

24mm – 37°

35mm – 31.5°

50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°

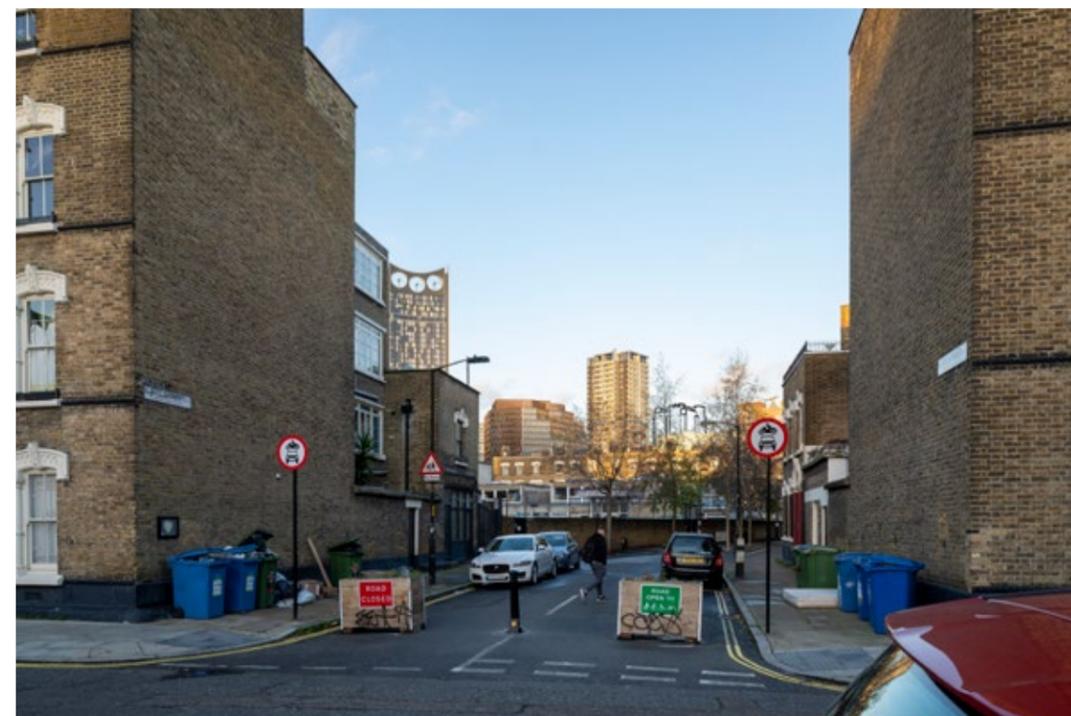
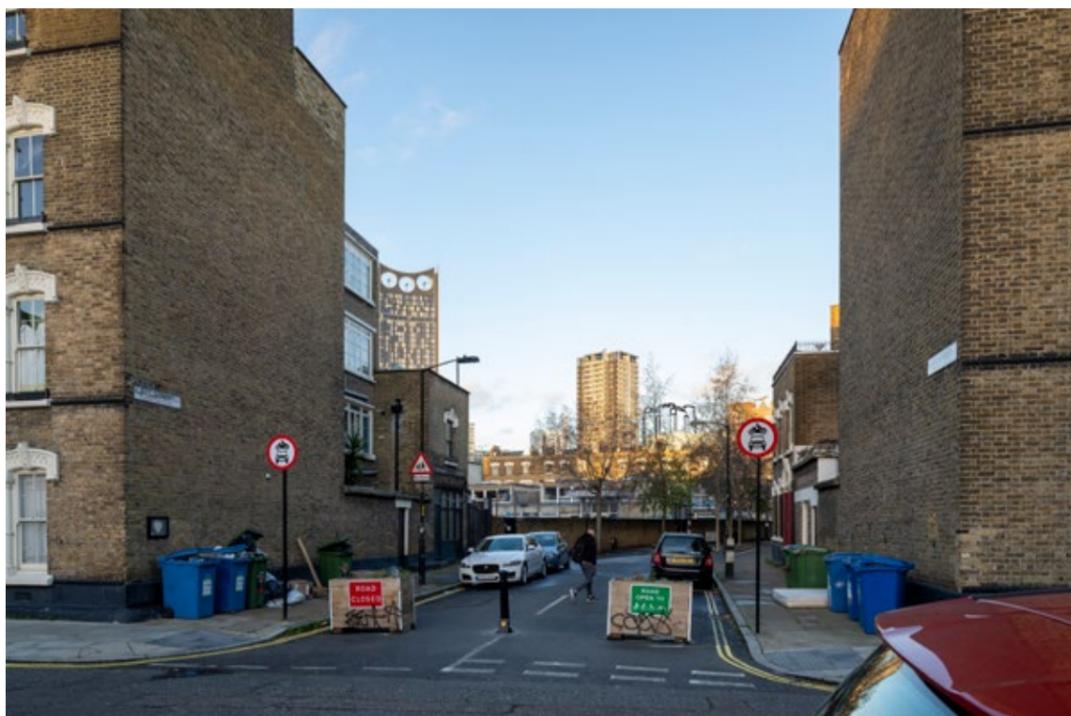


Cumulative view



09

Penton Place



Camera Location

View Location

Future Baseline

Proposed View

The view was assessed as View 30 for the Approved Development.

Future Baseline

This view is taken from Penton Place at the junction with Iliffe Street in the Pullens Estate CA. The dense pattern of development and relatively narrow streets have resulted in an enclosed townscape that does not afford many views out to the wider area. This viewing position is the only location in the conservation area, where there is a kink at the western end of Iliffe Street, that allows clear views towards the Approved Development across the lower buildings of the school to the north of Iliffe Street, outside the conservation area. Tenement buildings on Penton Place frame the view with the tenements on Peacock Street terminating the vista. The skyline of Peacock Street is punctuated by solar panels and chimney stacks behind the brick parapet. Beyond the conservation area Plot H2 of the Approved Development rises prominently on the skyline. On the left of the view, Strata is seen behind the tenement on Penton Place as a closer taller element in the urban backdrop to the conservation area. Consented Plots H7 and H11b of the Approved Development will be visible, though partly screened by trees, to the right of Plot H2.

Value attached to the view: this is a valued characterising view from a conservation area; noted in LBS Elephant and Castle SPD and OAPF (Ref 1-11) and its value is therefore **medium**.

Visual receptors affected: Low numbers of local residents

Susceptibility to change of visual receptors: Residents of a community where views contribute to the setting of a high-quality designated townscape have a **high** susceptibility.

Sensitivity: **medium to high**

Proposed

The top of the H1 Development would be visible on the skyline to the left of Plot H2 of the Approved Development beyond the tenements on Peacock Street. The H1 Development would be a noticeable new element of the view but would not dominate its composition and the magnitude of change to the composition of the wider scene would be medium. As the rendered view demonstrates, the top of the H1 Development would be legible as a distinctive contrasting piece of architecture that would mark Castle Square within the Elephant and Castle town centre seen from the south with a landmark building of non-residential use. The stepping shoulders of the H1 Development, which form landscaped terraces, respond to the smaller scale and finer grain of buildings to its south-west. As a

result the form of the H1 Development would be broken down and softened on the skyline in the view. The colour palette of earthy warm colours has been informed by the industrial heritage of the local context and would relate well to the brick materiality of the conservation area. The H1 Development would contribute to the articulation and variety, and legibility, of the cluster of taller new development at the southern end of Elephant and Castle that forms the focus of the view, with a beneficial effect.

Magnitude of change: **medium**

Effect: moderate in scale; beneficial in nature

Cumulative

To the left of the H1 Development parts of the Elephant and Castle Shopping Centre Cumulative Scheme would be visible, consolidating the emerging tall building cluster marking Elephant and Castle from the south. The Cumulative Schemes would increase the scale of the effect from that assessed for the H1 Development considered in isolation.

Cumulative Effect: moderate in scale; beneficial in nature

24mm – 37°

35mm – 31.5°

50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°

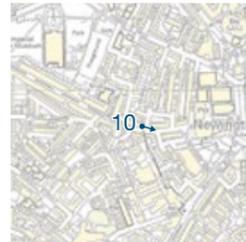


Cumulative view



10

Brook Drive



Camera Location

View Location



Future Baseline



Proposed View

The view was assessed as View 35 for the Approved Development.

Future Baseline

The view is taken from the southern edge of the Elliot's Row Conservation Area. Unlisted buildings in the conservation area on the left channel the view east towards Elephant and Castle, with less well defined late 20th century townscape on the right. One The Elephant is prominently visible in the centre as the focus of the view with the new Castle Centre visible at its base. The more distant Strata Tower and the lower Draper House consolidate the cluster of tall buildings marking the centre of Elephant and Castle, seen to its right. On the far right is the 360 development rising out of the frame. Consented Plot H7 will be distantly visible between One the Elephant and Strata Tower.

Value attached to the view: Although noted in LBS Elephant and Castle SPD and OAPF (Ref 1-11), this is an incidental view from the edge of the Elliot's Row CA and is therefore of **low** value.

Visual receptors affected: low numbers of local residents.

Susceptibility of visual receptors: While residents of a community where views contribute to the setting of a high-quality designated townscape have a high susceptibility, this environment is generally of 'ordinary' townscape quality, and susceptibility is judged to be **medium**.

Sensitivity: **low to medium**

Proposed

A sliver of the H1 Development would be visible infilling the lower part of the gap between One The Elephant and Strata Tower but leaving sky space between the two existing towers at the upper levels. The magnitude of change to the composition of the view, in the context of an established backdrop of much taller closer modern townscape which forms the easterly setting of the conservation area, would be low and the H1 Development would not be a noticeable feature of the view. The H1 Development would contribute to the articulation and variety of the cluster of taller new development at the southern end of Elephant and Castle that forms the focus of the view, with a beneficial effect.

Magnitude of change: **low**

Effect: minor in scale; beneficial in nature

Cumulative

To the left of the H1 Development parts of the Elephant and Castle Shopping Centre Cumulative Scheme would be visible, consolidating the emerging tall building cluster marking Elephant and Castle from the west. The Cumulative Schemes would increase the scale of the effect from that assessed for the H1 Development considered in isolation.

Cumulative Effect: moderate in scale; beneficial in nature

24mm - 37°

35mm - 31.5°

50mm - 20°

0°

50mm - 20°

35mm - 31.5°

24mm - 37°

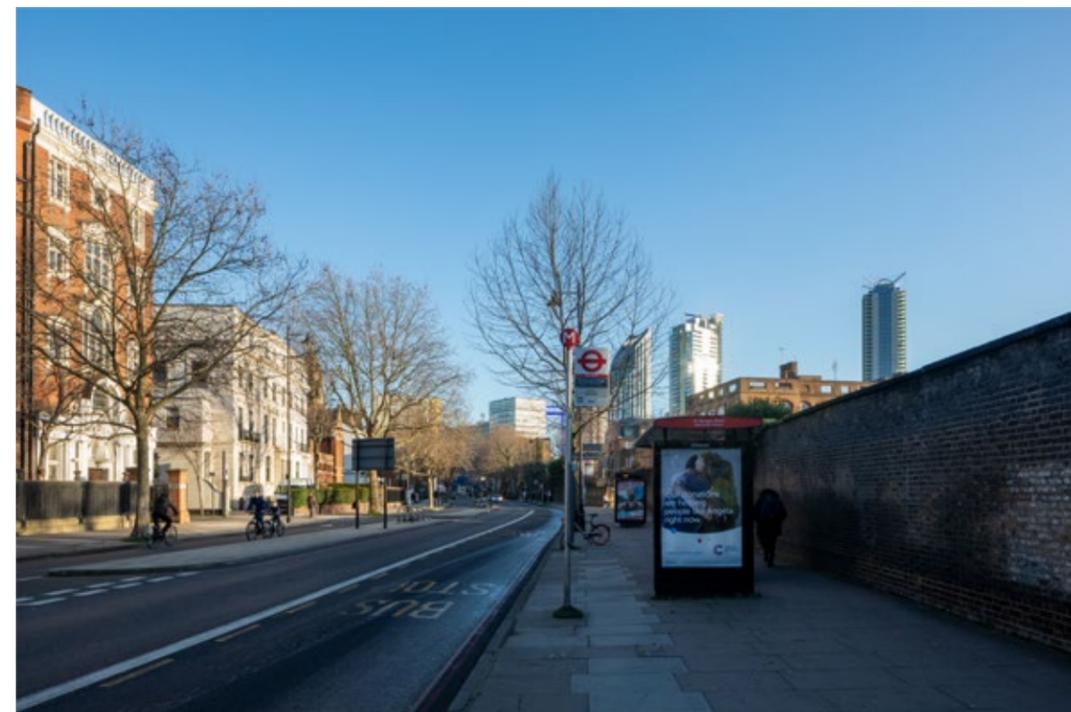
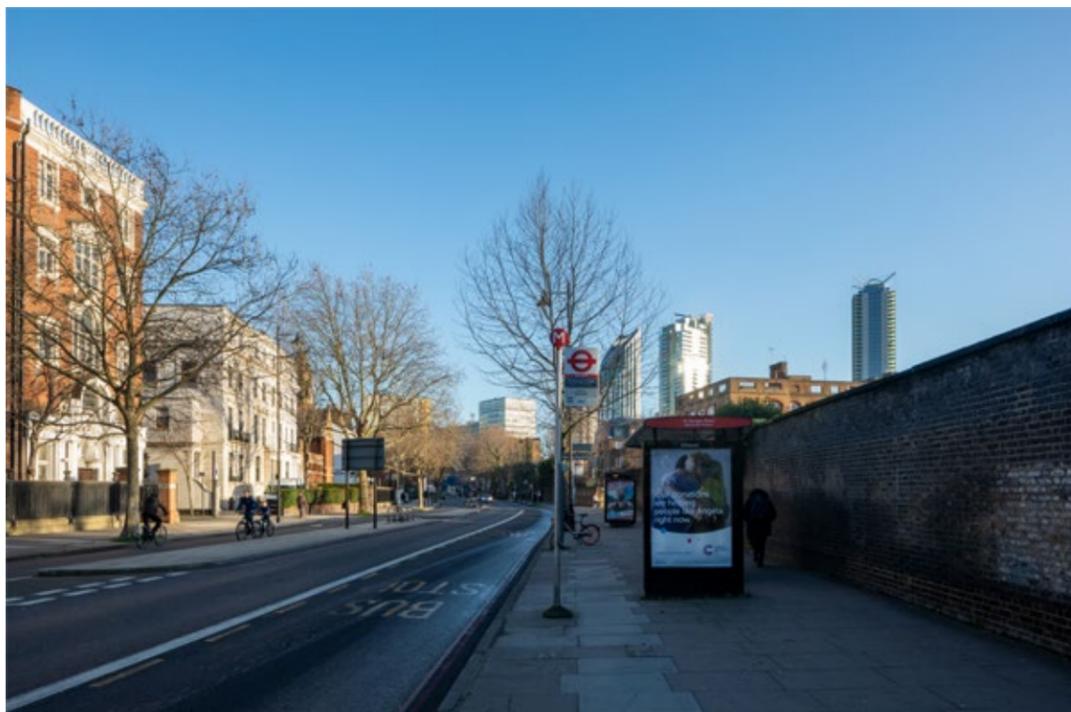
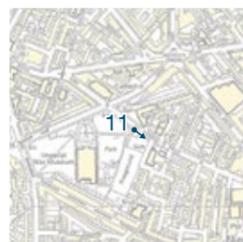


Cumulative view



11

St George's Road



Camera Location

View Location

Future Baseline

Proposed View

The view was assessed as View 39 for the Approved Development.

Future Baseline

The view is taken from the edge of the West Square Conservation area which includes the buildings on both sides of St George's Road in this view. In winter buildings lining St George's Road on the left are visible through the trees: the late 19th century white stucco terrace, Nos. 110-116 St George's Road, is included on the Council's draft Local List (Ref 1-12). To its right is the Grade II listed former Church of St Jude, originally built in 1806 but largely rebuilt in 1890. The brick boundary wall of the Geraldine Mary Harmsworth Park defines the right-hand edge of the street and partly visible beyond it is the Grade II listed Charlotte Sharman School on Geraldine Street, in yellow and red brick. Rising on the skyline beyond are tall buildings at Elephant and Castle: from left to right Strata Tower, One The Elephant and the 360 development. Plot H2 of the Approved Development is visible to the left of Strata Tower but obscured by street furniture from this position. To the left are lower buildings of the Elephant and Castle post-war redevelopment: Perronet House and the tower of the London College of Communication, visible through and above the trees.

Value attached to the view: Although noted in LBS Elephant and Castle SPD and OAPF (Ref 1-11) this is not a valued view point of recognised importance but an incidental view out of the West Square Conservation Area and is therefore of **low** value.

Visual receptors affected: Low numbers of local residents and moderate numbers of workers and travellers.

Susceptibility to change of visual receptors: Workers and travellers generally have a low susceptibility to change. Residents of a community where views contribute to the setting of a high-quality designated townscape have a high susceptibility to change. Susceptibility to change is therefore judged overall to be **medium**.

Sensitivity: **low to medium**

Proposed

A sliver of the H1 Development would be visible infilling the lower part of the gap between The London College of Communication and Plot H2 of the Approved Development. The magnitude of change to the composition of the view, in the context of an established backdrop of much taller modern townscape which forms the easterly setting of the conservation area, would be low and the H1 Development would not be a noticeable feature of the view. The H1 Development would contribute to the articulation, layering and variety of the townscape backdrop of the view with a beneficial effect.

Magnitude of change: **low**

Effect: minor in scale; beneficial in nature

Cumulative

The redevelopment of the London College of Communication site as part of the Elephant and Castle Shopping Centre Cumulative Scheme would be visible, concealing the H1 Development with a well-articulated skyline of much taller closer buildings, consolidating the emerging tall building cluster marking Elephant and Castle from the west. The Cumulative Scheme would increase the scale of the effect from that assessed for the H1 Development considered in isolation.

Cumulative Effect: major in scale; beneficial in nature

24mm – 37°

35mm – 31.5°

50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°

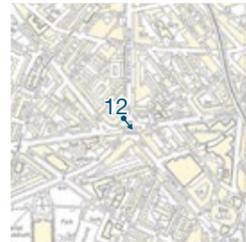


Cumulative view



12

St George's Circus



Camera Location

View Location



Future Baseline



Proposed View

The view was assessed as View 41 for the Approved Development.

Future Baseline

The view is taken from the north-west edge of St George's Circus within the St George's Circus Conservation Area, outside McLaren House, looking along London Road towards Elephant and Castle. The focus of the view is the central stone obelisk, erected in 1771 and now Grade II* listed. To the left on the junction of London Road and Borough Road, the refurbished Grade II listed former Duke of Clarence pub is an important remnant of the original early 19th century formal townscape composition around St George's Circus. The top of Two Fifty One is visible on the skyline beyond the Duke of Clarence, but remains lower than the listed obelisk, which is the focus of the view. The Grade II listed terrace on the right-hand side of London Road is obliquely visible to the right of the obelisk. Beyond it, looking south-eastwards along London Road towards Elephant and Castle, rises the top of Strata Tower, with Plot H2 of the Approved Development and Hannibal House discernible through the winter trees lower to its left.

Value attached to the view: this is a valued characterising view from a conservation area noted in LBS Elephant and Castle SPD and OAPF (Ref 1-11) and therefore is of **medium** value.

Visual receptors affected: High numbers of workers and travellers and students.

Susceptibility to change of visual receptors: Workers and travellers and students generally have a **low** susceptibility to change.

Sensitivity: **low to medium**

Proposed

The very top of the H1 Development would be visible above Hannibal House, partly concealing the taller Plot H2 of the Approved Development. The H1 Development would be screened by the winter branches of street trees on London Road whose foliage would largely conceal it in summer. The magnitude of change to the composition of the view in winter, in the context of an established backdrop of much taller modern townscape which forms the easterly setting of the conservation area, would be low and the H1 Development would not be a noticeable feature of the view; the magnitude of change would be reduced in summer to negligible. It would not alter detract from the obelisk as the focus of views from St George's Circus. When visible in winter, the H1 Development would contribute to the articulation, layering and variety of the townscape backdrop of the view with a beneficial effect.

Magnitude of change: **negligible in summer to low in winter**

Effect: insignificant to minor in scale; beneficial in nature

Cumulative

The Elephant and Castle Shopping Centre Cumulative Scheme would be visible, partly concealing the H1 Development with a well-articulated skyline of much taller closer buildings, consolidating the emerging tall building cluster marking Elephant and Castle from the west but would not detract from the obelisk as the focus of views from St George's Circus. The Cumulative Scheme would increase the change to the view and the scale of the effect would increase from that assessed for the H1 Development considered in isolation.

Cumulative Effect: moderate in scale; beneficial in nature

24mm – 37°

35mm – 31.5°

50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°

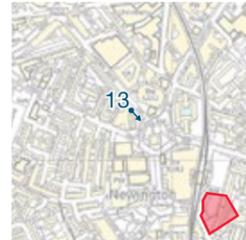


Cumulative view



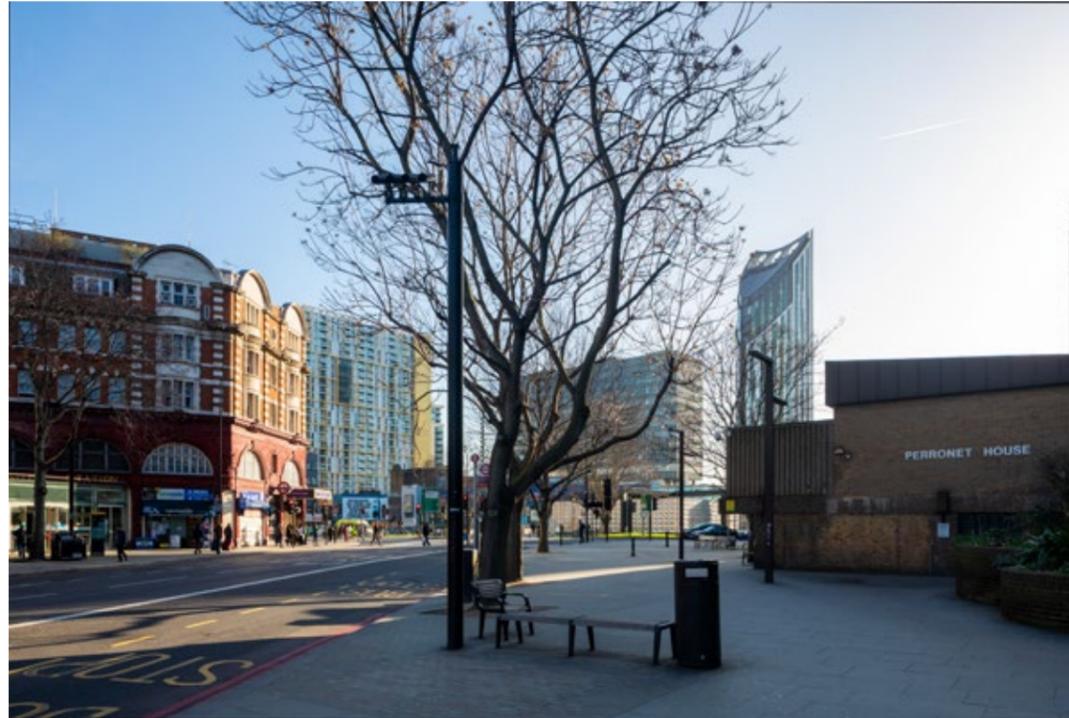
13

London Road



Camera Location

View Location



Future Baseline



Proposed View

Future Baseline

The viewing position is at the southern end of London Road close to the Elephant and Castle junction. On the left is the Bakerloo Line entrance to Elephant and Castle Underground Station, one of the few surviving pre-war buildings at Elephant and Castle and included on the LBS draft Local List (Ref 1-12). Beyond it the Grade II listed Faraday Memorial at the northern end of the junction, with the Elephant and Castle Shopping Centre, and the taller forms of Elephant One and Hannibal House, are visible. Consented Plot H7 of the Approved Development will be visible lower to the left of Hannibal House. Taller to the right is Strata Tower seen beyond the low entrance to Perronet House on the right foreground. Foreground street trees set within a broad pavement screen the view towards Elephant and Castle and foliage obscures, screens and softens it more noticeably in summer. The townscape of the modern Elephant and Castle junction is varied in scale, age and quality; while it is of generally ordinary quality it has a distinctive sense of place and some features worthy of conservation.

Value attached to the view: this is a characterising representative view of the 'ordinary' townscape of Elephant and Castle outside any conservation area. The value of the view is judged to be **low**.

Visual receptors affected: high numbers of travellers, workers, students, shoppers and some local residents.

Susceptibility to change of visual receptors: Residents have high susceptibility to change where views contribute to a high-quality townscape environment but as the townscape environment is generally of 'ordinary' quality residents' susceptibility to change is judged to be medium. Travellers, workers, students and shoppers would not be focussed on views of their surroundings and generally have low susceptibility to change. Susceptibility to change overall would be **low to medium**.

Sensitivity to change: **low**

Proposed

The H1 Development would be concealed behind Hannibal House.

Magnitude of change: **none**

Effect: No effect

Cumulative

The Elephant and Castle Shopping Centre Cumulative Scheme would be visible, with a well-articulated skyline of much taller closer buildings, consolidating the emerging tall building cluster around the junction. The Cumulative Schemes would reveal the H1 Development, which would be visible between the north and south elements of the Shopping Centre redevelopment at a lower scale than the closer consented buildings, contributing to the layering of the townscape backdrop to the junction. The Cumulative Schemes would increase the change to the view and the scale of the effect would increase from that assessed for the H1 Development considered in isolation.

Cumulative Effect: major in scale; beneficial in nature

24mm – 37°

35mm – 31.5°

50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°

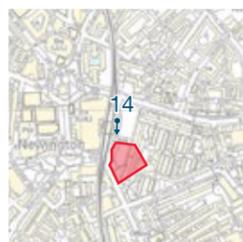
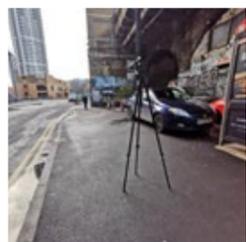


Cumulative view



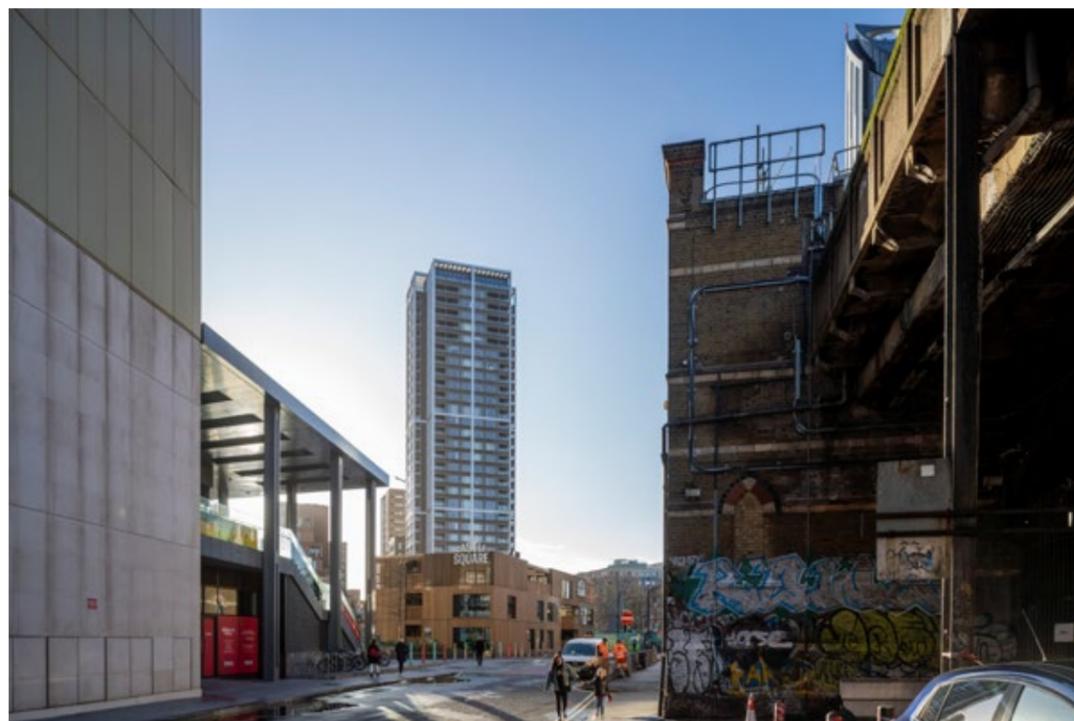
14

Elephant Road

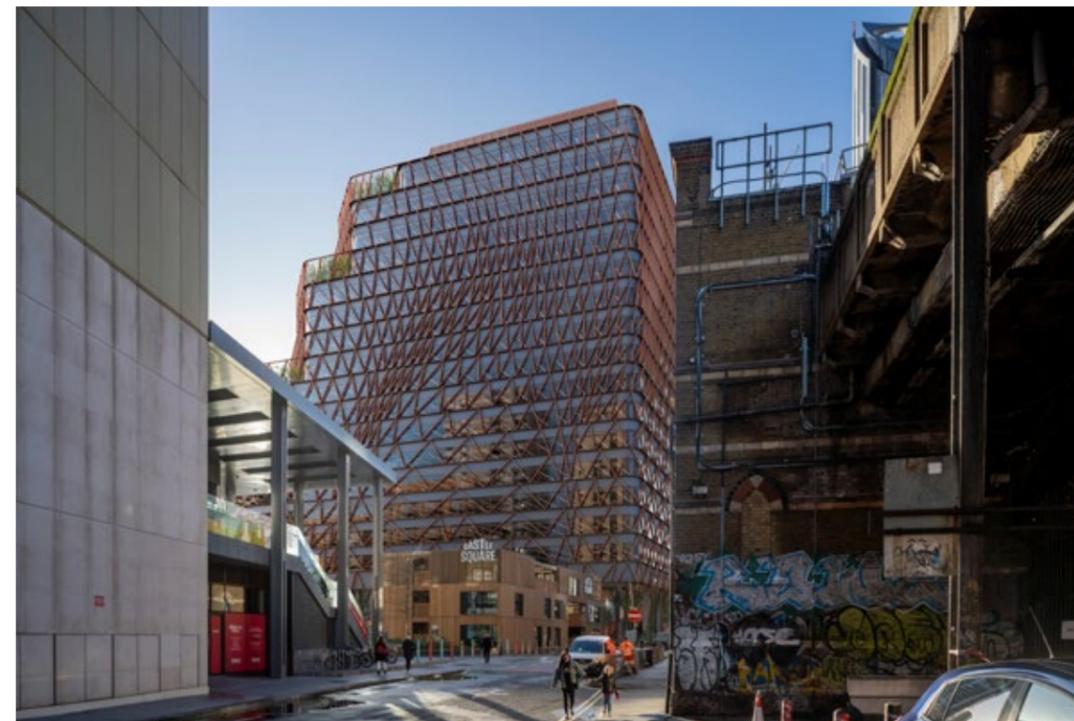


Camera Location

View Location



Future Baseline



Proposed View

Future Baseline

The viewing position is adjacent to the Victorian railway viaduct to the north of Elephant and Castle Thameslink Station. To the left is the base of Elephant One and the western edge of Castle Square, which is partly occupied by the Temporary Castle Square Development with the Approved Development site hoarding visible to its right. The completed Plot H2 of the Approved Development, with part of Plot H3 just visible behind it, terminates the view beyond with parts of the lower completed Phase 1 of the Approved Development in red brick to the left. Other mid-rise modern development in the backdrop of the view to the right is screened by trees. The townscape of the view is in the process of change. The unfinished landscape of Castle Square, site hoardings for the Approved Development and the low quality of the streetscape and public realm to Elephant Road at the base of the viaduct result in a poor-quality townscape with low visual amenity.

Value attached to the view: this is a representative view from an area of 'low' to 'ordinary' townscape quality outside any conservation area. The value of the view is judged to be **low**.

Visual receptors affected: low numbers of workers in the industrial uses and people visiting the shops and bars in the railway viaduct, moderate numbers of travellers using the Thameslink station and local residents.

Susceptibility to change of visual receptors: Residents have high susceptibility to change where views contribute to a high-quality townscape environment.

As the townscape environment is generally of 'low' to 'ordinary' quality and in the process of change, their susceptibility to change is judged to be medium. Workers, users of the shops and bars and travellers have a low susceptibility to change. Susceptibility to change overall is judged to be **low to medium**.

Sensitivity: **low**

Proposed

The H1 Development would define the southern end of Castle Square and terminate the view along Elephant Road. The H1 Development would be an immediately noticeable new feature of the view and would become its new focal point with a high magnitude of change. In the short term the Temporary Castle Square Development would conceal the base of the H1 Development but on its removal, the full north-east elevation of the H1 Development would be visible revealing its base which would ground the building and activate the southern edge of Castle Square (as shown in the future reference image).

The edges of a series of south-easterly planted terraces are visible on the left, designed to integrate and connect the H1 Development with The Park at the heart of the Approved Development. Architects ACME have taken inspiration from Michael Faraday's discovery of electromagnetic induction to develop the appearance of the façade: the rhythm of vertical fins is designed to evoke the hyperbolic forms present in Faraday's studies for electromagnetism, while providing varying levels of shading in response to the orientation of the individual elevations. Varying

densities and orientations of the diagonal facade fins would bring differentiation and scale to the elevations and a resulting change of transparency to create an animated highly modulated facade. The colour palette has been selected in response to earthy and warm colours of the historic context of the Site. The H1 Development would be a distinctive landmark piece of high-quality architecture that would make a strong contribution to the sense of place of the Approved Development with a beneficial effect.

Magnitude of change: **high**

Effect: moderate in scale; beneficial in nature

Cumulative

None of the Cumulative Schemes would be visible and the effect would not change from that assessed for the H1 Development in isolation.

Cumulative Effect: moderate in scale; beneficial in nature

24mm – 37°

35mm – 31.5°

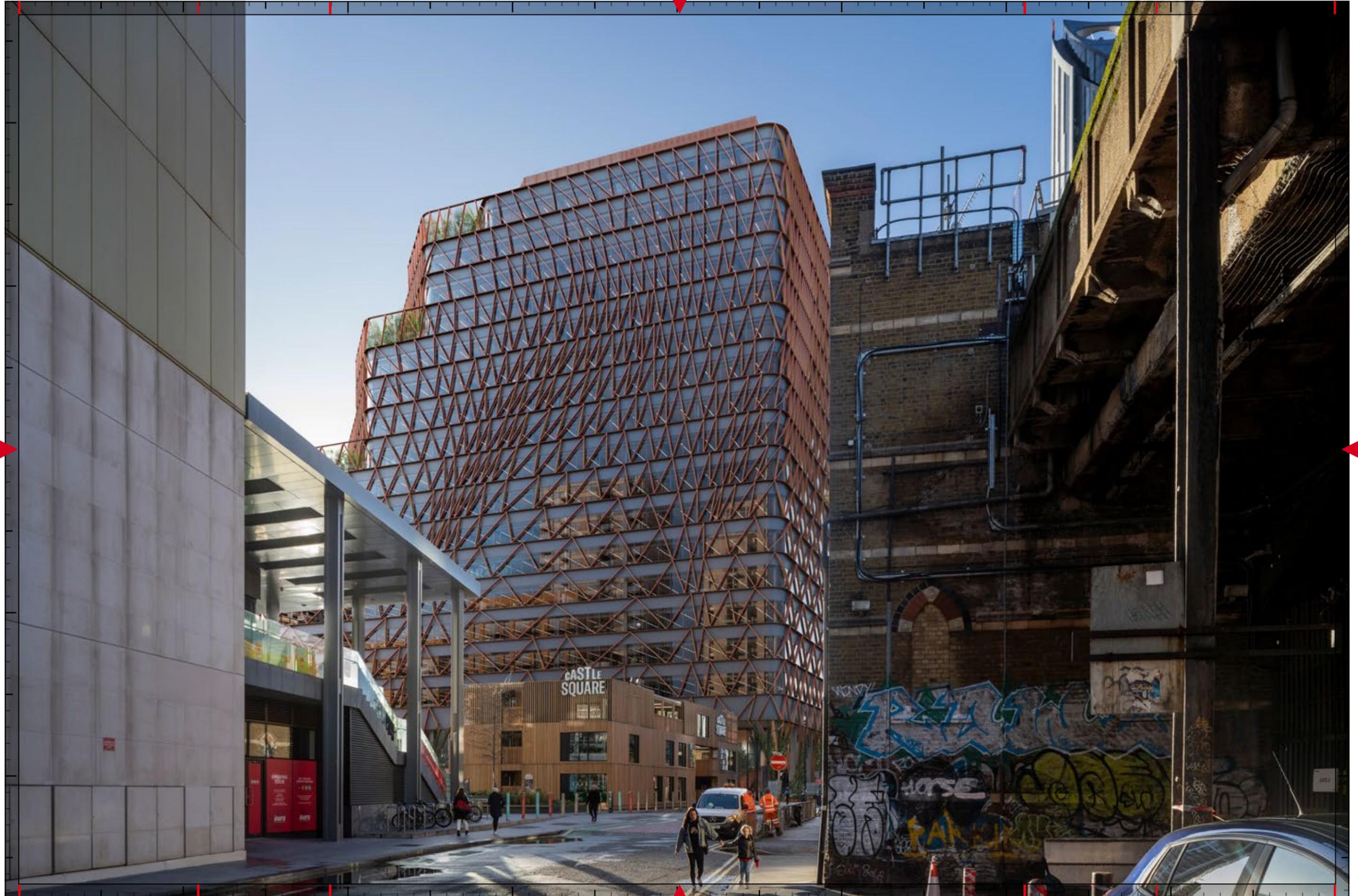
50mm – 20°

0°

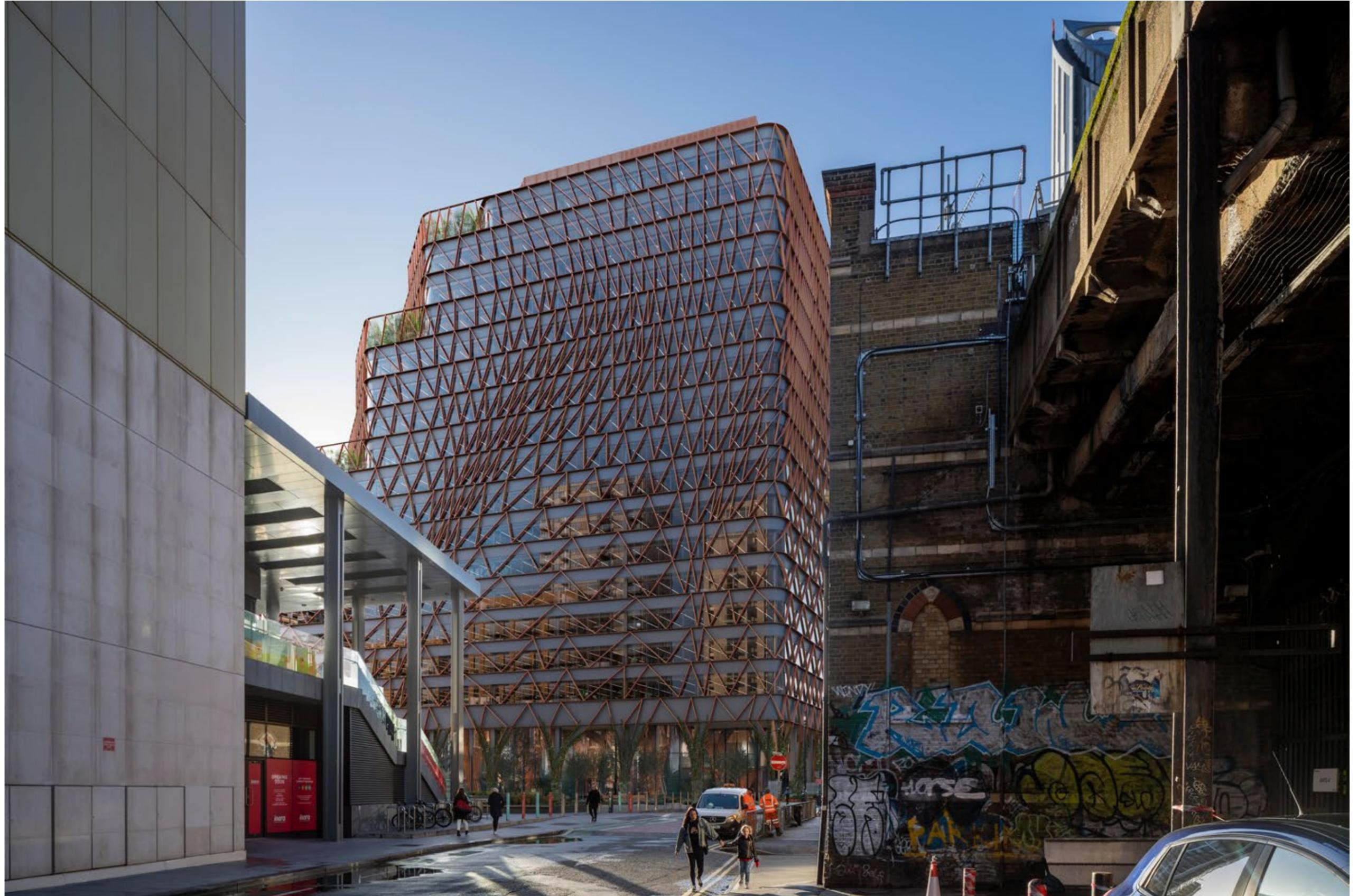
50mm – 20°

35mm – 31.5°

24mm – 37°



Cumulative view

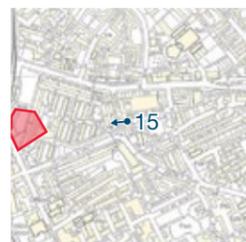
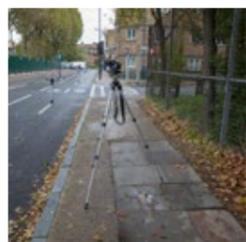


Future proposed view without the Temporary Castle Square Development



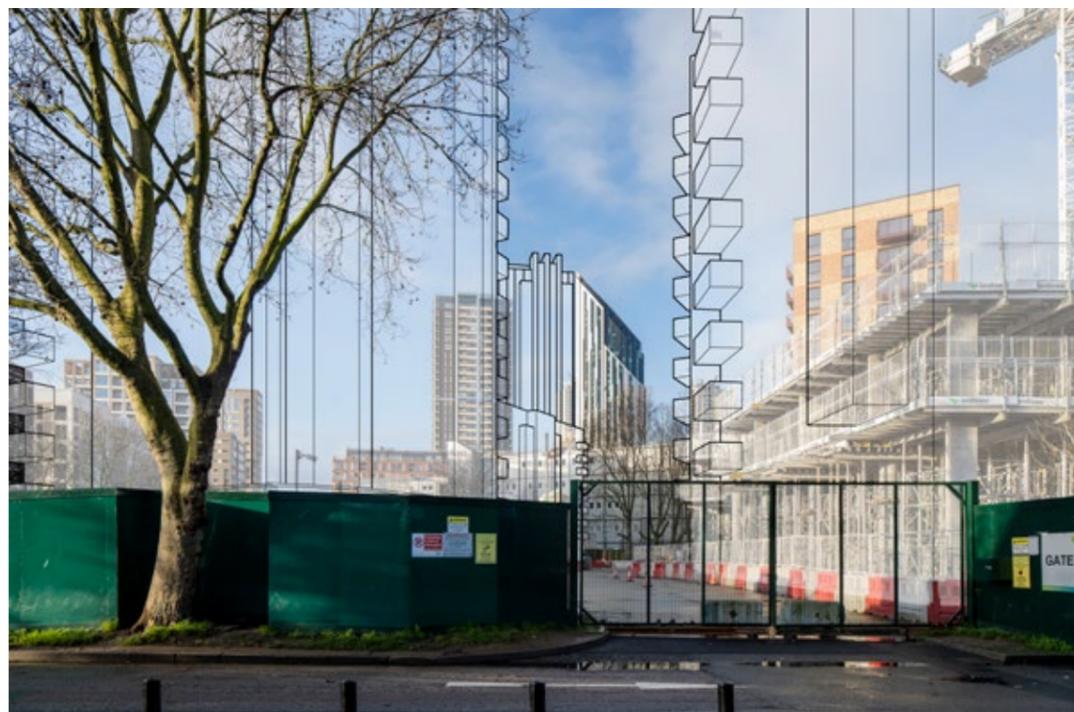
15

Heygate St, junction with Rodney Place

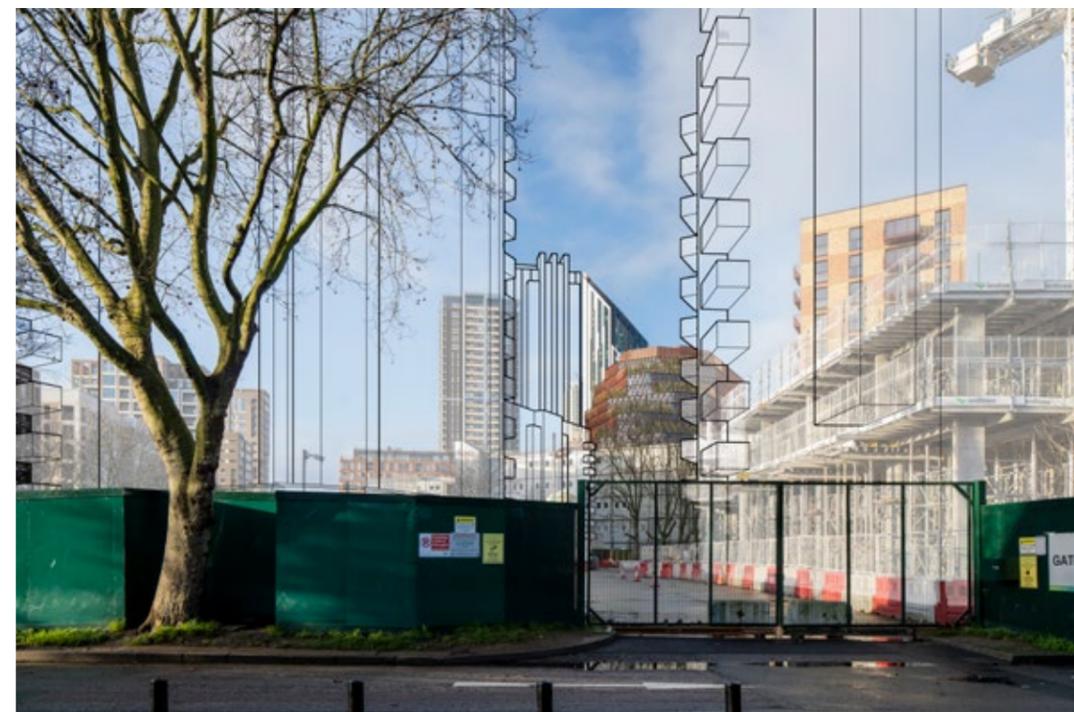


Camera Location

View Location



Future Baseline



Proposed View

Future Baseline

The viewing position is located at the south-east edge of Elephant Park. It is currently characterised by site hoardings and a site entrance on the perimeter of Elephant Park. In the foreground consented Plots H11b on the left and H11a on the right will define the south-east edge of the Approved Development on Rodney Place with tall buildings rising out of the frame. The Approved Development will channel a new view across The Park that will be terminated by Strata Tower and the consented Plot H7, partly screened by retained trees in The Park. The townscape of the view is in the process of change and the existing site hoardings and construction activity with low visual amenity, will be replaced by the well activated streetscape at the perimeter of the Approved Development.

Value attached to the view: this is a representative view from an area of 'ordinary' townscape quality outside any conservation area in the process of transformation. The value of the view is judged to be **low**.

Visual receptors affected: Moderate numbers of local residents living to the east of Rodney Place and in The Park, students and teachers of the Victory Primary School at the junction with Rodney Road and users of the Victory Community Park behind the viewing position.

Susceptibility to change of visual receptors: Residents have high susceptibility to change where views contribute to a high-quality townscape environment. As the townscape environment is generally of 'ordinary' quality and in the process of change, their susceptibility to change is judged to be medium. Students and teachers at the local school and users of the open space have a low susceptibility to change. Susceptibility to change overall is judged to be **low to medium**.

Sensitivity: **low**

Proposed

The H1 Development would terminate the view across The Park at the heart of the Approved Development from this location. Seen in the context of the emerging Approved Development, which includes much closer tall buildings, the magnitude of the change to the view would be low. The shoulders of the H1 Development, which form landscaped terraces, would step down towards The Park establishing physical relationships and visual connections between the H1 Development and The Park. As a result the form of the H1 Development would be broken down and softened on the skyline in the view and would have a distinctive appearance within the tall buildings of the Approved Development.

Magnitude of change: **low**

Effect: insignificant

Cumulative

None of the Cumulative Schemes would be visible and the effect would not change from that assessed for the H1 Development in isolation.

Cumulative Effect: Insignificant

24mm – 37°

35mm – 31.5°

50mm – 20°

0°

50mm – 20°

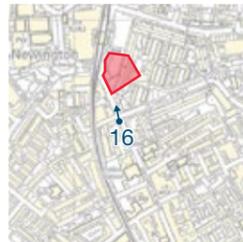
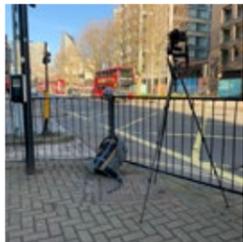
35mm – 31.5°

24mm – 37°



Cumulative view

16

Walworth Road,
junction with
Steadman Street

Camera Location

View Location



Future Baseline



Proposed View

Future Baseline

The modern townscape at the very northern end of the street, is outside the Walworth Road Conservation Area. This view looking north is characterised by a taller scale of buildings on the approach to the Elephant and Castle junction. On the right is the completed Plot H2 of the Approved Development rising out of the view. Beyond it, hoardings around the edge of the Site are visible in front of the railway viaduct. Mature street trees on the east side of Walworth Road screen and soften the streetscape even in this winter view. On the west side of Walworth Road to the left, the streetscape is lower and more varied, with some surviving Victorian development at Nos.82-96 to the north of the junction with Hampton Road (included on the LBS draft Local List (Ref 1-12)) visible obliquely beyond the modern mid-rise student accommodation at No.114. Beyond the railway viaduct crossing the northern end of Walworth Road tall buildings at Elephant and Castle junction terminate the view: to the left Hannibal House above the Elephant and Castle Shopping Centre, and to the right Two Fifty One on Newington Causeway, with lower buildings in the Grade II listed Metro Central Heights in front of it screened by the foreground winter street trees.

Value attached to the view: this is a representative view from an area of 'ordinary' townscape quality in a area undergoing considerable change outside any conservation area. The value of the view is judged to be **low**.

Visual receptors affected: Moderate numbers of local residents, workers and shoppers and high numbers of travellers.

Susceptibility to change of visual receptors: Residents have high susceptibility to change where views contribute to a high-quality townscape environment. As the townscape environment is generally of 'ordinary' quality and in the process of change, their susceptibility to change is judged to be medium. Workers and travellers generally have a low susceptibility to change. Susceptibility to change overall is judged to be **low to medium**.

Sensitivity: **low**

Proposed

The H1 Development would provide a concluding focus to the view at the point at which Walworth Road meets the railway viaduct and the magnitude of change would be high. As the sensitivity of the view is low the scale of the effect would be reduced to moderate. The tallest north-west corner of the H1 Development would address the tall buildings encircling the Elephant and Castle junction. The edges of a series of planted terraces, would step down towards the south and south-east, to integrate and connect the H1 Development with The Park, the adjacent new public open space at the heart of the Approved Development. A series of terraces on Walworth Road would reference the smaller scale listed terraces at 82-96 Walworth Road. Architects ACME have taken inspiration from Michael Faraday's discovery of electromagnetic induction to develop the appearance of the façade: the rhythm of vertical fins is designed to evoke the hyperbolic forms present in

Faraday's studies for electromagnetism, while providing varying levels of shading in response to the orientation of the individual elevations. Varying densities and orientations of the diagonal facade fins would bring differentiation and scale to the elevations and a resulting change of transparency to create an animated highly modulated facade. The colour palette has been selected in response to earthy and warm colours of the historic context of the Site. The H1 Development would be a distinctive high-quality piece of landmark architecture that would make a strong contribution to the sense of place of the Approved Development, marking the gateway to Elephant and Castle from the south, with a beneficial effect.

Magnitude of change: **high**

Effect: moderate in scale; beneficial in nature

Cumulative

The Elephant and Castle Shopping Centre Cumulative Scheme would be visible, with a well-articulated skyline of tall buildings beyond Elephant Park, consolidating the emerging tall building cluster around the junction. The Cumulative Scheme would increase the level of change to the view but, because the sensitivity of the view is low, the scale of the effect would not increase from that assessed for the H1 Development considered in isolation.

Cumulative Effect: moderate in scale; beneficial in nature

24mm – 37°

35mm – 31.5°

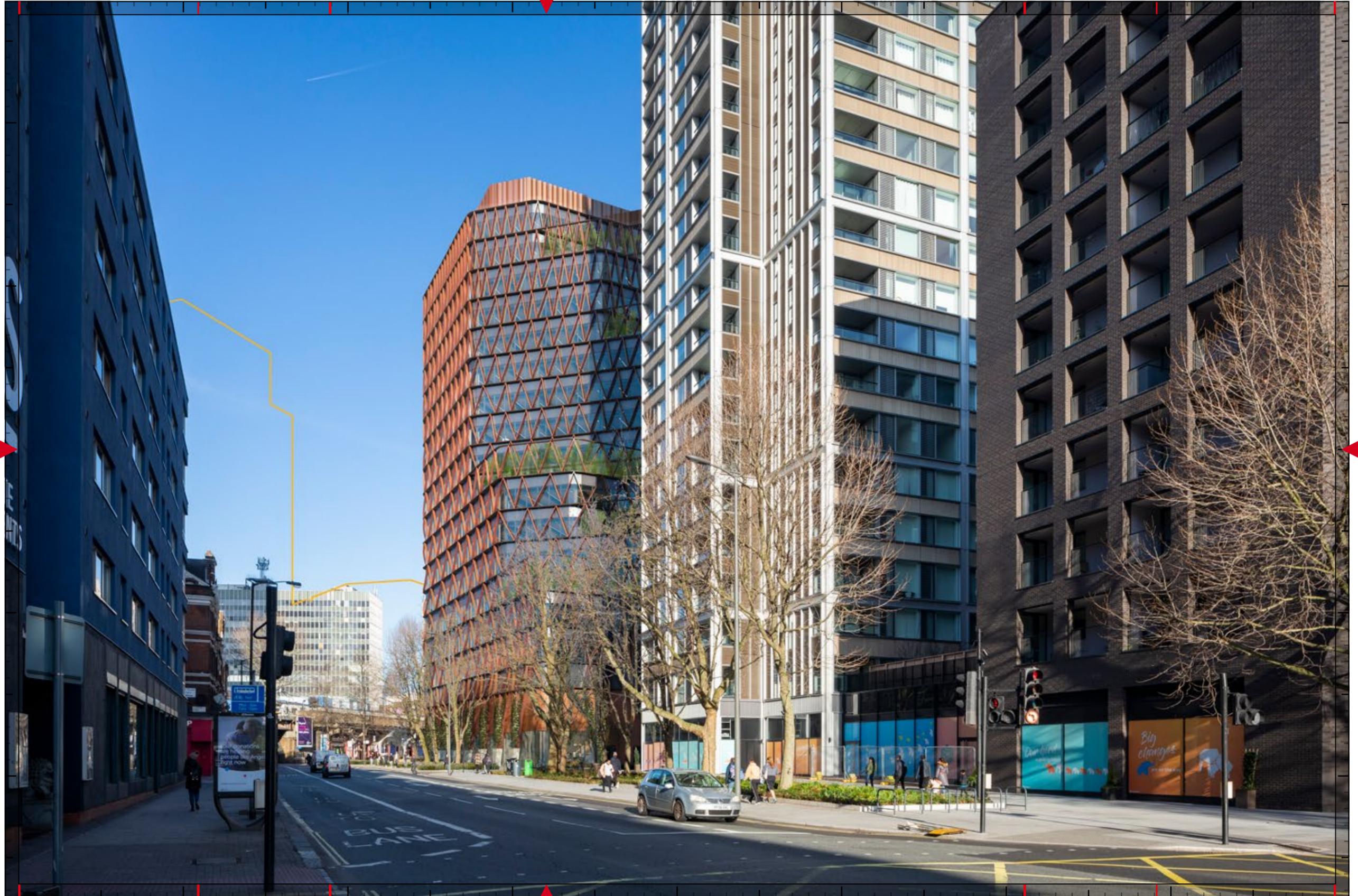
50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°

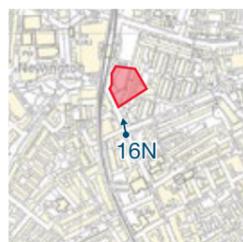
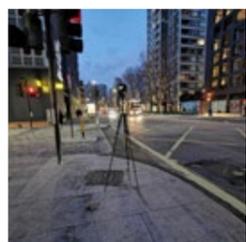


Cumulative view



16N

Walworth Road,
junction with
Steadman Street
(Dusk View)



Camera Location

View Location



Future Baseline



Proposed View

Future Baseline

The modern townscape at the very northern end of the street, is outside the Walworth Road Conservation Area. This view looking north is characterised by a taller scale of buildings on the approach to the Elephant and Castle junction. On the right is the completed Plot H2 of the Approved Development rising out of the view. Beyond it, hoardings around the edge of the Site are visible in front of the railway viaduct. Mature street trees on the east side of Walworth Road screen and soften the streetscape even in this winter view. On the west side of Walworth Road to the left, the streetscape is lower and more varied, with some surviving Victorian development at Nos.82-96 to the north of the junction with Hampton Road (included on the LBS draft Local List (Ref 1-12)) visible obliquely beyond the modern mid-rise student accommodation at No.114. Beyond the railway viaduct crossing the northern end of Walworth Road tall buildings at Elephant and Castle junction terminate the view: to the left Hannibal House above the Elephant and Castle Shopping Centre, and to the right Two Fifty One on Newington Causeway, with lower buildings in the Grade II listed Metro Central Heights in front of it screened by the foreground winter street trees.

Value attached to the view: this is a representative view from an area of 'ordinary' townscape quality in a area undergoing considerable change outside any conservation area. The value of the view is judged to be **low**.

Visual receptors affected: Moderate numbers of local residents, workers and shoppers and high numbers of travellers.

Susceptibility to change of visual receptors: Residents have high susceptibility to change where views contribute to a high-quality townscape environment. As the townscape environment is generally of 'ordinary' quality and in the process of change, their susceptibility to change is judged to be medium. Workers and travellers generally have a low susceptibility to change. Susceptibility to change overall is judged to be **low to medium**.

Sensitivity: **low**

Proposed

As by day, the H1 Development would provide a concluding focus to the view at the point at which Walworth Road meets the railway viaduct, and the magnitude of change would be high. As the sensitivity of the view is low the scale of the effect would be reduced to moderate. The massing, with the tallest north-west corner of the H1 Development addressing the tall buildings encircling the Elephant and Castle junction, a series of terraces on Walworth Road that reference the smaller scale listed terraces at 82-96 Walworth Road, and a series of planted terraces stepping down

towards the south, would remain clearly legible after dark. The varying densities and orientations of the diagonal facade fins within the façade would bring continue to bring differentiation and scale to the elevations, with greater transparency after dark, to create a very distinctive animated and highly modulated façade with a beneficial effect by night as by day.

Magnitude of change: **high**

Effect: moderate in scale; beneficial in nature

Cumulative

The Elephant and Castle Shopping Centre Cumulative Scheme would be visible, with a well-articulated skyline of tall buildings beyond Elephant Park, consolidating the emerging tall building cluster around the junction. The Cumulative Scheme would increase the level of change to the view but, because the sensitivity of the view is low, the scale of the effect would not increase from that assessed for the H1 Development considered in isolation..

Cumulative Effect: moderate in scale; beneficial in nature

24mm – 37°

35mm – 31.5°

50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°

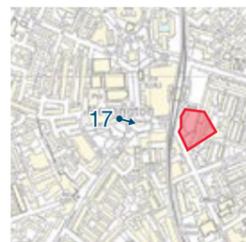


Cumulative view



17

St Mary's Churchyard



Camera Location

View Location



Future Baseline



Proposed View

Future Baseline

This close local view looks across the highway infrastructure at the southern end of the Elephant and Castle junction towards the Site from outside the Grade II listed perimeter railings of St Mary's Churchyard. On the left is the southern end of the blue-clad Elephant and Castle Shopping Centre, which is in the process of being demolished for redevelopment. Beyond it on the left of the view are the tops of Elephant One and to its right the top of Plot H2 of the Approved Development and the consented Plots H7 and H11a of the Approved Development. On the right is Strata Tower rising to 41 storeys out of the frame. The Site is partly screened by existing trees at the northern side of the rail bridge crossing the northern end of Walworth Road between the Shopping Centre and Strata Tower.

Value attached to the view: this is a representative view from an area of 'ordinary' townscape quality in a area undergoing considerable change outside any conservation area. The value of the view is judged to be **low**.

Visual receptors affected: Moderate numbers of local residents, workers and shoppers and high numbers of travellers.

Susceptibility to change of visual receptors: Residents have high susceptibility to change where views contribute to a high-quality townscape environment. As the townscape environment is generally of 'ordinary' quality and in the process of change, their susceptibility to change is judged to be medium. Workers and travellers

generally have a low susceptibility to change. Susceptibility to change overall is judged to be **low to medium**.

Sensitivity: **low**

Proposed

The H1 Development would terminate the view towards the railway viaduct, seen beyond the Elephant and Castle Shopping Centre, appearing equivalent in height to Elephant One to the left, and the magnitude of change would be high. As the sensitivity of the view is low the scale of the effect would be reduced to moderate. The tallest north-west corner, which characterises this view of the H1 Development would address the neighbouring tall buildings encircling the Elephant and Castle junction. The planted terraces stepping down towards the south and south-east, to integrate and connect the H1 Development with The Park would be barely discernible from this viewing position. Architects ACME have taken inspiration from Michael Faraday's discovery of electromagnetic induction to develop the appearance of the façade: the rhythm of vertical fins is designed to evoke the hyperbolic forms present in Faraday's studies for electromagnetism, while providing varying levels of shading in response to the orientation of the individual elevations. Varying densities and orientations of the diagonal facade fins would bring differentiation and scale to the elevations and a resulting change of transparency to create an animated highly modulated facade.

The colour palette has been selected in response to earthy and warm colours of the historic context of the Site. The perforated metal screen to the roof plant would integrate with the overall colour palette. The H1 Development would be a distinctive high-quality piece of landmark architecture that would make a strong contribution to the sense of place of the Approved Development, marking the gateway to the Approved Development from the southern end of the Elephant and Castle junction with a beneficial effect.

Magnitude of change: **high**

Effect: moderate in scale; beneficial in nature

Cumulative

The Elephant and Castle Shopping Centre Cumulative Scheme would be visible, closer to the viewing position on the left partly concealing the H1 Development and consolidating the emerging tall building cluster around the junction. The Cumulative Scheme would increase the change to the view but, because the sensitivity of the view is low, the scale of the effect would not increase from that assessed for the H1 Development considered in isolation.

Cumulative Effect: moderate in scale; beneficial in nature

24mm – 37°

35mm – 31.5°

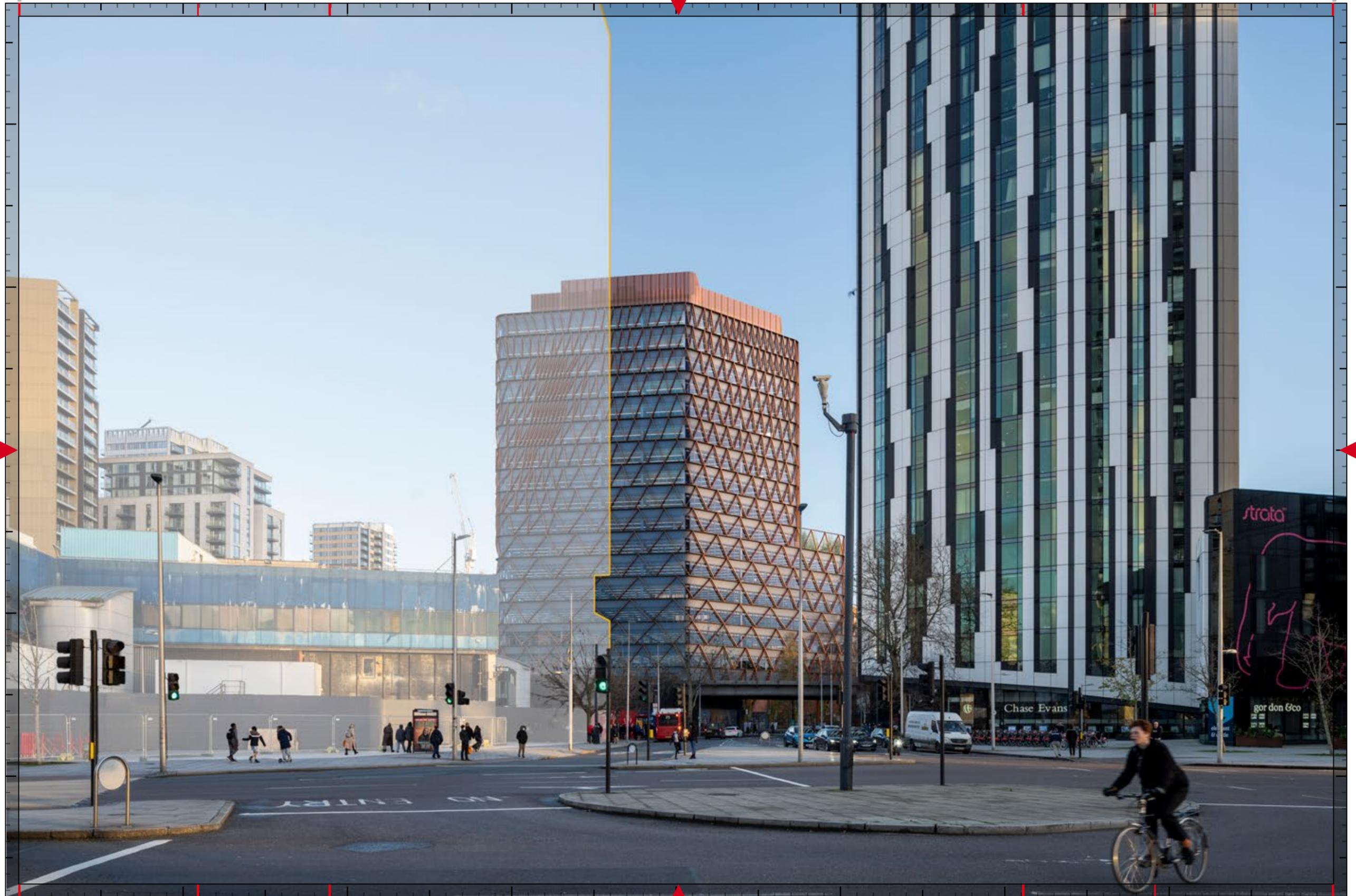
50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°



Cumulative view



05

Additional Mitigation / Enhancement And The Likely Residual Effects Of The H1 Development And Their Significance

The Works

- 5.1 As outlined in Section 4, relevant mitigation measures such as hoarding would be agreed as part of the CEMP. The measures would restrict adverse effects on views and townscape character during the enabling and construction process. Accordingly, no additional mitigation measures would be required. The residual effects would remain as reported in Section 4, as follows:
- **Insignificant** in relation to the heritage significance or appreciation of the heritage significance of built heritage assets;
 - **Direct, temporary, short-term, local effects, minor to moderate in scale and adverse** in nature, in relation to townscape character;
 - **Direct, temporary, short-term, local effects, moderate in scale and adverse** in nature in relation to close local views;
 - **Direct, temporary, short-term, local effects, minor** in scale and **adverse** in nature in relation to medium distance local views; and
 - **Insignificant** in relation to distant views.
- 5.2 All effects associated with the Works would be temporary and would last until the H1 Development has been completed.

Completed and Operational H1 Development

- 5.3 The residual effects of the completed and operational H1 Development (of ground plus 17 commercial storeys) which are considered to be significant are those which are minor, moderate and major in scale. They are summarised in Table 6.1. All effects of the completed and operational H1 Development would be indirect, and long-term.

Mitigation and residual effects on built heritage assets

- 5.4 Mitigation measures considered in response to anticipated visual changes to the settings of built heritage assets, and resultant changes and any potentially adverse effects on the ability to appreciate the heritage significance of those heritage assets, have been implemented during the design development of the H1 Development. No adverse effects have been assessed as a result of the final design of the H1 Development and no additional mitigation measures are required. The residual effects in relation to built heritage assets would remain **insignificant**. None of the effects would be adverse in nature and the H1 Development would not cause 'harm' in NPPF (Ref 1-3) terms to the heritage significance or ability to appreciate the heritage significance of any of the heritage assets assessed.

Mitigation and residual effects on townscape

- 5.5 Mitigation measures considered in response to the effects of the H1 Development on the townscape character and quality of the Walworth TCA within which it is located and on the settings of other TCAs within the study area have been implemented during the design development of the H1 Development. No adverse effects have been assessed for the final design of the H1 Development and no additional mitigation measures are required.

The residual effects would remain as reported in Section 4, as follows:

- TCA 1 Walworth: **insignificant to moderate** in scale; **beneficial** in nature; **significant**
- TCA 2 Elephant and Castle Town Centre: **insignificant to moderate** in scale; **beneficial** in nature; **significant**
- TCA 3 Rockingham: **insignificant**
- TCA 4 New Kent Road Corridor: **insignificant**



- TCA 5 Larcom: **insignificant**
- TCA 6 Walworth Road Corridor: **insignificant to moderate** in scale; **beneficial** in nature; **significant**
- TCA 7 Pullens: **insignificant to moderate** in scale; **beneficial** in nature; **significant**
- TCA 8 Newington Butts: **insignificant to minor** in scale; **beneficial** in nature; **significant**
- TCA 9 Kennington: **insignificant to minor** in scale; **beneficial** in nature; **significant**

Mitigation and residual effects on visual amenity

5.6 Mitigation measures considered in response to the effects of the H1 Development on the visual amenity of visual receptors as experienced in designated views and representative local views have been implemented during the design development of the H1 Development. No adverse effects have been assessed for the final design of the H1 Development and no additional mitigation measures are required.

The residual effects would remain as reported in Section 4, as follows:

- View 1 Serpentine Bridge, Hyde Park: LVMF Townscape View 23A.1: **insignificant**
- View 2 Serpentine Bridge kinetic sequence: View 5.2: **insignificant**
- View 3 Serpentine Bridge kinetic sequence: View 5.3: **insignificant**
- View 4 Serpentine Bridge kinetic sequence: View 5.4: **insignificant**
- View 5 Newington Gardens: **insignificant**
- View 6 New Kent Road: **insignificant**
- View 7 Walworth Road, junction with Manor Place: **minor** in scale; **beneficial** in nature; **significant**
- View 8 Pasley Park: **insignificant**
- View 9 Penton Place: **moderate** in scale; **beneficial** in nature; **significant**
- View 10 Brook Drive: **minor** in scale; **beneficial** in nature; **significant**

- View 11 St George's Road: **minor** in scale; **beneficial** in nature; **significant**
- View 12 St George's Circus: **insignificant to minor** in scale; **beneficial** in nature; **significant**
- View 13 London Road: **insignificant**
- View 14 Elephant Road: **moderate** in scale; **beneficial** in nature; **significant**
- View 15 Rodney Place: **insignificant**
- View 16 Walworth Road, junction with Steadman Street: **moderate** in scale; **beneficial** in nature; **significant**
- View 16N Walworth Road, junction with Steadman Street (dusk): **moderate** in scale; **beneficial** in nature; **significant**
- View 17 St Mary's Churchyard: **moderate** in scale; **beneficial** in nature; **significant**

5.7 All effects judged to be of a minor, moderate or major scale have been judged to be beneficial in nature.

06

Likely Residual Cumulative Effects And Their Significance

The Works

- 6.1 While the effects of the demolition and construction would be significant during the works they are temporary in nature; they would be mitigated by completion of the H1 Development and there would be no residual effects. All demolition and construction effects are indirect, temporary, and short term.

Completed and Operational Development

- 6.2 The residual cumulative effects of the completed and operational H1 Development (of ground plus 17 commercial storeys) which are considered to be significant are those which are minor, moderate and major in scale. They are summarised in Table 6.1. All residual cumulative effects of the completed H1 Development would be indirect, and long-term.

- 6.3 The residual cumulative effects on built heritage would not increase in comparison to the H1 Development assessed in isolation. The residual cumulative effects on built heritage would be as reported in Section 4: there would be no residual cumulative effects of the completed H1 Development on the heritage significance or ability to appreciate the heritage significance of conservation areas and listed structures in the study area. Cumulative effects on built heritage would therefore not be significant.

- 6.4 The residual cumulative effects on townscape character areas would increase in comparison to the H1 Development assessed in isolation for four TCAs: TCA 2 Elephant and Castle Town Centre, TCA 3 Rockingham, TCA 5 New Kent Road Corridor and TCA 9 Kennington. The residual cumulative effects would be as reported in Section 4, as follows:

- TCA 1 Walworth: **insignificant to moderate** in scale; **beneficial** in nature; **significant**
- TCA 2 Elephant and Castle Town Centre: **moderate** in scale; **beneficial** in nature; **significant**

- TCA 3 Rockingham: **insignificant to moderate** in scale; **beneficial** in nature; **significant**

- TCA 4 New Kent Road Corridor: **moderate** in scale; **beneficial** in nature; **significant**

- TCA 5 Larcom: **insignificant**

- TCA 6 Walworth Road Corridor: **insignificant to moderate** in scale; **beneficial** in nature; **significant**

- TCA 7 Pullens: **insignificant to moderate** in scale; **beneficial** in nature; **significant**

- TCA 8 Newington Butts: **insignificant to minor** in scale; **beneficial** in nature; **significant**

- TCA 9 Kennington: **insignificant to major** in scale; **beneficial** in nature; **significant**

- 6.5 The residual cumulative visual effects would increase in comparison to the H1 Development assessed in isolation for seven views: View 6 New Kent Road; View 7 Walworth Road, junction with Manor Place; View 8 Pasley Park; View 10 Brook Drive; View 11 St George's Road; View 12 St George's Circus; and View 13 London Road. The residual effects would remain as reported in Section 4, as follows:

- View 1 Serpentine Bridge, Hyde Park: LVMF Townscape View 23A.1: **insignificant**

- View 2 Serpentine Bridge kinetic sequence: View 5.2: **insignificant**

- View 3 Serpentine Bridge kinetic sequence: View 5.3: **insignificant**

- View 4 Serpentine Bridge kinetic sequence: View 5.4: **insignificant**

- View 5 Newington Gardens: **insignificant**

- View 6 New Kent Road: **insignificant**

- View 7 Walworth Road, junction with Manor Place: **minor** in scale; **beneficial** in nature; **significant**



- View 8 Pasley Park: **insignificant**
- View 9 Penton Place: **moderate** in scale; **beneficial** in nature; **significant**
- View 10 Brook Drive: **minor** in scale; **beneficial** in nature; **significant**
- View 11 St George's Road: **minor** in scale; **beneficial** in nature; **significant**
- View 12 St George's Circus: **insignificant to minor** in scale; **beneficial** in nature; **significant**
- View 13 London Road: **insignificant**
- View 14 Elephant Road: **moderate** in scale; **beneficial** in nature; **significant**
- View 15 Rodney Place: **insignificant**
- View 16 Walworth Road, junction with Steadman Street: **moderate** in scale; **beneficial** in nature; **significant**
- View 16N Walworth Road, junction with Steadman Street (dusk): **moderate** in scale; **beneficial** in nature; **significant**
- View 17 St Mary's Churchyard: **moderate** in scale; **beneficial** in nature; **significant**

Table 6.1: Residual Effects

| | | Sensitivity | Magnitude of Change | Residual Effect | Significance (in isolation) | Cumulative Residual Effect | Significance (cumulatively) |
|----------------------------|--|-------------|---------------------|-----------------|-----------------------------|----------------------------|-----------------------------|
| Built Heritage Assessment: | | | | | | | |
| CA | Conservation Areas | | | | | | |
| 1 | Larcom Street Conservation Area | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 2 | Walworth Road Conservation Area | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 3 | Elliott's Row Conservation Area | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 5 | The Pullens Estate Conservation Area | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| LS | Listed Structures | | | | | | |
| 1 | Metro Central Heights (formerly Alexander Fleming House) | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 2 | Michael Faraday Memorial, Elephant and Castle roundabout | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 3 | Metropolitan Tabernacle | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 4 | Railings, gates and piers to Old St Mary's Churchyard | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 5 | Elephant House, 4 Victory Place | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 6 | Star and Cross Church on Falmouth Road | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 7 | Nos.140, 142, 150 & 152 Walworth Road | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 8 | Southwark Municipal Offices, Walworth Road | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 9 | Southwark Central Library and Cuming Museum, Walworth Road | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 10 | The Walworth Clinic, Walworth Road | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 11 | Church of St John the Evangelist, Larcom Street | Medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |



Table 6.1: Residual Effects

| | | Sensitivity | Magnitude of Change | Residual Effect | Significance (in isolation) | Cumulative Residual Effect | Significance (cumulatively) |
|-----------------------|---------------------------------|-----------------|----------------------|--|-----------------------------|--|-----------------------------|
| Townscape Assessment: | | | | | | | |
| TCA | Townscape Character Areas | | | | | | |
| 1 | Walworth | Very low to low | Negligible to high | Scale: Insignificant to Moderate Nature: Beneficial | Significant | Scale: Insignificant to Moderate Nature: Beneficial | Significant |
| 2 | Elephant and Castle Town Centre | Very low | Low to high | Scale: Insignificant to Moderate Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |
| 3 | Rockingham | Low | Negligible to low | Insignificant | Insignificant | Scale: Insignificant to Moderate Nature: Beneficial | Significant |
| 4 | New Kent Road Corridor | Very low | Negligible to low | Insignificant | Insignificant | Scale: Moderate Nature: Beneficial | Significant |
| 5 | Larcom | Low to medium | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 6 | Walworth Road Corridor | Low | Negligible to high | Scale: Insignificant to Moderate Nature: Beneficial | Significant | Scale: Insignificant to Moderate Nature: Beneficial | Significant |
| 7 | Pullens | Low to medium | Negligible to medium | Scale: Insignificant to Moderate Nature: Beneficial | Significant | Scale: Insignificant to Moderate Nature: Beneficial | Significant |
| 8 | Newington Butts | Low | Negligible to low | Scale: Insignificant to Minor Nature: Beneficial | Significant | Scale: Insignificant to Minor Nature: Beneficial | Significant |
| 9 | Kennington | Low to medium | Negligible to low | Scale: Insignificant to Minor Nature: Beneficial | Significant | Scale: Insignificant to Major Nature: Beneficial | Significant |

Table 6.1: Residual Effects

| | | Sensitivity | Magnitude of Change | Residual Effect | Significance (in isolation) | Cumulative Residual Effect | Significance (cumulatively) |
|--------------------|---|-------------------|---------------------|---|-----------------------------|---------------------------------------|-----------------------------|
| Visual Assessment: | | | | | | | |
| View | | | | | | | |
| 1 | Serpentine Bridge, Hyde Park: LVMF Townscape View 23A.1 | High to very high | None | No effect | Insignificant | No effect | Insignificant |
| 2 | Serpentine Bridge kinetic sequence: View 5.2 | Medium to high | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 3 | Serpentine Bridge kinetic sequence: View 5.3 | Negligible | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 4 | Serpentine Bridge kinetic sequence: View 5.4 | Negligible | Negligible | Insignificant | Insignificant | Insignificant | Insignificant |
| 5 | Newington Gardens | Low | Low | Insignificant | Insignificant | Insignificant | Insignificant |
| 6 | New Kent Road | Very low to low | Low | Insignificant | Insignificant | Scale: Moderate Nature: Beneficial | Significant |
| 7 | Walworth Road, junction with Manor Place | Low to medium | Low | Scale: Minor Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |
| 8 | Pasley Park | Low | Low | Insignificant | Insignificant | Scale: Minor Nature: Beneficial | Significant |
| 9 | Penton Place | Medium to high | Medium | Scale: Moderate Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |
| 10 | Brook Drive | Low to medium | Low | Scale: Minor Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |
| 11 | St George's Road | Low to medium | Low | Scale: Minor Nature: Beneficial | Significant | Scale: Major Nature: Beneficial | Significant |
| 12 | St George's Circus | Low to medium | Negligible to low | Scale: Insignificant to minor Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |
| 13 | London Road | Low | None | No effect | Insignificant | Scale: Major Nature: Beneficial | Significant |
| 14 | Elephant Road | Low | High | Scale: Moderate Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |
| 15 | Rodney Place | Low | Low | Insignificant | Insignificant | Insignificant | Insignificant |
| 16 | Walworth Road, junction with Steadman Street | Low | High | Scale: Moderate Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |
| 16N | Walworth Road, junction with Steadman Street (dusk) | Low | High | Scale: Moderate Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |
| 17 | St Mary's Churchyard | Low | High | Scale: Moderate Nature: Beneficial | Significant | Scale: Moderate Nature: Beneficial | Significant |



07

Conclusions

- 7.1 The form and massing of the H1 Development has evolved in parallel with iterative testing of its potential effects on the quality of the townscape, on local visual amenity and on the appreciation of the heritage significance of local designated heritage assets.
- 7.2 The visual effects of the H1 Development have been tested in all the views agreed for the assessment of the Approved Development and accurately modelled and assessed in isolation and with agreed Cumulative Schemes, in a selection of those views plus additional new close views, all as agreed with LBS. The modelled views have also informed the assessments of townscape and built heritage effects.
- 7.3 The Works would have insignificant effects on built heritage. It would have significant effects on townscape character and local views, particularly close to the Site. The effects on distant views including the LVMF view from Assessment Point 23A.1 in Hyde Park would be insignificant. All effects associated with the Works would be temporary and would last until the H1 Development has been completed.
- 7.4 The H1 Development would reinstate a continuous street frontage to the northern end of Walworth Road and would provide definition and activity to the new public open spaces of Castle Square and The Park. The scale of the H1 Development at ground plus 17 commercial storeys would relate comfortably to the existing and emerging tall building cluster at Elephant and Castle. Its height and the massing of the top of the building has been carefully tested to ensure that there would be no effect on the designated LVMF view of the Westminster WHS from Assessment Point 23A.1 on the Serpentine Bridge in Hyde Park. The tallest north-west corner of the H1 Development would address the tall buildings encircling the Elephant and Castle junction. A series of planted terraces would step down towards the south and south-east, to integrate and connect the H1 Development with The Park, the new public open space at the heart of the Approved Development. Terraces on the Walworth Road elevation would relate to the listed terraces opposite at 82-96 Walworth Road. Varying densities and orientations of the diagonal facade fins would bring differentiation and scale to the elevations and a resulting change of transparency to create an animated highly modulated facade. The colour palette has been selected in response to earthy and warm colours of the historic context of the Site. The H1 Development would be a distinctive high-quality piece of landmark architecture that would make a strong contribution to the sense of place of the Approved Development.
- 7.5 While the H1 Development would be visible in the settings of local designated heritage assets there would be no resulting effects on the appreciation of the heritage significance of any designated heritage assets in isolation or cumulatively.
- 7.6 The H1 Development would have significant localised beneficial townscape effects on its surrounding context within about 200m of the Site and some significant beneficial effects further from the Site where streets and spaces align with the H1 Development. Where visible in longer views it would partly be screened by the intervening townscape or seen in relation to existing tall buildings. Any potential adverse townscape effects of the completed and operational H1 Development have been mitigated during the iterative design development process prior to submission and all significant effects of the completed and operational H1 Development would be beneficial in nature. Cumulative Schemes, in particular the Elephant and Castle Shopping Centre redevelopment, which is adjacent to the Site, would increase the cumulative effects on four out of the nine townscape character areas assessed in comparison to the H1 Development considered in isolation; all cumulative effects would be beneficial in nature.
- 7.7 The H1 Development would have significant localised beneficial effects on visual amenity within its surrounding context within about 200m of the Site and some significant beneficial effects further from the Site where streets and spaces align with the H1 Development. Where visible in longer views it would be partly screened by the intervening buildings or seen in relation to existing tall buildings. Any potential adverse visual effects of the completed and operational H1 Development have been mitigated during the iterative design development process prior to submission and all significant effects of the completed and operational H1 Development would be beneficial in nature. Cumulative Schemes, in particular the Elephant and Castle Shopping Centre redevelopment, which is adjacent to the Site, would increase the cumulative effects on seven out of the 17 views assessed in comparison to the H1 Development considered in isolation; all cumulative effects would be beneficial in nature.



R

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- 1-23 DCLG, National Design Guide (2019)
- 1-24 Historic England, *Advice Note 4: Tall Buildings* (2015)
- 1-25 GLA, *Character and Context Supplementary Planning Guidance* (2014)



A

Appendix A: Legislative And Planning Policy Background

National Legislation and Policy

Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) (Ref 1-21)

- A.1 Most of the principles that should be adhered to when determining planning applications that affect the historic environment are set out in policy and guidance. However, local planning authorities must also comply with important statutory duties when weighing the planning balance, as set out within the Planning (Listed Buildings and Conservation Areas) Act 1990 (the “Act”). The principle statutory tests of relevance within the Act are as follows:

(a) Section 66(1) states that *“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”*; and

(b) Section 72(1) states that *“in the exercise, with respect to any buildings or other land in a conservation area, of 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.”* Sub-section (2) explains that the provisions referred to within subsection (1) include the Planning Acts.”

National Planning Policy Framework 2019 (Ref 1-3)

- A.2 A National Planning Policy Framework (NPPF) was introduced in 2012 to replace the previous Planning Policy Statements (PPS), and revised in July 2018, February 2019 and June 2019. It sets out the Government’s overarching planning policies on the delivery of sustainable development through the planning system.

- A.3 Chapter 12 notes that *“the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”* (para.124). It notes that development should optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (para.127) and that design quality should be considered in the assessment of development proposals (para.128).
- A.4 Policy and guidance relating to conservation and enhancement of the historic environment is set out in Chapter 16 of the NPPF. It is broadly consistent with the policies in NPPF 2012 Chapter 12, which it replaces.
- A.5 As the NPPF Glossary (Annex 2) defines it, ‘significance’ is “the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.” (p. 71) The significance of relevant heritage assets is described in Section 4.
- A.6 When determining applications, the NPPF requires Local Planning Authorities to account for:
- *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - *The desirability of new development making a positive contribution to local character and distinctiveness.”* (para. 192).
- A.7 When assessing the likely impact of a proposed development, *“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” (para. 193). The substantial harm or loss of significance to Grade I and II* listed buildings and WHSs should be wholly exceptional.

A.8 Less than substantial harm “should be weighed against the public benefits of the proposal” (para.196). Substantial harm to significance will be permitted when the harm enables the H1 Development to provide “substantial public benefits that outweigh that harm or loss” or when all of the following criteria are met:

- “the nature of the heritage asset prevents all reasonable uses of the site; and
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and
- the harm or loss is outweighed by the benefit of bringing the site back into use.”

A.9 When considering proposals for development within a conservation area, WHS or setting of a heritage asset, Local Planning Authorities are required to seek opportunities for enhancement and to treat favourably proposals which “preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset” (para.200). Additional guidance is given in relation to changes in settings in the Historic England publication; The Setting of Heritage Assets (Ref 1-2).

National Planning Policy Framework, Draft text for Consultation 2020 (Ref 1-3A)

A.10 Paragraph numbering has changed, and a new paragraph has been inserted on the removal of historic statues, plaques or memorials at para.197. There are no changes relevant to this assessment.

Planning Practice Guidance (Ref 1-22)

A.11 The Planning Practice Guidance (PPG) is an online resource providing guidance on implementing the policies of the NPPF. It was first published in March 2014 and has subsequently been continuously updated. The web resource replaces various guidance documents, including By Design (2000). There are two sections of the PPG that are of particular relevance to this assessment:

- Design; and
- Conserving and enhancing the historic environment.

A.12 The PPG on Design, which supports section 7 of the NPPF, states that local planning authorities are required to take design into consideration (‘Requiring Good Design’) and should give great weight to outstanding or innovative designs which help to raise the standard of design more generally in the area: “Planning permission should not be refused for buildings and infrastructure that promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design (unless the concern relates to a designated heritage asset and the impact would cause material harm to the asset or its setting which is not outweighed by the proposal’s economic, social and environmental benefits” (Ref 1-3, para.004).

A.13 The PPG states (para.015) that new or changing places should have the following qualities commonly exhibited by successful, well-designed places:

- be functional;
- support mixed uses and tenures;
- include successful public spaces;
- be adaptable and resilient;
- have a distinctive character;
- be attractive; and
- encourage ease of movement.

A.14 The PPG on Conserving and enhancing the historic environment, supports section 12 of the NPPF. It states that “Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential effect and acceptability of development proposals” (para.009).

A.15 The PPG refers to the glossary of the NPPF for a definition of significance, which is that:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting...” (Ref 1-1, p.71). The NPPG notes that “in legislation and designation criteria, the terms ‘special architectural or historic interest’ of a listed building and the ‘national importance’ of a scheduled ancient monument are used to describe all or part of the identified heritage asset’s significance” (Ref 1-3, para.008).

A.16 When assessing the significance of heritage assets, Local Planning Authorities are likely to need “expert advice in addition to the information provided by the historic environment record, similar sources of information and inspection of the asset itself” (para.010).

A.17 Significance derives not only from a heritage asset’s physical presence, but also from its setting. The PPG states that “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” (para.013).

A.18 When identifying harm and assessing its degree, the PPG advises that:

“what matters in assessing if a proposal causes substantial harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting. Whether a proposal causes substantial harm will be a judgement for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial

harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.” (para.017)

A.19 In relation to harm to conservation areas, the PPG gives advice in relation to assessment of demolition of buildings within conservation areas, which is not applicable to this assessment (para.018).

A.20 The avoidance and minimisation of harm to heritage assets is attributed to “a clear understanding of the significance of a heritage asset and its setting” (para.019) by the PPG. It continues “Early appraisals, a conservation plan or targeted specialist investigation can help to identify constraints and opportunities arising from the asset at an early stage. Such studies can reveal alternative development options, for example more sensitive designs or different orientations, that will deliver public benefits in a more sustainable and appropriate way” (para.019).

A.21 The NPPF requires less than substantial harm to heritage assets to be weighed against public benefits, which are defined in the PPG as follows: “Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Public benefits may include heritage benefits, such as:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation”* (para.020).

National Design Guide (2019) (Ref 1-23)

A.22 Published on 1st October 2019, the National Design Guide (NDG) sets out the characteristics of well-designed places and demonstrates what good design means in practice. It forms part of the government’s collection of planning practice guidance and should be read alongside the separate planning practice guidance on ‘Design: process and tools’. The guidance is intended to support the NPPF which sets out that achieving high quality places and buildings is fundamental to the planning and development process. The NDG outlines the Government’s priorities for well-designed places in the form of ten characteristics. The guidance states that: ‘In a well-designed place, an integrated design process brings the ten characteristics together in a mutually supporting way. They interact to create an overall character of place.’ (page. 4)

A.23 The NDG outlines the key components of good design, including: layout; form; scale; appearance; landscape; materials; and detailing. The document states that: ‘All developments are made up of these components put together in a particular way. The choices made in the design process contribute towards achieving the ten characteristics and shape the character of a place.’ (page. 5)

A.24 The ten characteristics that contribute towards well-designed places and are intended to foster local character, community and be sensitive to climate change, are:

- Context – enhances the surroundings;
- Identity – attractive and distinctive;
- Built form – a coherent pattern of development;
- Movement – accessible and easy to move around;
- Nature – enhanced and optimised;
- Public spaces – safe, social and inclusive;
- Uses – mixed and integrated;
- Homes and buildings – functional, healthy and sustainable;
- Resources – efficient and resilient; and
- Lifespan – made to last.

A.25 Each of these ten characteristics are described in detail in Part 2 of the NDG and each heading includes two or three policy directions and a number of good practice examples.

A.26 Within ‘Context’ and ‘Identity’, the guidance emphasises the importance of understanding place, noting that new development should respond positively to the site itself and its local and wider context. The NDG further highlights the importance of understanding the history of how a place has evolved, noting that well-designed places and buildings are influenced positively by the significance and setting of heritage assets and any other specific features that merit conserving and enhancing. The PPG, published by the Department for Communities and Local Government (DCLG), is an online resource providing guidance on implementing the policies of the NPPF (Ref 1-2). Design: process and tools (updated 1st October 2019) is relevance to this assessment.

Historic England Advice Note 4: Tall Buildings (2015) (Ref 1-24)

A.27 This guidance supersedes *Guidance on Tall Buildings* published by CABE (now Design Council CABE) and English Heritage (now Historic England) in 2007. Historic England’s advice “focuses on how the value of heritage assets may be affected, and how the heritage conservation objectives within legislation and national policy can best be achieved” (p. 1). This document provides guidance on the assessment of the likely effects of tall buildings on the historic environment. While it recognises that “*Towns and cities evolve, as do their skylines... In the right place well-designed tall buildings can make a positive contribution to urban life*” it also notes that “*if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility, can also seriously harm the qualities that people value about a place... One of the principal failings in the design of certain tall buildings was a lack of understanding of the nature of the area around them, and the impact they would have on both specific features of the historic environment and its general character.*” (p.2).

A.28 Planning applications for tall buildings would need to address the likely effects of a tall building in isolation and cumulatively with concurrent proposals. An application including a tall building would be expected to include:

- a. *“Accurate and realistic representations of the proposal*
- b. *Consideration of the character of surrounding areas and the settings of heritage assets*



- c. Consideration of impact on significant views
- d. Consideration of impact on townscape and public realm
- e. Other relevant environmental issues, particularly sustainability and environmental performance, eg the street level wind environment” (para. 4.7)

A.29 The guidance states that tall buildings should set exemplary standards of urban design and architecture. “Good design will take the opportunities available for improving the character and quality of an area and respond to local character and history” (para. 4.9). “Consideration needs to be given to a tall building’s contribution to public space and facilities. This applies both internally and externally, including the provision of a mix of uses (especially on the ground floor of towers), as part of a well-designed public realm. Consideration of the impact on the local environment is also important, including microclimate, overshadowing, night-time appearance, light pollution, vehicle movements, the environment and amenity of those in the vicinity of the building, and the impact on the pedestrian experience. Well-designed tall buildings provide an inclusive environment, both internally and externally, taking opportunities to offer improved permeability, accessibility and, where appropriate, the opening up or A.29. It also states that: “A high quality scheme will have a positive relationship with: Topography

- a. Topography
- b. Character of place
- c. Heritage assets and their settings
- d. Height and scale of development (immediate, intermediate and town-or city-wide)
- e. Urban grain and streetscape
- f. Open spaces
- g. Rivers and waterways
- h. Important views including prospects and panoramas
- i. The impact on the skyline” (para. 4.5)

A.30 It further states that “Delivering architectural quality involves a consideration, amongst other things, of the building’s:

- a. Scale
- b. Form and massing
- c. Proportion and silhouette
- d. Facing materials
- e. Detailed surface design
- f. Relationship to other structures

- g. Impact on streetscape and near views
- h. Impact on cityscape and distant views
- i. Impact on the skyline” (para. 4.8)

A.31 In para. 5.5 the guidance states that when considering any proposal that has an adverse effect on a designated heritage asset through development within its setting, “great weight should be given to the asset’s conservation”, with any harm requiring a “clear and convincing justification” in accordance with NPPF para. 132.

Guidelines for Landscape and Visual Impact Assessment Third Edition 2013 (Ref 1-6)

A.32 Produced jointly by the Landscape Institute and the Institute of Environmental Management and Assessment, the Guidelines for Landscape and Visual Impact Assessment (GLVIA) presents principles for assessment of landscape and visual effects of new developments and their significance and has informed the methodology described in Section 4 of this volume.

Regional Policy

The London Plan: Spatial Development Strategy for Greater London (March 2021) (Ref 1-13)

A.33 The new London Plan was published in March 2021 The following policies are relevant to this assessment and relevant elements of their content are summarised below:

Chapter 3 Design:

- Policy D1 London’s form, character and capacity for growth
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering good design
- Policy D8 Public realm
- Policy D9 Tall buildings

Chapter 7 Heritage and Culture

- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework

A.34 **Policy D1 London’s form, character and capacity for growth** notes that Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area. This includes assessment of urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density), heritage assets, views and landmarks.

A.35 **Policy D3 Optimising site capacity through the design-led approach** states that “All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity” and “Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling” and continues that development proposals should “enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions”.

A.36 **Policy D4 Delivering good design** states that where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. Design review panels should be used to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, if they are above the applicable density in Policy D6 or propose a building defined as a tall building by the borough or one that is more than 30 m in height where there is no local tall building definition. It is important

that design quality is maintained throughout the development process from the granting of planning permission to completion of a development so the design quality of development should be protected by having a sufficient level of design information provided as part of the application and conditioning the ongoing involvement of the original design team should be considered.

A.37 **Policy D8 Public realm** states that development proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. The public realm should be seen as a series of connected routes and spaces that help to define the character of a place. Its design should be based on an understanding of how the public realm in an area functions and creates a sense of place.

A.38 **Policy D9 Tall buildings** states that while high density does not need to imply high rise, “*tall buildings can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London’s cityscape, and many tall buildings have become a valued part of London’s identity. However, they can also have detrimental visual, functional and environmental effects if in inappropriate locations and/or of poor-quality design*” (para. 3.9.1). The visual impacts of proposed tall buildings need to be considered in: long range views, in which a new tall building should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views; mid-range views in which the proposal should make a positive contribution to the local townscape in terms of legibility proportions and materiality; and immediate close views from the surrounding streets in which the base of the building should have a direct relationship with the human scale and character of the street. Whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Architectural quality and materials should be of an exemplary standard. Tall buildings should positively contribute to the character of the area. Proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings; proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear

public benefits that outweigh that harm. Buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it. Publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings.

A.39 **Policy HC1 Heritage conservation and growth** states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. **Policy HC3 Strategic and Local Views** describes the LVMF SPG (Ref 1-2) and States that the Mayor will, when necessary, review the LVMF SPG. Unlike Policy 7.11 it requests that boroughs clearly identify important local views in Local Plans and strategies; it states that local views should be protected and managed in a similar manner as Strategic Views. **Policy HC4 London View Management Framework** states that development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve or enhance viewers’ ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.

London View Management Framework Supplementary Planning Guidance (LVMF SPG) 2012 (Ref 1-2)

A.40 The LVMF SPG was updated and published in March 2012. It was created to provide additional clarity and detail to the sections of The London Plan (Ref 1-13) that deal with the management of important London views. The LVMF SPG includes 13 Protected Vistas - of St Paul’s Cathedral, the Palace of Westminster and the Tower of London. The Protected Vistas are geometrically defined and place additional consultation and referral requirements on development which exceeds the defined threshold plane. The Protected Vistas are included within views from a total of 27 Viewing Places identified in the LVMF SPG. The views are separated into four categories ‘London Panoramas’, ‘River Prospects’, ‘Townscape Views’ and ‘Linear Views’. All of the views in the LVMF SPG are subject to Qualitative Visual Assessment, as outlined in the Management Plan for each designated view provided in the Framework.

Character and Context Supplementary Planning Guidance (2014) (Ref 1-25)

A.41 This SPG was published in 2014 to inform studies of context and character in relation to planning applications in London. It sets out the process for identifying a study area and the key elements of character which inform the overall townscape character, include aspects which are: physical – such as architectural and urban form and natural habitats; cultural, social and economic – including historic development, function and community activity; and perception and experience – including permeability, legibility, associations and visual relationships.

A.42 The SPG identifies means of surveying the site and recording and organising the relevant material. It also defines the terms and process of analysis of this material, including classification of character type and description of places. It notes that “*A good description of the character of a place should draw on the information gained in the survey and highlight valued elements irrespective of designation. The aim should be to describe the overall character of the place, with reference to factors such as:*

- Landform
- Land use
- Demographics
- Activity and image
- Architectural style and vernacular
- Scale, mass and density
- Public realm
- Access and permeability
- Connections and circulation
- Views and visual interest” (para. 7.23, p.57).

A.43 It states that “*Descriptions should draw out the way these factors interact and are perceived. The level and type of description should be proportional to the scope and purpose of the study. It often needs to strike a balance between factual statements about the components of the place, and more evocative statements about its character. This*



balance may vary according to the purpose of the work. For example, an appreciation of a place or site which sets out to demonstrate what is special about it should be more evocative, seeking to capture qualities, making more reference to aesthetic qualities, views and perception. In contrast, if an assessment is to inform planning policy or development management decisions, a more factual description may be required.” (para. 7.24, p.57).

Local Policy

Southwark Core Strategy 2011 (Ref 1-14)

A.44 The Core Strategy, adopted in April 2011, is part of the Development Plan along with the saved policies of the Southwark Plan and London Plan. These are the main documents used to make planning decisions and set the strategy for development in Southwark.

A.45 The Core Strategy sets out the vision for Southwark until 2026 by identifying a series of Strategic Objectives. Strategic Objective ‘2F – Conserve and protect historic and natural places’ aims to conserve and enhance Southwark’s heritage assets and the wider historic environment.

A.46 There is one Core Strategy policy of relevance to this assessment, Strategic Policy ‘12: Design and Conservation’. The Policy will ensure that development will “achieve the highest possible standards of design for buildings and public spaces to help create attractive and distinctive places which are safe, easy to get around and a pleasure to be in.” (p.104) This will be achieved by:

“Expecting development to preserve or enhance Southwark’s historic environment, including conservation areas, archaeological priority zones and sites, listed and locally listed buildings, registered parks and gardens and scheduled monuments;

[...]

Making sure that the height and design of development conserves and enhances strategic views and is appropriate to its context, the historic environment and important local view; and

Requiring tall buildings to have an exemplary standard of design and make a positive contribution to regenerating areas and creating

unique places. Locations where tall buildings could go are in London Bridge, the northern end of Blackfriars Road, Elephant and Castle and action area cores.” (pp.104-5)

A.47 The policy defines tall buildings as follows:

“Tall buildings are those which are higher than 30 metres (or 25 metres in the Thames Policy Area) and/or which significantly change the skyline. 30 metres is approximately the height of a 10 storey block of flats or a 7-10 storey office building. In areas which have a low scale character, any building that is significantly higher than surrounding buildings will be regarded as a tall building even if it is lower than 30 metres.” (p.107)

Southwark Plan (policies saved 2013) (Ref 1-15)

A.48 The Southwark Plan was adopted by the LBS in July 2007 and was partly superseded by the Core Strategy (Ref 1-14) in April 2011. Some policies in the Southwark Plan were saved; those of relevance are outlined below.

A.49 Policy ‘3.12 - Quality in Design’ stresses the high quality of architectural and urban design that developments should achieve in order to enhance the built environment and “to create attractive, high amenity environments people will choose to live in, work in and visit.” (p.49) Whether the development is a new building or forms alterations to an existing one, the design approach should be creative and respectful of the site’s shape, size, location, development opportunities, and historic environment.

A.50 Policy ‘3.13 – Urban Design’ sets out the requirement for all developments to respect the principles of good urban design and to relate to the existing built environment, including streets, squares, parks, waterways, and other spaces constituting the public realm. It requires that specific consideration is given to:

i. Height, scale and massing of buildings – Designing a building that is appropriate to the local context and which does not dominate its surrounding inappropriately;

ii. Urban structure, space and movement – Proposals should have regard to the existing urban grain, development patterns and density in the layout of development sites;

iii. Townscape, local context and character – Proposals should be designed with regard to their local context, making a positive contribution to the character of the area and provide active frontages;

iv. Site layout – Building location, public spaces, microclimate, and outlook, site access and servicing, permeability, safety and ease of movement including vehicular, pedestrians and cyclists;

v. Streetscape – A high quality of design and materials will be required for the street environment including street furniture, planting and public art. This should be coordinated wherever possible, to avoid unnecessary clutter, and ensure a safe, informative and attractive environment...” (p.50)

A.51 Policy ‘3.18 – Setting of Listed Buildings, Conservation Areas and World Heritage Sites’ details local policy in relation to conservation areas and listed buildings. It states that: “Permission will not be granted for developments that would not preserve or enhance:

i. The immediate or wider setting of a Listed Building; or

ii. An important view(s) of a Listed Building; or

iii. The setting of the Conservation Area; or

iv. Views into or out of a Conservation Area.” (p.54)

A.52 Policy ‘3.20 – Tall Buildings’ relates to the development of tall buildings stating that:

“Planning permission may be granted for buildings that are significantly taller than their surroundings or have a significant impact on the skyline on sites, which have excellent accessibility to public transport facilities and are located in the central activities zone (particularly in opportunity areas) outside landmark viewing corridors. Proposals for tall buildings should ensure that there are excellent links between the building(s) and public transport services. Any building over 30 metres tall (or 25 metres in the Thames Policy Area) should ensure that it:

| | | |
|---|--|--|
| | <p>A.57 The detailed policies of relevance to this assessment are as follows:</p> <p>P12: Design of places</p> <p>P13: Design quality</p> <p>P16: Tall buildings</p> <p>P18: Listed buildings and structures</p> <p>P19: Conservation areas</p> <p>P20: Conservation of the historic environment and natural heritage</p> <p>P21: Borough views</p> <p>P23: World heritage sites</p> | <p>and the Central Activities Zone and areas that benefit from the highest levels of public transport access where there is the greatest opportunity for regeneration as where the highest tall buildings will typically be located. Individual sites where taller buildings may be possible have been identified in the site allocations. <i>“Tall buildings, if thoughtfully designed to an exemplary standard, can be an important component in contributing to Southwark’s physical regeneration, raising population density, avoiding urban sprawl and increasing the activities and life opportunities on offer for nearby residents.”</i> (p.23). The policy goes on to state that new tall buildings must:</p> |
| <p>A.53 Policy ‘3.21 – Strategic Views’ notes designated strategic views of St Paul’s Cathedral from Greenwich Park, Blackheath Point, Parliament Hill, Primrose Hill, Kenwood, and Alexandra Palace and further River Prospects.</p> | | <p><i>“1. Be located at a point of townscape landmark significance; and</i></p> |
| <p>A.54 Policy ‘3.22 – Important Local Views’ states that <i>“the LPA will seek to protect and enhance identified views, panoramas, prospects and their settings that contribute to the image and built environment of the borough and wider London”</i>. Relevant local views have been identified in consultation with the LBS and are assessed in Section 7.</p> | <p>A.58 Policy P12 – Design of places seeks to ensure that development responds positively to the existing townscape, character and context in terms of height, scale, massing and better reveals local distinctiveness. Existing urban grain, street patterns and permeability should be considered and public realm should be of high design quality.</p> | <p><i>2. Have a height that is proportionate to the significance of the proposed location and the size of the site; and</i></p> <p><i>3. Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and</i></p> |
| <p>New Southwark Plan: Southwark Council’s Proposed Changes to the Submitted New Southwark Plan 2018-2033 (August 2020) (Ref 1-16)</p> | <p>A.59 Policy P13 – Design quality states that <i>“Development must provide:</i></p> | <p><i>4. Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and</i></p> |
| <p>A.55 The New Southwark Plan will be a new borough-wide planning and regeneration strategy up to 2033. The council submitted the New Southwark Plan to the Secretary of State on 16 January 2020. The final stage of the plan-making process, the ‘Examination in Public’ has now started. The New draft New Southwark Plan is not yet adopted, but is a material consideration and should be afforded appropriate weight in accordance with para. 48 of the NPPF. Once finalised and adopted, it will replace the saved Southwark Plan (Ref 1-15) policies and the Core Strategy (Ref 1-14).</p> | <p><i>1 High standards of design including building fabric, function and composition;</i></p> <p><i>2 Innovative design solutions that are specific to the site’s historic context, topography and constraints; ...</i></p> <p><i>6 Buildings and spaces that utilise active design principles that are fitting to the location, context, scale and type of development; ...</i></p> | <p><i>5. Respond positively to local character and townscape; and</i></p> <p><i>6. Provide a functional public space that is appropriate to the height and size of the proposed building; and</i></p> <p><i>7. Provide a new publically accessible space at or near to the top of the building and communal facilities for users and residents when above a height of 60m where appropriate.”</i></p> |
| <p>A.56 The New Southwark Plan sets out six Strategic Policies, of relevance is amended Policy SP2 – Regeneration that works for all. Point 9 of the policy states that this will be achieved through: <i>“Enhancing local distinctiveness and heritage-led regeneration by requiring the highest possible standards of design, creating vibrant attractive, healthy, safe and distinctive buildings and places...”</i> (p.32)</p> | <p><i>7 Active frontages and entrances that promote activity and successfully engage with the public realm in appropriate locations; ...”</i> (p97)</p> <p>A.60 Policy P16 – Tall buildings notes that tall buildings are those <i>“significantly higher than surrounding buildings or their emerging context”</i> (p.42) and identifies Major Town Centres, Opportunity Area Cores, Action Area Cores</p> | |

The policy goes on to state that they must also:

- “1. Be of exemplary architectural design and residential quality and avoid unacceptable harm to the significance of designated heritage assets or their settings; and*
- 2. Conserve and enhance the significance of designated heritage assets and make a positive contribution to wider townscape character. Where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required; and*
- 3. Avoid harmful and uncomfortable environmental impacts including wind shear, overshadowing, and solar glare; and*
- 4. Maximise energy efficiency and prioritise the use of sustainable materials; and*
- 5. Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and provide widened footways and routes to accommodate increased footfall.” (p.102)*

the proposal on the Borough Views.” (p.111) The following views are protected by this policy:

- View 1: The London panorama of St Pauls Cathedral from One Tree Hill;
- View 2: The linear view of St Pauls Cathedral from Nunhead Cemetery;
- View 3: The linear view of St Pauls Cathedral along Camberwell Road;
- View 4: The river prospect of River Thames and its frontage, Tower Bridge and St Paul’s Cathedral from Kings Stairs Gardens; and
- View 5: The townscape view south from the centre of the Millennium Bridge.

A.63 Policy P23 – World heritage sites states that development will only be permitted when the significance of the Outstanding Universal Value of World Heritage Sites and their settings are sustained and enhanced. This should include views in, out and across sites.

A.61 Policies P18 – Listed buildings and structures and P19 – Conservation areas aim to conserve and enhance the significance of listed buildings and of conservation areas including their settings and views that contribute positively to the significance. Policy P20 – Conservation of the historic environment and natural heritage aims to conserve and enhance the significance and setting of other heritage assets including scheduled monuments, protected London squares, registered parks and gardens, ‘unlisted buildings of townscape merit’ and protected trees.

A.62 Policy P21 – Borough views states that development must preserve and where possible enhance borough views of significant landmarks and townscape. *“Borough views are significant views and panoramas that make a positive contribution to experiencing Southwark’s environment within London, informing how we are located in an historic and important world city. Development that affects these Borough Views should provide Accurate Visual Representations (AVRs) to demonstrate the impact of*



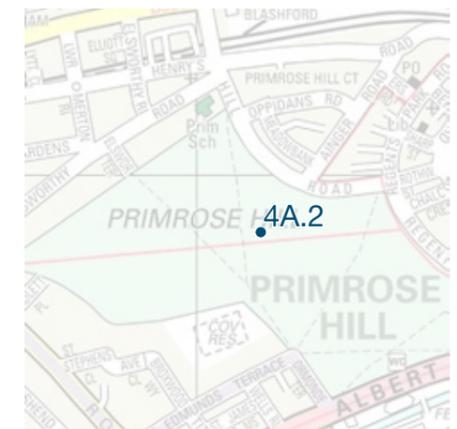
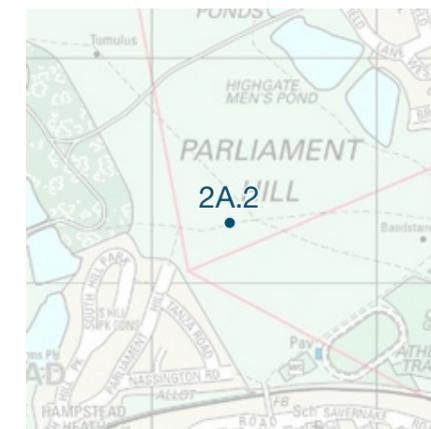
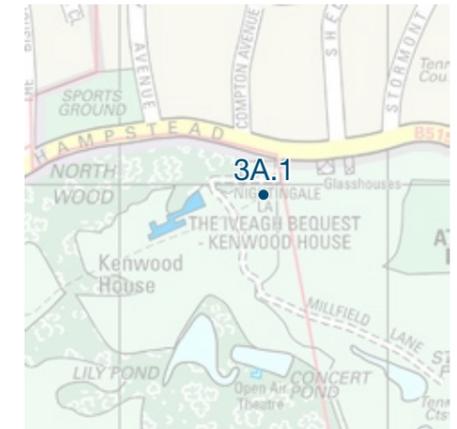
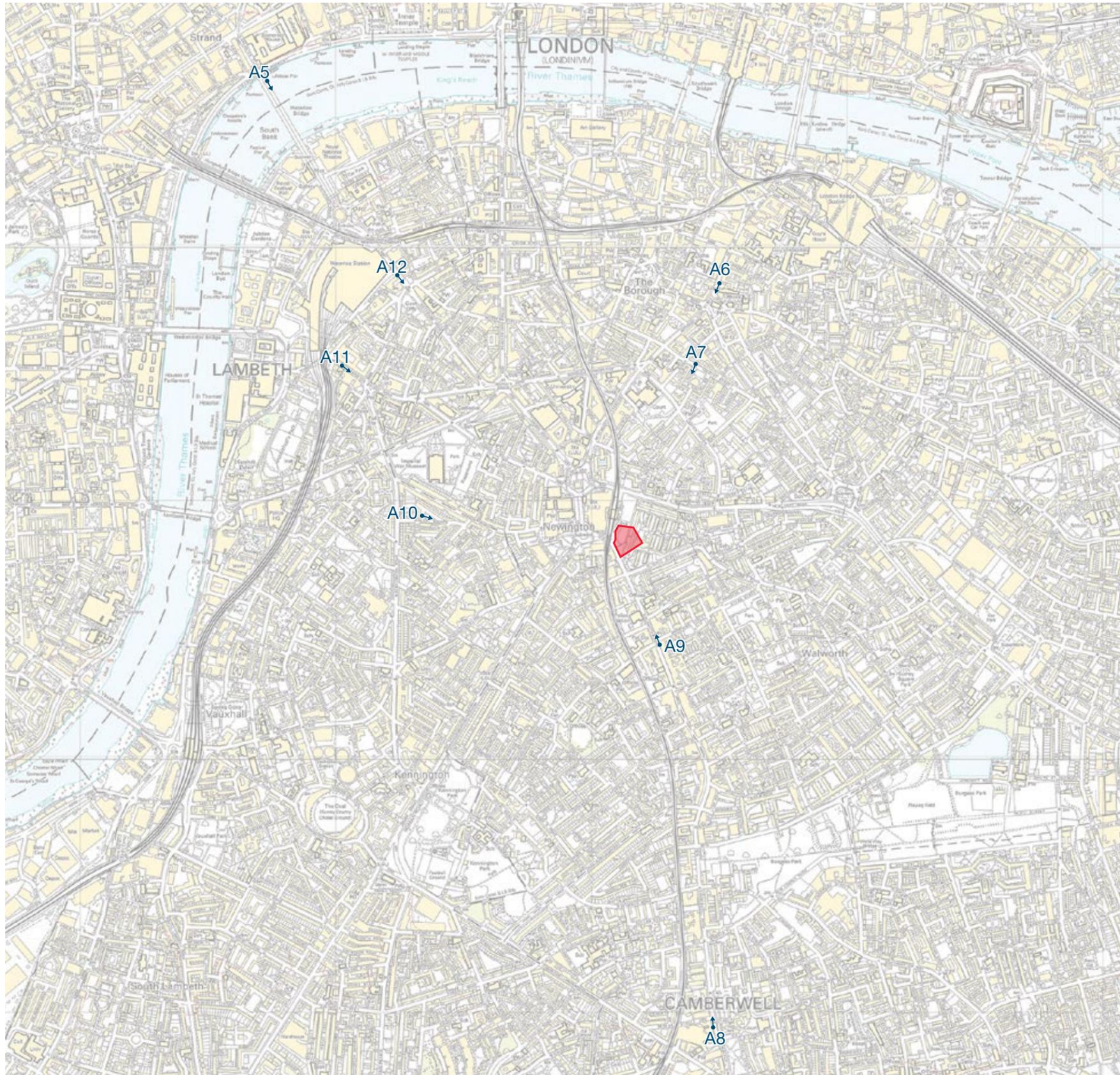
B

Appendix B: Supplementary Views

Table B1: Supplementary view photography data

| View | Location | Page | Style | Wireline/ Massing | Verified | Ref | Lens | Field of View | Film | Date | Time |
|------|---|------|-------|----------------------|----------|--------|------|---------------|---------|------------|-------|
| A1 | Alexandra Palace (LVMF London Panorama 1A.2) | 118 | AVR-1 | Wireline | Y | D18671 | 50mm | 40° | Digital | 25/3/2019 | 15:44 |
| A2 | Kenwood (LVMF London Panorama 3A.1) | 120 | AVR-1 | Wireline | Y | D18695 | 50mm | 40° | Digital | 25/2/2019 | 16:21 |
| A3 | Parliament Hill (LVMF London Panorama 2A.2) | 122 | AVR-1 | Wireline | Y | D18677 | 50mm | 40° | Digital | 25/3/2019 | 17:00 |
| A4 | Primrose Hill (LVMF London Panorama 4A.2) | 124 | AVR-1 | Wireline | Y | D18023 | 50mm | 40° | Digital | 19/2/2019 | 14:12 |
| A5 | Waterloo Bridge (LVMF River Prospect LVMF 15B.1) | 126 | AVR-1 | Wireline | Y | D20233 | 24mm | 74° | Digital | 14/11/2019 | 14:07 |
| A6 | Borough High Street, Junction with Newcommen Street | 128 | AVR-0 | Massing | | D19416 | 24mm | 74° | Digital | 21/8/2019 | 09:33 |
| A7 | Trinity Church Square | 130 | AVR-0 | Massing | | D20942 | 24mm | 74° | Digital | 23/3/2020 | 10:13 |
| A8 | Camberwell Road South | 132 | AVR-0 | Massing | | D20236 | 24mm | 74° | Digital | 14/11/2019 | 16:28 |
| A9 | Walworth Road / Browning Street | 134 | AVR-0 | Massing | | D19424 | 24mm | 74° | Digital | 22/8/2019 | 10:45 |
| A10 | Walcot Square | 136 | AVR-0 | Massing | | D20792 | 24mm | 74° | Digital | 27/2/2020 | 15:29 |
| A11 | Westminster Bridge Road | 138 | AVR-0 | Massing | | D20535 | 24mm | 74° | Digital | 19/1/2020 | 14:33 |
| A12 | Waterloo Road | 140 | AVR-0 | Massing | | D20537 | 24mm | 74° | Digital | 19/1/2020 | 14:01 |

Figure B.1: Map of supplementary viewing positions





A1

Alexandra Palace
(LVMF London
Panorama 1A.2)



Future Baseline



Proposed View



Camera Location



View Location

50mm - 20°

0°

50mm - 20°



Cumulative view



A2

Kenwood (LVMF
London Panorama
3A.1)



Future Baseline



Proposed View



Camera Location



View Location

50mm - 20°

0°

50mm - 20°



Cumulative view



A3

Parliament Hill (LVMF
London Panorama
2A.2)



Future Baseline



Proposed View



Camera Location



View Location

50mm - 20°

0°

50mm - 20°



Cumulative view



A4

Primrose Hill (LVMF London Panorama 4A.2)



Future Baseline



Proposed View



Camera Location



View Location

50mm - 20°

0°

50mm - 20°



Cumulative view



A5

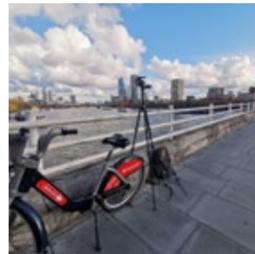
Waterloo Bridge
(LVMF River
Prospect 15B.1)



Existing View



Proposed View



Camera Location



View Location

24mm – 37°

35mm – 31.5°

50mm – 20°

0°

50mm – 20°

35mm – 31.5°

24mm – 37°



Cumulative view



A6

Borough High Street, junction with Newcommen Street



Existing View



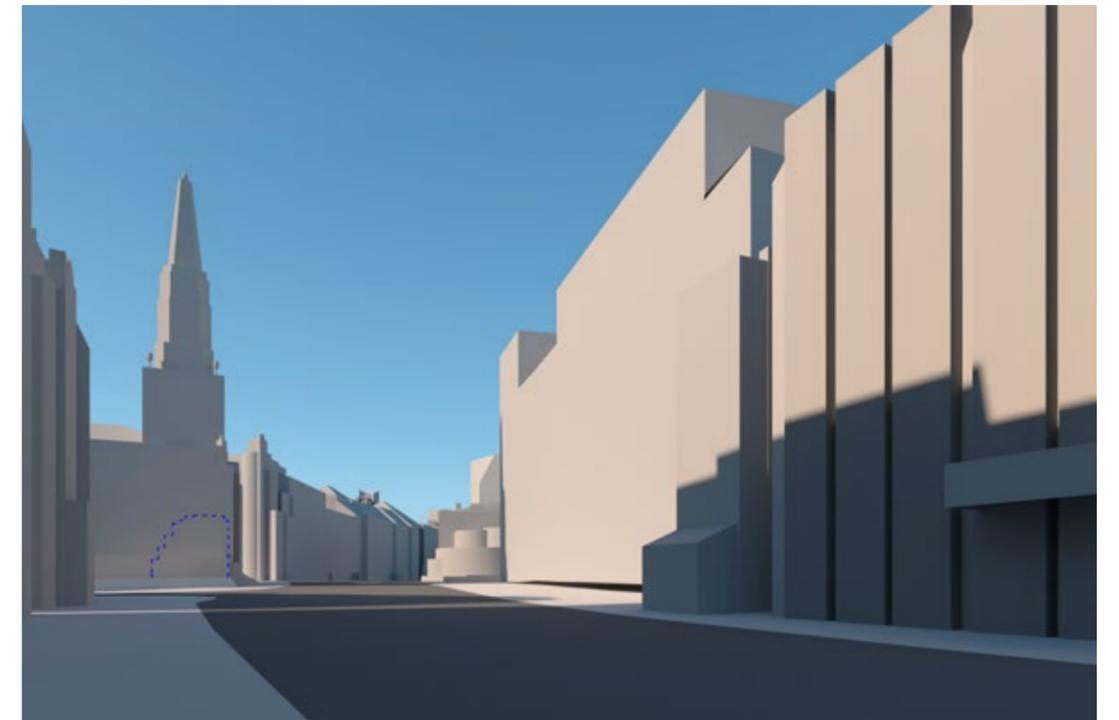
Future baseline



Camera Location



View Location



Proposed View



Cumulative view

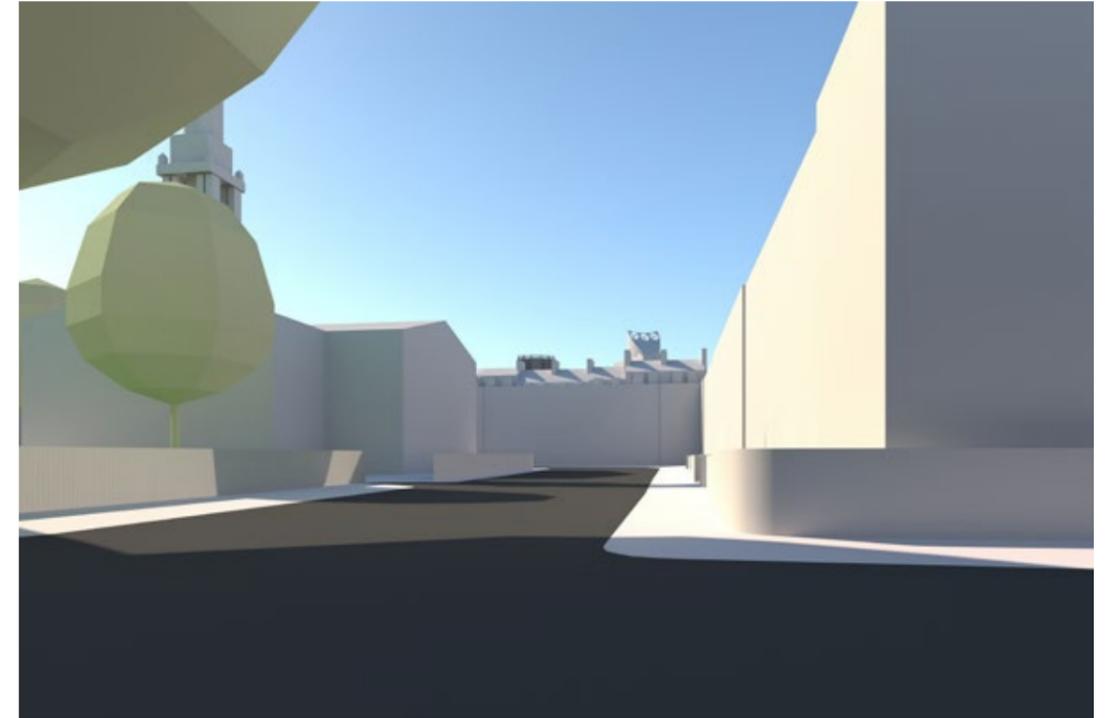


A7

Trinity Church Square



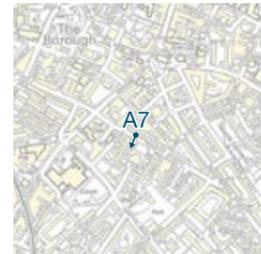
Existing View



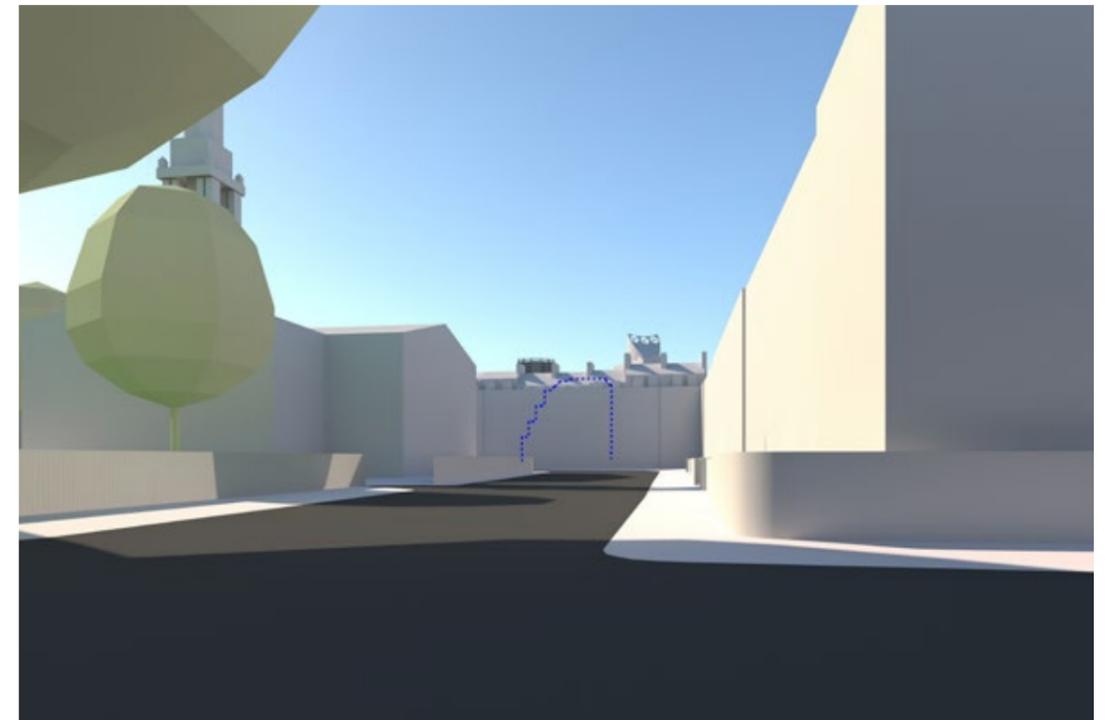
Future baseline



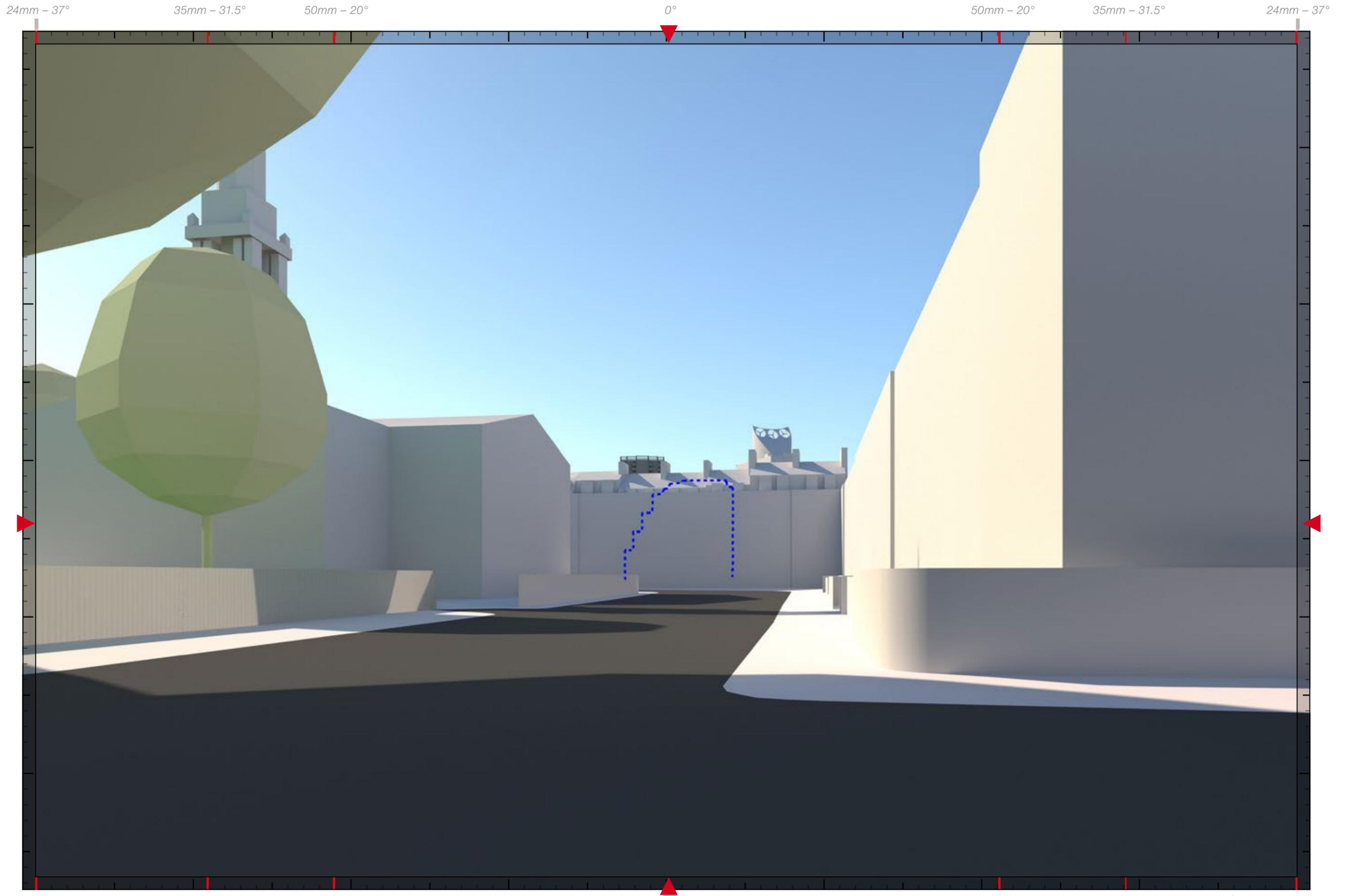
Camera Location



View Location



Proposed View



Cumulative view

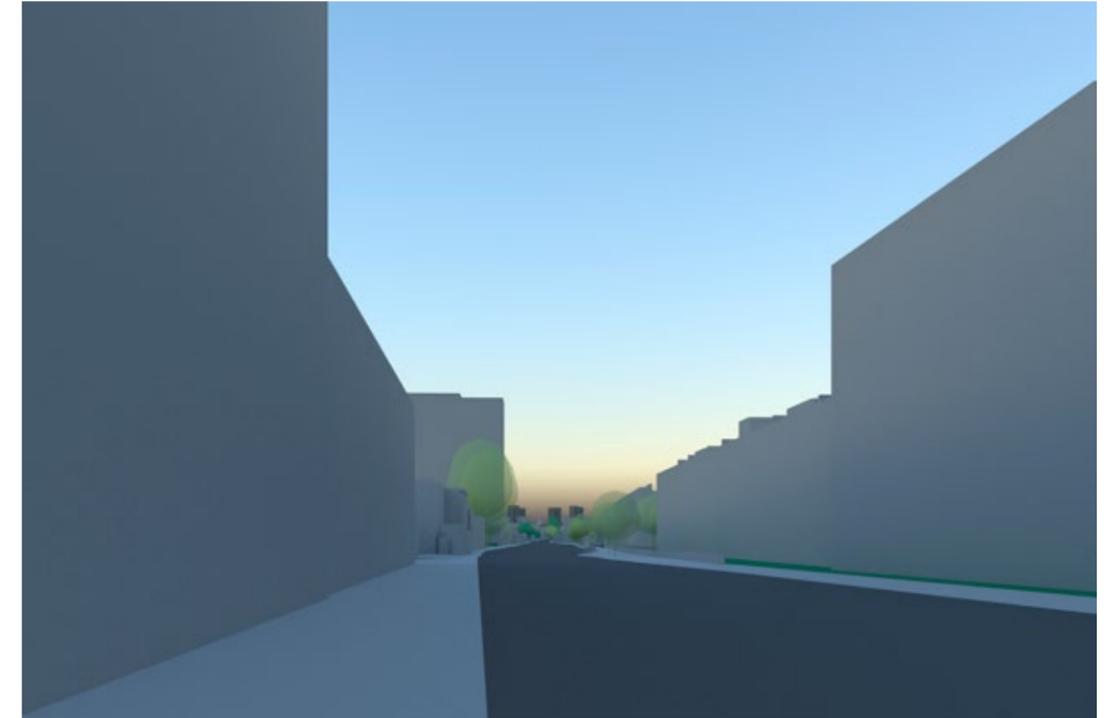


A8

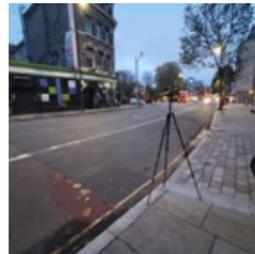
Camberwell Road South



Existing View



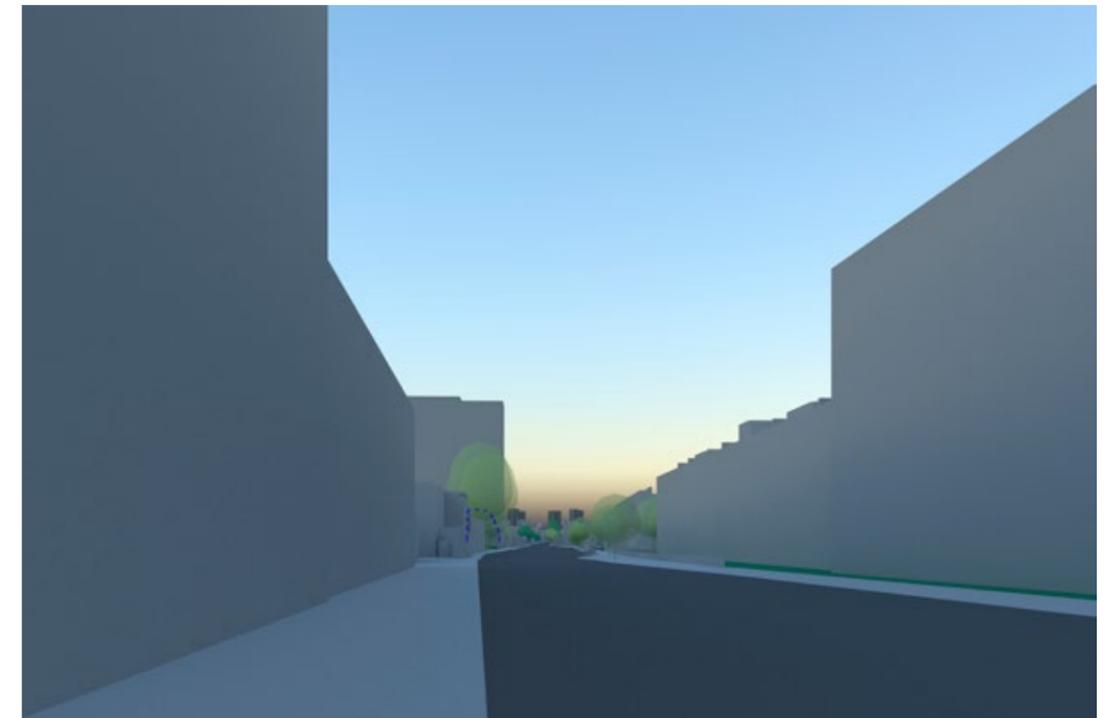
Future baseline



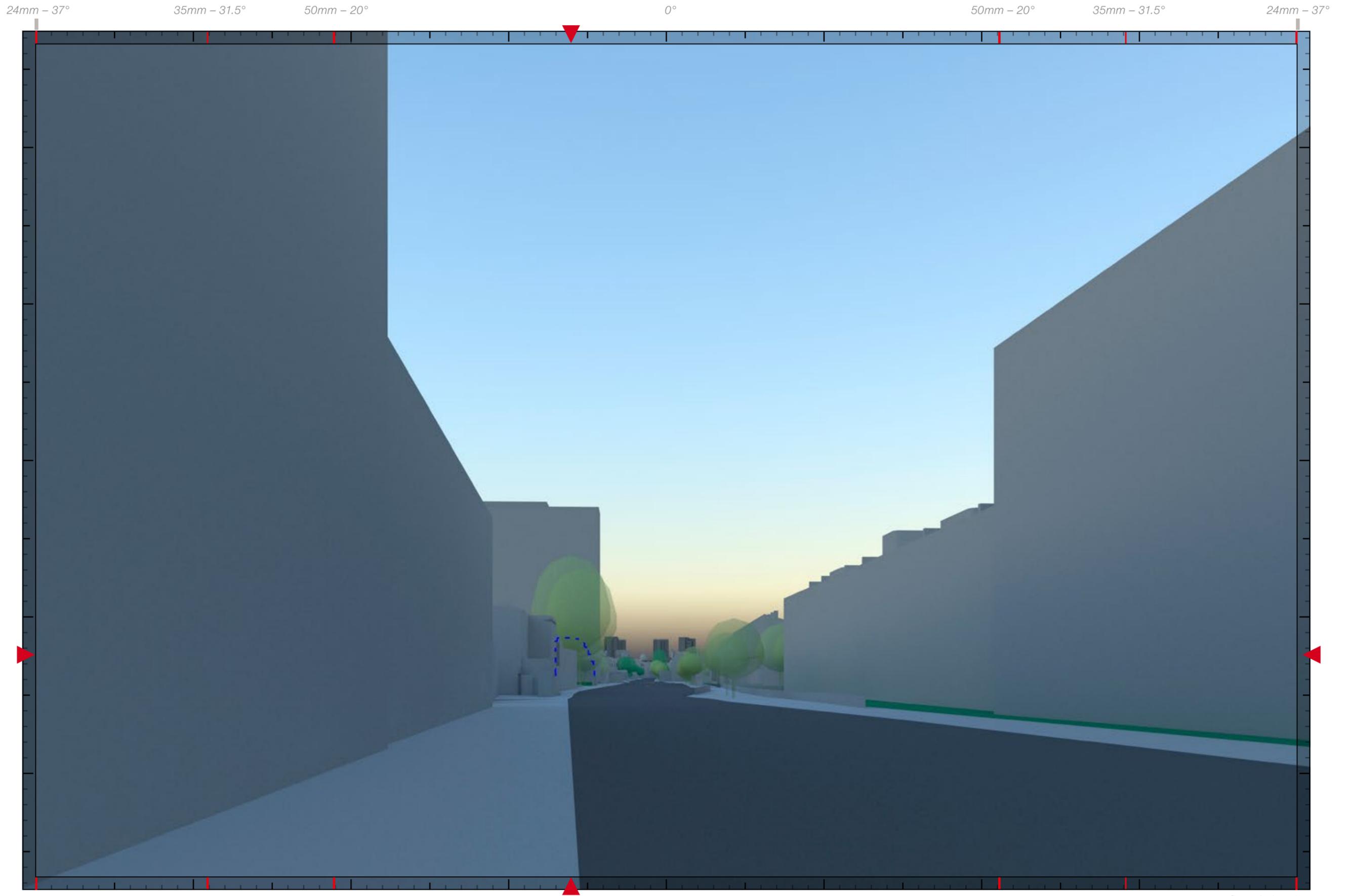
Camera Location



View Location



Proposed View



Cumulative view