

## 5.2 Heritage

5.2.1 Chapter 8 of the 2013 ES reported the likely significant effects of the development on existing heritage receptors during the construction and operational phase of the proposed development.

5.2.2 This Section has been prepared in order to outline the key changes in relation to the Consented Scheme and to identify changes to the findings and conclusions associated with the 2013 ES. It also considers variations to the status of heritage assets in proximity and any additional assets designated since the 2013 ES.

### 5.2.3 Changes to the Approved Scheme

5.2.4 The amendments since the 2013 ES are:

- the creation of a gap through Plot D to allow a view to heritage assets beyond.
- the omission of Building K1, the closest Building to the Grade I Listed Royal Foundry.
- minor increase in height to several buildings in Plot K.

### Planning Policy Context: Legislation, Guidance and Standards

5.2.6 The Planning Context as set out in the 2013 ES, has been compared to current Planning standards. The following documentation (in Italics) was referenced in the 2013 ES.

5.2.7 *The Planning (Listed Buildings and Conservation areas) Act 1990 imposes a duty on the Secretary of State to compile lists of buildings of special architectural or historic interest. Section 69 of the Act imposes a duty on local planning authorities to designate conservation areas any area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.*

### National Planning Policy

5.2.8 The 2013 ES noted the following:

5.2.9 *Relating directly to the conservation of the historic environment, the National Planning Policy Framework (NPPF) 2012 introduces policies that respond to the heritage consent regimes established in the Planning (Listed Buildings and Conservation Areas) Act 1990. More specifically Section 12 defines the policies for conserving and enhancing the historic environment and heritage assets. Of particular relevance to this planning application, the section sets out the importance of being able to assess the significance of heritage assets that may be affected by a development.*

5.2.10 *Significance is defined in Annex 2 as being: the value of an asset to this and future generations because of its archaeological, architectural, artistic or historic interest. It is clearly stated within NPPF that significance is not only derived from an asset's physical presence, but also from its setting. The setting of a heritage asset is defined as: 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the assets and its surroundings evolve.'*

5.2.11 *The NPPF encourages local planning authorities to look for developments within conservation areas and World Heritage Sites and within the setting of heritage assets that enhance or better reveal their significance. Proposals that preserve those elements of setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.*

5.2.12 Government policy in relation to the historic environment is now outlined in Section 16 of the *NPPF (2023)*, entitled '*Conserving and Enhancing the Historic Environment*'. This provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development;
- Understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- Conservation of England's heritage assets in a manner appropriate to their significance; and
- Recognition of the contribution that heritage assets make to our knowledge and understanding of the past.

5.2.13 Section 16 of the *NPPF (2023)* recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.

5.2.14 Paragraph 200 states that planning decisions should be based on the significance of the heritage asset and that the level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to understand the potential impact of the proposal upon the significance of that asset.

5.2.15 Paragraph 209 requires the decision-maker to take into account the effect on the significance of non-designated heritage assets and to make a balanced judgement having regard to the scale of harm or loss and the significance of the asset(s) potentially affected.

- 5.2.16 Paragraph 211 states that local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact on them, and to make this evidence (and any archive generated) publicly accessible. It notes that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.
- 5.2.17 Heritage Assets are defined in Annex 2 of the *NPPF (2023)* as: a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).
- 5.2.18 Designated Heritage Assets comprise: A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Parks and Garden, Registered Battlefield or Conservation Areas designated under the relevant legislation.
- 5.2.19 Significance is defined as the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.
- 5.2.20 Setting is defined as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
- 5.2.21 The *NPPF (2023)* is supported by the *PPG (July 2019)*. In relation to the historic environment, paragraph 002 (002 Reference ID: 18a-002-20190723) states that:
- “Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.”*
- 5.2.22 Paragraph 18a-013 (Paragraph: 013 Reference ID: 18a-013-20190723) outlines that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between places that may have limited or no intervisibility with each other. This may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.

5.2.23 Paragraph 18a-013 concludes “*The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. The contribution may vary over time. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation.*”

5.2.24 The key test in NPPF (2023) paragraphs 205-208 is whether a proposed development will result in substantial harm or less than substantial harm to a designated asset. However, substantial harm is not defined in the NPPF. Paragraph 18a-018 of the PPG provides additional guidance on substantial harm.

5.2.25 Paragraph 208 of the NPPF (2023) outlines that where a proposed development results in less than substantial harm to the significance of a heritage asset, the harm arising should be weighed against the public benefits accruing from the proposed development. Paragraph 18a-020 of the PPG outlines what is meant by public benefits:

5.2.26 “*Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). 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 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, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit. Examples of heritage benefits may include:*

- *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.*”

5.2.27 *In considering any planning application for development, the planning authority will be mindful of the framework set by Government policy, in this instance the NPPF, current Development Plan policy and any other material considerations.*

5.2.28 Whilst the planning context cited in the ES of 2013 has since been revised as shown, those revisions constitute an enhancement of the principles set out in Paragraphs 1.1.12 and 1.1.26 of this ES.

5.2.29 The revisions do not change the overall criteria upon which the assessment of the Approved Scheme is based. It is considered that the revisions contained in the NPPF (2023) do not alter the principle of assessment of the assets and the resulting outcomes.

### **Local Planning Policy**

5.2.30 The 2013 ES quoted Policy DH1, the *Royal Borough of Greenwich UDP of 2006* which was summarised thus:

*Policy D1 of the RBG UDP (2006) states that all development proposals should take into account and be sensitive to the character of the surrounding area in terms of design, bulk, scale and the use of materials. They should also be sensitive to the development capabilities of the site and be visually appropriate to the site and its setting.*

*This policy seeks to establish a broad design philosophy with regards to all new development and is concerned with the impact of the design of the development on the character of the Borough, including the Borough's historic environment. Further policies, specifically D16, establish clear principles for protecting conservation areas, stating that planning applications need to take into account the local scale, established pattern of development and landscape, building form and materials”.*

5.2.31 The current *Local Plan* is dated 2014. *Policy DH1 - Design* remains the policy dealing with built heritage, expanding upon the principles set out in the 2006 document. Although a new *Local Plan* is in the process of consultation, the relevant *Local Plan* is still the *Royal Borough of Greenwich Local Plan – Core Strategy’ 2014*. It sets out requirements in further detail and notes (issues relating to Built Heritage only included):

*Policy DH1: All developments are required to be of a high quality of design and to demonstrate that they positively contribute to the improvement of both the built and natural environments. To achieve a high quality of design, all developments are expected to:*

*i. provide a positive relationship between the proposed and existing urban context by taking account of:*

- topography, landscape setting, ridges and natural features;*
- existing townscapes, local landmarks, views and skylines;*
- the architecture of surrounding buildings;*
- the quality and nature of materials, both traditional and modern;*
- established layout and spatial character; the scale, height, bulk and massing of the adjacent townscape;*
- architectural, historical and archaeological features and their settings;*
- the effective use of land; the potential for a mix of uses;*
- the cultural diversity of the area;*

*ii. promote local distinctiveness by providing a site-specific design solution*

5.2.32 The Local Plan summarises its approach as follows *'Greenwich's rich historic heritage ranging from the well-known Maritime Greenwich World Heritage Site to the 20 diverse conservation areas will have been protected and enhanced. New development within Greenwich will have provided high quality architecture and urban design to achieve increased levels of safety and create an enhanced and more sustainable urban environment'*.

5.2.33 It continues: *'Development along and near the Thames frontage should have a design that is mindful of the maritime coastal nature of the river in Royal Greenwich, which differs significantly from its character in other parts of London. Development along and near the Thames frontage, where considered appropriate, also can and should pay homage to the heritage of industrial development. The Greenwich Strategy recognises how the role of a high-quality environment contributes to the health, safety and wellbeing of all communities and aims to make the most of Royal Greenwich's historic heritage'*.

### **The London Plan**

5.2.34 *The London Plan 2021* is also relevant. It includes the following policies:

#### *2.26 Policy HC1 Heritage conservation and growth*

*A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.*

*B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:*

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making*
- 2) utilising the heritage significance of a site or area in the planning and design process*
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place*
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.*

*C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.*

**Guidelines:**

5.2.35 English Heritage (now Historic England) guidance upon setting was cited in the 2013 ES. This was based upon the guidance note of 2011. The 2013 ES quotes:

5.2.36 *The setting of an asset is an important element in its significance and should not be considered separately. The document notes that an assessment of the impact of a proposed development should identify whether the development would be acceptable in terms of the degree of harm to an asset's setting.*

5.2.37 *This can be identified by using a broad five-step approach that (1) identifies which assets and settings are affected; (2) identifies how and to what degree these settings make a contribution to the significance of the heritage asset; (3) assesses the effects of the proposed development; (4) explores ways to minimise harm and maximise enhancement; and (5) proposes how to document the decision and monitor outcomes.*

5.2.38 *The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration; by spatial associations; and, by our understanding of the historic relationship between places. For example, buildings that are in close proximity but not visible from each other may have an historic or aesthetic connection that amplifies the experience of the importance of each. They would be considered to be within one another's setting.*

5.2.39 The 2017 Guidance Note on Setting expands upon these issues but takes the same five steps to assess setting. It also reiterates that other factors can influence setting and that it is not limited to intervisibility. Thus, the principles upon which the heritage assets were assessed in 2013 have not been altered by revisions within the updated version of 2017.

**Appendices**

5.2.40 This Chapter is accompanied by the following appendix

- Appendix 5.2.1 – The Ropeyards, Royal Arsenal Riverside, Plots D and K: Heritage Statement, Orion Heritage 2024

## **Assessment Methodology and Significance Criteria**

5.2.41 The following section outlines the methodologies applied to identify and assess the potential impacts and likely effects to result from the Proposed Development. It is noted that these have not changed since the 2013 ES.

### **Extent of The Study Area and selection of relevant heritage assets**

5.2.42 The study site is shown on the Site Plan in Appendix 5.2.1. This remains unchanged from the 2013 study. A search radius of 500m radius from the centre of the study site was used in the 2013 ES to identify designated heritage assets which might be directly or indirectly impacted by the development.

5.2.43 In 2013, it was noted that this search radius was used as, due to urban build up, there would be negligible impact upon the significance of heritage assets beyond that distance. Only restricted glimpses of upper levels set against other taller buildings would be visible.

5.2.44 The search radius remains unchanged in this study for the same reason. There is increased urban development since 2013 which will limit intervisibility even further.

5.2.45 Selection of heritage assets in the 2013 ES was based upon:

- The schedule produced by English Heritage of Listed Buildings in 2013 was used to identify relevant heritage assets. This organisation is now renamed Historic England for the purpose of defining heritage assets. A review of the 2013 list of relevant buildings against the current Historic England schedule of Listed Buildings, cross-checked against the GLHER, indicates that there are no alterations to the number of Listed Buildings on the study site and within the search radius.
- It was, however, noted that some assets which had a single reference number on the 2013 Site Plan, in fact comprised two assets on the current list. Where this occurs, it is noted in *Table 3: List of assets and level of impact*.
- The Royal Borough of Greenwich's '*List of Conservation Areas*'. This ES takes into account the fact that the *Woolwich Conservation Area* was designated in 2019.
- The Royal Borough of Greenwich's '*List of Locally Listed Buildings*', to which the Carriage Completion Workshops to the east, were added in 2021.



5.2.46 As a result of this review, within the study area, the only changes to the number of assets considered are the inclusion of the *Woolwich Conservation Area* (designated 2019) and the *Carriage Completion Workshops* (Locally Listed 2021).

5.2.47 Although both are set beyond built screening, as a result of relative proximity, they are within the search radius and now included within the assessment. The ES which accompanied the Approved Scheme of 2013 provided the Initial Baseline information.

5.2.48 This document utilised data from the *Heritage List for England, the Royal Greenwich Local Heritage List Buildings of Local Architectural & Historic Interest, historic maps held in the Royal Greenwich archives, The British Library and the National Archives*. A site visit was also undertaken.

5.2.49 This information was then reviewed by Orion Heritage, and a Heritage Statement produced to review change to impact by alterations to the proposals or criteria used to assess impact.

5.2.50 The baseline legislation and policy has been revised although the principles remain constant. Any minor changes or enhancements do not adversely impact the conclusions reached concerning significance of the assets and contribution of the study site to their setting.

5.2.51 Several developments set out in the 2013 ES on the study site have now been or are in the process of being completed. The overall impact is to further limit intervisibility between the study site and the relevant heritage assets.

**Method of Assessment**

5.2.52 The significance of a heritage asset is defined in the glossary of the NPPF as “*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.*” In the case of many heritage assets their importance has already been established through the designation (i.e. scheduling, listing and register) processes applied by Historic England.

5.2.53 Red lettering notes the different categorisation which was used in the 2013 HS. In summary, Grade II Listed Buildings and all Conservation Areas, not just those of high importance, are now elevated to a National (High) Level. The *Royal Arsenal West Conservation Area* assessed in the 2013 ES was of such significance as to be assessed as high, so the assessment is unchanged. The *Woolwich Centre Conservation Area*, recently designated, will be assessed at a high level of importance.

**Table 1: Importance of receptor**

Importance	Description
National (High)	<ul style="list-style-type: none"> <li>• Listed Buildings (<i>Grade II assessed in 2013 as medium, I and II* high</i>)</li> <li>• Conservation Areas (<i>only CAs of ‘exceptional quality’ assessed as high</i>)</li> </ul>

	<ul style="list-style-type: none"> <li>• Non-designated built assets of national importance, assessed with reference to the Secretary of State’s published Principles of Selection for Listing Buildings (DCMS 2010).</li> </ul>
Regional/County (Medium)	
Local (Low)	<ul style="list-style-type: none"> <li>• Historic buildings on a 'local list'. Non-designated built assets of local significance.</li> <li>• <b>Locally Listed Building</b></li> <li>• <b>Historic buildings of modest quality historic in their fabric or historical association</b></li> </ul>

**Assessment of Magnitude of Impact**

5.2.54 The nature and likelihood of the impacts of the scheme is assessed in both the long and short term, on archaeological and heritage features against clearly defined criteria.

5.2.55 Value/sensitivity has been assigned to effects relative to the heritage significance, its sensitivity to change and the magnitude of impact in accordance with best practice.

5.2.56 It is widely recognised that the heritage value/sensitivity of an asset is not the same as its sensitivity to changes to its setting. Thus, in determining effects upon the setting of assets by a proposed development, both value and sensitivity to changes to setting need to be considered. Although setting was assessed in the same 5-step manner in the 2013 ES, the importance of setting is further expanded in current methods of assessment.

5.2.57 There is now an increased emphasis upon setting and the definition of the level of harm is added. However, the methods of assessing impact in the ES of 2013, noted in the red lettering on the table below, illustrate that, whilst the wording may be different, the principles upon which the relevant assets have been assessed have not been changed.

**Table 2: Assessment of Magnitude of Impact**

Assessment	Example of works carried out	Level of harm resulting
Major Adverse	Demolition of built heritage assets or demolition within a Conservation Area.	Substantially harmful change to the significance of a built heritage asset or Conservation Area due to a change in setting.  <b>Change to key historic elements, such that the importance of the asset is totally altered.</b>
Moderate Adverse	Harmful alteration (but not demolition) of a built heritage asset or alterations to a building in a Conservation Area.	Less than substantial harm to the significance of a built heritage asset or Conservation Area due to a change in setting.  <b>Change to many key historic elements, such that the importance of the asset is significantly modified.</b>

Minor Adverse	Alterations to a built heritage asset or Conservation Area resulting in minor harm.	Minor harm to the significance of built heritage asset or Conservation Area due to a change in setting. <b>Change to key historic elements, such that the importance of the asset is noticeably different.</b>
Negligible	Negligible impact from changes in use, amenity or access. Negligible direct impact to the built heritage asset or Conservation Area.	Negligible perceptible change to the significance of a building or Conservation Area due to a change in setting. <b>Slight changes to historic elements that hardly affect the importance of an asset.</b>

**Table 3: Magnitude of change**

Level of Change		Minor	Moderate	Major
Heritage Value	National Importance (High)	Minor or moderate <b>Moderate</b>	Moderate or major	Moderate or major <b>Major</b>
	Regional / County Importance (Medium)	Minor <b>Moderate/Minor</b>	Moderate	Moderate or major
	Local Importance (Low)	Negligible or minor	Minor or Moderate	Moderate

## Consultation

5.2.58 A full Consultation List is included within Section 8, Figure 5, of the ‘*Planning Statement*’ (Stantec 2024) submitted as a separate document with this application. The following includes only meetings at which heritage issues were discussed.

17th May 2021	Design presentation for the design proposals at the site of Plots D&K.
8th Dec. 2022	Discussion on the architecture of the buildings, in relation to existing context and heritage assets.
28th Nov. 2023	Design Review Panel Applicant presented scheme, as per s106 Design Review process clause.
16th Jan. 2024	Meeting focused on Plots D & K, with Design and Planning Officers.
30th Jan. 2024	Pre-application discussion regarding architectural approach, landscaping proposals and technical matters.

## **Assessment of Effects, Mitigation and Residual Effects**

5.2.59 Below is the Table 4 of heritage assets and the assessments included within the 2013 ES for the approved scheme, together with the assessment of the impact of both the temporary and permanent proposed works. These are noted in black. The adjustment to the importance of the assets as a result of elevating Grade II Listed assets to high importance, is noted in red.

5.2.60 Also noted in red are List Entry Numbers (LEN), designated since 2013. Where there two LENs, this denotes the asset described as a single asset in the 2013 ES is, in fact, two separate assets adjacent.

### ***Heritage Assets included within 2013 ES - Demolition and Construction Phase***

5.2.61 The only asset whose importance has been elevated to high by the enhancement of Grade II assets, and whose impact is assessed as minor adverse, is the *Main Guard House*. The elevation of its importance does not change the assessment during the Demolition and Construction Phase.

5.2.62 The 2013 ES noted that '*There will be a temporary moderate adverse effect on the (Royal Arsenal Woolwich) Conservation Area during construction*'. It also notes that '*There will also be a temporary effect on the listed Main Guard House [3] and the effect on these assets will be minor adverse. The temporary effect on the listed Royal Brass Foundry [9] and Royal Military Academy [17] will be moderate adverse during construction*'. No other heritage assets were considered to be impacted.

5.2.63 Whilst the adverse effect identified during the Demolition and Construction Phase will be slightly reduced by the omission of Building K1, any minor improvement as a result of this will not alter the assessments set out in Table 4. The impact remains temporary as previously assessed.

5.2.64 Mitigation will be as a result of adherence to the Construction Management Plan.

### ***Heritage Assets included within 2013 ES – Operational Phase***

5.2.65 The assessment of Grade II assets, other than those set out in 5.2.66, is not considered to be impacted by their increase in assessed importance to high from medium as they have both limited proximity intervisibility. This is further restricted intervisibility by increased development since 2013, and the study site is not considered to be within their setting.

5.2.66 The 2013 ES noted a minor adverse impact to the *Main Guard House* and the *Pavilions*, a moderate adverse impact to the *Royal Brass Foundry* and the *Royal Military Academy* and a moderate beneficial impact to the *RAW Conservation Area*.

5.2.67 These impacts will be further reduced by the removal of Building K1, the closest Building to the *Royal Brass Foundry* and the *Main Guard House*. The benefit of this offsets the relatively limited increase in height to the other Buildings in Plot K.

5.2.68 A gap is introduced through Plot D to the Pavilions which also mitigates impact by providing a vista to the heritage asset from the study site. This mitigation reduces the level of impact to the integrity of the Pavilions and the intervening square.

5.2.69 Whilst the removal of Building K together with the introduction of a gap within Plot D, constitute a reduction in level of impact, the assessments in Table 4 remain within the levels already identified.

***Heritage Assets designated since the 2013 ES***

5.2.70 ***Woolwich Conservation Area*** was designated in May 2019. *The Woolwich Conservation Area* covers the central zone of Woolwich including its main commercial and entertainment areas. As this is a relatively limited view of the study site, it is considered to be within the wider vicinity and assessed within this context. It largely covers the later development of the town centre of Woolwich, including a wide diversity of commercial buildings which primarily face inwards, with the exception of some low-rise shops on the busy main road which separates the town from the study site. The *Woolwich Conservation Area Appraisal (WCAA)* provides a *Summary of Significance*, the main points of which are:

- *The London Plan 2021 defines Woolwich as one of eleven former medieval market towns. Part of a significant group of historic Thameside towns including Greenwich, Deptford and Chatham which developed to serve royal, naval and military ambitions but retain strong individual characters.*
- *Buildings and public spaces illustrate development from a historic market town into a thriving civic & commercial centre. Characterised by low-rise built form, public open spaces and landmark historic buildings. Coherent townscape subdivided into three principal zones: Historic Core, Commercial and Civic. Characteristic materials: 19C & early 20C buildings in yellow stock, red or buff coloured brick with stone, stucco or terracotta detailing; inter-war buildings faced in red brick, fine ashlar or pale coloured faience tiles. Shopfronts of red and black granite.*
- *Comprises principal public square, historic marketplace, 18C parish church and gardens, Victorian High Street, Catholic church complex, 1930s entertainment hub and late 19C-early 20C civic quarter. Key landmark buildings have relatively tall vertical towers, which make an important contribution to Woolwich's skyline and aid wayfinding. Includes 59 local heritage assets and 18 listed buildings including three at Grade II\*. Consistent building heights predominantly 2-3 storeys, with several landmark buildings of 4-5 storeys.*
- *Historic Interest: Influential in growth of national co-operative movements, the birthplace of one of Britain's foremost cooperative societies and one of its most successful building societies; associated with General William Carr, Governor General of the Royal Military Academy and Tom Cribb, world champion bareknuckle boxer. River Thames is important to the area's historic development and distinctive identity.*

- *Architectural interest: includes fine examples of the work of leading Victorian, Edwardian and inter-war architects including: A.W.N. Pugin & Sir Alfred Brunwell Thomas; Met Police architect John Dixon Butler; cinema architects George Coles, Cecil Masey & Reginald Uren; modernist architects Hector O’Hamilton & Robert Lutyens.*

### **Woolwich Conservation Area – Demolition and Construction Phase**

5.2.71 The proximity of *Woolwich Conservation Area* to the study site, despite intervening screening, suggests that there will be a low magnitude of impact as a result of the Demolition and Construction Phase. This will exert a moderate adverse effect.

5.2.72 This effect will be temporary and mitigated by adherence to the Construction Management Plan. There will be no permanent impact.

### **Woolwich Conservation Area –Operational Phase**

5.2.73 The significance of the *Woolwich Conservation Area*, set out in the *WCAA Summary of Significance*, is largely as a result of its evolution since Medieval times, exhibiting a wide variety of buildings which retain a cohesiveness despite different styles and materials.

5.2.74 It is essentially inward looking, despite its close proximity and relationship to the Royal Woolwich Arsenal Dockyard. The proposed development on the study site does not impact its significance as described in the *WCAA*.

5.2.75 The northeast boundary of the *Woolwich Conservation Area* runs approximately parallel to the southwest boundary of the study site. However, with the exception of a small length at the *Royal Arsenal Gatehouse*, Beresford Road and urban development intervenes to severely limit intervisibility.

5.2.76 An important view looking northeast from the *Woolwich Conservation Area* through the *Royal Arsenal Gatehouse* (named as Beresford Gate in the 2013 HS) will not be significantly altered by the proposed development.

5.2.77 The study site is within the setting of the *Woolwich Conservation Area*. Despite limited intervisibility, there are connections. The development of Woolwich was not instigated by, but it has, and will continue to be, influenced by the various phases of the Royal Woolwich Dockyard’s evolution.

5.2.78 There may be some limited views of the taller structures from several areas. These will be set against other tall buildings and thus not stand out as isolated structures. The assessment of level of impact is included in Table 4.

5.2.79 This concludes that the magnitude of impact is low. It might, however, be considered that the proposed development constitutes an improvement upon recent buildings on the study site, as a result of which the permanent effect is considered to be moderately beneficial.

5.2.80 The **Former Carriage Completing Workshop** is the second addition to those buildings included within the search radius since 2013. It was added to the Local Heritage List in 2021. Local located immediately to the east of the study site, its significance is set out in the Local List as follows:

- *Age and History; Surviving element of large complex of carriage-completing workshops begun in 1860 and connected to New Carriage Store. A ‘great smithery’ and one of the most complete smiths’ shops in the world. Gunnery House was a turnery block of 1883-6 overseen by Col. H. D. Crozier. Part of the Centre housing 19 light-industrial workshops, being developed into housing.*
- *Design & Materials; Twelve bays by four, single height cast-iron frame to north-lit saw-tooth roofs; two-storey western block Features Octagonal columns and perforated beams to composite roof trusses internally; some original segmental arched openings survive to north elevation. Western block has segmental-arched windows to ground floor with tri-partite frames, first floor windows have flat arches except for round-headed central feature window with radial fanlight.*
- *Significance; Handsome example of 19C industrial architecture from the Royal Arsenal, historic association with neighbouring Grade II New Carriage Store. Qualifying criteria: Historical Interest; Architectural Interest: i) sole-surviving example. Environmental Significance: i) characterful, locally valued feature iii) group value with New Carriage Store, Building 10.*

5.2.81 It is positioned some distance to the east on the opposite side of the wider Royal Arsenal Woolwich site, set beyond extensive historic and recent built form. There is neither invisibility nor other specific connection to suggest that the study site is within its setting.

5.2.82 As a result, it is not within such proximity so as to be impacted by either the Demolition and Construction Phase, nor the Operational Phase of the proposed works. It is concluded that no impact is caused to the *Former Carriage Completing Workshop* by the development, either by the approved scheme or the revisions set out in this submission.

**Table 4: Heritage Assets within search radius and changes to status since 2013**

Asset, List Entry No. & Grade		Importance	Impact Magnitude (construction)	Effect (temporary, before mitigation)	Impact Magnitude (operation)	Effect (permanent, before mitigation)
<b>Conservation Areas</b>	Royal Arsenal Woolwich	High	Low	Moderate adverse	Low	Moderate beneficial

	Woolwich (Centre) Designated 2019	High	Low	Moderate adverse	Low	Moderate beneficial
1358997 II	Royal Carriage Factory Former New Carriage Store Building 10	Medium High	No impact		No impact	
1289024 II	Officers' Quarters The Officers Block (Building 11)	Medium High	No impact		No impact	
1210926 II	Main Guard House	Medium High	Low	Minor adverse	Low	Minor adverse
1078957 II	Verbruggens' House	Medium High	No impact		No impact	
1211005 II*	Dial Arch Block Dial Square Entrance Range	High	No impact		No impact	
W 1245208 II E 1211082 II	Pavilions Royal Laboratory East and West Pavilions	Medium High	Low	Minor adverse	Low	Minor adverse
1245205 II	Gun Mounting Shed Building 19	Medium High	No impact		No impact	
1078956 I	Royal Brass Foundry	High	Low	Moderate adverse	Medium	Moderate adverse
1079080 II	Beresford Gate Main Entrance to Royal Arsenal	Medium High	No impact		No impact	
1213553 II	Armstrong Gun Factory	Medium High	No impact		No impact	
1245203 II 1245206 II	Paper Cartridge Factory Building 17 and Royal Laboratory Building 18	Medium High	No impact		No impact	
1359015 II*	Royal Military Academy The Board Room	High	Low	Moderate adverse	Medium	Moderate adverse
1288913 II	Greenwich Heritage Centre	Medium High	No impact		No impact	



	Building 41 And 41a Royal Laboratory Square					
1211108 II	Statue of the Duke of Wellington	Medium High	No impact		No impact	
1389382 II	Equitable House	Medium High	No impact		No impact	
1078915 II	Royal Arsenal Rifle Shell Factory Gateway	Medium High	No impact		No impact	
1078990 II	Elephant and Castle Public House	Medium High	No impact		No impact	
1253068 II	Entrance to Woolwich Pedestrian Tunnel North and South	Medium High	No impact		No impact	
1376229 II	North Woolwich Station Turntable and Platform Lamps	Medium High	No impact		No impact	
1376224 II*	Gallions Hotel	High	No impact		No impact	
E 1078955 II W 1245207 II	E&W Riverside Guardrooms	Medium High	No impact		No impact	
1078958 II*	The Grand Store, West and South Ranges, Buildings 36, 37 and 46	High	No impact		No impact	
1358996 II 1211038 II	Middlegate House and attached gate	Medium High	No impact		No impact	
1289552 II	Gun Emplacements on Riverside	Medium High	No impact		No impact	

## Summary & Conclusions

- 5.2.83 The amendments constitute limited revisions to the Consented Scheme.
- 5.2.84 Opportunity has been taken, in connection with these necessary revisions to the approved design, to carry out several improvements which reduce the impact of the development on the heritage assets within the search area. The search area as determined in the 2013 ES to be within a 500m radius.
- 5.2.85 These include the removal of Building K1, which was the closest block to those heritage assets in closest proximity to the study site. This constituted an important beneficial change as there was previous concern about its proximity to the Grade I Listed *Royal Brass Foundry* to the east.
- 5.2.86 In order to compensate for this considerable benefit, the height of the adjoining blocks was raised by a relatively small amount. This would be barely perceptible from either ground level or from a distance, and of a far lesser impact than Block K1 would have exerted upon *The Royal Brass Foundry*. It removed the major concern in relation to heritage assets in proximity.
- 5.2.87 Concern was also expressed about the enclosing nature of the proposed blocks to the west of *The Royal Laboratory West and East Pavilions*. This has been addressed by the introduction of a gap between Block D1 and Block D5, facilitating a view through to the Pavilions Square. This allows a sense of discovery whilst maintaining the important relationship between the Pavilions and coherence of the intervening square.
- 5.2.88 Also considered were changes in legislation, policy and guidelines since 2013. Whilst all of these have been revised in this document, in some cases extensively, the principles by which the heritage assets have been assessed have been enhanced. However, the core principles themselves have not been changed and, for the purpose of assessment of the assets in this document, the results of the individual assessment of 2013 is not changed.
- 5.2.89 Alterations to the criteria by which the assets were selected and their importance assessed were also reviewed. It was found that levels of importance had changed. Grade II Listed Buildings increased in importance from medium to high, whereas previously only I and II\* Listed Buildings were assessed as high. It was found that this elevated status did not change assessments made in 2013 as with one exception.
- 5.2.90 The single exception was the Main Guard House, which was considered to have a minor adverse impact. Its elevation of importance is offset by the removal of Building K1. This would constitute a benefit which would balance its elevated importance and leave the resulting level of impact unchanged.

5.2.91 Two heritage assets were identified as having been designated since 2013. The first is the *Woolwich Conservation Area*. It was found that its historic and architectural values which were set out in the *Woolwich Conservation Area Appraisal*, were not impacted by the proposals.

5.2.92 Whilst the study site was within its wider setting, with a view from the Conservation Area to the study site at the *Main Gate* (Beresford Gate), it was considered that any impact upon the Conservation Area by the proposals would be limited. As the proposals were an improvement upon previous development on the study it, the impact was considered to be moderately beneficial.

5.2.93 The other asset designated since 2013 is the *Former Carriage Completing Workshop*, added to the Local List in 2021. Whilst it is a good example of an early 19<sup>th</sup> century industrial building related to several other assets within the Royal Woolwich Arsenal, it is at some considerable distance from the study site, with no intervisibility, nor other connections to suggest the study site is within its setting. It is therefore considered that the proposals do not impact this asset by development in its setting.

5.2.94 Whilst it did not alter assessments of importance or impact, some clarifications were made to the list of assets set out in 2013. These included;

- adding List Entry Numbers (LENS), which were not available in 2013. This helps to clarify the precise location of the asset, particularly as different names are sometimes used.
- names have changed of some of the assets which are identified with a different name on Historic England's Schedule of Listed Buildings.
- Some of the assets identified with a single number on the assets list and plan of 2013 are now designated as two separate assets.

5.2.95 All of these alterations and corrections were identified separately on the various tables and lists.

5.2.96 In conclusion, the criteria upon which assessments were made of heritage assets for the approved scheme of 2013 have been reviewed in the light of revisions to the relevant documentation. This included legalisation, policy, guidelines, criteria and additional assets.

5.2.97 Revisions were made to the approved proposals of 2013 in order to comply with current regulations. Opportunity has been taken, as a result of these, to further minimise the impact of the proposals on heritage assets in proximity.

5.2.98 It was concluded that there was no increase in assessed levels of harm identified as a result of the review and revisions to the approved scheme. The impact on some assets was further minimised by the revisions but this did not alter the category of impact identified in the previous assessment of 2013.

## 6.0 References

### 2013 ES

Department of Communities and Local Government (2012) *National Planning Policy Framework*

English Heritage (2008) *Conservation Principles Policy and Guidance*

English Heritage (2011) *The Setting of Heritage Assets*

Mayor of London - *The London Plan Spatial Development Strategy for Greater London* (July 2011)

*Planning (Listed Buildings and Conservation Areas) Act*, (1990)

Planning Policy Statement PPS5 (2010) *Planning for the Historic Environment:*

*Historic Environment Planning Practice Guide*

Royal Borough of Greenwich (2006) *Greenwich Unitary Development Plan*

Scott Wilson (2008) *The Warren, Woolwich Royal Arsenal*

### 2024 ES Addendum

Department of Communities and Local Government (2023) *National Planning Policy Framework*

Historic England (as English Heritage) (2008) *Conservation Principles Policy and Guidance*

Historic England (2017) *The Setting of Heritage Assets*

Mayor of London - *The London Plan Spatial Development Strategy for Greater London* (July 2021)

*Planning (Listed Buildings and Conservation Areas) Act*, (1990)

Planning Policy Statement PPS5 (2010) *Planning for the Historic Environment:*

Royal Borough of Greenwich (2014) *Royal Greenwich Local Plan*

Scott Wilson (2008) *The Warren, Woolwich Royal Arsenal*