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From: [REDACTED]
Sent: 10 December 2021 11:36
To: [REDACTED]
Subject: Application Ref: 21/04356/FUL - Former Lambeth Workhouse, 1 Dugard Way London, SE11 4TH

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Hello [REDACTED]

Re: Former Lambeth Workhouse, 1 Dugard Way London, SE11 4TH
Application Ref: [21/04356/FUL](#)

Thank you for consulting Historic Buildings & Places on this application.

Please note that on 1 October 2021, the Ancient Monuments Society adopted Historic Buildings & Places (HB&P) as its new working name, which better reflects the Society's current focus on sustaining, defending and promoting historic buildings and places of all types and ages. We remain one of the National Amenity Societies, as per the 'Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021'.

HB&P **objects** to this application for the construction of a residential building of 14 storeys on the site of the former Lambeth Workhouse/ Hospital adjacent to the surviving grade II listed former Water Tower (list entry 1392739), grade II listed Administrative Block, also known as the Master's House (list entry 1392740), and the locally listed lodge buildings.

The previous proposal for a 29-storey tower (19/02696/ FUL) was dismissed at appeal in January 2021 due to the negative impact the proposed apartment building would have on the character of the area and harm to the setting of the above mentioned heritage assets. Having viewed the plans and documents provided, we do not believe that a 14-storey tower in this location adequately mitigates these reasons for refusal. We disagree with the justifications in Section 2 and 8 of the Design and Access Statement that the reduced building heights 'remove' the impact on adjoining conservation areas and 'allow a clear view of the water tower silhouette'.

In order to address the impacts on the nearby conservation areas, the footprint of the proposed apartment building has been relocated immediately adjacent to the water tower and Administrative Block, and the footprint has been extended in a series of stepped buildings from 14 to 5 storeys. The scale and massing of the proposed building in such close proximity to the water tower and Administrative Block has not reduced the harm to the setting of these buildings. This is particularly so for the Water Tower, which has prominently risen above the surrounding buildings since 1877. The new plans only provide for one clear view of the water tower silhouette from the east side, though this will be greatly diminished by the nature of the proposed apartment building towering over it. All views and therefore the setting of the listed water tower would be greatly impacted by the presence of the proposed apartment building.

The relevant NPPF (2021) policy considerations are:

- Paragraph 189: Heritage assets range from sites and buildings of local historic value to those of the highest significance... 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.
- Paragraph 199: 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.

The NPPF and Planning (Listed Buildings and Conservation Areas) Act 1990 requires great weight be applied to the conservation of heritage assets, and in this instance HB&P does not consider the design or public benefits of the scheme are of a level to outweigh the harm that would be caused to the nearby conservation areas or the listed buildings adjoining it. The proposal therefore conflicts with Section 16 of the National Planning Policy Framework 2021 and Section 16 (2) of the Planning (Listed Buildings and Conservation Areas) Act 1990.

I would be grateful if we could be informed when this additional material becomes available.

Case Work



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Historic Buildings & Places is the working name of the Ancient Monuments Society, a registered charity in England and Wales (no. 209605). It is one of the National Amenity Societies and, as such, is a consultee on all Listed Building Consent applications involving an element of demolition as required by the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including planning applications affecting historic buildings in conservation areas and undesignated heritage.