

BRIEFING NOTE: ELLIOTTS ROW CONSERVATION AREA – WOODLANDS (KENNINGTON STAGE) INQUIRY



SUBJECT

Elliotts Row Conservation Area – Woodlands
(Kennington Stage) Inquiry

DATE

12 November 2020

PREPARED BY

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INTRODUCTION

- 1.1 Elliott's Row Conservation Area was not identified by Lambeth in their Statement of Case amongst those assets it was considered would be impacted by the proposed development at the site.
- 1.2 At paragraph 6.1 of his rebuttal, Mr Black, reading my evidence at paragraph 6.128, clarifies that the Council meant to find harm to the Elliott's Row Conservation Area. This falls within the administrative boundary of the London Borough of Southwark. It was not identified, I understand, through an oversight.
- 1.3 In this note, I consider the impact of the proposals on this designated asset, adding to the analysis of it in my main PoE. I think this is justified because the LPA is now alleging harm to a new asset, and my treatment of it in main PoE should be supplemented to assist the Inquiry

ELLIOTT'S ROW CONSERVATION AREA APPRAISAL

- 1.4 Southwark Council adopted the Elliott's Row Conservation Area Appraisal in March 2013. I reproduce this at Annex 1.
- 1.5 I cite relevant extracts from the Appraisal below. First, at paragraph 3.1.1, a definition of the area's special interest:
 - 3.1.1 *This is a cohesive townscape comprising development from throughout the 19th and early 20th centuries. The historic street layout remains, creating a legible and permeable environment. Well defined streets are a feature with high quality and architecturally interesting frontage development. This is a highly urban environment with little in the way of soft landscaping.*
- 1.6 The Appraisal goes on to discuss the urban morphology of the CA at paragraphs 3.1.2-3.1.5:
 - 3.1.2 *The road layout of the conservation area generally dates from around the 1800s, although buildings fronting the roads date from throughout the 19th and early 20th centuries.*

- 3.1.3 *Street blocks tend to be long and narrow, aligned in a north-south direction. They are fronted by terraces ranging in length from around nine to 29 houses. Short streets in an east-west alignment are located at the south of the area: Hedger Street and Lamlash Street. The latter is an early 19th century street, whilst Hedger Street; a cul-de-sac, was introduced in the late 20th century (post 1977). The narrow street blocks and frequent plot subdivisions results in a finely grained townscape.*
- 3.1.4 *The streets are narrow, generally between 5 to 6 metres in width, and well enclosed by housing which generally ranges in height from two to three and a half storeys, with examples of five and six storey tenement blocks. Terraces generally have small rear gardens/yards and small front gardens (approximately 2 metres from boundary to front elevation). Backland areas are located with street blocks.*
- 3.1.5 *There is no planned open space (albeit allotments are located to the south and north of Lamlash Street) which contributes to the overall sense of a well enclosed/confined townscape. The allotments replaced 19th century housing that were still intact on the 1977 OS map.*
- 1.7 I note there is a specific discussion within the Appraisal from paragraph 3.127 on setting, which draws attention to developments of contrasting scale to the north-west and east of the CA. The Appraisal identifies harm to setting from some existing tall development outside its boundaries:
- 3.1.28 *To the north-west, Prospect House is an 11 storey, 1960s modular residential block with a concrete frame set in a large plot of gardens/car parking which Gaywood Road backs on to. Prospect House contrasts with the conservation area in layout, scale, appearance and materials. Similarly Perronet House to the east is a large scale block, with blank frontages set back from Princess Street. These two large-scale buildings form overbearing and negative elements within the setting of the conservation area to the north.*
- 1.8 There is also a section on views, from which I extract two relevant parts:
- 3.3.2 *The enclosed townscape created by relatively tall buildings in comparison to the width of streets and the lack of any landmark features within the conservation area means that planned views are not a feature of the townscape.*
- 3.3.3 *When looking eastwards along Brook Drive and St. George's Road the tall buildings of the Elephant and Castle town centre are seen. These assist with locating the conservation area in its wider context.*
- 1.9 Thus, notwithstanding existing tall development in another location judged to cause harm, tall development in a different context is deemed to have at least some townscape benefit and, I infer from the drafting, not to be harmful.
- 1.10 I should also add here, before moving on to the substantive point, that the Elliott's Row CA was addressed in the HTVIA prepared by Turley for the application (CD2/13). It was clearly identified as an asset and assessed. A minor adverse effect was identified (see paragraph 5.74).

ANALYSIS WITHIN MY EVIDENCE

- 1.11 View 8 in the HTVIA (**CD2/13**) is taken from Hayles Street within the Elliott's Row Conservation Area. I attach this view at Annex 2 to this note.
- 1.12 I treat this view, the approach to the consideration of its impact in the HTVIA, in my evidence from paragraph 6.127 onwards. I cite my analysis below:
- 6.127 This scene is fairly characteristic of north Lambeth, comprising of fairly [sic] typical Victorian terraced housing laid out on a byelaw street, and demonstrating the hands of different builders providing variations of the same domestic product range.*
- 6.128 I note that the Council allege no harm to this asset in its SoC, [I] and agree.*
- 6.129 The orientation of the tower to this view is very dramatic, so that the different steps appear very clearly delineated and over the approach distances here (decreasing) the tower becomes more prominent, but no more so that other towers in the wider area seen in relation to other streets.*
- 6.130 Still it is an intense impact, and I agree with the HTVIA that it is high. As to the direction of effect, that depends on the judgment formed about the quality of the building design. If it is considered of the requisite high standard, then the impact is beneficial notwithstanding the magnitude of change.*
- 6.131 I must [state] here that the reasoning in the HTVIA's analysis of this scene is telling and explains why the assessor came up with harmful impacts. Paragraph 6.65 the assessment depends in part on the introduction of a view of a tall building in a scene that currently has none. That approach is not consistent with the London Plan, because change in this context is not in itself harmful. This is the sort of comment I would expect to see in a landscape and visual impact assessment, in open countryside, for instance. The text also refers to potential overshadowing, but I cannot see the evidence for that. Yes, the tower is located to the south but set at some distance, and there is no overshadowing analysis of this effect in the documentation I could find, and the LPA apparently has not requested one.*
- 1.13 Overall, I consider the design features of the proposals will ensure that the scheme does not overbear on the townscape, harming an appreciation of the spatial or architectural characteristics identified in the CA appraisal. Additionally, I consider that no characteristics contributing to the significance of the CA are affected. The well-defined and enclosed streets have a strong and distinctive character, which is robust and can sustain views of a building of the scale proposed taking into account its existing context. The critical factor is of course the quality of the proposals, which I deem to be high and to contain features which mediate the scale difference and so seek to reflect contextual influences.
- 1.14 Finally, I note that the comment in the Council's appraisal of the conservation area at 3.3.3, cited above, apply equally to these proposals. The proposals do locate the receiving asset/townscape in a wider context.