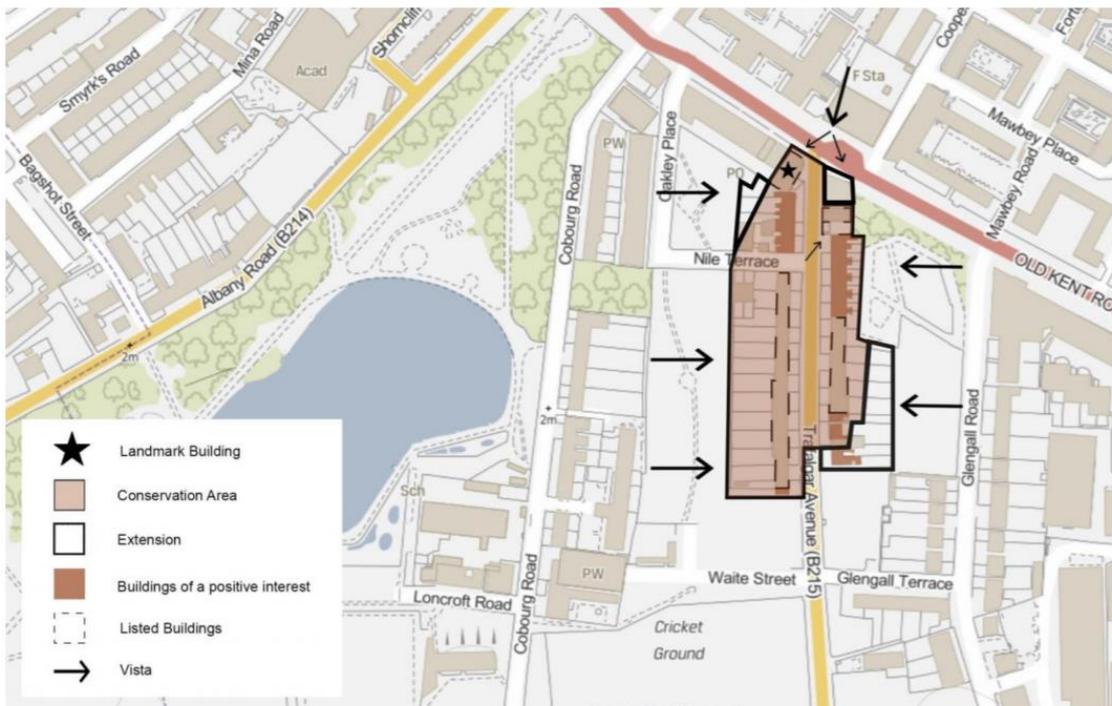


Figure 18: 'Location of conservation area' map, including vistas (p.3 of Trafalgar Avenue Conservation Area Appraisal)

Setting and Contribution of Site to Significance

3.27 The setting of the Trafalgar Avenue Conservation Area is extensive and includes all the land surrounding the conservation area in which its heritage values are appreciable. This includes 2-10 Ossory Road. While the Site is within the setting of the conservation area, it makes no meaningful contribution to the character and appearance of the area, which is reflected in the fact that it was excluded from the boundary of the conservation area, while the locally listed Mineral Water Bottling Factory, discussed below, was included.

Non-Designated Heritage Asset

Old Mineral Water Bottling Factory, 12 Ossory Road

- 3.28** Directly to the west of the Site is the locally listed Old Mineral Water Bottling Factory at 12 Ossory Road, which was included on the Southwark Local List in October 2018. The Old Mineral Water Works was constructed between 1871 and 1899 and is of local heritage interest.
- 3.29** It is a reasonably large building in yellow stock brick with paler brick detailing. A gabled entrance façade is aligned with the approaching cobbled lane off Ossory Road. Modern extensions and alterations to the windows in particular have diluted this building's historic architectural integrity though the oldest portion is still legible amidst the much altered wider surroundings. It has historic values pertaining to the illustration of industrial functions that developed in this area, in close proximity to domestic areas but capitalising on the proximity of the Grand Surrey Canal.
- 3.30** The building has been modern changes to its composition have diluted the significance of the building and eroded its interest. These changes include the blocking up of fenestration and introduction of modern windows which are out of keeping with the late Victorian industrial character of the ranges. These more recent changes are appreciable in **Figures 19-20**.

Setting and Views

- 3.31** A key view of the Old Mineral Water Bottling Factory are looking west from Ossory Road along the access lane whereby the gabled entrance and its low-scale industrial character of the locally listed building is appreciable. From these positions the two-storey scale of the ranges is visible, in addition to the stock brickwork which forms the main building material in combination with a lighter buff brick used for string courses and the window detailing and surrounds.
- 3.32** 2-10 Ossory Road makes no positive contribution to the character and appearance of the non-designated heritage asset and is a markedly larger structure in close proximity. It does not better reveal or enhance the local interest of this industrial

building. The Site shares no architectural or historical relationship with the locally listed building asides from its location and proximity to the asset.



Figure 19-20: Photographs of the locally listed 12 Ossory Road (November 2019)

4. Proposals and Impact Assessment

Proposal

- 4.1** The proposal seeks to redevelop the existing site through the construction of an 11 storey mixed use building providing 117 residential units on the upper floors. Industrial uses will occupy the ground floor level.
- 4.2** Figures 21-24 provide a series of as existing and proposed views of the site from a number of surrounding locations. These were agreed with the local planning authority as being key to understanding the visual impact of the proposals. They illustrate the form, scale and appearance of the proposed building within the context of the existing townscape. It is worth noting again that proposals for redevelopment of the sites at nos.14–22 Ossory Road have been granted a resolution to consent and the locality will thus change further with the intensification of development on this site as well.

Effect on Heritage Significance

Effect on Setting of Nos. 1-35 and 24–38 Glengall Road (II)

- 4.3** The principle of residential use on this Site is appropriate to the setting of the conservation area and listed buildings given that the plot was first developed in the mid-19th century for residential use and remained as such until the demolition of Nos. 2-10 Buttler’s Terrace on the west side of Ossory Road in the second half of 20th century.
- 4.4** There will be a very limited degree of less-than-substantial harm to the heritage significance of the grade II listed buildings at Glengall Road, by way of change to their setting. Only those buildings on the east side of Glengall Road, Nos. 1-30, will be negatively impacted, given that the development will not be appreciable in views of the front elevations of those listed buildings located on the west side of the road.

4.5 When considered in the context of the 'scale of harm' table set out in 2.8 of this report, the proposal will amount to a very low level of less-than-substantial harm, being placed at the very bottom of the table.

4.6 In assessing the effect of the proposal on the significance of the listed buildings, by a change to their setting, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main considerations pertinent to this application.

Proximity to the development to the asset: The development Site is located approximately 50m to the east of the grade II listed Nos. 1-30 Glengall Road; there is intervening built form in the form of the locally listed late 19th century Old Mineral Water Bottling Factory.

Position in relation to topography and watercourses: There are no watercourses between the Site and the listed buildings.

Position in relation to key views: The Site is located to the east of the listed buildings and therefore some views towards the front elevations of the northern houses in Nos. 1-30 Glengall Road will experience change through the appearance of new taller built form behind and above some of the houses (**Figures 24-25**). Views towards the frontages of the listed villas on the west side of Glengall Road will see no change as the development will fall behind them, though the new development may be visible in outward views from these houses.

Orientation of development: The development has been orientated in the most appropriate manner to address Ossory Road, utilising the plot to its maximum potential and ensuring that all usable space on Site has been adequately exploited.

Degree to which location will physically or visually isolate the asset: The proposal will in no way physically or visually isolate the listed buildings, which will continue to be read and understood in much the same way within the context of the existing townscape. The character of Glengall Road, which the listed terraces address and which forms their primary approach route will remain broadly unchanged. These terraces are already experienced in a much altered urban environment with larger more recent buildings on two sides.

Prominence, dominance and conspicuousness: While the scheme will introduce prominent new built form into the townscape, the new building at 2-10 Ossory Road is not considered to dominate the group of listed buildings on Glengall Road, given that it will only be visible in some views looking east. The tower cannot be considered to be prominent or dominant in views of the listed villas on the west side of the street, given that the observer will have his or her back turned to the Site when viewing these assets from Glengall Road.

Competition with or distraction from the asset: The terraces of listed buildings have a high degree of coherence and have been treated as a group – they are listed as a group too. The proposal will not affect all buildings in the listed group to the same degree, it will however infill and rise above the houses at the northern end of this group to a greater degree and in these instances could potentially distract and compete with their prominence to a degree by eroding the sense of space between them, filling the gap, and diminishing the skyline of their ridges and chimneys. Considered as a whole, and factoring in views away from the site towards those on the western side of the street the effect is very small, but it will affect those buildings in the north eastern side of the street to a greater degree.

Dimensions, scale, massing, proportions: The scale, massing and proportions of the new building has been designed in order to maximise the plot and as a result of discussion at Pre-Application stage with the GLA. While it is different from the dimensions, scale, massing and proportions of the listed buildings this is to be expected in an urban environment where modern, large scale, development is part of the varied grain of the townscape.

Visual permeability: The new building will not be visually permeable and it will be visible in at least one gap between the listed villas, but the impact is highly localised to a small number of specific views.

Materials and design: Design studies have resulted in a mix of brown and grey brick for the materials of the main built form. This respects the wider prevalent historic materials of the nearby townscape as well as the listed buildings in Glengall Road.

Diurnal and seasonal change: Diurnal and seasonal change will have very little impact on the effect of the new built form in views towards the listed buildings on Glengall Road.

Change to built surroundings and spaces: It is clear that the proposal will represent a change to the setting of the listed buildings, in that a taller, more prominent structure will now appear in some views of the assets on the east side of Glengall Road. This larger proposed building falls within a recognised area of intensification

Change to general character: It is not considered that the proposed scheme would change the general character of the surroundings of the listed buildings, which would continue to be read, understood and appreciated in much the same way following the introduction of new built form within their setting. The existing setting in the area of the site is already much larger and although the height of development in this street will increase this is within a recognised broader context of greater scale contrasting to the domestic listed buildings on Glengall Road.

4.7

The assessment process indicates that there will be a small degree of less than substantial harm arising to the listed building which comprises Nos. 1-35 and 24-38 Glengall Road through the proposed development. The harm is considered to fall in the lower level of less than substantial harm (see the table at Appendix 1) for the following reasons:

- There will be no loss or physical impact on any historic fabric of the listed buildings or any elements of their domestic curtilage areas; as such, the key facets of the significance of the heritage assets, i.e. the physical structures which make-up these buildings, will remain intact and unchanged; the group value which these buildings possess will be preserved and the listed buildings will continue to be read, appreciated and understood as historic structures without change.
- The existing Site does not make any meaningful contribution to the setting or significance of the grade II listed buildings and thus offers opportunity for redevelopment and removal of existing buildings without causing any harm.
- The new building will be considerably taller than either the present building on the site, or others in the immediate context. This is depicted in the proposed

model view (**Figure 25**). The taller form will appear in some views over rooflines and filling in the gaps, particularly between nos 3 and 5, 7 and 9 and 11 and 13. Views between these buildings look directly towards the Site. Similar longer views from Burgess Park towards the northern listed building pairs will be similarly affected with the new building rising above and behind the listed buildings.

- The listed buildings in the southern end of the terrace, and those on the west side of the street will see no change. In relation to the western properties the observer will have his or her back turned to the Site when viewing these listed building.
- The brick materials proposed to be utilised in the scheme are sympathetic to the historic character and appearance of the heritage assets and wider townscape, particularly the more industrial nature of Ossory Road in comparison to Glengall Road. The design and materiality has been developed over time and in conjunction with local officers to secure the best and optimal use and development for this site
- There is already large-scale modern development forming the backdrop to some views of the listed buildings, when looking north and north-east along Glengall Road towards the assets and further similar developments at nos 14-22 Ossory Road have been granted resolution to consent. The proposed scheme is thus in an area of accepted and emerging intensification.
- The applicant has taken every opportunity to engage with the Local Authority and GLA at an early stage of the proposal, to ensure the compatibility of the scheme with both local need and its heritage context; this has been reflected in the comments by the GLA within the feedback to the initial proposal as part of Pre-Application discussions.



Figure 21: Proposed view towards the Site from Old Kent Road (Cityscape Digital)



Figure 22: Proposed model view of the Site from Old Kent Road with emergent schemes at nos 14-22 Ossory Road indicated (Cityscape Digital)



Figure 23: Existing view of the Site, from Ossory Road (Cityscape Digital)



Figure 24: 3D model view of the Scheme including the emergent situation recently consented (Cityscape Digital)



Figure 25: View of grade II listed buildings and gap between Nos 11 and 13 directly towards the site today(Cityscape Digital)



Figure 26: Proposed view showing visual infill of the gap between nos 11 and 13 and slight projection above the roofline, emergent situation indicated in wireline (Cityscape Digital)

Effect on Glengall Road Conservation Area

4.8 The character and appearance of the Glengall Road Conservation Area will be preserved in that the site falls outside its limits and will not affect any specific building or area within the area.

4.9 However, the scale of the building means that it will rise above the terrace on the eastern side of Glengall Road and the key view identified in Figure 16 out of Burgess Park towards the northern end of the Glengall Road semi detached listed buildings is likely to experience a noticeable change. Because of the intrusion of new development both on the site, and further to the south which introduces a cumulative increase in scale in the area beyond this conservation area the assessment concludes a level of less-than-substantial harm to the aesthetic values and significance of the conservation area. The effect will be small when considering the existing nature of the setting, and the scope of all views around and through this conservation area in total but the change will have a limited effect on the experience of buildings which contribute to the historical and architectural interest of the area and thus on the character of the area itself.

Effect on the Trafalgar Avenue Conservation Area

4.10 In regard to the Trafalgar Road Conservation Area No harm is identified. This area is a very small discrete conservation area focussed on one road and the buildings thereon. The greater distance, and trees within Burgess Park, provide a greater measure of visual screening and though the proposed building may become visible in some very limited views out of or past the Trafalgar Avenue Conservation Area the degree of change to this conservation area is markedly lower and not considered as harmful to its specific values.

Effect on Old Mineral Water Bottling Factory, 12 Ossory Road

4.11 The Old Mineral Water Bottling Factory will continue to be a locally significant historic industrial building and the proposals despite being close and of a greater scale are not considered to innately erode or harm the local interest of this building. The proposed building will be in close proximity to this 19th century factory and be

much taller than the existing, but the scale of the existing building on the site is already large and is already of a markedly different character – along with all others on Ossory Road. This locally listed building is primarily experienced from close quarters on the lanes that run towards and around its historic core, this close and intimate means of experiencing it will remain, as will the important view towards its gabled front façade from Ossory Road. Instead of the sheet cladding of the existing site building a brick fabric will be introduced, restoring a degree of material coherence to the area even with the larger built form.

5. Conclusion

5.1 It is proposed to redevelop 2-10 Ossory Road with of an 11-storey mixed-use building within the setting of a number of designated and non-designated heritage assets. The existing application site building makes no contribution to the special interest of any of these assets and does not better reveal their heritage significance or values.

5.2 There will be a marked change to some views towards and between the listed buildings comprising the pairs of odd numbered buildings 1-13. Gaps between buildings will be visually infilled by the proposed building behind which will also rise behind some rooflines of these buildings. For this reason the proposal is considered to give rise to a small degree of level of less-than-substantial harm to the setting and heritage significance of the grade II listed group of listed buildings. For a similar reason – the change to the visual experience of the setting of this historic area – a degree of less than substantial harm is also identified to the Glengall Road Conservation Area. This harm is considered to be at the lower end of the scale of harm as set out within the table reproduced in Appendix 1 of this report.

5.3 Paragraph 202 of the NPPF (2021) states that:

'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.'

5.4 Discussion of the planning balance is beyond the scope of this assessment it should be noted that there are public benefits arising from the scheme, discussed elsewhere in the submission. The limited effect to visual experiences within the surrounding historic environment needs to be balanced against those benefits.

Appendix 1

Scale of Harm (HCUK, 2019)

The table below has been developed by HCUK Group (2019) based on current national policy and guidance. It is intended as simple and effect way to better define harm and the implications of that finding on heritage significance. It reflects the need to be clear about the categories of harm, and the extent of harm within those categories, to designated heritage assets (NPPF, paragraphs 201 and 202, and guidance on NPPG).⁶

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

⁶ See NPPG 2019: “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.” Paragraph 018 Reference ID: 18a-018-20190723.