

Tooting Bec Lido – Pump Room
Tooting Bec Road
London SW16 1RU
Heritage Statement
London Borough of Wandsworth
May 2019



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1.0 Introduction

1.1 Instruction

This Heritage Statement has been produced by Built Heritage Consultancy to accompany a planning application by Richmond and Wandsworth Councils to rebuild part of the Tooting Bec Lido plant room, Tooting Bec Road, London SW16 1RU (the 'Site'). The Heritage Statement will assess the significance of any on-site heritage assets and any in the surrounding area that might potentially be affected by the scheme proposals. It will also assess the potential heritage impacts on the identified heritage assets in light of the proposed scheme.

1.2. Scheme Proposals

The scheme comprises the partial demolition of part of the lido plant room and replacement with a single storey addition to the existing building, on the same footprint.

1.3. Structure of Report

Section 2 sets out the identified heritage assets to assess as part of this Heritage Statement.

Section 3 sets out the history of the locality.

Section 4 sets out our background understanding of the on-site building and surrounding Lido buildings.

Section 5 sets out a map regression of the Site.

Section 6 sets out the assessment of significance of the identified heritage assets.

Section 7 provides an overview of the scheme proposals and an assessment of the potential heritage impacts.

Section 8 sets out the summary and conclusions of this Heritage Statement.

The Appendices include any relevant Historic England list entries, a summary of any relevant legislation, policy and guidance relevant to the historic environment and a Bibliography for this Heritage Statement.

2.0 Identification of Heritage Assets to Assess

2.1 Paragraph 189 of NPPF

Paragraph 189 of the NPPF states: *“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....”*

2.2 Identified Heritage Assets

The heritage assets that could potentially be affected by the subject proposals are outlined below.

Designated Heritage Assets

Listed Buildings

None.

Conservation Area(s)

Garrad’s Road Conservation Area and Streatham Park Conservation Area. The Site does not lie within either conservation area but lies in the setting of both.

Non-Designated Heritage Asset

Tooting Bec Lido. The LPA have confirmed by email that they consider the building to be locally listed. That said the Lido complex is not at present itemised on the local list for Wandsworth as at the date of this report (http://www.wandsworth.gov.uk/downloads/download/201/local_list). The building is on the candidate list for nominated heritage assets but this list is not noted on the LPA’s website as approved or adopted. In any event it is clear that the LPA consider the building to be a non designated heritage asset.

2.3 Scoped Out Heritage Assets

Outside the Site’s boundary and within the identified surrounding area of the Site are numerous heritage assets of varying significance and designations. Having borne in mind Historic England’s Historic Environment Good Practice Advice in Planning Note 3—The Setting of Heritage Assets (2017), the heritage assets listed below are considered sufficiently well concealed from potential visual impacts by existing topography, street pattern, built form and or dense foliage that they are unlikely to experience any effects to their heritage significance (whether visual, experiential or other) as a result of the proposed scheme. The following heritage assets have therefore been scoped out from our Heritage Statement:

- Heaver Estate Conservation Area;
- Culverden Road Conservation Area;
- Streatham Park & Garrad’s Road Conservation Area (London Borough of Lambeth);
- 3 Garrad’s Road, SW16 (locally listed – London Borough of Lambeth);
- 19 Garrad’s Road, SW16 (locally listed – London Borough of Lambeth); and
- 25 Garrad’s Road, SW16 (locally listed – London Borough of Lambeth).

3.0 History of Locality: Tooting Bec

3.1 Etymology

There were two manors in the area, Tooting Bec (Upper Tooting) and Tooting Graveney (Lower Tooting). The settlement takes its name from Bec Abbey in Normandy. Following the Norman Conquest in 1066, the area of Tooting was split and part was given to Richard of Tonbridge, who in turn gave it to Bec Abbey. Anselm, later Saint Anselm visited the area before he became the second Archbishop of Canterbury. Tooting Graveney takes its name from the Gravenell family who were also given land after the Norman Conquest by William I.

'Tooting' is thought to originate in Saxon times and derive from 'Toot', meaning to look out, and 'ing', meaning meadow.

Norman History

Tooting Bec itself lies on Stane Street, a Roman Road which linked London and Chichester. The area was included in the Domesday Book of 1086 as "Totinges", held partly by St. Mary de Bec-Hellouin Abbey and partly by Westminster Abbey.

Medieval and Pre-Industrial Revolution History

At the start of the medieval period, Tooting Bec was under the control of a local priory associated with Bec Abbey in Normandy. The priory was dissolved in 1315 and the lands were then gifted to Eton College by 1440.

By the start of the Jacobean period Tooting Bec was the largest village in the parish of Streatham. The manor passed through various monastic and secular hands before and after the Reformation, ending up as part of the Duke of Bedford's extensive holdings in the area. The area included a large manor house, which likely lay on the same location as Park Holme. Tooting Bec was the name for the manor, rather than being the name of a settlement itself, with the area that would in time be called Tooting Bec more likely called Upper Tooting at the time, centred around the northern end of what is now Upper Tooting Road. Lower Tooting was centred around today's Tooting Broadway station.

Queen Elizabeth visited Tooting in the year 1600, possibly to visit Sir Henry Maynard, secretary to Lord Burghley, the Lord High Treasurer and Lord of the Manor of Tooting Graveney at the time.

19th Century History

The area suffered from poor drainage which delayed and prevented much development over its history. It was originally a swampy meadow with watercourses draining into the River Wandle, which itself flows into the River Thames at Wandsworth.



Figure 3.1: Hyde Farm, Tooting Bec Common, Streatham, 1860

The drainage problem was overcome in the late 19th century prompting the Metropolitan Board of Works to acquire Tooting Bec Common in 1873 from Robert Hudson to prevent it from being built on. This was also as a result of the legal battles of the owner of Tooting Graveney Common, W. S. Thompson, who had attempted to enclose the common, but an injunction was imposed by the courts, with enclosure and development halted. Management was passed over to London County Council in 1889 and in time to Wandsworth Council in 1970.



Figure 3.2: Tooting Bec Road, Tooting Bec Gardens, Streatham, c. 1895

The Lords of the Manor retained ownership and continued to profit from the land until it passed into municipal hands in the 1870s. During the late Victorian and Edwardian periods, the area underwent fundamental change with the laying out of a multitude of typical terraced houses, as seen across swathes of London at the time, owing to significant population explosion. Tooting Common and Tooting Bec remained protected however.

20th Century History

In 1903 the Tooting Bec Asylum was built and soon after in 1906 the Tooting Bec Bathing Lake was built.

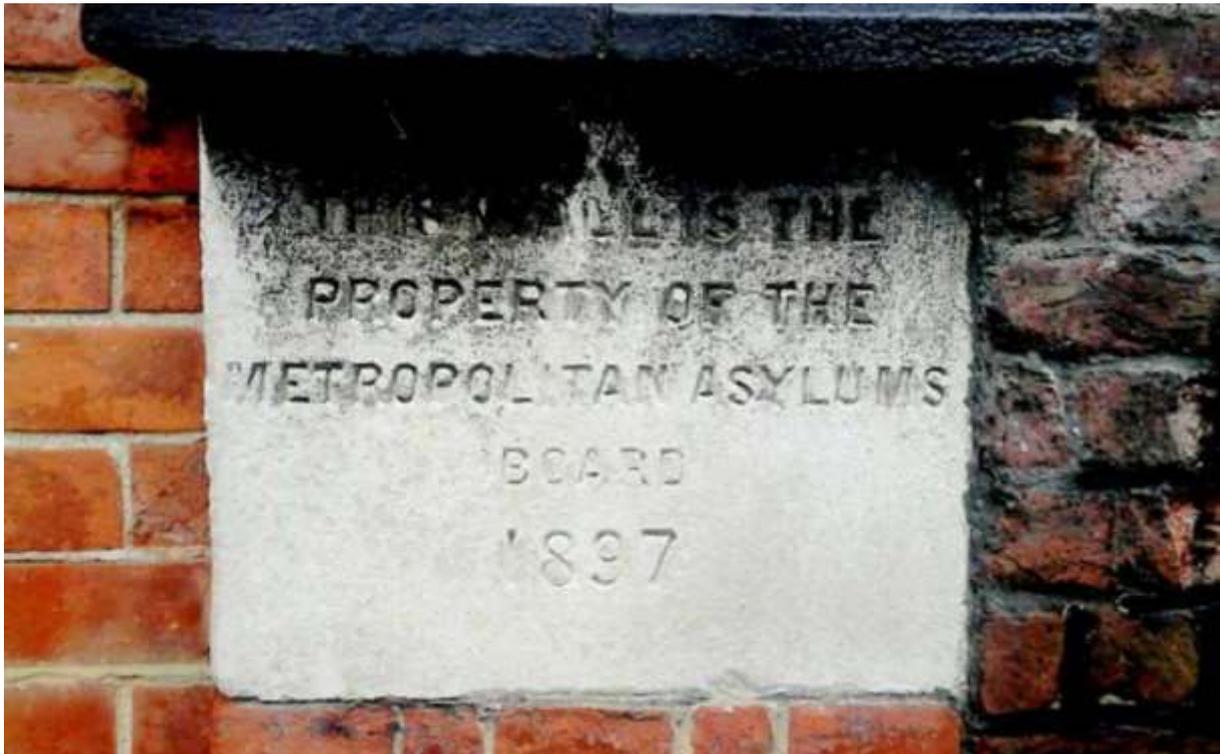


Figure 3.3: Foundation stone of the Tooting Bec Asylum.



Figure 3.4: Tooting Bec Bathing Lake in c. 1906.

Between 1901-11, the London County Council built a pioneering new cottage estate for working-men and their families: the Totterdown Fields Estate, which has since been designated as a conservation area. In 1924 the grand villa Park Holme was demolished, being redeveloped as housing (Bell estate). In 1926 Tooting Bec Station opened on the Northern Line, designed by Charles Holden.



Figure 3.5: Tooting Bec Station.

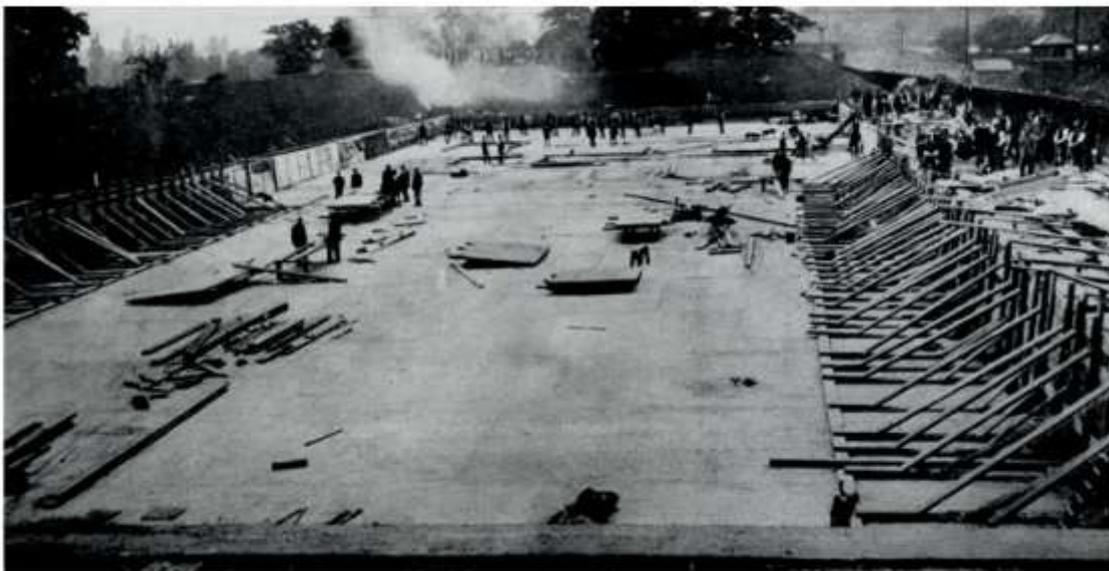
During both World Wars Tooting Bec Common and Tooting Graveney Common were used as a site of recruitment and training and for food production and rehousing. The Home Guard served here and the parks contained a number of bomb shelters and anti-aircraft guns.

In 1995, Tooting Bec Asylum closed and was later redeveloped as housing.

4.0 Background Understanding of On-Site Heritage Assets

Tooting Bec Lido (Non Designated Heritage Asset)

Originally known as Tooting Bec Bathing Lake, the Tooting Bec Lido is one of the oldest lidos in Britain. It was originally intended partly as a communal bath as very few homes in 1906 had their own bathrooms. It was built in just four months during the spring of 1906, and was opened to the public on 28th July that same year. The impetus for the scheme came from Reverend John Hendry Anderson, Rector of Tooting and Chairman of the Works Committee of the Central Unemployment Body for London, and former Mayor of Wandsworth, it was an early example of a work creation scheme. The pool is also one of Britain's biggest measuring 100 x 33 yards. The South London Swimming Club was established in 1906, with the Club seeking permission from the London County Council to use the new Lake as its headquarters and it has played an active role in the life of the Lido ever since. To seal the Lake's floor, Portland cement was laid on bitumous sheeting, while the sides were concreted using timber form work. Stone flagging was then used for the Lake's surround. Initially it was a rudimentary bathing lake, with simple changing shelters on the eastern (railway) side.



Building Tooting Bathing Lake, spring 1906, Wandsworth Heritage Service

Figure 4.1: Showing the construction of the bathing lake in 1906.



The opening ceremony, 28 July 1906, London Metropolitan Archives

Figure 4.2: Showing the opening of the bathing lake in 1906.

The original entrance structure comprised three brick arches, built at the same time as the lake, with curved flanking walls. The entrance punched through the mound that was created by the spoil from the pool's excavation to separate the lake from the common. In the 1930s this structure was badly compromised by the addition of toilet blocks on both sides, which were insensitively sliced into the outer piers of the arches and the retaining walls.



Diving boards and original entrance, 1910, SL5C collection

Figure 4.3: Entrance block in 1910, northern elevation, showing the early diving boards (since removed).



Original entrance viewed from the Common © Ron Elam, tel: 020 8874 8544

Figure 4.4: Entrance block after completion, southern elevation.

Later Changes

- The bathing lake was converted to a swimming lido in the 1930s. It was also modernised with the installation of the fountain, the water filtration system, a café, showers and WCs.



Figure 4.5: New lido in use in 1935.

- In 1932, the filtration system was installed in a standalone Pump Room to keep the water clean, still operational today. The system was installed by Royles of Irlam.

WE HAVE SPECIALISED SINCE 1903 IN THE DESIGN AND CONSTRUCTION OF APPARATUS FOR SWIMMING BATHS COMPRISING

-FILTRATION, AERATION AND STERILISATION-

Since that date we have installed more than 175 Plants including the largest Open Air Bath in the Country at TOOTING BEC COMMON (contents, 1,000,000 gallons), the open air sea water Bath at GRANGE OVER SANDS (contents 450,000 gallons) and the largest indoor sea water Bath at WHITE ROCK BATHS, HASTINGS (contents 200,000 gallons). More recent installations include ST. BRIDE'S INSTITUTE, LONDON, ROCK FERRY BATHS, BIRKENHEAD, PUBLIC BATHS, URMSTON and WHITECROFT SCHOOL BATH, BOLTON. Several other Plants are also in course of construction at the present time.



Our Plants include the latest improvements for the treatment of Bath water, including a simplified form of automatic feed for the necessary chemicals and the production of Chloroson, while the workmanship is maintained at the high standard which has always characterised our production.

Royles Limited

Figure 4.6: New Pump Room filtration system – Royles Limited advert referencing the Lido.

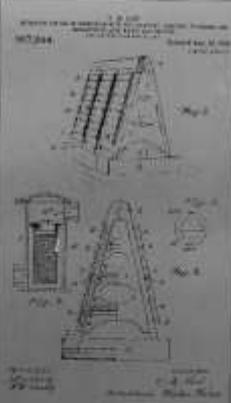
A peek into the pump room

A bit of history
The original Tooting Bathing Lake did not have any filters, and the water was so dirty you couldn't see the bottom. As late member Hazel Green said of swimming there as a child, "...sludge squelched between your toes when you put your feet down".

In the 1930s, barely 75 years after it was built, the bathing lake needed improvements to bring it in line with hygiene standards of the time: the water purification system was installed in 1932 by Royles of Irlam, a Manchester based engineering company whose chairman, Oliver Row, had patented an invention for cleaning pool water in 1916. He described it as "apparatus for use in connection with the straining, aerating, filtering, and reheating of swimming bath water and the like".

The Row system remained unchanged for several decades. It used a combination of pumps, strainers, filters and aerators to clean and oxygenate the water, making it fit for use. The open-air fountain, technically an annex, was an essential part of the system and became an iconic feature of lidos in the 1930s.

"Apparatus for use in connection with the straining, aerating, filtering, and reheating of swimming bath water and the like."



Drawings from Oliver Row's patent application of 12 March 1916

Figure 4.7: Filtration system methodology from on-site Interpretation Board.

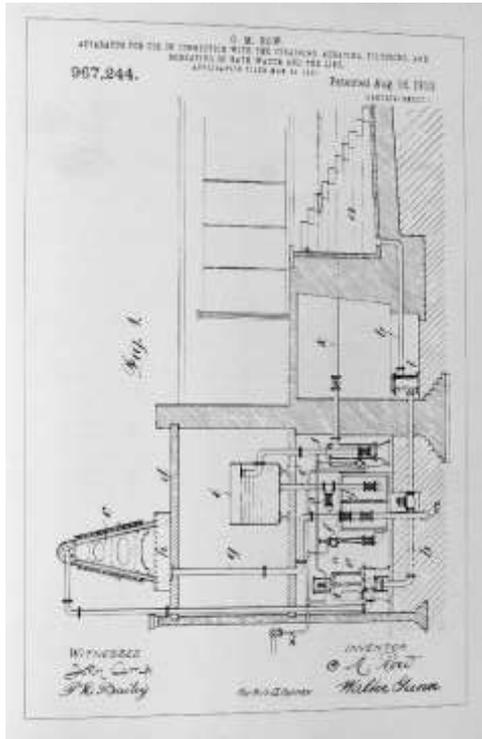


Figure 4.8: Filtration system methodology from an on-site Interpretation Board.



Figure 4.9: Filtration system methodology from an on-site Interpretation Board. Note method of functioning including use of aerator.

- The Pump Room was erected at the southern end of the pool, where it remains today. The building is a utilitarian rectangular block and, set over one storey although it extends to the equivalent of two storeys at approximately five metres high. The Pump Room when originally built, was smaller than today and approximately extended to the same southern (front entrance) building line of the original entrance building. Please see Figure 4.10 below.



Figure 4.10: Tooting Bec Lido in 1937 (Britain from Above). This figure shows the original Pump Room dimensions in the 1930s, and that no paddling pool was built to the north-eastern corner at this time.



Figure 4.11: Close up of Figure 4.10.

- In 1936 the café opened and, with the advent of mixed bathing, changing cubicles with doors were added. WCs and shower blocks were also installed. Also in 1936 a new Art Deco water fountain was installed.
- Some time between the 1937 and 1950-51 (see Figure 5.5) the Pump Room was extended to the south. This extension appears to be formed of similar windows and detailing to the original part of the Pump Room and likely dates to just before or soon after WWII, approximately 1938-49.



Figure 4.12: Lido in use in the 1970s showing the pump room in the distance. This photograph shows the Pump Room has been extended to the rear by this time.

- Originally painted green, the cubicle doors acquired their current bright colour scheme in 1981.
- During the 1980s, when most of the lidos in London closed, Tooting Bec Lido survived, thanks to the determination of the South London Swimming Club.

- The children’s paddling pool was installed in 1999.
- In 2002 the buildings underwent a facelift. The modern shallow end entrance was constructed resulting in the demolition of the original entrance block. The latter had been located at the deep end of the Site. Other works included the refurbishment of the pool, redesigned foyer, new showers and the complete modernisation and refurbishment of the lido café. The three arched original entrance will be rebuilt to form the outer wall of the new deep-end sunbathing terrace. The infill panels of the reconstructed arches will be used to commemorate the Reverend John Hendry Anderson, who proposed the building of the pool in 1906.
- In 2006 the Club celebrated its own and the Lido’s centenary.
- The construction of the Lido Pavilion in 2017, funded by the South London Swimming Club, Sports England and Wandsworth Council.



Figure 4.13: The entrance arches prior to demolition, southern elevation.



Figure 4.14: *The entrance arches prior to demolition, northern elevation.*

Site Photographs



Figure 4.15: South-western corner of the Pump Room adjoining the new pavilion.



Figure 4.16: New pavilion building.



Figure 4.17: View of the earth bund to the western side of the Lido as seen from Tooting Bec Common. No visibility of the pool from Park except adjacent to new entrance.



Figure 4.18: New Lido entrance.



Figure 4.19: Main pool looking north towards the café and fountain.



Figure 4.20: Changing rooms to the western side of the pool.



Figure 4.21: *Café and aerator fountain.*



Figure 4.22: *Paddling pool to the north-eastern corner of Lido complex.*



Figure 4.23: *Changing cubicles to the eastern side.*



Figure 4.24: *Location of the former entrance block between the new pavilion and the Pump Room.*



Figure 4.25: *Pump Room, northern elevation.*



Figure 4.26: *Pump Room's (Southern Building) western elevation, south-western corner.*



Figure 4.27: Pump Room, western elevation.
Note part cordoned off.



Figure 4.28: Pump Room's (Northern Building) western elevation.



Figure 4.29: Pump Room's (Southern Building) eastern elevation.



Figure 4.30: Pump Room's (Northern Building) eastern elevation.



Figure 4.31: Southern elevation of the Pump Room's Southern Building.

5.0 Site Map Regression

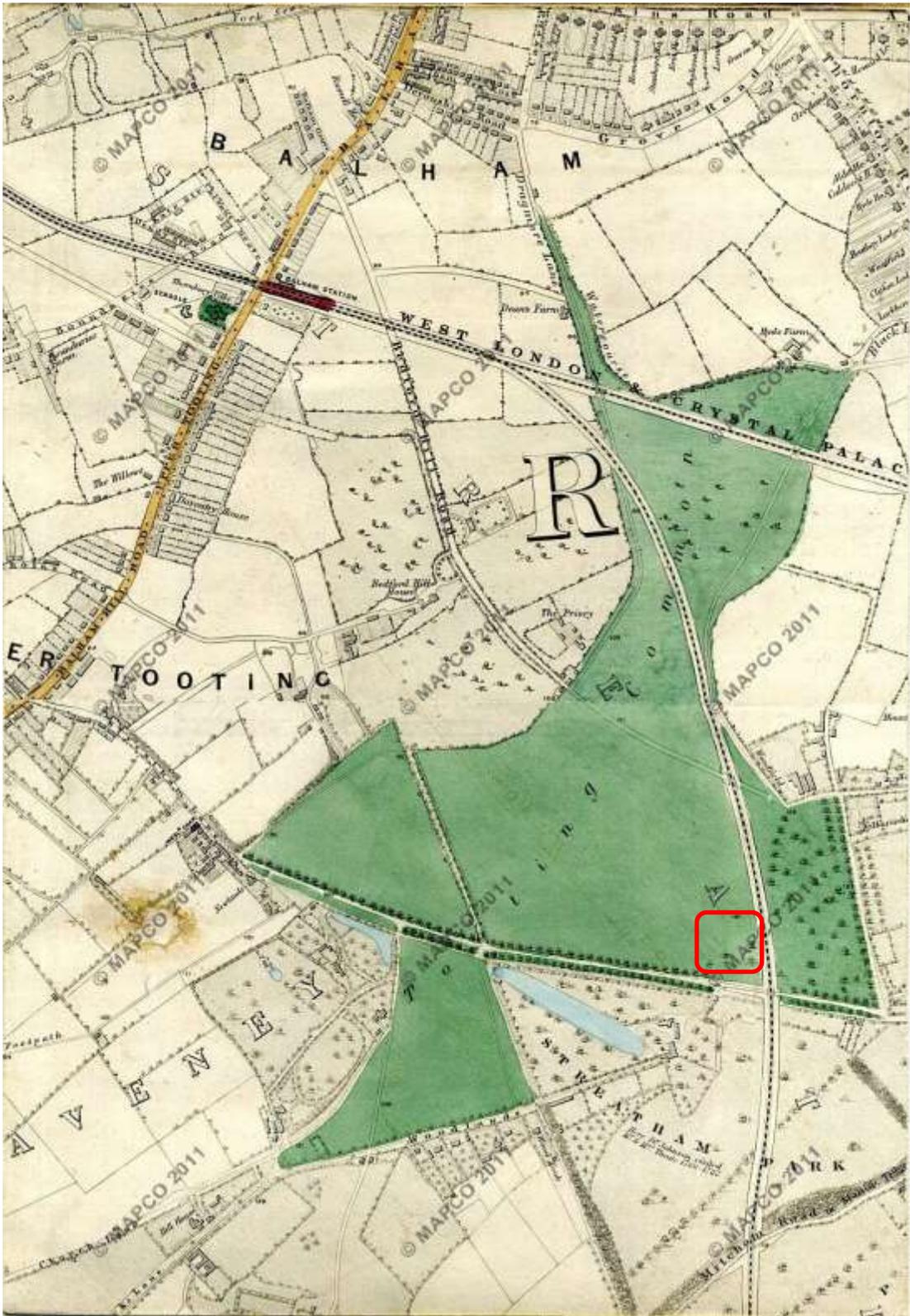


Figure 5.1: Stanford's Library Map Of London And Its Suburbs 1872 with the approximate location of today's Lido complex marked in red. This map shows how underdeveloped the area remained at this time. A fish pond lies to the southern side of Tooting Bec Road and further south is Streatham Park. The Site itself remains undeveloped at this time.

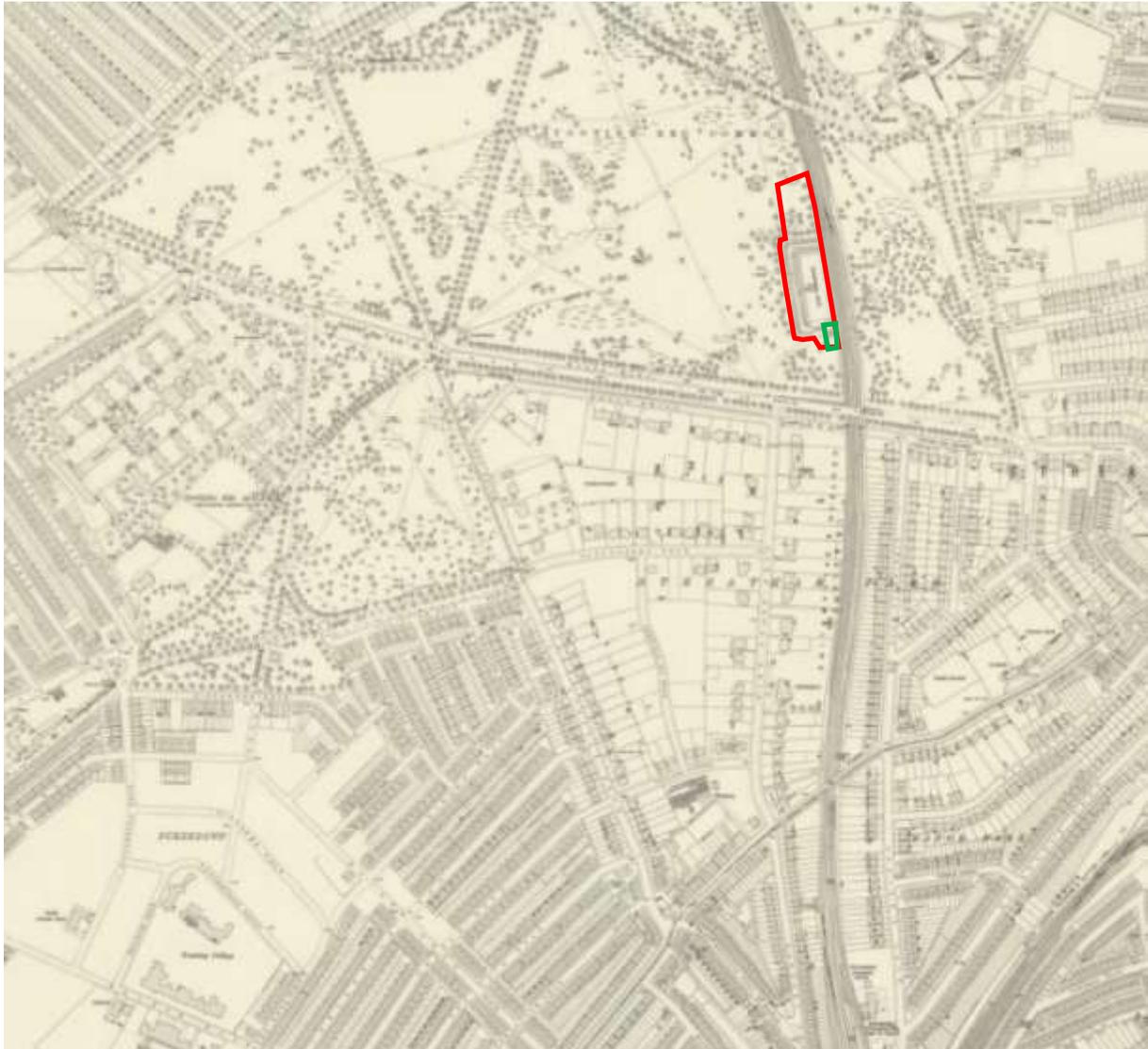


Figure 5.3: 1916 OS map, revised 1935 with the approximate Lido boundary marked in red and the approximate Site boundary marked in green. This map shows that the eastern side Garrad's Road has been developed to include a number of substantial detached houses in relatively small plots, since Figure 5.2. The Site is now shown with the bathing lake, dating from 1906. We can see the bathing lake itself as well as the earth bund constructed around it to shield views from the park into the bathing lake. Figure 5.4 shows a close up of this map showing the Site in more detail.

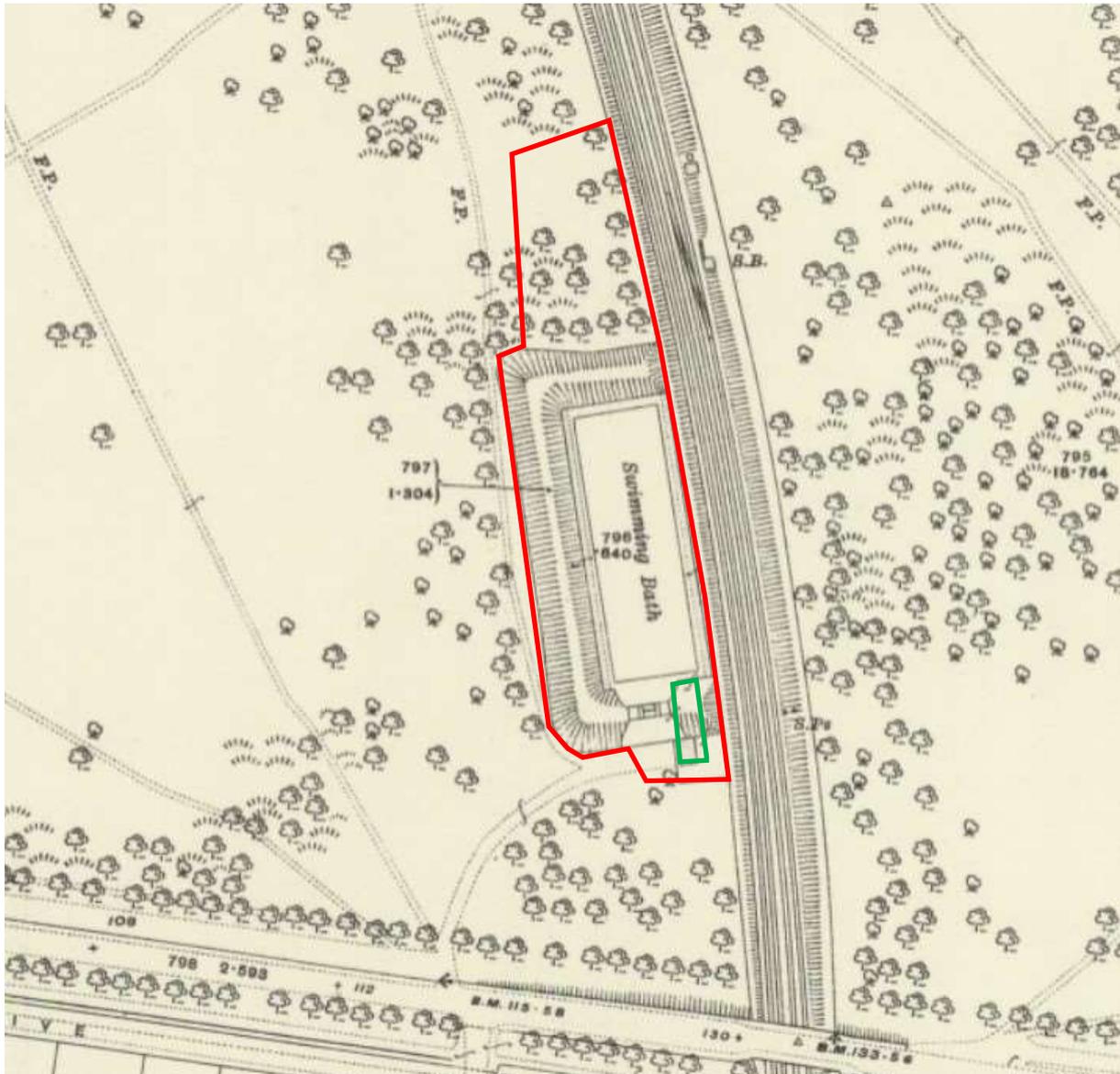


Figure 5.4: 1916 OS map, revised 1935 with the approximate Lido boundary marked in red and the approximate Site boundary marked in green. This close up allows us to see the entrance block to the southern side of the bathing lake, and a standalone building to the south-east, in the location of the future pump house.



Figure 5.5: 1950-51 OS map with the approximate boundary of today's Lido buildings marked in red and the approximate boundary of the Site marked in green. We can see to the northern side of the Site the new café and fountain have been built by this time. We can also see the large Pump Room to the south-east which replaced the previous building in the south-eastern corner. Note the two buildings were not on exactly the same plot, with the later Plant Room being marginally further east and also set further to the north and south. The Pump Room's (Northern Building as existing) was not therefore an extension of the previous building shown in Figure 5.4.

This map also show that the park contains a number of detached buildings to the west of the Lido, on the southern fringe of the park. Since that time, the buildings have been removed.

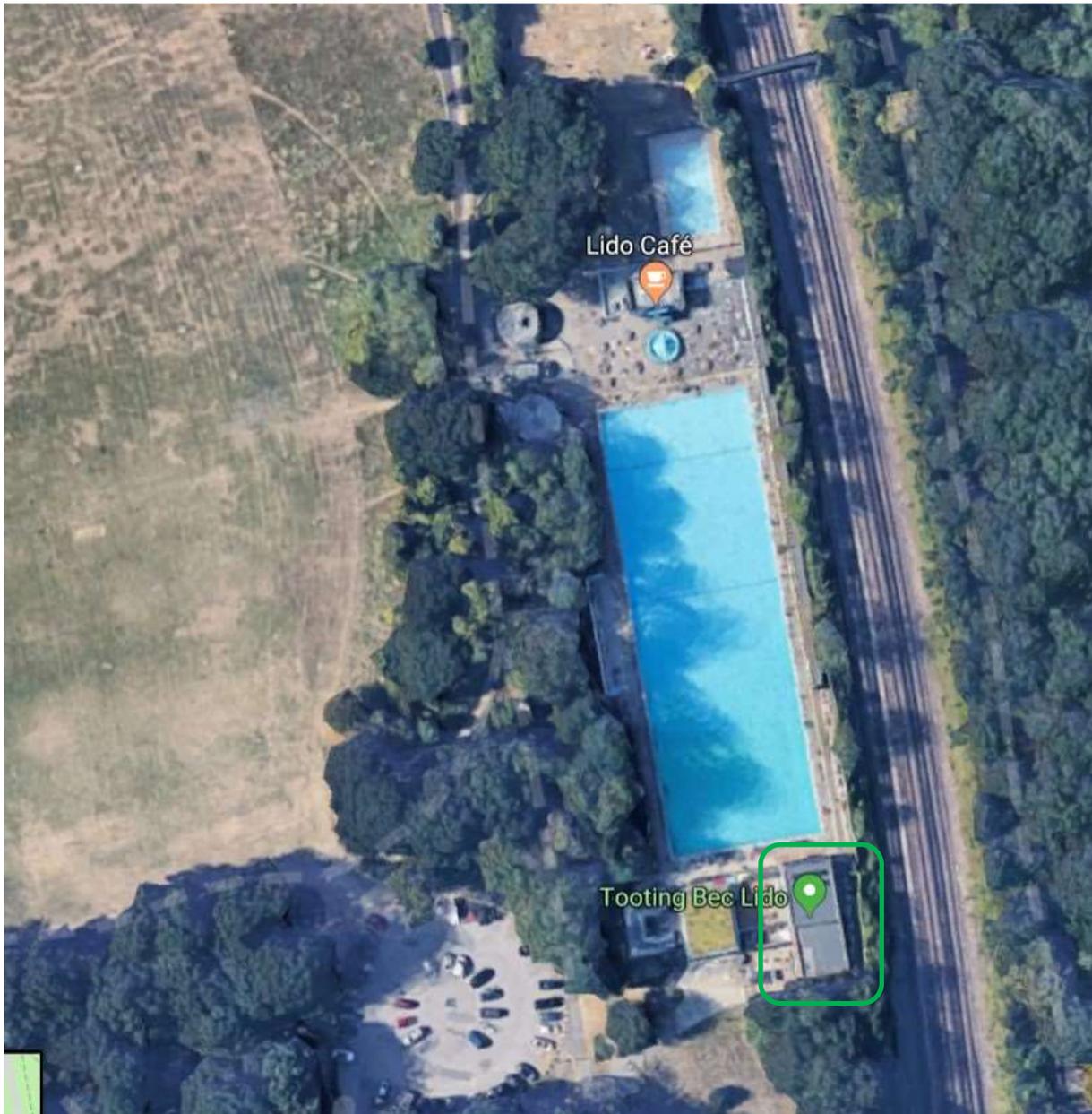


Figure 5.6: Google Earth aerial photograph, 2019. This image shows the cafe, fountain, Pump Room and changing cubicles as extant. We can also see the new entrance building to the southern side and a modern paddling pool to the north-eastern side. The existing Pump Room is marked in green.

6.0 Assessment of Significance

6.1 Designated Heritage Assets

6.1.1 Garrad’s Road Conservation Area

There is a minimal chance for the conservation area to be affected given the minor nature of the proposed works. With this in mind and given Paragraph 189 of the NPPF the assessment below will be proportionate to the significance of the heritage asset but also proportionate to the potential impact. Given the low potential impact, a high level assessment of significance has been undertaken with the emphasis on setting, given that the Site lies outside the conservation area.

Identification of Part of Conservation Area Potentially Affected

The Sites does not lie within the conservation area, but lies in close proximity to the western conservation area boundary. There is a possibility there would be some marginal visibility from the conservation area’s western boundary towards the replacement on-site built form. This visibility is likely to be slim to non-existent given the intervening railway line but this will be discussed in Section 7.



Figure 6.1: LPA’s Conservation Area boundary map with the approximate location of the Site marked in red (BHC annotation).

Historical Development

The LPA's Garrad's Road CA Character Statement (1998) provides an outline assessment of the significance of the conservation area. It highlights that it should be viewed as part of a larger conservation area that straddles the boundary with the London Borough of Lambeth.

The LPA's Conservation Area Appraisal comments:

"The development of the area is bound up in the history of the neighbouring parishes of Streatham and Tooting. Both contained extensive common lands; Garrads Road is adjacent to one of these. Tooting Bec Common, together with the area of common called Graveney, in the parish of Tooting, are remnants of much larger common areas reduced by enclosures.

The commons were watery and boggy in parts and gravelly in others, and were used predominantly for grazing but also for mineral extraction or dumping of waste. A number of watercourses drained the area; two were of particular significance. Falcon Brook flowed south to north across the common, approximately on the line of the railway cutting (the present western boundary of the conservation area). The Woodbourne (or Streatham Brook) entered the common from the northeast (on the line of the present Mount Ephraim Road) and flowed eastwards to the York Ditch (a third watercourse on the line of the present Dr. Johnson Avenue). Although no longer in existence, these historical natural features to some extent formed the framework on which the present structure of the common developed. There is a gentle gradient from the south-east corner down to the north-west corner of the common.

The commons were further divided by the development of the railways. Two lines cross the commons: to the north the West End and Crystal Palace line opened in 1855; and, running north-south, the London, Brighton and South Coast line was built in 1861. The latter separates the part of the common now in the conservation area from the rest of Tooting Bec Common.

The remaining common areas were vested in the late C19 in the Metropolitan Board of Works, whose purpose included the maintenance of the land as open space for public benefit. They were subsequently transferred to the LCC and eventually to Wandsworth Council."

Character and Appearance

The LPA's Conservation Area Appraisal comments:

"Most of the common within the conservation area lies between Tooting Bec Road in the south and Bedford Hill in the north, with a small detached area north of Bedford Hill. A number of tracks cross the northern part of the common, but of particular note is the bridleway running around three sides of the common and northwards from Bedford Hill. The boundaries are open, except the one along the railway cutting.

Landscape

This area of common retains less of the original semi-natural appearance than much of the rest. This is probably because of its virtual separation by the railway and its proximity to the areas of Victorian middle class housing. The hard surface games area and associated building reinforce this more park-like image. Nevertheless, the area is open and has a well treed landscape. Of particular note is an avenue of oak trees of historic significance, close to the eastern edge of the common. Though less complete than when originally planted, these oak trees commemorate a visit of Elizabeth I to the area in the late 16th century. A line of elms along the southern boundary (Tooting Bec Road), provides a clear edge to this part of the common.

Buildings

No substantial buildings are located on the common itself, but it is bordered on three sides by development, and these buildings (in the LB Lambeth part of the conservation area) give a strong definition to the edges of the common, and dominate views outwards from it.

This surrounding area was built up in the late Victorian and Edwardian era, although earlier less dense development existed at least from the C15. Most buildings are in an Arts & Crafts style, with detailing typical of the time. In Garrads Road, to the east of the common, 'Mindaroo' is a Voyseyesque design with an interesting massing and long sloping roofs, gables and chimneys, and rough cast walls. The existing building of greatest antiquity is 'Saxoncroft', originally of c.1870 but much altered and extended since. The other buildings in Garrads Road were mainly built between 1900-1914 and 1935-1940, with some more recent insertions.

To the south, in Tooting Bec Gardens, buildings of particular note are No.38, erected in 1905 for the Bishop of Southwark; 'Carn Brae' of similar date and design; and, the earlier 'Sussex House' (c.1880), on the corner of Ambleside Avenue, which is by the noted local architect Frederick Wheeler.

The houses in The Spinney and 233-243 Bedford Hill, on the north side of the common, were built by Messrs Wates just before the second world war."



Figure 6.2: View from Bedford Hill looking south into the conservation area.



Figure 6.3: View looking south into conservation area from junction of Bedford Hill and Garrad's Road.



Figure 6.4: View looking south along the avenue of trees adjoining Garrad's Road.



Figure 6.5: Example Arts and Crafts house on Garrad's Road.



Figure 6.6: View looking south along the most westerly footpath within the woodland, adjoining the railway track. Note dense mature trees surrounding and to the right hand side.



Figure 6.7: View of the metal fence along the most westerly footpath within the woodland, adjoining the railway track. Note very limited visibility through westwards to the Site.



Figure 6.8: View when camera is placed between the fence uprights looking towards the Site. Pump Room very partially visible if one is actively seeking it out.



Figure 6.9: View of the railway track that separates the Site from the conservation area.

Key Views

No key views into, out of or within the conservation area were identified in the LPA's Conservation Area Appraisal. Nor have any been identified by the LPA separately. We have undertaken our own analysis of these key views for the purposes of this report and consider these to be:

- All internal pathways within the conservation area;
- Views from the Arts & Crafts houses on the conservation area's eastern edge off Garrad's Road through the dense woodland of this part of the conservation area;
- Views from Bedford Hill looking south into the woodland;
- View looking north-south and vice versa along the avenue of trees towards the eastern boundary of the conservation area;
- View from Woodfield Avenue/Garrad's Road junction into the woodland; and
- View from Tooting Bec Road into the woodland.

Contribution of Site to Significance by way of Setting

The Site lies within Tooting Bec Common, which historically formed a larger area of common land with Tooting Graveney Common. When the London, Brighton & South Coast railway line was built in 1861, it separated the conservation area (LB of Wandsworth) from the remainder of Tooting Bec. Therefore the two areas of common land have a long term former historical link and association, used historically in common by the local community for foraging and feeding of their livestock etc. until byelaws in the late 19th century and early 20th century changed the accepted practices on the common land. Tooting Bec Common therefore contributes very positively to the significance of the conservation area by setting.

The Site on the other hand ceased being an undeveloped part of Tooting Bec Common in 1906. In the beginning the Site was built as a bathing lake for the local communities. This was not therefore a pastime boating hobby to undertake on a new landscape watercourse, rather a sizeable local resource for those on low incomes without home bathing facilities to come to the lake to wash. There was no functional link between the original bathing lake and Tooting Bec Common, nor the conservation area, in that sense. When the bathing lake was converted to a lido in the 1930s this increased its leisure time qualities to closer align with those of the wider park as a public place for leisure. Since this time the Lido has provided a much used and much appreciated local facility, which despite peaks and troughs in its use over the decades, remains an important local amenity. It should be noted that this new Lido use was created many decades after the conservation area's separation from the main body of Tooting Bec Common by the railway. In that sense, the only potential contribution the current Site makes to the significance of the conservation area is by way of being built on part of the original Tooting Bec Common, which remains legible today. The contribution made by the Lido to the conservation area's significance, however, is very limited. The Site, as a later addition to the later conversion of the bathing lake to a lido, makes a negligible contribution towards significance.

Summary of Significance

- The combination of grassland and trees that form a naturalistic reminder of the common's former character and role within the community;
- Woodlands of the conservation area adjoining the London to Brighton railway line, and avenue of trees to the eastern side;
- Key views within the woodland; and
- The contribution the remainder of Tooting Bec Common west of the railway line makes to the significance of the conservation area by signifying the wider common within its setting.

6.1.2 Streatham Park Conservation Area

There is a minimal chance for the conservation area to be affected given the minor nature of the proposed works. With this in mind and given Paragraph 189 of the NPPF the assessment below will be proportionate to the significance of the heritage asset but also proportionate to the potential impact. Given the low potential impact, a high level assessment of significance has been undertaken with the emphasis on setting, given that the Site lies outside the conservation area.

Identification of Part of Conservation Area Potentially Affected

The Site does not lie within the conservation area, with any potential impact being purely by setting. The conservation area boundary runs to the southern side of Tooting Bec Road, north of 5 North Drive. The Site lies approximately 200m to the north-east of the conservation area.

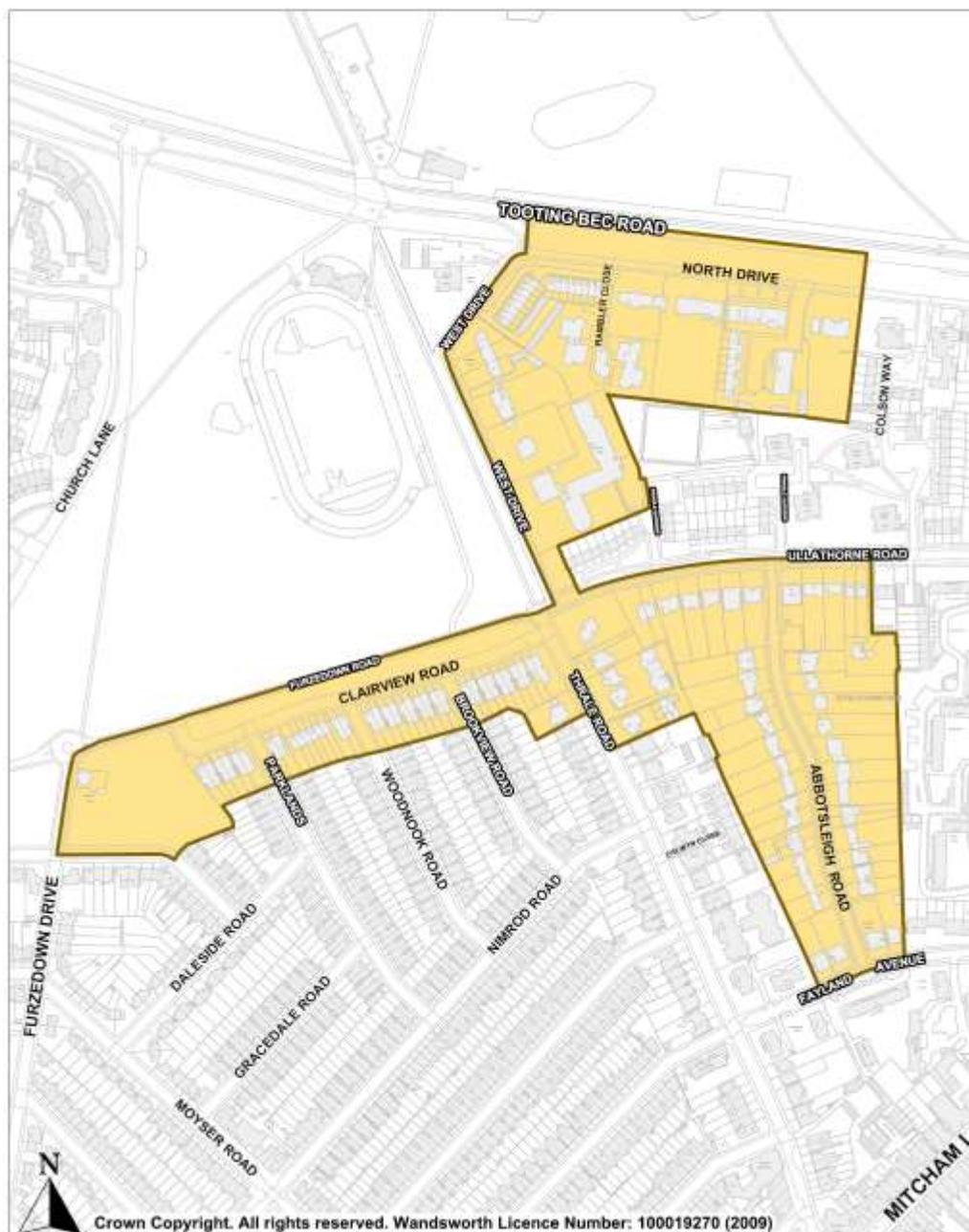


Figure 6.10: Conservation Area Map. Site lies outside the area of this map.

Historical Development

The LPA's Conservation Area Appraisal sets out the historical development of the conservation area, which will be provided below for ease of reference:

- *“Tooting Bec Common together with Tooting Graveney Common and Streatham Green are the remains of common land that once stretched as far as Mitcham. As London's population was growing, and land was developed for housing, much of the old common land was under threat, which led eventually to the passing of the Metropolitan Commons Act in 1866.*
- *The Thrale family, owners of Southwark Brewery, purchased 100 acres of the common land from the Duke of Bedford on which they built Streatham Park, a splendid Georgian mansion which became the country seat for the family. The house was built in the 1740s, from what was originally a medieval building, but was demolished in 1863.*
- *The area was the site of a number of country houses in the early nineteenth century, most of which are now lost. In 1803 Benjamin Oakley erected a large mansion, Tooting Lodge, which in 1807 was sold to Rees Goring Thomas. Thomas purchased the Lordship of the Manor of Tooting Graveney in 1811, whereupon the lodge became the Manor House. In 1861 the Manor was purchased by a Mr. Thompson who applied to enclose the common but was resisted by the commoners who won a notable court victory preventing his activities.*
- *Following the passing of the Metropolitan Commons Act, the commons were transferred to public ownership in 1875, which prevented speculative building on the land. ...*
- *By then the commons at Tooting had been divided by building of roads and railways, with the west end and Crystal Palace line in the north which opened in 1855, and the London, Brighton and south coast line running north - south which opened in 1861.*
- *At the turn of the twentieth century a number of large old detached houses survived, such as Parklands, Woodlands, Brooklands and Wood Nook which can be seen on the tithe map and the map of 1896 fronting the common along Furzedown Road. Woodlands was the home of Henry Doulton of Royal Doulton pottery. These houses made way for the Edwardian terraced housing seen today along Clairview Road.*
- *Large houses from the turn of the century that have survived include Dixcote on North Drive (1897 by Voysey) and Yew Tree Lodge, West Drive (1899 by Leonard Stokes) and no. 3 West Drive. All in completely different styles, but each resolutely continuing the country house tradition whilst all around was being developed for smaller and denser housing.*
- *By the Second World War, Furzedown Road was still a rustic avenue bordered by trees and the map of 1919 shows Abbotsleigh Road laid out and divided into building plots on land previously occupied by the nursery. The development of several buildings in this road is attributed to builders called Wates. In 1897 Edward Wates and his three brothers set up the first Wates Company. During the 1920s and 1930s Edward's sons, Norman, Sir Ronald and Allan, expanded the Company by speculative house building and then extending their activities into general contracting. Wates built a number of properties in the Streatham area. In one estate Wates advertised their more expensive houses as “the finest homes in the finest suburb” and pointed out that Streatham was “London's most favoured, healthy and convenient suburb”.*

Character and Appearance

The LPA's Conservation Area Appraisal sets out the character and appearance of the conservation area, which will be summarised below for ease of reference. Please note that the only potential area of the conservation area that would have fleeting views of the proposed scheme is North Drive and therefore this area alone will be covered below.

- *“The overall character and appearance of the conservation area relies upon the relationship between the groups of detached and semi-detached late nineteenth and early twentieth century buildings, particularly the frontage to Tooting Bec Common, as well as the historic landscape and vestiges of woodland surviving from large estates that were sold for development around the end of the nineteenth century.”*

North Drive

- *“No. 5 North Drive represents a Neo-Georgian early twentieth century composition of two storeys with symmetrical projecting wings. It is of yellow stock brick with red brick dressings to quoins, windows and stringcourse. The semi-circular segmental pediment to the porch replete with engaged columns gives a splendid definition to the front entrance. Typically, windows are timber sashes of 12 lights. A dentil cornice at eaves level gives definition at roof level. Plain clay tiles cover the roof, which is splayed at the eaves.*
- *Dixcote, 8 North Drive, is a listed building (grade II*) dating from 1901. It is essentially the work of CFA Voysey in his own inimitable manner. The building is a broad asymmetrical seven bay, two-storey composition, constructed of brick with a roughcast finish and Ham Hill stone dressings and tile roof. The casement windows have stone mullions and leaded lights. The casements are arranged in pairs and groups of three, four and five. To the rear the bays are divided by buttresses; so characteristic of Voysey's work. His influence is also represented in the battered chimneystacks.*
- *No. 9 is a ranging two-storey early twentieth century composition with roughcast finish. A two-storey projecting bay is relieved by a central entrance with brick surround. The brickwork continues through to first floor where it is terminated in the form of an arch, with herringbone brickwork detailing above a central window. Windows are small paned steel casements. A heavy brick chimney is expressed externally to the front elevation.*
- *Nos. 10-17 North Drive are a terrace of three storey buildings built in the 1960's and detract from the overall character of the area in terms of their form, design and development. The projecting integral garages at ground floor level give a bleakness to the street frontage.”*

Materials and details

“A variety of materials have been used for house construction in the conservation area, with brick being the predominant material. Some houses were finished with roughcast or render, notably to upper floors, as part of their design. In some places this has survived unpainted.

The green tile roof to no. 29 Abbotsleigh Road is unusual, otherwise roofs are mainly of plain clay tile or concrete tile. Tiles are also used as vertical coverings to bays, gables and dormers to a few properties. Stone is used on a few buildings for details around windows.

Exposed timber occurs on a few buildings in Ullathorne and Abbotsleigh Roads. Timber is also used for traditional windows and doors as well as front boundary fences. All original materials help create the area's special interest and appearance and should be looked after or reinstated wherever possible.”

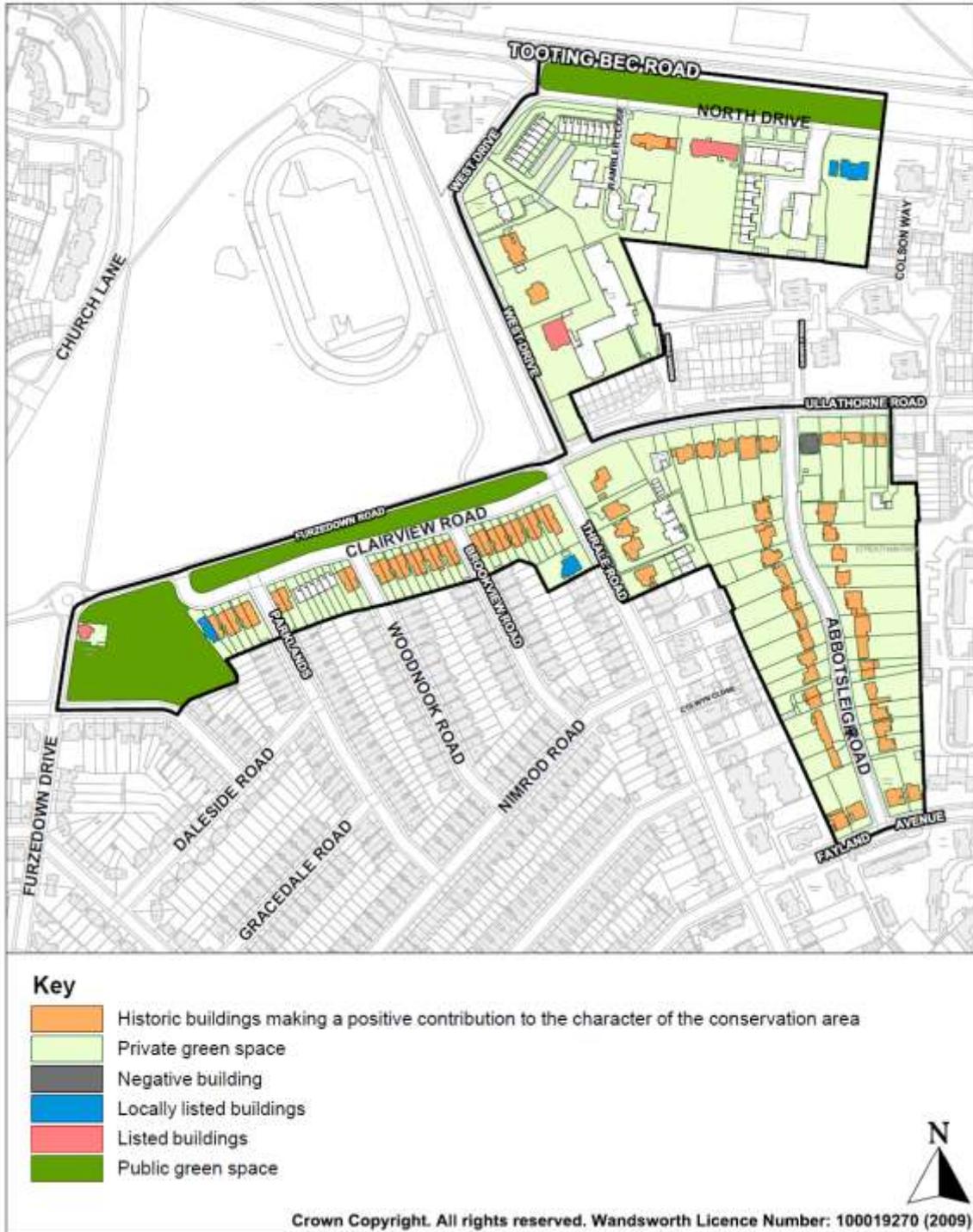


Figure 6.11: Diagram from the LPA’s Conservation Area Appraisal setting out the relative contribution of the building stock in the conservation area. Site lies outside the area of this map.

Key Views

Page 17 of the LPA's Conservation Area Appraisal comments as follows:

"Local views are essentially confined to those looking out from the roads that approach Tooting Bec Common into the common, and also from the common towards the buildings fronting on to the common. The spaces between buildings allow views of the rich landscape setting to the houses...."

Contribution of Site to Significance by way of Setting

The Site lies approximately 200m to the north-east of the conservation area's northern boundary. It lies on Tooting Bec Common, views over which have been identified in the LPA's Conservation Area Appraisal as contribution to the conservation area's significance as an element of setting. The Lido itself, has been in its current use and closely linked use as a bathing lake, for over a century, as long as many of the Edwardian houses built in the conservation area, and therefore has been a long standing element and historical part of the setting of the conservation area. That said, views towards the Lido are more theoretical than actual given the distance and prevailing tree coverage on Tooting Bec Common and the Site's current use is not one that has any historical or former functional link with the conservation area, or the latter's component parts.

Overall, the Site is not considered to contribute towards the significance of the conservation area as an element of setting.

Development on the Site hypothetically has the potential to affect the significance of the conservation area (by setting) and therefore any potential heritage impacts will be assessed in Section 7.

Summary of Special Interest

Page 6 of the LPA's Conservation Area Appraisal comments:

"Streatham Park Conservation Area was designated a Conservation Area on 30 June 1987 and extended in May 1989. The overall character and appearance of the conservation area relies upon the relationship between the groups of detached and semi-detached late nineteenth and early twentieth century houses, particularly the frontage to Tooting Bec Common, as well as the historic landscape and vestiges of woodland surviving from large estates that were sold for development around the end of the nineteenth century. This gives the area a very green suburban character of low density and pleasantness. The margins of Tooting Bec Common in Clairview Road and North Drive and the grass verges with trees to Ullathorne and Abbotsleigh Roads give the impression of the common flowing into the area reinforcing its landscape character."

6.1.3 Tooting Bec Lido (Non Designated Heritage Asset)

The scheme proposals relate to the Pump Room of the Lido, and this assessment will therefore focus on the Pump Room alone. In addition, the proposals relate solely to the southern section of the Pump Room, which is a later extension. As discussed in Section 4, the northern part of the Pump Room (Northern Building) dates to 1932. The southern section of the Pump Room (Southern Building) dates from between 1938 and 1950.

Architectural Description

Northern Building

Northern Elevation

The northern elevation is two bays and one storey high formed of red brick laid in Flemish bond. The elevation contains a Pate's plate to the north-eastern corner, numerous areas of cementitious pointing (some fairly historic) and includes areas of ribbon pointing. There are some areas of brick mortar repairs as well. At low (plinth) level the building contains a cementitious render, which has blown in areas revealing the brickwork beneath. The elevation also contains a modern riser to the western side, a modern flue, installations for electrical conduits, security cameras etc., of no heritage value. The windows are set under flat headed brick lintels suggestive of concrete lintels behind. The windows themselves are original and comprise steel framed, fixed windows with later curvilinear glazing bars behind. The original window ledges are formed of brick, and coated with cementitious render. At parapet level one can see a concrete parapet, seemingly later with a modern flat roof above.

The front door contains the concrete render architrave that surmounts the door and the large clock above. This door, door architrave and clock are the focus for the elevation lying to the centre. The building is utilitarian in its detailing but has some loose Classical derivations in its symmetry and the use of Crittall style windows to mimic '6 over 6' sashes. The door itself has been overboarded to the front and back but is substantial and appears original.

Eastern Elevation

The elevation is also formed of red brick in Flemish bond. The elevation contains a security camera to the north-eastern corner, ferrous fixings in various locations, a gas meter, various electrical and other conduits, and various cracks to the elevation. Again the windows are set under flat brick heads, indicating a concrete or steel lintel internally. The windows are similar to the northern elevation in mimicking '6 over 6' sashes but open, pivoting centrally.

Western Elevation

The elevation has recently undergone works to introduce two new windows and re-render it in line with the overall recent improvement works to the Lido buildings. The elevation also includes interpretation boards indicating the history of the Pump Room filtration system. The windows are modern, powder coated aluminium or uPVC of no heritage value.

Southern Elevation

The building has no southern elevation as the Southern Building, the later extension, directly abuts this elevation.

Internally

The Northern Building still retains its Royle's filtration cylinders for Pumps 1-3. There are two new structures internally formed of breeze blocks, to the western side, but otherwise much of the plant appears original. From an internal inspection it is clear that the window lintels are formed of concrete.

The building internally was seemingly built with concrete beams to the room with steel I-beams to support the span.



Figure 6.12: Showing 2 of the 3 cylinders. Modern enclosures to the right hand side.



Figure 6.13: Original Royles valve board to the original Royles cylinders.

Southern Building

Northern Elevation

The building has no northern elevation as the Southern Building, the later extension, directly abuts the southern elevation of the Northern Building.

Eastern Elevation

The elevation contains three bays and is one storey formed of red brick laid in Flemish bond. The brickwork to the Southern Building is subtly darker, and upon close inspection of a later date than the Northern Building. Towards the parapet wall, the brickwork appears to have been replaced on many occasions indicating repeated roof leaks and partial rebuilds.

The elevation contains a large cast iron downpipe, hopper and brackets, original from the construction of the building between 1938-1951. A concrete hopper lies at ground level. Between the two buildings is a rubberised infill with polystyrene between. The brickwork to the two buildings is not bonded together. The elevation shows signs of very significant structural problems with sizeable cracks. The elevation contains numerous Avonguard monitoring fixings.



Figure 6.14: Eastern elevation of South Building.



Figure 6.15: Note the junction between the two buildings. The brickwork between the two buildings is not bonded together.



Figure 6.16: Significant structural cracks in many areas across the elevation and residual evidence of the use of Avonguard crack monitoring equipment.



Figure 6.17: An example of a significant structural crack to the eastern elevation.



Figure 6.18: Window to the southern extreme, with a concrete lintel above.



Figure 6.19: Join between the two buildings, showing a rubberised infill and also polystyrene behind.

The windows are eclectic with one centrally pivoting steel window matching the examples on the eastern elevation of the Northern Building. The central window has been boarded in and could not be inspected internally due to the internal plant's location. To the southern extreme of the elevation is a window covered with tongue and groove boarding. The elevation also contains a large cast iron downpipe from the southern end of the elevation angled towards the northern extreme, dropping along its course. The first section from the parapet level hopper to the first bracket is uPVC, otherwise the downpipe is original to the construction of the Pump Room's (Southern Building).

Western Elevation

The elevation is partially obscured with tarpaulin shielding the building from the elements. The elevation also shows signs of significant structural cracks and is in notable disrepair. The elevation contains two bays, with the windows being steel matching the eastern elevation of the Northern Building and similarly have pivoting central sections. The elevation also contains cast iron hoppers and downpipes, and cementitious render at plinth level. At parapet level is a concrete parapet wall and a modern flat roof above.

Southern Elevation

The elevation contains a single bay and a doorway. The window again mimics a '6 over 6' sash window and centrally pivots. The doorway contains a cementitious render architrave rising from the plinth, similar to that seen on the front elevation of the Northern Building. The doorway would have been visible by visitors to the pool, when the original entrance building lay to the southern end of the pool hence the additional detailing. The window lintel comprises a flat arched brick lintel, with a brick and cementitious render cill.

Again the elevation shows signs of very significant structural disrepair and is partially covered with tarpaulin. A set of modern security gates have been affixed to the elevation of no heritage value. These fixings are becoming loose as the brickwork degrades.



Figure 6.20: *Southern Elevation of Southern Building.*

Internally

The roof of the building has evidently been renewed in recent times with steel profile sheeting and is supported by a succession of steel I-beams, one supporting the other, then delivering the loads to the external walls. These I-beams and the roof in places itself, are supported by temporary Acrow props. The interior shows signs of significant cracking to the brickwork and also contains an area covered with Tarpaulin to the south-western corner.

The building is one large open plan space containing plant from a variety of periods. The most sizeable installation are two Permutit Company cylinders, which are likely original to the construction of the building between 1938 and 1950. We know that the cylinders cannot be the same age as the Royles cylinders are United Water Softeners changed their name to the Permutit Company in 1937. The interior also contains a valve board on the party wall between the Northern and Southern Buildings which appears original to the building's construction as well as a number of large iron water pipes for supply and extraction. There are also more modern plant installations which are of no heritage value.



Figure 6.21: The building's roof shows signs of substantial structural problems and is currently propped in a number of places using temporary Acrow props.



Figure 6.22: One of the cylinders to the Southern Building.



Figure 6.23: Main corridor, leading to the southern elevation. Shows the main water pipe to the cylinders.



Figure 6.24: Plant in north-western corner.



Figure 6.25: Permutit Company cylinder No. 1 in Southern Building.



Figure 6.26: Permutit Company cylinder No. 2 in Southern Building.



Figure 6.27: Historic Saunders valve, likely original to building.



Figure 6.28: Modern plant machinery of no heritage value.



Figure 6.29: Original valve board on party wall between the Northern and Southern Buildings.



Figure 6.30: Modern plant in the north-western corner.

Assessment of Significance

Tooting Bec Bathing Lake/Lido Pump Room (Non Designated Heritage Asset)

Tooting Bec Lido Main Buildings

The Pump Room forms ancillary building to the main lido facilities: the pool, changing cubicles, aerator and café. Since the bathing lake was converted to lido use, the Pump Room has formed an integral part of the operational requirement to lido use.

The Lido buildings and pool comprise two principal phases: 1) the original 1906 Bathing Lake buildings; 2) the 1932 conversion to a lido.

The original bathing lake was the brainchild of Reverend John Hendry Anderson (Wandsworth Borough Councillor and vicar of St Nicholas Church, Tooting), design by H J Marten (Borough Surveyor). The pool was dug as a project for the unemployed.

The lido conversion typifies many of the characteristics of lidos built in the interwar period. Lido architects employed concrete pools, painted in azure colours, with ultra-modern facades with large glazed areas, and elevations painted in dazzling white or azure. The ancillary buildings such as the café, aerator and entrance blocks were often in strong Art Deco designs. Lidos are a typical building of the interwar period, reflecting the interest in health, sport and mass activities of the period.

The Thirties Society's *Farewell My Lido* (1991): *"Leisure time is now taken for granted as a natural feature of modern life. Yet for the masses is a relatively recent phenomenon, dating from the 1930s when the majority of the population first enjoyed the benefits of reduced working hours and annual paid holidays....The LCC lidos included shingle beaches, sunbathing and spectator terraces, flower beds, fountains, chutes and diving boards as well as cafes. Towels and bathing costumes could be hired.... The word lido, derived from the Latin 'litus' meaning shore, was borrowed from the famous beach resort of Venice and ...therefore were their lending their facilities an air of exotic excitement and continental sophistication...."*

The lido itself forms an important local landmark and has provided a much valued and at times much used, local facility. Its provision by the local council as a means of bathing when first launched increases the illustrative historical and social communal value of the main lido swimming pool itself and original eastern changing cubicles. London boroughs were empowered under the 1846 and 1899 Baths and Washhouses Acts to provide outdoor as well as indoor baths, with the Tooting Bec Bathing Lake being constructed in 1906. The lido is also of national significance as the largest fresh water pool in England home of one of England's oldest swimming clubs, founded in 1906, and one of declining number of lidos nationally. The original entrance building had subtle Classical derivations, since demolished (due to be rebuilt) with the later lido buildings predominantly being in a more Art Deco style indicating their later construction date in the 1930s. The café and the fountain have the highest aesthetic design value of the on-site buildings.

The Lido buildings generally have associative historical value with the South London Swimming Club and are of illustrative historical value and social communal value as they have provided a valued local facility for many decades, some for over a century.

Pump Room's Northern Building

Neither the Northern Building, nor the Southern Building, form part of the original Tooting Bec Bathing Lake buildings built in 1906. The Northern Building forms part of the 1931/32 buildings constructed on-site to convert the bathing lake to a lido, in line with the fashion on the 1920s and 1930s for local authority funded exercise facilities.

The Northern Building has a more elaborately designed front elevation (albeit still relatively plain) than the remainder of the building as the northern elevation is highly visible within the lido complex. The Northern Building is considered to possess an element of aesthetic fortuitous value, and a marginal

element of aesthetic design value. The building's main significance lies in its associative historical value with the Lido and the South London Swimming Club forming part of the swimming pool buildings over many decades. Its contribution is the lowest of the on-site historical buildings as it is not one of the original bathing lake buildings, nor one of the initial lido conversion buildings.

The interior of the Northern Building includes much of its original plant, most notable the Royles cylinders. These cylinders and the pipework that serves them are considered to contribute as strongly as the building itself to the significance of the non designated heritage asset. These cylinders are also a well-preserved example of water filtration, aeration and sterilisation in swimming pool plant, pioneered by Royles Engineering Ltd of Irlam, from 1910 onwards. The Lido's existing aerator or fountain is a vital element of this system and a distinctive feature of lidos of this era.

There are modern infill enclosures internally formed of breeze blocks which are of no heritage value.

Pump Room's Southern Building

The southern building was built between 1938 and 1950 in a similar but not identical style to the Northern Building. The building is not therefore part of the initial lido conversion works and likely was included to house additional plant at a later date. The building is exceptionally plain to the southern elevation. The only elements of noteworthy detailing across the elevations are the windows that match the Northern Building (eastern elevation) and the cast iron downpipes and hoppers that relieve the otherwise plain elevations. The building is not aesthetically displeasing, but does not possess any notable architectural merit. It has an element of aesthetic fortuitous value, and a marginal element of aesthetic design value.

The building's main significance lies in its associative historical value with the Lido and the South London Swimming Club forming part of the swimming pool buildings over many decades. The building has an element of associative historical value with the South London Swimming Club and the lido generally as well as social communal value and illustrative historical value for the local community as forming part of the lido swimming pool buildings over many decades. Its contribution is the lowest of the on-site historical buildings as it is not one of the original bathing lake buildings, nor one of the initial lido conversion buildings but a plain addition to an ancillary building. Its contribution to the significance of the Lido building's is positive, but only marginally above neutral.

7.0 Scheme Overview and Assessment of Heritage Impacts

7.1 Scheme Overview

- The scheme proposes the demolition of the existing Southern Building of the Pump Room due to significant structural issues with the existing building;
- Installation of new, stronger foundations to seek to prevent a reoccurrence of the structural problems encountered with the existing building;
- Rebuilding on the same footprint and same dimensions as the existing building;
- No windows are proposed in the western and eastern elevations. A single window is proposed above the new central doorway proposed to the southern elevation;
- New brick elevations are proposed using new, red brick; and
- One hopper and downpipe are proposed to the western elevation. To the eastern new downpipes and hoppers are proposed.

7.2 Assessment of Potential Heritage Impacts

7.2.1 Streatham Park Conservation Area

Demolition of Southern Building

In Section 6, we assessed that the Lido does not contribute towards the conservation area's significance by setting. The demolition of the existing building would therefore preserve the significance of the conservation area by setting, looking at this element in isolation.

Replacement New Building

Structural Movement in Existing Building

The structural movement in the existing building is confirmed by the Thomasons' Structural Report of January 2018 and is clearly evident from on-site inspection and as shown within this report. The long term solution recommended on Page 12 of their report was rebuilding the existing building. This is an important consideration, confirming that the building is only proposed to be demolished and rebuilt due to significant long term structural issues with the building.

Replicate Existing Footprint

The scheme proposes to reinstate the building on the same footprint at the existing building. This part of the scheme would not therefore be perceivable from the conservation area and would have a neutral impact on the significance of the conservation area as an element of setting.

Proposed Elevations

The proposed western and eastern elevations would be window-less, as distinct from the current elevations in these locations which contain a small number of windows. The existing windows do not allow visibility into the Pump Room as they have obscured glass and function only to allow natural light to illuminate the interior.

The existing windows do break down the existing elevation to a degree but this is not considered an important or necessary function as the existing and proposed building is a utilitarian building with an industrial function to pump and sterilise the lido's water. The very limited architectural merit of the existing Southern Building has already been noted. The existing windows are also a point of structural weakness in the existing building, and have been largely omitted from the proposed building to seek to prevent a reoccurrence of the same problem. This part of the proposals is considered to have a neutral impact on the significance of the conservation area as an element of setting.

To the southern elevation, a new central doorway is proposed, which echoes the position of the central doorway on the Northern Building’s northern elevation, and is considered a more complementary design to the existing southern elevation as it corresponds to the very loose Classical symmetry of the Northern Building. Above the doorway a new window is proposed. This part of the proposals is considered to enhance the significance of the conservation area as an element of setting.

Proposed Materials

The scheme proposes the replacement of the existing cast iron hoppers and downpipes to the side elevations and replacement with new uPVC (black) downpipes. The existing downpipes make a limited but positive contribution towards the significance of the non designated heritage asset and their replacement with economical uPVC equivalents would result in a minor degree of harm to the significance of the non designated heritage asset. That said, in the context of the conservation area, the specific detailing of the building cannot be seen from the conservation area and this minor departure in detailing from the existing is not considered to detrimentally impact on the significance of the conservation area as an element of setting. The Lido would continue to contribute towards to the significance of the conservation area by setting to the same limited degree as it does at present and therefore overall, this part of the scheme is considered to have a neutral impact on the significance of the conservation area by setting.

The new walls would be formed of breeze blocks to the exterior, and clad in red brick slips to the exterior to all the walls to read externally as brick built. This part of the proposals has been informed by the construction of the existing building and is considered an appropriate design response. This part of the proposals is considered to have a neutral impact on the significance of the conservation area as an element of setting.

Overall Assessment of Impact

The Site lies approximately 200m to the north-east of the northern conservation area boundary. Given the prevailing mature trees between Tooting Bec Road and the Pump Room only glimpsed views are possible looking towards the Site (see Figure 7.1).



Figure 7.1: View looking north-east from the conservation area’s northern boundary towards the Site.

In reality given that the proposed scheme is replacing the existing building’s footprint and built form to the same density and bulk as before, there would no perceivable visual impact from the

conservation area. Any potential impact is therefore more 'academic' than visual as relates to the design of the replacement building as part of the lido, which contributes, albeit only to a marginal degree to the significance of the conservation area.

The proposed demolition of the existing building has been assessed as likely to have a neutral impact on the significance of the conservation area though the change to its setting. However, the design of the replacement building has also been identified as an improved design over the existing building, the former complementing the architectural style of the Northern Building to a higher degree. This is considered a heritage benefit. Another heritage benefit is the replacement of the existing building to allow for the long term use of the Pump Room for its existing, and indeed its original use, serving the lido. The Pump Room is an integral and vital part of the Lido's functioning and the lido would cease to operate without it. We have assessed in Section 6, that the lido's significance lies in its communal and historical value, and re-providing the Southern Building to the Pump Room in an improved facility that would ensure the long term survival of the existing lido use is considered a notable and powerful heritage benefit.

When the scheme is considered as a whole, taking the harm and the heritage benefits into account, the scheme is considered to enhance the significance of the conservation area as an element of setting.

7.2.2 Garrad's Road Conservation Area

Demolition of Southern Building

In Section 6, we assessed that the contribution made by the Lido to the conservation area's significance, by way of setting, is very limited and only lies at marginally positive. The Site, as a later addition to the later conversion of the bathing lake to a lido, makes a positive but negligible contribution towards the significance of the conservation area by way of setting.

The demolition of the existing building would therefore result in the faintest element of harm to the setting of the conservation area, considered to be negligible, looking at this element in isolation.

Replacement Building Design

Largely identical points would be raised as per the assessment of impact for the Streatham Park Conservation Area. The Site lies in close proximity at approximately 30m to the west of the conservation area's western boundary. However, the potential visibility is even less than with the Streatham Park Conservation Area assessment, given the fencing and treeline along the eastern side of the railway line (see Figure 7.2).

In reality given that the proposed scheme would replace the existing building's footprint and built form to the same density and bulk as before, there would no perceivable visual impact from the conservation area. Any potential impact is therefore more academic than visual and relates to the design of the replacement building as part of the lido, which contributes, albeit only to a marginal degree to the significance of the conservation area.



Figure 7.2: View looking west from the conservation area's western boundary towards the Site.

The proposed demolition of the existing building has been assessed as likely to cause a minute level of harm to the significance of the conservation area by setting. However, the design of the replacement building has also been identified as an improved design over the existing building that complements the architectural style of the Northern Building to a higher degree. This is considered a heritage benefit. Another heritage benefit is the replacement of the existing building to allow for the long term use of the Pump Room for its existing, and indeed its original use, serving the lido. The Pump Room is an integral and vital part of the Lido's functioning and the lido would cease to operate without it. We have assessed in Section 6, that the lido's significance lies in its communal and historical value, and re-providing the Southern Building to the Pump Room in an improved facility that would ensure the long term survival of the existing lido use is considered a notable and powerful heritage benefit.

When the scheme is considered as a whole, taking the harm and the heritage benefits into account, the scheme is considered to enhance the significance of the conservation area through change to its setting.

7.2.3 Tooting Bec Lido (Non-Designated Heritage Asset)

Demolition of Existing Southern Building

As discussed in Section 6, the Southern Building was built between 1938 and 1950 in a similar but not identical style to the Northern Building. The building is not therefore part of the initial lido conversion works and likely was included to house additional plant at a later date. The Southern Building is exceptionally plain to its southern elevation. The only part of noteworthy detailing is the windows that match the Northern Building (eastern elevation) and the cast iron downpipes and hoppers that relieve the monotony. The building is not aesthetically displeasing, but does not possess any notable architectural merit.

It has an element of aesthetic fortuitous value, and a marginal element of aesthetic design value. The building's main significance lies in its associative historical value with the Lido and the South London Swimming Club forming part of the swimming pool buildings over many decades. The building has an element of associative historical value with the South London Swimming Club and the lido generally as well as social communal value and illustrative historical value for the local community as forming part of the lido swimming pool buildings over many decades. Its contribution is the lowest of the on-site historical buildings as it is not one of the original bathing lake buildings, not one of the initial lido conversion buildings but a plain addition to an ancillary building. Its contribution is positive, but only marginally above neutral.

Given this positive contribution to the significance of the non designated heritage asset, albeit very marginal, a minute element of harm by its demolition to its significance is acknowledged.

Replacement Building Design

Similar comments would be made as set out for the assessment of impact for the Streatham Park Conservation Area:

- The requirement to rebuild the existing Southern Building due to significant structural issues;
- The proposed replacement building would be of the same footprint, bulk and scale;
- The western and eastern elevations would not contain windows to reduce the likelihood of a repetition of the structural problems faced by the existing buildings; and
- A new centrally located door and window above to the Southern Building's southern elevation would better complement the architectural style of the Northern Building's northern elevation and would sit more comfortably with its neighbour therefore than the existing building.

The scheme proposes the replacement of the existing cast iron hoppers and downpipes to the side elevations and replacement with new uPVC (black) downpipes. The existing downpipes make a limited but positive contribution towards the significance of the non designated heritage asset and their replacement with economical uPVC equivalents would result in a minor degree of harm to the significance of the non designated heritage asset.

The new walls would be formed of breeze blocks to the exterior, and clad in red brick slips to the exterior to all the walls to read externally as brick built. This part of the proposals has been informed by the construction of the existing building and is considered an appropriate design response. It is not clear from the scheme drawings what bond would be used when applying the brick slips. The existing walls use Flemish bond which could be achieved with brick slips.

Overall, this part of the proposals is considered to have a neutral impact on the significance of the non designated heritage asset.

7.2.4 Overall Assessment of Impact

The proposed demolition of the existing building and installation of uPVC downpipes to the side elevations, have been assessed as likely to cause a minute level of harm to the significance of the non designated heritage asset. However, the design of the replacement building has also been identified as an improved design over the existing building that complements the architectural style of the Northern Building to a higher degree. This is considered a heritage benefit. The Northern Building, which contributes to higher extent to the significance of the non designated heritage asset, than the Southern Building, would be unaffected by the proposals.

Another heritage benefit is the replacement of the existing building to allow for the long term use of the Pump Room for its existing, and indeed its original use, serving the lido. The Pump Room is an integral and vital part of the Lido's functioning and the lido would cease to operate without it. We have assessed in Section 6, that the lido's significance lies in its communal and historical value, and re-providing the Southern Building to the Pump Room in an improved facility that would ensure the long term survival of the existing lido use, is considered a notable and powerful heritage benefit.

When the scheme is considered as a whole, taking the harm and the heritage benefits into account, the scheme is considered to enhance the significance of the existing lido buildings (non designated heritage asset).

7.3 Scheme Assessment Against Legislation and Policy

Legislation – The Planning (Listed Buildings and Conservation Areas) Act 1990

The Act sets out regarding applications for planning permission within conservation areas that:

“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

Section 72 does not apply to the setting of conservation areas however, and therefore is not relevant in this instance.

National Policy – NPPF and NPPG

In line with Paragraph 189 of the NPPF, the significance of the potentially affected heritage assets has been outlined in Section 6 of this Heritage Statement, including any contribution made by setting to the significance of the identified heritage assets. In Section 7 we have also undertaken an assessment of the potential heritage impacts of the proposed scheme.

The scheme proposals have been assessed as likely to enhance the significance of the both the Garrad’s Road Conservation Area and the Streatham Park Conservation Area by setting; as well as enhancing the significance of the Lido’s buildings (non designated heritage asset) by setting. The NPPF paragraphs relating to harm to the historic environment (e.g. 194, 195, 196, 197 etc..) do not apply.

We have shown in our detailed Assessment of Heritage Impacts how the scheme has sought to minimise any heritage impacts and therefore satisfies Paragraph 190 of the NPPF. The design process has taken account of the key heritage principles of paragraphs 192 and 193 of the NPPF. Clear justifications for those elements of the scheme likely to have a heritage impact, are also provided in the Assessment of Heritage Impacts (Section 7 of this Heritage Statement), as required under Paragraph 194 of the NPPF.

National Policy – NPPF and NPPG

For the reasons given above the application proposals are considered to comply with London Plan (As Amended) Policy 7.6 Architecture, Policy 7.8 Heritage Assets and Archaeology; Wandsworth Local Plan Core Strategy Adopted March 2016 Core Policies for Issues: Policy IS 3; and Development Management Policies Document Adopted March 2016 Policy DMS 2 - Managing the historic environment.

8.0 Summary and Conclusions

This Heritage Statement has been produced by Built Heritage Consultancy to accompany a planning application by Richmond and Wandsworth Councils for the demolition and rebuilding of part of the Tooting Bec Lido Pump Room. The Heritage Statement has assessed the significance of any on-site heritage assets and any in the surrounding area that might potentially be affected by the scheme proposals. It has also assessed the potential heritage impacts on the identified heritage assets in light of the proposed scheme.

Legislation

The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out regarding applications for planning permission within conservation areas that:

“s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”

Section 72 does not apply to the setting of conservation areas however, and therefore is not relevant in this instance.

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In line with Paragraph 189 of the NPPF, the significance of the potentially affected heritage assets has been outlined in Section 6 of this Heritage Statement, including any contribution made by setting to the significance of the identified heritage assets. In Section 7 we have also undertaken an assessment of the potential heritage impacts of the proposed scheme.

The scheme proposals have been assessed as likely to enhance the significance of the both the Garrad’s Road Conservation Area and the Streatham Park Conservation Area by setting; as well as enhancing the significance of the Lido’s buildings (non-designated heritage asset) by setting. The NPPF paragraphs relating to harm to the historic environment (e.g. 194, 195, 196, 197 etc..) do not apply.

We have shown in our detailed Assessment of Heritage Impacts how the scheme has sought to minimise any heritage impacts and therefore satisfies Paragraph 190 of the NPPF. The design process has taken account of the key heritage principles of paragraphs 192 and 193 of the NPPF. Clear justifications for those elements of the scheme likely to have a heritage impact, are also provided in the Assessment of Heritage Impacts (Section 7 of this Heritage Statement), as required under Paragraph 194 of the NPPF.

National Policy – NPPF and NPPG

For the reasons given above the application proposals are considered to comply with London Plan (As Amended) Policy 7.6 Architecture, Policy 7.8 Heritage Assets and Archaeology; Wandsworth Local Plan Core Strategy Adopted March 2016 Core Policies for Issues: Policy IS 3; and Development Management Policies Document Adopted March 2016 Policy DMS 2 - Managing the historic environment.

Appendices:

Appendix 1: Bibliography

This Heritage Statement has been produced predominantly using the sources listed below. Please also note the Legislation, Policy and Guidance set out in **Appendix 2**.

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Appendix 2: Legislation, Policy and Guidance

Legislation

The Planning (Listed Buildings and Conservation Areas) Act 1990

Listed Buildings

The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for; *“(s.7) ... any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest”*

In determining such applications the following duty is placed upon the decision maker: *“Section 16(2) In considering whether to grant listed building consent for any works the local planning authority, or as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

Section 66 contains a similar duty, which states: *“In considering whether to grant planning permission ... for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*

Case Law since 2012

Recent case law has added clarification to the interpretation of Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990. Section 66 states that special regard must be given by the authority in the exercise of planning functions to the desirability of preserving or enhancing Listed Buildings and their setting.

Barnwell Manor Wind Energy Limited (2014)

An appropriate example of upholding a S66 is in the case of West Coast Energy’s proposal for five wind turbines to be installed within the setting of the Grade I listed Barnwell Manor, Northamptonshire. The National Trust advocated that the proposals would have an adverse impact upon the heritage asset’s setting and, reinforced by local opposition, the proposal was rejected by East Northamptonshire District Council in 2010.

The developers won an appeal for four turbines, however, this was overturned at the High Court who said the decision was legally flawed. A subsequent Appeal to overturn the High Court ruling in was also dismissed in February 2014.

Lord Justice Sullivan held that, in enacting Section 66(1) of the Listed Buildings Act 1990, Parliament intended that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm. It should be given ‘considerable importance and weight’ when the decision-maker carried out the balancing exercise. It confirmed that ‘preserving’ meant doing ‘no harm’. But Lord Justice Sullivan said that this created a ‘strong presumption against the grant of planning permission’. It is that ‘strong presumption’ which made Barnwell stand out from earlier decisions.

The judgment found that the Inspector considering the appeal had not given special regard to the desirability of preserving the setting and had moved too swiftly to the balancing exercise under the NPPF.

Mordue (2015)

In *Mordue v Secretary of State for Communities and Local Government* [2015], the claimant argued that the inspector had failed to apply the duty imposed by s.66 by neglecting to give “considerable importance and weight” to the acknowledged impact of a wind turbine on the setting of listed

buildings.

The court allowed the claimant's application. The inspector had referred to the impact on listed buildings but, applying the NPPF guidance, concluded that heritage issues were outweighed by the environmental benefits. However, there was no indication of what weight the inspector had given in each case or cumulatively.

The judge felt bound to follow the judgment in *East Northamptonshire v Secretary of state for communities and local government* [2014], which placed the onus of proof on the secretary of state to demonstrate that considerable importance and weight had been given to the impact on listed buildings, rather than on the claimant to establish that the decision was legally flawed. In *Mordue*, therefore, applying the NPPF alone was not sufficient, because it did not demonstrate that the required weight had in fact been given.

Notably, it was held that paragraph 134 (now Paragraph 196 in the Revised 2019 NPPF), read together with 132 and 133 of the Framework (now Paragraphs 193-195 of the Revised 2019 NPPF), lays an approach which corresponds with the duty in section 66(1) and a decision maker who works through those paragraphs in accordance with their terms, will have complied with the section 66(1) duty.

Forge Field (2014)

Despite the decision in *Barnwell Manor*, the LPAs in the Forge Field and South Lakeland cases (decided in June and November 2014 respectively) fell into the same trap of carrying out a balancing exercise in accordance with Paragraph 134 of the NPPF (now Paragraph 196 in the Revised 2019 NPPF), after concluding the relevant proposal will lead to less than substantial harm to designated heritage assets, without *demonstrably* giving "considerable importance and weight" to the desirability of preserving those heritage assets. In both cases, the High Court quashed the grant of planning permission. However, it is clear from the *Babergh* case (decided in October 2014) that provided the decision-maker demonstrably has regard to the statutory duty in section 66(1) and/or section 72(1) of the Act when carrying out the balancing exercise pursuant to Paragraph 134 of the NPPF (now Paragraph 196 as above), the Courts are unlikely to interfere with their decision unless it is so unreasonable that no reasonable person could have made it.

Steer v SSCLG (2017)

In this case the judge held, and upheld by the Court of Appeal in July 2018, that the Inspector erroneously concluded that a physical or visual connection was needed for an element to form part of the setting of a heritage asset. The inspector disregarded the existence of an historical, social and economic connection between the listed building and the site. This approach, it was held, was inconsistent with the broad meaning given to "setting" in the NPPF, the PPG and Historic England's Historic Environment Good Practice Advice in Planning Note 3 (2017).

Conservation Areas

The Planning (Listed Buildings and Conservation Areas) Act (1990) sets out regarding applications for planning permission within conservation areas that:

"s.72(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

There is no corresponding statutory duty to have special regard to the desirability of preserving the setting of conservation areas.

National Policy

National Planning Policy Framework (NPPF) (Revised 2019)

The Government's guidance in relation to conserving and enhancing the historic environment is set out in Chapter 16 of the Framework (Paragraphs 184-202). Prior to Section 16 there are also some relevant paragraphs to heritage assets that will be provided below:

"79. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply: ...

b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

c) the development would re-use redundant or disused buildings and enhance its immediate setting;"

"118. Planning policies and decisions should:

...c) give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land;

d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)"

"127. Planning policies and decisions should ensure that developments:

...c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)...."

145. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

...c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;

d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces...."

Section 16, Conserving and Enhancing the Historic Environment, contains for the following key paragraphs:

"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.

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.

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.

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.

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.

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.*

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.

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.

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.

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.

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.

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.

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 Conservation Area or World Heritage Site as a whole.

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.”

Annex 2: Glossary (Part)

“Heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing).”

Local Policy

London Plan (As Amended)

Policy 7.6 Architecture

This policy states:

Strategic

“A Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape. It should incorporate the highest quality materials and design appropriate to its context.

Planning decisions

B Buildings and structures should:

a be of the highest architectural quality

b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm

c comprise details and materials that complement, not necessarily replicate, the local architectural character

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

e incorporate best practice in resource management and climate change mitigation and adaptation

f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces

g be adaptable to different activities and land uses, particularly at ground level

h meet the principles of inclusive design

i optimise the potential of sites.”

Policy 7.8 Heritage Assets and Archaeology

This policy states:

Strategic

“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.

Planning decisions

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.

LDF preparation

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, 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.”

Wandsworth Local Plan Core Strategy Adopted March 2016

Core Policies for Issues: Policy IS 3

This policy states:

“Good Quality Design and Townscape

a. The Council will protect and reinforce the existing varied character and heritage of the borough.

b. The layout, form and design of new buildings and the spaces around them should contribute positively to the local environment, creating places, streets and spaces which meet the needs of people, are visually attractive, safe, accessible to all, sustainable, functional, adaptable, durable, inclusive, and while having their own distinctive identity maintain and reinforce local character. Designs and layouts which make efficient and effective use of land, including innovative approaches that help deliver high quality outcomes will be promoted.

c. Throughout the borough, with the exception of the major development sites within Nine Elms, the

scale and density of development should make the most effective use of land and buildings, paying regard to the site's accessibility and existing and proposed infrastructure and the London Plan 2015 density matrix, without harming the character of the surrounding area. Within the Opportunity Area, subject to the provision of necessary infrastructure and paying regard to the London Plan 2015 density matrix, there is scope to create a new community in a high quality urban setting. An indication of appropriate density setting for individual sites is included in the Site Specific Allocations Document. In new housing development appropriate provision must be made for amenity space and, for family housing, play space.

d. Tall buildings, that is those which are substantially taller than the prevailing height of neighbouring buildings and/or which significantly change the skyline, may be appropriate in the borough's town centres, Nine Elms near Vauxhall or Putney Wharf, Wandsworth Riverside Quarter, Wandle Delta, Ransomes Dock, Battersea Power Station and Lombard Road/York Road Riverside focal points of activity (as illustrated on Map 17). Some locations within these areas will be sensitive to, or inappropriate for, tall buildings. Applications for tall buildings will need to justify themselves in terms of the benefits they may bring for regeneration, townscape and public realm and be of high architectural quality, respect local context and the historic environment. Tall buildings are likely to be inappropriate in other areas. Detailed criteria for the assessment of tall buildings is set out in DMPD Policy DMS4, consideration of the appropriateness of tall buildings on individual sites, and the heights at which buildings will be considered 'tall' on individual sites is set out in the individual site allocations and in Appendix 1 of the Site Specific Allocations Document.

e. Views of the Westminster World Heritage Site will be protected in accordance with the London Plan 2015 and the London View Management Framework. f. The Council's position on the protection of Important Local Views is set out in the Local Views Supplementary Planning Document."

Development Management Policies Document Adopted March 2016

Policy DMS 2 - Managing the historic environment

This policy states:

"a. In addition to satisfying the relevant parts of Policy DMS1, applications affecting a heritage asset or its setting will be granted where it:

- i. is in accordance with the NPPF, the London Plan and relevant Historic England guidance;
- ii. takes full account of the Council's Conservation Area Appraisals and Management Strategies;
- iii. is accompanied by a satisfactory Statement of Heritage Significance and Impact (Heritage Statement) produced by a heritage specialist where appropriate.

b. Applications will be granted where they sustain, conserve and, where appropriate, enhance the significance, appearance, character and setting of the heritage asset itself, and the surrounding historic environment, and where they have consideration for the following:

- i. the conservation of features and elements that contribute to the heritage asset's significance and character. This may include: chimneys, windows and doors, boundary treatments, original roof coverings, shopfronts or elements of shopfronts in conservation areas, as well as internal features such as fireplaces, plaster cornices, doors, architraves, panelling, walls and historic planform in listed buildings;
- ii. the reinstatement of features and elements that contribute to the heritage asset's significance which have been lost which may include any of the above items or others;
- iii. the conservation and, where appropriate, the enhancement of the space in between and around buildings as well as front, side and rear gardens;
- iv. the removal of additions or

modifications that are considered harmful to the significance of any heritage asset. This may include the removal of pebbledash, paint from brickwork, non-original style windows, doors, satellite dishes or other equipment; v. the use of the heritage asset should be compatible with the conservation of its significance; vi. historical information discovered during the application process shall be submitted to the Greater London Historic Environment Record by the applicant.

c. Development involving substantial harm to heritage assets will only be granted in exceptional circumstances, where the great weight given to conservation has been fully taken into account; and the substantial public benefit derived has been clearly and convincingly demonstrated in accordance with the requirements of the NPPF.

d. Proposals for development involving ground disturbance in Archaeological Priority Areas (as identified on the Policies Map), will need a desk based archaeological assessment and may also require field evaluation. The recording and publication of results will be required and in appropriate cases, the Council may also require preservation in situ, or excavation.

e. Further detail will be set out in a forthcoming Historic Environment Supplementary Planning Document (SPD).

f. Applications affecting non-designated heritage assets (such as locally listed buildings) will be dealt with in accordance with the NPPF. g. Where there is evidence of deliberate neglect of or damage to a heritage asset the deteriorated state of the heritage asset will not be taken into account in any decision.”

Guidance

National Planning Practice Guidance (As amended)

The NPPG provides added to clarity to the interpretation of the NPPF.

Principles of Selection for Listed Buildings (2018)

The Principles for Selection of Listed Buildings sets out that a building has to be of special architectural or historic interest to be listed compiled under the Planning (Listed Buildings and Conservation Areas) Act 1990.

Listed buildings are graded to reflect their relative special architectural and historic interest.

- *“Grade I buildings are of exceptional special interest;*
- *Grade II* buildings are particularly important buildings of more than special interest;*
- *Grade II buildings are of special interest, warranting every effort to preserve them.”*

“The Secretary of State’s policy is to provide as much clarity as possible about where the special interest of buildings lie when listing them or revising an existing list entry. Section 1(5A) of the 1990 Act allows the Secretary of State to state definitively in a list entry if particular parts or features of the building (including any objects or structures that are fixed to it, or in its curtilage) are not part of the listed building or of special architectural or historic interest. Unless particular parts or features have been so excepted the protection conferred by listing applies to the whole of the building, not just its exterior....”

“The Secretary of State uses the following criteria when assessing whether a building is of special architectural or historic interest and therefore should be added to the statutory list:

- *Architectural Interest: To be of special architectural interest a building must be of importance in its design, decoration or craftsmanship. Special interest may also apply to particularly significant examples of building types or techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms. Engineering and technological interest can be an important consideration for some buildings. For more recent buildings in particular, the*

functioning of the building (to the extent that this reflects on its original design and planned use, where known) will also be a consideration. Artistic distinction can also be a factor relevant to the architectural interest of buildings and objects and structures fixed to them.

- *Historic Interest: To be able to justify special historic interest a building must illustrate important aspects of the nation's history and / or have closely substantiated historical associations with nationally important individuals, groups or events; and the building itself in its current form will afford a strong connection with the valued aspect of history."*

"When making a listing decision, the Secretary of State may also take into account:

- *Group value: The extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings. Sometimes group value will be achieved through a co-location of diverse buildings of different types and dates.*
- *Fixtures and features of a building and curtilage buildings: The desirability of preserving, on the grounds of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building.*
- *The character or appearance of conservation areas: In accordance with the terms of section 72 of the 1990 Act, when making listing decisions in respect of a building in a conservation area, the Secretary of State will pay special attention to the desirability of preserving or enhancing the character or appearance of that area.*

General principles

Age and rarity:

The older a building is, and the fewer the surviving examples of its kind, the more likely it is to have special interest. The following chronology is meant as a guide to assessment; the dates are indications of likely periods of interest and are not absolute. The relevance of age and rarity will vary according to the particular type of building because for some types, dates other than those outlined below are of significance. However, the general principles used are that:

- *before 1700, all buildings that retain a significant proportion of their original fabric are likely to be regarded of special interest;*
- *from 1700 to 1850, most buildings that retain a significant proportion of their original fabric are likely to be regarded of special interest, though some selection is necessary;*
- *from 1850 to 1945, because of the greatly increased number of buildings erected and the much larger numbers that have survived, progressively greater selection is necessary;*
- *careful selection is required for buildings from the period after 1945, another watershed for architecture.*

Buildings less than 30 years old:

Such buildings are not normally considered to be of special architectural or historic interest because they have yet to stand the test of time. It may nevertheless be appropriate to list some modern buildings despite their relatively recent construction – for example, if they demonstrate outstanding quality (generally interpreted as being equivalent to Grade I or II). The Secretary of State calculates the age of a building from the point at which the ground was first broken.*

Aesthetic merits:

The appearance of a building (both its intrinsic architectural merit or any group value) is often a key consideration in listing, but the special interest will not always be reflected in obvious external visual quality. Buildings that are important for reasons of technological or material innovation, engineering or as illustrating particular aspects of social or economic history, may have little external visual quality but can still be of special interest.

Selectivity:

Where a building qualifies for listing primarily on the strength of its special architectural interest, the fact that there are other buildings of similar or identical quality elsewhere is not likely to be a major consideration. However, a building may be listed primarily because it represents a particular historical type to ensure that examples of such a type are preserved. Listing in these circumstances is largely a comparative exercise and needs to be selective where a substantial number of buildings of a similar type and quality survive. In such cases, the Secretary of State's policy is generally to list only the most representative or most significant examples of the type.

National interest:

The emphasis in this document is to establish consistency in selection to ensure that not only are all buildings of strong intrinsic national architectural or historic interest included on the statutory list, but also the most significant or distinctive regional buildings that together make a major contribution to the national historic stock. For instance, the best examples of vernacular buildings will normally be listed because they illustrate the importance of distinctive local and regional building traditions. Similarly, for example, some buildings will be listed because they represent a nationally significant but localised industry, such as shoemaking in Northamptonshire or cotton production in Lancashire.

State of repair:

The general state of repair and upkeep of a building will not usually be a relevant consideration when deciding whether it meets the test of special architectural or historic interest. The Secretary of State will list a building that has been assessed as meeting the statutory criteria, irrespective of its state of repair. Loss of original fabric will however be a relevant consideration when considering special interest."

Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)

This Historic England guidance note clarifies how to assess heritage asset significance, suggested archival sources of information, it recommends best practice recording procedures and discussed unauthorised works. It is a useful resource to aid with the interpretation of the NPPF.

Cumulative Impact

Paragraph 28 states: *"The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset as a larger scale change. Where the significance of a heritage asset has been compromised in the past by unsympathetic development to the asset itself or its setting, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset in order to accord with NPPF policies. Negative change could include severing the last link to part of the history of an asset or between the asset and its original setting. Conversely, positive change could include the restoration of a building's plan form or an original designed landscape."*

Design and local distinctiveness

Paragraph 53 states: *"Both the NPPF (section 7) and PPG (section ID26) contain detail on why good design is important and how it can be achieved. In terms of the historic environment, some or all of the*

following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:

- *The history of the place;*
- *The relationship of the proposal to its specific site;*
- *The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept;*
- *The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size;*
- *The size and density of the proposal related to that of the existing and neighbouring uses;*
- *Landmarks and other built or landscape features which are key to a sense of place;*
- *The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces;*
- *The topography;*
- *Views into, through and from the site and its surroundings;*
- *Landscape design;*
- *The current and historic uses in the area and the urban grain;*
- *The quality of the materials.”*

Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets, 2017 GPA Note 3 (Second Edition)

The stated purpose of GP3 is to set “...out guidance, against the background of the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guide (PPG), on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas, and landscapes.

It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets. The guidance has been written for local planning authorities and those proposing change to heritage assets.

It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 – 1st edition, 2015 and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).”

A number of the key worthy sections are provided below for ease of reference.

“NPPF Glossary: Setting of a heritage asset

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 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 (NPPF, Annex 2: Glossary).”

“PPG: What is the setting of a heritage asset and how should it be taken into account?”

The “setting of a heritage asset” is defined in the Glossary of the National Planning Policy Framework.

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (PPG, paragraph: 013, reference ID: 18a-013-20140306)."

Views and setting

"The contribution of setting to the significance of a heritage asset is often expressed by reference to views, a purely visual impression of an asset or place which can be static or dynamic, long, short or of lateral spread, and include a variety of views of, from, across, or including that asset.

Views which contribute more to understanding the significance of a heritage asset include:

- *those where the composition within the view was a fundamental aspect of the design or function of the heritage asset;*
- *those where town- or village-scape reveals views with unplanned or unintended beauty;*
- *those with historical associations, including viewing points and the topography of battlefields;*
- *those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected;*
- *those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant."*

Setting and Views – A Staged Approach to Proportionate Decision-Taking

"...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 (i.e. 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.

Conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development. Many places coincide with the setting of a heritage asset and are subject to some degree of change over time. NPPF policies, together with the guidance on their implementation in the Planning Policy Guidance (PPG), provide the framework for the consideration of change affecting the setting of undesignated and designated heritage assets as part of the decision-taking process (NPPF, paragraphs 131-135 and 137) [since amended in the Revised 2019 NPPF to 192-197 and 200 respectively]

Amongst the Government's planning policies for the historic environment is that conservation decisions are based on a proportionate assessment of the particular significance of any heritage asset that may be affected by a proposal, including by development affecting the setting of a heritage asset. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to the complexity of the case, from straightforward to complex:

Step 1: Identify which heritage assets and their settings are affected

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated

Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it

Step 4: Explore ways to maximise enhancement and avoid or minimise harm

Step 5: Make and document the decision and monitor outcomes."

Historic England: Conservation Area Designation, Appraisal and Management; Historic England Advice Note 1 (2016)

HEAN1 provides guidance to LPAs on the management of Conservation Areas. It outlines best practice for their designation and for the production of conservation area character appraisals. The latter should be academically rigorous to allow the special interest of the conservation area in question to be clearly intelligible to the reader and therefore be used as a guide to how sensitive to change relative parts of a conservation area are.

Historic England Advice Note 2: Making Changes to Heritage Assets (2016)

The stated purpose of HEAN2 is to illustrate: *"...the application of the policies set out in the NPPF in determining applications for planning permission and listed building consent, as well as other non-planning heritage consents, including scheduled monument consent. It provides general advice according to different categories of intervention in heritage assets, including repair, restoration, addition and alteration, as well as on works for research alone, based on the following types of heritage asset: buildings and other structures; standing remains including earthworks; buried remains and marine sites; and larger heritage assets including conservation areas, landscapes, including parks and gardens, and World Heritage Sites. It will be useful to owners, developers, local planning authorities and others in considering works to heritage assets."*

English Heritage: Conservation Principles, Policies and Guidance – For Sustainable Management of the Historic Environment (2008)

Paragraph 31 states: *"Many heritage values are recognised by the statutory designation and regulation of significant places, where a particular value, such as 'architectural or historic interest' or 'scientific interest', is judged to be 'special', that is above a defined threshold of importance. Designation necessarily requires the assessment of the importance of specific heritage values of a place; but decisions about its day-to-day management should take account of all the values that contribute to its significance. Moreover, the significance of a place should influence decisions about its future, whether or not it is has statutory designation."*

The values recommended to assesses in the guidance are provided below:

Evidential value

“Evidential value derives from the potential of a place to yield evidence about past human activity.”

Historical value

“Historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative.”

“Illustrative value has the power to aid interpretation of the past through making connections with, and providing insights into, past communities and their activities through shared experience of a place. The illustrative value of places tends to be greater if they incorporate the first, or only surviving, example of an innovation of consequence, whether related to design, technology or social organisation. The concept is similarly applicable to the natural heritage values of a place, for example geological strata visible in an exposure, the survival of veteran trees, or the observable interdependence of species in a particular habitat. Illustrative value is often described in relation to the subject illustrated, for example, a structural system or a machine might be said to have ‘technological value’.”

“Association with a notable family, person, event, or movement gives historical value a particular resonance. Being at the place where something momentous happened can increase and intensify understanding through linking historical accounts of events with the place where they happened – provided, of course, that the place still retains some semblance of its appearance at the time. The way in which an individual built or furnished their house, or made a garden, often provides insight into their personality, or demonstrates their political or cultural affiliations. It can suggest aspects of their character and motivation that extend, or even contradict, what they or others wrote, or are recorded as having said, at the time, and so also provide evidential value.”

Aesthetic value

“Aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place.”

“Design value relates primarily to the aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole. It embraces composition (form, proportions, massing, silhouette, views and vistas, circulation) and usually materials or planting, decoration or detailing, and craftsmanship. It may extend to an intellectual programme governing the design (for example, a building as an expression of the Holy Trinity), and the choice or influence of sources from which it was derived. It may be attributed to a known patron, architect, designer, gardener or craftsman (and so have associational value), or be a mature product of a vernacular tradition of building or land management. Strong indicators of importance are quality of design and execution, and innovation, particularly if influential.”

Communal value

“Communal value derives from the meanings of a place for the people who relate to 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, but tend to have additional and specific aspects.”

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