



Historic England

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Direct Dial: 020 7973 3763

Our ref: P00936530

18 July 2018

Dear Mr Glasgow

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**CANADA WATER MASTERPLAN - LAND BOUNDED BY LOWER ROAD (WEST),
REDRIFF ROAD (SOUTH), QUEBEC WAY (EAST), SURREY QUAYS ROAD AND
CANADA WATER DOCK (NORTH), AND SITE AT ROBERTS CLOSE, LONDON
SE16**

Application No. 18/AP/1604

Thank you for your letter of 8 June 2018 regarding the above application for planning permission. This is a hybrid application which seeks outline planning permission for the masterplan site at Canada Water, and detailed planning for Phase 1 which is located at the far west end.

Historic England was involved in pre-application discussions regarding this masterplan development, and I attach a copy of our advice which should be read alongside this consultation response.

Historic England's Advice

Historic England continues to recognise that this scheme has the potential to significantly improve the townscape around Canada Water including its surviving heritage assets. We also accept tall building development in this area is *largely* supported by local planning policy, and there are already a number of existing and approved tall building developments in the area including the 41 storey tower at the Decathlon site which is currently under construction.

However, as a large-scale masterplan development, which incorporates seven tall buildings potentially rising to a height of 162m AOD, this scheme would have a profound and far-reaching impact on the London skyline and would, in our view, adversely affect the setting of highly graded designated heritage assets.



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As set out in our pre-application advice, we have identified the impact of the development in views along the northern half of London Bridge towards the Grade I listed Tower Bridge as being particularly harmful. This is because the cluster of tall buildings, as accentuated by the 162m tower in Plot D would block the silhouette of Tower Bridge's south bastion in kinetic views along London Bridge, visually competing with its monumental character and reducing its landmark status along the Thames. This impact is evident in View 4 and 5 of the submitted Townscape, Built Heritage and Visual Assessment (Tavernor Consultancy, May 2018).

We also raised concern at pre-application stage about the impact of the proposed tall buildings on the setting of the Grade I St Paul's Cathedral in views from the Grade I Registered Greenwich Park. The visual assessment of the London View Management Framework (LVMF, Mayor of London, March 2012) View 5A.2 demonstrates that the masterplan would result in a major change to the London skyline in the view towards the Cathedral, which is a Protected Vista as set out in the LVMF SPG.

Whilst the central viewing corridor would be retained, the development would appear to encroach on the setting of the Cathedral and in our opinion contribute to a canyon effect in this particular view. We consider that the encroachment created by the tall buildings would cause harm to the landmark status of St Paul's Cathedral.

Finally, we also consider that the tall buildings would encroach on the spire of the Grade II* Church of St Mary Rotherhithe which is a distinctive townscape feature and a key building in the St Mary's Rotherhithe Conservation Area. This impact is represented in View 12 of the submitted Townscape Assessment from Waterside Gardens in Wapping. Whilst a number of taller buildings already present an impact on the listed church and conservation area, the tall building development would nonetheless cause some incremental harm to the significance of both assets in our opinion.

Historic England is disappointed that despite our concerns raised at pre-application stage, no exploration into reducing or redistributing the height of the tall buildings has been considered. In fact, most of the proposed buildings are now taller than what we reviewed at pre-application stage.

However, in response to our initial advice, there does now appear to be greater integration of the Grade II listed former Dock Offices, which lie just outside the Phase 1 development site, into the scheme. This would be achieved by creating landscaped public realm within the Dock Office Courtyard.





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Recommendation

Historic England continues to recognise the opportunities that these proposals present in improving the urban environment around Canada Water and reshaping the public realm so it more successfully engages with the historic environment. In addition to your work on understanding the historical context and local values, this has the potential to be an example of good placemaking.

However, we remain of the view as set out at pre-application stage that this hybrid scheme would cause harm to the historic environment, particularly to the setting of Tower Bridge and St Paul's Cathedral. In accordance with Paragraph 132 of the National Planning Policy Framework (NPPF), your Council should be satisfied that 'clear and convincing justification' has been provided by the Applicant for the scale and massing of the development.

Your Council should also consider whether the harm we have identified is outweighed by the delivery of public benefits in accordance with Paragraph 134 of the NPPF. We consider that the improvements to the public realm around the surviving waterways and the former Dock Offices would make some contribution to the heritage-related public benefits of the scheme. We recommend that your Council considers ways of delivering the Dock Office Courtyard landscaping as part of the Phase 1 works either by condition or legal agreement should you be minded to approve the application.

Finally, we would draw your Council's attention to Historic England's guidance on Tall Buildings (Advice Note 4) which recommends that the location and design of tall buildings should be part of a plan-led system that reflects the local vision for the area. Whilst we recognise that much of the masterplan site falls within the indicative area for tall building development as set out in the adopted Canada Water Area Action Plan (2015), we note that these proposals far exceed the recommended building heights of between 20 and 25 storeys. We also note that some of the proposed tall buildings including those within Plots B and C are located well outside the adopted tall buildings area. Your Council should address this apparent failure to comply with local planning policy in determining the hybrid application.

Your Authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Regarding the impacts on unscheduled archaeology, undesignated heritage assets, and the setting of Grade II designations such as the Former Dock Offices and Southwark Park, please seek comments from your Council's Design & Conservation Team and Archaeologist.





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Yours sincerely

Alasdair Young

Inspector of Historic Buildings and Areas

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Mr Hugh Sowerby
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Direct Dial: 020 7973 3763

Our ref: PA00584109

3 October 2017

Dear Mr Sowerby

Pre-application Advice

CANADA WATER, SURREY QUAYS ROAD, LONDON, SOUTHWARK

Thank you for seeking to involve Historic England in pre-application discussions regarding the proposed redevelopment at Canada Water in Southwark. Thank you also for arranging the very useful meeting on 12 September in which Allies and Morrison Architects and Tavernor Consultancy presented the emerging proposals on behalf of British Land.

As was explained, these proposals are for a large mixed-use redevelopment of the Canada Water area, including 7 tall buildings, the largest of which would rise to a height of 162m AOD. It is intended to submit a hybrid application early next year for the masterplan development with detailed planning for a Plot A1 which includes a 3-tier tower of 129m AOD.

Significance of the Historic Environment

The development site is located on an area of land formerly occupied by dock infrastructure associated with the Surrey Commercial Dock which closed in 1969. The surviving body of water known as Canada Water and its fragments of dock wall provide an important tangible link to this industrial past. However, the rest of the area is of relatively poor townscape value with large car parking areas and a 1980s shopping centre occupying much of the development site.

Whilst there are no designated heritage assets within the development site, the Grade II listed former Surrey Commercial Dock Company Manager's Office borders the site boundary at its north-west end. Although the Dock Office has lost much of its industrial context, its striking clock tower remains an important local landmark.

Further to the west is the Victorian Grade II Registered Southwark Park which provides relief from the busy urban townscape that surrounds it. To the north lies the



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St Mary's Rotherhithe Conservation Area containing the Grade II* Church of St Mary Rotherhithe, the spire of which remains a distinctive townscape feature particularly in views across the Thames from Wapping.

The development site is also located in close proximity to two London View Management Framework Strategic Views, namely LVMF 5A.2 from Greenwich Park to St Paul's Cathedral, and LVMF 6A.1 from Blackheath Point to St Paul's Cathedral. It is also located within the Wider Setting Consultation Area of LVMF 11B.1 from London Bridge towards Tower Bridge, and within the background of LVMF 4A.1 from Primrose Hill to St Paul's Cathedral (although technically beyond the background assessment area).

Historic England's Advice

Due to the scale and amount of tall buildings on site, the proposed masterplan would undoubtedly result in a major change to London's skyline in a range of far reaching views across London. Nonetheless, Historic England acknowledges that tall buildings can make a positive contribution to London when they are situated in the right place and are excellent works of architecture. A key component of ensuring successful tall buildings that enhance the overall townscape is the plan-led approach, where local authorities identify appropriate locations for tall buildings in their local development frameworks. Further guidance on this issue can be found in Section 3 of Historic England's Advice Note on *Tall Buildings* (December 2015, <https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4>).

Figure 9 of the pre-application document you have shared identifies Southwark Council's indicative area for tall buildings as set out in the adopted *Canada Water Area Action Plan* (AAP, Southwark Council, November 2015). Our Historic Places Team expressed support for the AAP's vision at draft stage, particularly in terms of its aspiration to create a sense of place with a focus on the surviving historic docks, the River Thames, and the creation of parks. Some concern, however, was raised over the approach to the strategy for tall buildings, although we accept that the AAP and its recommendations have now been adopted by Southwark Council.

The overlaid site boundary for the proposed masterplan development reveals that most of the proposed tall buildings do fall generally within the AAP's allocated indicative area. The exceptions are the two towers of 105m and 95m AOD which would be located in Plot C at the south end of the site, and the 100m AOD tower located towards the centre of the site in Plot G.

The pre-application document you have shared sets out a wide range of views which are subject to assessment on p66. We are content that this sufficiently captures all of our key areas of interest, and I address the most significant of these in order of priority



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below:

Views 8.1 - 8.3 from London Bridge: downstream towards Tower Bridge

In 2013, English Heritage (as we were known then) raised concern about the tower development on the adjacent site currently occupied by a Decathlon retail store (ref: 12/AP/4126). This was principally because we felt that the proposed 151.8m tower would reduce the visual prominence of the Grade I Tower Bridge as the principal landmark in views from London Bridge. Although this development has now been approved, the proposed masterplan has the potential to cause incremental harm.

On the basis of the assessment, Views 8.1 and 8.2 demonstrate that the proposed 162m tower would visually compete with, and block the silhouette of Tower Bridge's south bastion, adding to the impact already created by the approved Decathlon tower. We therefore consider that the proposed development in these views would cause harm to the historic environment.

View 5.1: Greenwich Park

This assessment demonstrates that the proposed development would become a significant part of the skyline in views from Greenwich Park towards St Paul's Cathedral (LVMF 5A.2). Whilst the central viewing corridor would be retained, the development would appear to encroach on the setting of the Cathedral and create a canyon effect in this particular view.

It should be noted that the Plot C towers which contribute to this sense of encroachment (to the left of the image) are outside Southwark Council's indicative area for tall buildings. The proposed 129m and 162m tower to the right of the cathedral, whilst very large, are within (or at least on the boundary of) the adopted tall buildings indicative area, and appear slightly more successfully clustered together with existing and approved tall buildings.

We would therefore attribute some harm to the setting of the Cathedral by this sense of encroachment and would encourage a reduction in height of the 105m and 95m towers within Plot C to address this impact, and to reflect Southwark Council's tall buildings policies.

View 4: Primrose Hill

Again, the towers of Plot C are clearly visible in views from Primrose Hill and appear in close proximity to the dome of St Paul's Cathedral (LVMF 4A.1). Whilst lower and further from the dome than other recently approved schemes, we would nonetheless flag this as a sensitive issue at this stage, particularly as these towers fall outside the Council's adopted tall buildings zone.



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Dock Office

Plot A1 which will be subject to detailed planning permission is located next to the Grade II listed Dock Office. The landmark status of the Dock Office clock tower will clearly be challenged by the proposed 129m tower, and a visual assessment along Surrey Quays Road will be helpful in assessing the extent of impact on its setting.

Whilst it is very likely that the proposed tower will cause harm to the setting of the Dock Office, we equally recognise that this element of the masterplan has the potential bring about heritage-related public benefits particularly with regards to reconnecting the Office with the surrounding townscape and improving the quality of its landscaping. We understand that the Office is also in the ownership of British Land, and we strongly advise that the application for Plot A1 includes as much information as possible about the future aspirations for the listed building to ensure that it becomes a fully integrated and valuable part of the regeneration of Canada Water.

Southwark Park

As previously mentioned in this letter, English Heritage (as we were) raised concern over the now approved tower on the Decathlon retail store site (ref: 12/AP/4126). This was partly because of the visibility of the tower above the tree line in important views of the Grade II Registered Southwark Park. Whilst Historic England now has relatively restricted remit regarding the setting of Grade II listed buildings and parks, it is clear that the proposed towers would further encroach on the setting of the Park and its sense of separation from the surrounding urban townscape, therefore causing some incremental harm.

View 13: Waterside Gardens

This view assesses the proposed development from Wapping towards the St Mary's Rotherhithe Conservation Area, and demonstrates that the proposed masterplan would be clustered amongst the existing Ontario Point tower and the approved developments in the Canada Water area. We therefore have no significant concerns regarding the impact on the Conservation Area in this particular view.

At our meeting, I mentioned the desire to see a more kinetic assessment of this view, particularly with regards to the potential impact on the silhouette of the Grade II* Church of St Mary Rotherhithe. However, it appears from further investigation that there are limited direct views of the Conservation Area from this part of Wapping, as many of the warehouses front directly on to the Thames without any public pathways. Therefore, no further assessment from Wapping is necessary from Historic England's perspective.

Recommendation

Historic England recognises the opportunities that this scheme presents in improving



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the urban environment around Canada Water and reshaping the public realm so it more successfully engages with the surviving heritage assets in the area. We also acknowledge that local strategic planning policy supports some tall buildings within parts of the development site.

However, due to the substantial scale and height of the tall buildings within the proposed masterplan, there will inevitably be a harmful impact on the historic environment for the reasons set out in this letter.

Paragraph 132 of the National Planning Policy Framework (NPPF, March 2012) states that, in determining applications, local planning authorities should give 'great weight' to the conservation of designated heritage assets, and that significance can be harmed or lost by development within the setting of such heritage assets. It then states that 'any harm or loss should require clear and convincing justification'.

Therefore, the future hybrid application should be supported by strong justification for the proposed scale and massing of the scheme. In the meantime, we would strongly recommend exploring opportunities to reduce the height of the towers, particularly with regards to the tallest elements, and the two towers in Plot C which appear to have a significant impact in long-range views.

The NPPF also requires any harm to the significance of designated heritage assets to be weighed against the public benefits of the scheme by local planning authorities in determining applications. Any opportunity to deliver heritage-related benefits, such as sensitively integrating the listed Dock Office into the masterplan, and revealing the history of the Surrey Commercial Docks potentially through an interpretation strategy, would be particularly encouraged.

Next Steps

I hope this advice is useful, and please do contact me if you require any clarification on the points raised. We would be happy to provide further pre-application advice as part of our Enhanced Advisory Services if you would find it helpful. Further information on this service can be accessed via <https://historicengland.org.uk/services-skills/our-planning-services/charter/Our-pre-application-advisory-service/>.

Yours sincerely

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