

Ms Shanali Counsell
London Borough of Wandsworth
The Town Hall
Wandsworth High Street
London
SW18 2PU

Direct Dial: 020 7973 3763

Our ref: P01577906

19 June 2024

Dear Ms Counsell

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

**THE GLASSMILL 1 BATTERSEA BRIDGE ROAD SW11 3BZ
Application No. 2024/1322**

Thank you for your letter of 30 May 2024 regarding the above application for planning permission. Historic England was involved in pre-application discussions regarding these proposals last year, and although the development is slightly lower in height than the plans we reviewed, the following advice largely reflects our advice set out then. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England considers that this proposed tall building would be a harmful and incongruous addition to the London skyline, with wide-ranging impacts on the historic environment, including to designations of very high significance. If approved, the scheme could pave the way for other tall building development in the area and lead to further harm. We strongly recommend that the proposed building is significantly lowered in height to reduce its impact on the historic environment and to align with your Council's local policies for development on this site.

Historic England Advice

Significance of the historic environment

The development site is prominently located in Battersea on the south bank of the Thames and contains a 1980s office building known as the Glassmill. The Glassmill is not listed and not in a conservation area and appears to be of modest architectural quality.

However, the site is located just to the south of the Grade II **Battersea Bridge** which



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was designed by Joseph Bazalgette and built in 1890. It is a low-lying five-span bridge with stone piers. Its architectural interest is best experienced in views along the Thames where it is seen within a mixed townscape setting.

The next Thames crossing downstream is the Grade II* listed **Albert Bridge** which has a similarly mixed townscape setting. However, it is more sensitive to change due to its distinctive and highly elegant Gothic embellishments related to its suspension and cable-stayed construction which can be appreciated from the Chelsea Embankment towards Battersea Park (as set out in the list entry).

To the south-west of the development site is the **Westbridge Road Conservation Area** - a small area of land which captures a high-quality townscape containing a mix of tightly-knit Victorian buildings. Of particular note is a pair of Grade II listed Gothic villas (Nos 2 and 4) built in 1845 with distinctive flint elevations which are described in Wandsworth Council's Conservation Area Appraisal as being "unique within Battersea" (Para 1.1). The striking and unusual architecture of the villas can be appreciated in views along Westbridge Road against a clear sky, although they are largely screened by trees during summer months.

To the east of the development site is **Battersea Park** - a Victorian park with significant 20th century landscaping. It is included on Historic England's Register of Parks and Gardens (RPG) at Grade II*. Of relevance to these proposals is the diagonal pathway, a typical design feature of Victorian public parks, which runs north-west at the west-end of the park, and is terminated by a thick tree canopy. There is little visual intrusion of the modern townscape in these views, particularly during summer months.

Along the river to the west is the old village of Battersea which lies at the heart of the **Battersea Square Conservation Area**. The street pattern around the Square is medieval in origin and retains an enclosed and leafy village character. The Georgian Church of St Mary is located at the northern end of the conservation area. It is one of the Borough's most significant historic buildings as recognised in its Grade I listing. The visual prominence of the church and its riverfront setting have been harmed by the Somerset Estate - a post-war housing development which contains two 21-storey tower blocks. More recently, the 20-storey Montevetro apartment building which was built in the late 1990s has visually severed the church from its river setting to the north-east.

Due to the scale of the proposals, it will be necessary to consider London's heritage across a wide area, including more distant heritage assets across local authority boundaries. The most sensitive of these more distant designations is the Grade I listed **Royal Chelsea Hospital**, built 1682-1702 to the designs of Sir Christopher Wren. The hospital is set within a Grade II RPG which features grand geometric grounds to the south from which the exceptional architectural interest of the hospital complex can be



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appreciated along a series of axes.

To the west is the **Cheyne Conservation Area** which contains various Georgian and Victorian residential terraces. Of relevance to these proposals is Paultons Square which is framed by Grade II listed terraces. A defining characteristic of these late-Georgian London terraces is their clean parapet line (made possible by their butterfly roof structures) which can be appreciated against a clear sky in views around the square.

Impact

These proposals are for the demolition of the Glassmill office building, and the erection of a part 9, part 33 storey residential-led development designed by Farrells. The overall height has been reduced slightly since our pre-application involvement.

The impact of the proposed development on the historic environment is assessed in the Built Heritage, Townscape and Visual Impact Assessment (BHTVIA, Montagu Evans, March 2024). The BHTVIA indicates that the proposed development would be a very bold architectural statement especially in river views, starkly contrasting with its townscape context due to its enormous height.

Perhaps the most noticeable juxtaposition in scale illustrated in the BHTVIA would be from Cheyne Walk towards **Battersea Bridge** (Viewpoint 11) where the tall building would rise significantly above the riverfront townscape. As set out above, the significance of Battersea Bridge largely relates to Bazalgette's design and innovation, which would continue to be appreciated despite the imposing nature of the tall building. Taking this into account, as well as the low-lying positioning of the bridge, and its mixed townscape setting, we consider the harm caused to the listed bridge to be low, despite the significant visual impact.

However, the **Albert Bridge** is more sensitive to development within its setting due the high architectural interest of its suspension and cable-stayed construction which can be appreciated in river views. In Viewpoint 4 (Cadogan Pier), the proposed tall building would visually distract from these elements of significance by competing with the towers and diminishing its overall architectural elegance.

We recognise that existing tall building developments along the Chelsea Embankment are visible, and that the architectural interest of the bridge is appreciated in the round. Nonetheless, we consider that some harm of a relatively low level would result on the basis of this assessment.

From the **Westbridge Road Conservation Area** the proposed tall building would be seen rising just behind the Victorian townscape (Viewpoint 20, wireline) and it is likely that it would appear above the historic roofscape on the approach towards Battersea



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Bridge Road. We advised at pre-application stage that visual assessment would be helpful, for example from the far-side pavement across from the Grade II listed Nos 2-4 Westbridge Road. Although a view of the listed buildings has been included in the submission (p56, Fig 5.30), no further visual assessment has been provided.

Nonetheless, it is likely that the tall building would erode an appreciation of the well-preserved historic townscape in kinetic views along Westbridge Road by creating a visual distraction behind its roofline. We note that the tree canopy partially screens this roofline during summer months. Taking this into account, we consider that the impact of the proposed tall building would cause a low level of harm to the conservation area and Grade II listed buildings.

The Zone of Theoretic Visibility maps (ZTV, p35-37) indicate that the proposed development would likely be visible from much of **Battersea Park**. In the assessed views, the proposed tall building would be most prominent from Viewpoint 15 (Battersea Park West, wireline). From here, the proposed building would be seen above the tree canopy where other modern development is just visible to the left. Although this would be significant visual impact, this is not a particularly sensitive viewpoint in our opinion. However, in our pre-application advice, we recommended that an additional viewpoint should be added along the diagonal tree-lined axis directly in front of the timber shelter. From this location, the Victorian designed landscaping and enclosed treelined character of Battersea Park can be better appreciated.

This assessment has not been prepared in the BHTVIA. However, having tested these views using 3D modelling software, it is likely that the proposed tall building would rise above the tree canopy in views along the north-west diagonal axis. It is therefore likely that some low level of harm would result from these impacts due to the encroachment of the tall building on the well-preserved and enclosed Victorian character of the Grade II* RPG.

The assessed views of the **Battersea Square Conservation Area** suggest that the proposed development would not be visually prominent from Battersea Square (Viewpoint 25). In Viewpoint 18 of **St Mary's Church**, views of the church and its riverside setting have been heavily compromised by post-war and more recent development. Despite this being the historic heart of Battersea, it appears unlikely that these proposals would cause harm to the conservation area or its component listed buildings.

Across the Thames, the tall building would be visible from the grounds of the **Royal Chelsea Hospital**, where the formal composition of both Wren's hospital complex and its axial landscaping can be appreciated. Chelsea's historic townscape is visible from this location, but there is virtually no intrusion of modern development from the south grounds towards the hospital.



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The proposals, although seen at a distance in Viewpoints 1 (Royal Hospital), 2 (Royal Hospital Road, wireline) and 23 (Royal Hospital 2, wireline), would undermine this well-preserved site of exceptional interest, and visually distract from the formality of its axial landscaping. We consider that some harm of a relatively low level would therefore be caused to both the Grade I listed Hospital and the Grade II RPG.

Finally, in views from Paultons Square (Viewpoint 6, wireline) within the **Cheyne Conservation Area**, the proposed development would rise significantly above the parapet line of the Grade II listed Georgian terraces facing the square. Although the proposal would be partially screened by trees in this static view, it is very likely that the development would be visible against a clear sky from other locations within the square. This visual intrusion would erode the appreciation of this high-quality and formal Georgian townscape which is a key part of the conservation area's character. We therefore consider that harm of a relatively low level would be caused to the conservation area, and its Grade II terraced houses on Paultons Square for the same reason.

Relevant Policy

In considering this application, we would draw your Council's attention to Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) which impose a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings. Section 72 of the Act requires local authorities to have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas.

Government policy on how to carry out these duties is found in the National Planning Policy Framework (NPPF, December 2023). Section 16 of the Framework sets out how the historic environment should be conserved and enhanced and makes clear at paragraph 201 that development proposals should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal. In practice that means that less harmful alternative solutions should be fully explored before any application is determined.

Paragraph 205 states that that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance. The more important the asset, the greater the weight should be (paragraph 189).

Any harm or loss should require clear and convincing justification (paragraph 206). If any harm is deemed to be 'less than substantial', it should be weighed against the public benefits of the proposals (paragraph 208).

Historic England's revised Tall Buildings advice note supports an evidence-based and



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plan-led approach for the development of tall buildings. It encourages development plans to include “specific tall building policies to support area/sites identified as appropriate tall buildings” (p11).

This is echoed in the London Plan, which has a specific policy relating to tall building development (D9). The Policy requires Boroughs to identify appropriate locations and heights for tall buildings and provides that “Tall buildings should only be developed in locations that are identified as suitable in Development Plans”.

Wandsworth Council’s recently adopted Local Plan (July 2023) includes detailed Tall and Mid-rise Building maps for the borough (Policy LP4). It allocates the development site within Mid-rise Building Zone MB-B2-02 (immediately west of Tall Building Zone TB-B2-04) with a maximum appropriate height of 6 storeys (18 metres) (p471).

Position

Historic England recognises that the site can accommodate redevelopment of an increased scale, and considers that this could be achieved without causing harm to the historic environment. However, due to its height, the current scheme fails to do this. At a maximum of 33 storeys, the proposed building would become amongst the tallest in the borough and substantially larger than any other building in the area. It would constitute a visually intrusive and incongruous element which would have extensive and wide-reaching harmful impacts on the historic environment. While we note that the overall height of the proposed development has been slightly reduced since our pre-application involvement, the harm would remain broadly consistent on the basis of the plans we reviewed then.

As set out, harm would be caused to various heritage designations in Wandsworth Council’s boundary including Battersea Park, the Albert Bridge, as well as the Westbridge Road Conservation Area. However, it is the harm to heritage on the opposite side of the Thames which causes us greater concern. This is due to the well-preserved, and formally arranged townscape character in the Cheyne Conservation Area, and the exceptional interest of the Royal Chelsea Hospital.

In accordance with the NPPF, very great weight should be given to the conservation of Grade I listed buildings such as the Royal Chelsea Hospital (Paragraph 205), and Grade II* sites such as the Albert Bridge and Battersea Park. The NPPF also requires clear and convincing justification for any harm caused (Paragraph 206).

Historic England’s Tall Buildings guidance, echoed in the London Plan, advocates a plan-led approach for tall building development so local authorities can deliver a vision for an area and avoid incongruous development schemes that have permanent, and sometimes ‘knock-on’ consequences on the built environment.



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Although parts of the neighbouring riverfront are within Tall Building Zones in Wandsworth Council's Local Plan, the Glassmill is specifically identified within a Mid-rise Building Zone (MB-B2-02) with a maximum appropriate height of 6 storeys. The proposed development would be 27 storeys taller than what is set out in the Local Plan. Given the major departure from up-to-date tall buildings policy, the justification for the proposals would need to be extremely strong, as would the public benefits to satisfy Paragraph 208 of the NPPF.

Therefore, we are unable to support these plans, and strongly recommend that the tall building is lowered significantly in height to reduce or remove entirely the harm to historic environment on both sides of the Thames.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

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

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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