Draft Lambeth Site Allocations DPD

SA7 6-12, Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11

Evidence



January 2022



CONTENTS

Part	Content	Page
1	Introduction	4
2	Site Appraisal / Analysis	5
2.1	Site and Context Photographs	6
2.3	Site Character and brief History	9
	Site Sharaster and Siter mistory	
2.5	Historical Maps	10
2.6	Site Context	11
2.12	Heritage Assets	13
2.30	Designated Views	15
2.30	Designated views	13
2.31	Routes, Access, Servicing and Public Realm	15
2.32	Planning and Emerging Context	16
2.33	Site Constraints and Opportunities	16
2	Davien Annua alb	4.7
3	Design Approach	17
3.1	Key Principles	17
4	Indicative Approach	18

Appendix	Townscape and Visual Impact Assessment	27
6	Conclusion	26
5.5	Effect on Heritage Assets	24
5.1	Townscape and Visual Impact Assessment	20
5.	Appraisal of Indicative Approach	20
4.7	Indicative Approach – Daylight and Sunlight	19
4.4	Indicative Approach – Massing and General Height	18
4.2	Indicative Approach – Layout and Access	18
4.1	Indicative Approach - Overview	18

1. INTRODUCTION

- 1.1 This evidence demonstrates the approach taken to understanding the design-led optimisation of the site to inform the content of the draft site allocation policy for this site.
- 1.2 This evidence is in several parts. Part 2 contains an assessment of the site and its context and analysis of the opportunities and constraints these present. That assessment has informed the key design principles for approaching development on the site as set out in Part 3. The detailed analysis has allowed an indicative approach to massing and height to be developed which is set out in Part 4. The indicative approach has been tested to ensure it meets the key design principles and this testing is explained in Part 5. Part 6 concludes the evidence with the identification of key design considerations to be included within the SADPD Policy itself.
- 1.3 The indicative approach included in this evidence is one way to achieve design-led optimisation of the site, assuming it is comprehensively redeveloped. The indicative approach is for testing purposes only and does not have the status of planning policy or guidance. It is not intended to be prescriptive. Applicants and their architects are expected to develop their own approaches to optimisation of capacity within the context of the parameters, constraints and opportunities set out in the site allocation policy.
- 1.4 The indicative approach massing, in combination with land use analysis, has informed the approximate land use quantums included within the draft site allocation policy. As the indicative approach does not include detailed floor plan designs, a number of standard assumptions have been used to approximate the potential number of residential units, including London Plan space internal standards, London Plan and Local Plan external amenity space standards, Local Plan requirements for dual aspect residential units, Local Plan policy for dwelling size mix, and best practice separation distances for that context. For this reason, the indicative quantums included in the draft allocation are approximate and should not be read as absolute minima or maxima. Applicants and their architects may be able to demonstrate a different figure based on alternative design solutions to the site. Detailed planning assessment of design proposals at pre-application and planning application stage may also result in a variation on the indicative figures included in the draft site allocation policy.
- 1.5 Building height definitions can be found in Local Plan Policy Q26. As storey heights vary according to the building use, they are not an accurate means to gauge height. For that reason, building heights are expressed in metres rather than storeys. Additionally, above Ordinance Datum (AOD) height is used to aid understanding of site and context topography in those circumstances where the topography is varied.
- 1.6 The maps in this document are reproduced by permission of Geographers' A-Z Map Co. Ltd. Licence No. C0466
 - ©Crown copyright and database rights 2021 Ordnance Survey 100017302
 - © Crown Copyright and database right 2021. Ordnance Survey 100019338

2. SITE APPRAISAL / ANALYSIS

2.1 Site Address: 6-12, Kennington Lane and Wooden Spoon House, 5 Dugard Way SE11



Figure 1 – Site boundary map

Site and Context Photographs

2.2 The photographs in this section show the site and its context



Figure 3 - The western end of the site frontage to Kennington Lane is enclosed with high railings. Note the billboard on the gable of no. 34 Kennington Lane.



Figure 4 – The frontage to Kennington Lane is particularly unpleasant for pedestrians and dominated by a large, discordant billboard on the site.



Figure 5 - The eastern end of the site frontage to Kennington Lane showing neighbouring property and the cramped and cluttered frontage treatment of the site.



Figure 6 - Wooden Spoon House occupying the north part of the site



Figure 7 - Wooden Spoon House, Dugard Way.



Figure 8 – the north and south lodges and reception buildings of the corner workhouse as viewed from the south.



Figure 9 - The surviving section of boundary wall as viewed from the east. This eastern end is its tallest part of the wall. The western end is lower and plain.

Site Character and Brief History

- 2.3 Kennington Lane is a long-established route which pre-dates the urbanisation of the area. The site is located on its northern side at its most northern end close to the boundary with the London Borough of Southwark.
- 2.4 The site is in two parts. The southern part fronts Kennington Lane and occupies a frontage once covered by nos. 6 32 Kennington Lane. This part appears to have been in a mix of residential and light industrial uses during the 19th Century. The commercial operations expanded, perhaps assisted by bomb damage during the Second World War. Post-war demolitions, in phases, have created the site we know today. The yard presents an almost continuous open frontage to Kennington Road except for a c1950s commercial building (nos 6-12) which sits in the centre of the frontage. Additionally, a warehouse (a lightweight industrial structure) is setback within the site.
- 2.5 The northern part of the site was historically part of the Lambeth Workhouse complex which was erected in the 1870s. Around the workhouse main entrance off Renfrew Road a number of public buildings were erected in the 19th Century a Magistrate's Court and a Fire Station. These buildings, and the surviving workhouse buildings form the Renfrew Road

Conservation Area (see later). The Workhouse became Lambeth Hospital in the 20th Century and much redevelopment / demolition occurred in the post-war years under NHS management. The southernmost wing of the old workhouse was demolished in the 1970s and replaced by Wooden Spoon House which is a two-storey purpose-building office / healthcare building. It is the last remaining healthcare building on the former Workhouse site. A number of mature, self-seeded trees stand in the garden space to the rear of Wooden Spoon House.

2.6 Separating the northern and southern parts of the site is a truncated section of the former workhouse boundary wall. It is a high, stock brick structure with some red brick dressings. Whilst of some character, and evidence of the extent of the workhouse's original grounds, it is considered to have limited heritage value (truncated, and now severed from the surviving historic workhouse buildings by modern development) and is not considered to be a non-designated heritage asset, although it has significant character.

Historical Maps

2.7 The maps below clearly illustrate the presence of the former workhouse building in the northern part of the site and the variety of common Victorian building types that once occupied the southern part of the site.



Figure 10 - 1893-1895 OS Map

The eastern half of the southern site appears to be in commercial use judging by the scale of buildings. Frontages to Kennington Road have a fine grain similar to the terraces on either side. The western half of the southern site is occupied by around 10

terraced houses with possible commercial ground floors. The northern part of the site contains the workhouse wing.



Figure 11- 1950 - 1952 - By the 1950s the eastern half of the site was marked on maps as a Timber Yard. The western half remained a terrace of residential buildings. The old workhouse building remains on the northern part of the site.

Site Context

Local Character

- 2.8 Kennington Lane is a Medieval route which today connects Vauxhall to Elephant and Castle. The historic village of Kennington was located around Kennington Cross, at the junction with Kennington Road. Much of Kennington Lane was lined with Georgian and Victorian terraces. However, at the northern end, bomb damage and subsequent urban renewal in the mid 20th Century led to the replacement of much 19th Century housing stock with large municipal estates set in open space. These developments have given the northern end of Kennington Lane a varied character. Some positives are the open and green character, whilst some of the negatives are poor quality environment and little active frontage or natural surveillance.
- 2.9 Fragments of 19th Century frontage remain at nos 34 40 Kennington Lane. More historic townscape can be seen around the corner on Renfrew Road (see Renfrew road Conservation Area section later) and on the corner prow where Kennington Lane and Kennington Park Road meet at the borough boundary with Southwark. The post-war estates Cottingham (Festival of Britain) and Cotton Gardens (brutalist) bring welcome greenery and openness and their architectural quality is good. The combination of surviving Victorian buildings and post-war estates makes for a varied context with very little consistency in scale or layout but with some similarities in materiality (brickwork predominates).

2.10 The borough boundary with Southwark bounds to the immediate East of the site. This is the Elephant and Castle Opportunity Area. The character areas of the Elephant and Castle Opportunity Area are shown in Figure 4 of Southwark's Elephant and Castle Opportunity Areas SPD (2013). See below.

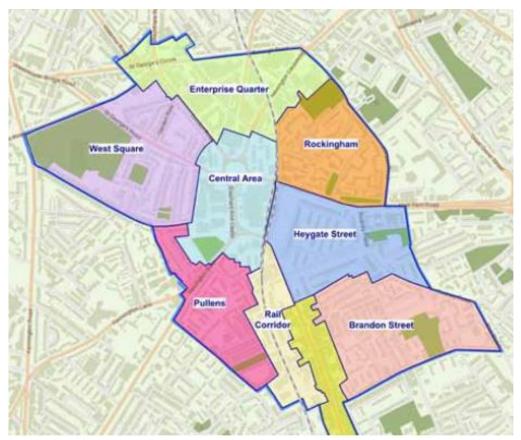


Figure 12 - Elephant and castle Opportunity Area plan.

2.11 The immediately adjoining character area is the Pullens Character Area which is characterised by two to five storey residential properties largely dating from the 20th Century.

Building Heights

- 2.12 There is considerable variety in building heights locally. The 19th Century buildings generally range from three to four storeys. Interwar Gilmour House on the corner with Renfrew Road is six storeys. The Cottingham Estate opposite, ranges from three storeys up to 10 storeys (point blocks in centre of estate). This height arrangement has very little impact on the street scene as the height steps up into the centre of the estate. A recently completed residential development adjoining the site at no. 2 Kennington Lane / Newington Butts rises to six storeys.
- 2.13 Within the Renfrew Road Conservation Area to the north, buildings rise to five storeys, with the exception of a landmark historic water tower which is slightly taller.
- 2.14 On Kennington Lane, the 1970s Cotton Gardens Estate has three brutalist blocks of around 20 storeys. These are one of a couple of isolated group of tall buildings in Kennington. To the east of the site the Pullens Character Area has a low-rise character, beyond the Pullens

Character Area, is the Central Character Area of the Opportunity Area Planning Framework (OAPF) which is identified as suitable for, and has, an emerging tall buildings cluster. The closest of these towers on Newington Butts is 45 storeys. Para. 4.5.16 of Southwark's Opportunity Area OAPF (2013) states:

'...However, the existing character of parts of the west, south and east of the wider opportunity area [which includes the Pullens] comprises low scale residential development, conservation areas or open spaces. These areas cannot accommodate significantly taller development'.

Building Uses

- 2.15 The southern part of the site is occupied by a building materials depot. The three storey building in the middle of the site frontage was formerly in education use but is vacant. Wooden Spoon House on the northern part of the site is in healthcare use.
- 2.16 beyond the site boundary residential uses prevail. However, the Metropolitan Police occupy Gilmour House, Renfrew Road, there is a Buddhist Centre in the former Magistrates Court, Renfrew Road, and the Cinema Museum occupies the principal surviving Workhouse building (The Master's House) on Dugard Way.
- 2.17 The nearest town centres are at Kennington Cross and Elephant and Castle.

Heritage Assets

Designated Heritage Assets

- 2.18 To the east and north of the site a number of buildings are statutory listed:
 - No. 46 Renfrew Road (Former Fire-station) (grade II)
 - The Jam Yang Buddhist Centre, Renfrew Road (Former Court-House) (grade II)
 - K2 Telephone Kiosk, outside Jam Yang Centre, Renfrew Road (grade II)
 - Master's House, Dugard Way (grade II)
 - Water Tower, Dugard Way (grade II)
- 2.19 To the north and west of the site is Renfrew Road Conservation Area. Its special interest is derived from the Victorian civic and institutional buildings on the east side of Renfrew Road and off Dugard Way including the former Courthouse, fire station, workhouse, as well as a pub, lodges and water tower. The majority of these buildings have been repurposed as either residential or community uses. There is only one vacant building (the northern reception lodge, Dugard Way).
- 2.20 A little to the north of the Renfrew Road Conservation Area is the extensive West Square Conservation Area (in Southwark) which comprises largely 19th Century housing, some London squares and the Imperial War Museum. At its heart, West Square is a Georgian open space enclosed by listed buildings. Closer to the north is the Elliott's Row conservation area (in Southwark). To the West is the Walcot CA which comprises mostly Grade II listed late Georgian homes around two London squares Walcot Square and St Mary's Gardens.

Non-designated Heritage Assets

- 2.21 The following nearby buildings are on Lambeth's Local Heritage List:
 - Former Court Tavern, 42 Renfrew Road
 - Gate piers, gates, two gate lodges and two reception buildings, (which include nos. 3 and 4)
 Dugard Way
- 2.22 The stock brick wall separating the two parts of the site is a remnant of the old workhouse but its outside the conservation area and isolated from all the surviving historic buildings. Given its limited historic interest it is not considered to be a non-designated heritage asset.



Figure 13 - Former Fire-station, Renfrew Road and the telephone kiosk (both grade II)



Figure 14 - Main entrance to workhouse and hospital site is between locally listed gate lodges

Designated Views

Strategic Views

- 2.23 The following strategic views fall across the site:
 - Townscape View 27(b) Parliament Square to Palace of Westminster

Local Views

- 2.24 Local views (Policy Q25):
 - (c) (i) views N and NNE from Brockwell park to the City
 - (c) (ii) view NNE from Norwood Park to the City
 - (c) (iii) view N from Gipsy Hill to the City
 - (d) (i) view SE and SSE from Westminster Bridge Road to the Lincoln Tower
 - (d) (xiii) (a) view E from Victoria Tower Gardens and (b)
 SE from Members' Terrace of Houses of Parliament to Lambeth Palace
 - (d) (xiv) view ESE from Millbank to 8 Albert Embankment 2.24 The site also technically falls into the backdrop of the following Policy Q25 (d) landmark silhouette views:

Routes, Access, Servicing and Public Realm

- 2.25 Kennington Lane is a busy main road into Elephant and Castle. It is highly trafficked and when it merges with Newington Butts the pedestrian environment is a rather bleak, traffic dominated experience. Local pedestrians generally avoid this route and use Dugard Way as an alternative pedestrian route to and from Elephant and Castle. Dugard Way runs West to East just to the north of the site and runs through the historic Lambeth Workhouse campus. That route has string townscape value and is closed to through traffic.
- 2.26 Renfrew Road is an important local road linking Kennington Lane to Kennington Road and providing the principal vehicular access into the historic Lambeth Workhouse campus. Its southern end is lined with historic buildings and it is the primary pedestrian route for visitors to the Cinema Museum arriving from Kennington Lane. On this approach visitors get to pass through the historic workhouse gates to access the museum and it is from that approach the visitor gets the bets appreciation of that listed building.
- 2.27 Local pedestrian flows are focused both by necessity and choice along Renfrew road and Dugard Way. These routes are also historic ones of townscape value. There appears to be no need for additional routes through the site as a result.
- 2.28 The only access to the front part of the site is from Kennington Lane whilst Wooden Spoon House is accessed only from the north via Dugard Way.

Planning and Emerging Context

2.26 Elephant and Castle to the Northeast is an area of complete transformation. The Southwark policy position seeks the delivery of a cluster of tall buildings around the junction where the shopping centre is being replaced by a mixed-use development. Beyond, such as in the Pullens character area very tall buildings are not considered appropriate.

Site Constraints and Opportunities

2.27 The site constraints are:

Constraints

Views The local and strategic views identified in para

2.23 and para 2.24

Heritage sensitivity In particular the settings of the former Fire

Station, the Jam Yang Centre (former Magistrate's Court) and the setting of the

Renfrew Road Conservation Area.

Amenity Residential neighbour sensitivity to the west,

north and eastern boundaries of the site – outlook, privacy, daylight and sunlight etc.

2.28 The site opportunities are:

Opportunities

Urban repair Stitching back together the fragmented

townscape of Kennington Lane.

Visual Amenity Removal of unsightly frontage condition,

discordant billboards and poor appearance.

Building line Recreation of a strong building line with

entrances and natural surveillance to Kennington

Lane

Public realm improvements to Kennington Lane

including a potential public space

Safety and security Creation of enclosed, defensible, residential

frontage to Dugard Way

3 Design Approach

Key Principles

3.1 In seeking to achieve a design-led optimisation of the site, site -specific design drivers include:

A Respect Heritage Assets

Cause no harm to the significance or setting of designated or non-designated assets. In particular:

- Renfrew Road Conservation Area in particular in relation to views from Renfrew Road and Dugard Way
- Walcot Conservation Area in particular in relation to views from Walcot Square and St Mary's Gardens
- West Square Conservation Area
- Elliot's Row Conservation Area
- former Magistrates Court, Renfrew Road in views from Renfrew Road and Kennington Lane.
- former Fire Station, Renfrew Road in views from Renfrew Road and Kennington Lane.
- Respect the setting of locally listed building at no. 4 Dugard Way

B Respect established built character

 Respond positively to the townscape context in a manner that comfortably mediates between the ranges of building heights that characterise the locality in a logical and coherent manner

C Respect / Reinforce established building lines

 Reinstate a strong street frontage building line / sense of enclosure to Kennington Lane which optimises opportunities for activity and natural surveillance from the buildings.

D Public Realm Enhancements

• Optimise opportunities for improved public realm / urban greening to Kennington Lane in particular.

E Transport

Not undermine Dugard Way's historic and functional role as the principal public route between Kennington Lane and the Cinema Museum, Dugard Way

F Neighbour and future occupier amenity

- Present residential use and residential entrances to Dugard Way
- Optimse the use of spaces for residential amenity of occupiers
- Protect neighbour amenity to the north by not creating public N-S routes through the site

G Trees and Urban Greening

• Allow space on site for replacement tree planting

4. Indicative Approach

<u>Indicative Approach - Overview</u>

4.1 The approach entails an arrangement of blocks within the site which respond positively to the sensitive adjoining neighbour relationships and seek to improve the quality of the public realm / pedestrian experience to Kennington Lane.

Indicative Approach - Site Layout and Access

- 4.2 Vehicular and pedestrian access is from Kennington Lane with vehicular servicing along a lane to the western side of the site. Blocks are arranged to ensure generous public realm to Kennington Lane and to respect neighbour amenity. Including a c20m separation distance from Dugard Way neighbours to the north, and 13-20m separation distance to the former fire station at the west. The central space is public realm to Kennington Lane and communal amenity space for the residential occupiers within the site.
- 4.3 Commercial uses are limited to ground floor. A basement on site would allow for disabled parking, plant and other back-of-house uses to be removed from the ground floor to make more space for active uses. Vehicular servicing is off the lane along the western side of the site. Residential uses occupy the upper floors. Residential communal amenity space is anticipated at ground level and rooftops.



Figure 16 – Aerial view of the indicative approach

<u>Indicative Approach – Massing and General Building Height</u>

4.4 The Indicative Approach layout has a range of heights from c21m AOD (c six storeys) up to c49m AOD (c 13 storeys). They are arranged in order to integrate with the locality and to ensure acceptable effects on adjoining neighbours. A c49m block and a c21m block front the

- new public realm on Kennington Lane. Deeper within the site are c37m AOD (c11 storeys), c27m AOD (c8 storeys) and c18mm AOD (c6 storey) blocks are arranged around the central space. The Indicative Approach's varied massing and height is considered compatible with the varied local buildings heights.
- 4.5 The tallest (c49m AOD) block is of a height considered appropriate given its location on a main approach road into the Elephant and Castle town centre and is situated away from Southwark's Pullens Character Area. At 49m, the height is well below that of the tall buildings within the nearby Elephant and Castle cluster (typically 100 150m) and is low enough to ensure it does not register as a part of that cluster or extend the cluster into this area.



Figure 17 - 3D model view of the indicative approach

Indicative Approach - Daylight and Sunlight

In planning the Indicative Approach the objective has been to ensure that it is generally consistent with the established parameters for daylight and sunlight best practice for inner urban / urban locations, having regard in particular to sensitive residential neighbours (the locations of which are identified in the draft site allocation policy), and to the quality of new residential accommodation on the site. That said, any scheme that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage in accordance with the BRE's publication: 'Site layout planning for daylight and sunlight: a guide to good practice (BR209)' and relevant Mayoral policy and guidance.

5. Appraisal of the Indicative Approach

Townscape and Visual Impact Assessment

- 5.1 A townscape and visual impact assessment has been undertaken with three principal objectives:
 - firstly, to ensure that the impact on Strategic and Local views is acceptable in relation to view composition and appreciation,
 - secondly, to ensure that the townscape effects of the development are acceptable; in this
 regard the starting point has been that a degree of noticeable townscape change is
 inevitable but it should not be discordant or unduly dominant in its context; and
 - thirdly, to ensure no harm to the significance (including setting) of heritage assets.
- 5.2 In accordance with best practice there has been no presumption that change within the setting of heritage assets is automatically harmful. Instead, the contribution of setting to the significance of the asset has been at the forefront of assessments and thus how that significance might be influenced by changes to the context.
- 5.3 This height and massing exercise has informed conclusions about whether the site is an appropriate location for a tall building(s) as defined by Policy Q26 of the Lambeth Local Plan. The indicative approach is considered to constitute the optimum level of development capacity for the site. This does not preclude other possible approaches to optimisation coming forward, in different forms, through the planning process.
- 5.4 Twenty two views were tested to understand the impact of the Indicative Approach on its context. The detailed analysis on each view is contained in Appendix 1 and the findings are summarised below:

View no.	View Location	Analysis conclusion
1	Strategic View - Townscape View 27(b) Parliament Square to Palace of Westminster	The indicative approach is completely screened by the Palace of Westminster. No effect. No harm to the view.
2	Local View - (c) (i) views N and NNE from Brockwell park to the City	The tallest element of the indicative approach is lost within the middle ground development of the view. It is unlikely to be visible to the naked eye given the distance and tree cover. No harm to view.
3	Local View - (c) (ii) view NNE from Norwood Park to the City	The tallest element of the indicative approach is lost within the middle ground development of the view. It is unlikely to be visible to the naked eye given the distance and tree cover. No harm to view.

4	Local View - (c) (iii) view N from	The indicative approach is screened from view
	Gipsy Hill to the City	by foreground buildings. No effect on view.
5	(d) (i) view SE and SSE from Westminster Bridge Road to the Lincoln Tower	The indicative approach is screened by foreground development and is not visible in this view.
6	(d) (xiii) (a) view E from Victoria Tower Gardens	The indicative approach is screened by Lambeth Palace with inly a small part glimpsed on the model. However, in reality with the distances involved and the amount of tree screening the effect ill be nil. The silhouette of Lambeth Palace will remain unaltered. No impact or harm on view
7	(d) (xiii) (b) SE from Members' Terrace of Houses of Parliament to Lambeth Palace	The indicative approach is located off to the left and is not within the silhouette of Lambeth Palace in the view. No effect.
8	(d) (xiv) view ESE from Millbank to 8 Albert Embankment	view and will not be visible within the view. No effect on the landmark silhouette.
9	Dugard Way between Limelight House and Goddard House	The indicative approach (pink) will continue the scale of foreground buildings adding to the view a lower middleround building and a taller one beyond. The middleground building is of similar height to the foreground buildings. The view south to the distant trees is retained. The effect is considered acceptable.
10	Dante Way / George Mathers Road junction	The indicative approach is visible above the two storey roof tops in the foreground. The view is not sensitive to change with the taller building appearing a good distance from the low-rise buildings and viewed in relation to the towers on the distant Cotton Gardens Estate. The impact is acceptable.
11	Dugard Way / Renfrew Road junction	In this moment of the kinetic view the indicative approach can be seen peeking up behind the roofline. However, as the viewer moves forward the two built forms will separate.
		The effect on the significance of the listed building is negligible the massing of the indicative approach is neither dominant nor

		distracting and its effect in the roofline is fleeting. As the view proceeds south along Renfrew Road the proposal is visible in gaps between buildings. Between Magistrates Court and listed former Fire station. The effect is acceptable. No heritage or townscape harm.
12	Renfrew Road outside former fire station	The Indicative approach is not visible. No effect.
13	Dante Road / Longfield Road	The highest part of the indicative approach is visible above the two storey roof tops in the foreground. The townscape impact is not discordant given the context. No townscape harm.
14	Kennington Lane at Brutus Court	The indicative approach (pink) will reintroduce a building frontage to Kennington Lane bringing with it much-needed enclosure and animation. The massed frontage has a varied roof height reducing the massing down to a scale and form compatible with the surrounding buildings. The highest part is viewed with the Elephant and Castle tall buildings in its backdrop. The townscape effect is beneficial.
15	Newington Butts at Canterbury Place	The Indicative approach (in pink) occupies the middle ground and re-establishes a building line to Kennington Lane. The highest part peeks over the existing roofline but is pulled back from the street frontage and thus is not unduly dominant. There is noticeable townscape change but no harm results.
16	Newington Butts at Hampton street	The highest part of the indicative approach (pale pink) is glimpsed over the roof tops of the contemporary buildings in the foreground and is no higher than the foreground gables. The effect is neither jarring nor discordant. No harm results.
17	Elliotts Road (outside no. 58)	The tallest element of the indicative approach is visible in the distance at the end of the street, with the lower elements of the massing being

		hidden behind middle ground buildings. The massing is noticeable but not unduly dominant – terminating the vista as it does and not rising to a height that might be considered eye catching or distracting. No townscape harm. No harm to the setting of Elliots Row CA.
18	Hayles Street	The indicative approach is off to the left in this view and is screened by foreground buildings. No effect.
19	West Square (central garden)	The indicative approach is concealed by foreground development. No effect.
20	Walcot Square	Upon close scrutiny, the highest part of the Indicative approach is glimpsed between the chimney stacks of the terraced houses on the right. Should the viewer be situated in the culde-sac space further to the north the model may increase slightly in prominence. However, even then, it is unlikely to noticeably exceed the height of the chimneypots. Given the very modest visual impact the effect on the character and appearance of the Walcot Conservation Area here is negligible. Slight change but no harm. No harm to the setting of the listed buildings or Walcot CA.
21	Geraldine Mary Harmsworth Park –	The highest element of the indicative approach is seen over the low-rise roofscape to the right of centre. It is a modest addition in a variegated low-rise roofscape. The view is ultimately dominated by the tall buildings of the Elephant and Castle cluster. The effect on the view as a whole is negligible. No adverse effect on West Square Conservation Areas' character or townscape.
22	Geraldine Mary Harmsworth Park – dog exercise area	The highest element of the indicative approach is seen over the low-rise roofscape to the right of centre. It is a modest addition in a variegated low-rise roofscape. The view is ultimately dominated by the UNCLE tower of the Elephant and Castle cluster with the towers of Cotton Gardens Estate visible off to the right. The effect on the view as a whole is negligible. No adverse effect on West Square Conservation Areas' character or townscape.

Effect on Heritage Assets

5.5 The Indicative Approach has been assessed for its effect on the significance (including setting) of heritage assets. The has required an understanding of the significance of each asset and especially the contribution that the setting makes to that significance. The objective has been to ensure no adverse effect on significance. The conclusions are set out in the below.

Asset	Effect
Renfrew Road Conservation Area (NW corner of the site) The current buildings on the have a neutral effect on the setting of the conservation area.	See views 9, 11 and 12. The indicative approach is visible from Renfrew Road and limited locations on Dugard Way. The lower parts only visible at relatively close quarters. Whilst the highest element will be clearly appreciable in some of the more wider views. It will read as part of the largely post war / contemporary urban context but will not be unduly dominant. With high quality design, calm and recessive detailing, and the selection of locally distinct materials the effect should be positive. No heritage harm.
Former Fire Station, Renfrew Road — the building has a robust architectural character and it plays an important townscape role in adding to the strong sense of enclosure on Renfrew Road.	See views 11 and 12 The indicative approach will be visible in the immediate backdrop of this building but its massing and arrangement will not be unduly dominant or distracting. With high quality design, calm and recessive detailing, and the selection of locally distinct materials the effect should be positive. No heritage harm.
Former Magistrate's Court, Renfrew Road – The backdrop of this building is very much defined by the tall building cluster of Elephant and Castle.	See view 11. The indicative approach will be visible in the backdrop of this building only in the view from the Northwest but its massing and arrangement will not be unduly dominant or distracting. With high quality design, calm and recessive detailing, and the selection of locally distinct materials the effect should be positive. No heritage harm.
Telephone Kiosk, Renfrew Road – this building in appreciated in close quarters within the streetscape of Renfrew Road. As a design classic, it does not rely on its wider setting for its significance.	The indicative approach will be visible in the wider backdrop of this building only in the view from the west. As a design classic the kiosk does not rely on its wider setting for its significance. Therefore, no heritage harm.
Former Lambeth Workhouse, Dugard Way – now occupied by Cinema	The former workhouse campus is enclosed by walls which limits the number of approaches to

Museum this building is located some distance to the north of the site	this building. Its architectural significance is best appreciated in views form the Southwest. In these views the Indicative approach is not visible. In less significant views from the north, which are at close-range to the listed building, the indicative approach will not be visible. No heritage harm.
Water Tower, George Mathers Way – this building is best appreciated in views north along George Mathers Way but is also visible in views from the north at Walcot Square.	See view 20. The indicative approach will not harm the setting of the Water Tower. No heritage harm.
Gate piers to Lambeth Workhouse – these are best appreciated in views west and east from Dugard Way and Renfrew Road	The indicative approach is located some distance to the south and will not be visible in relation to these gates. No heritage harm.
North lodge to Lambeth Hospital and north reception building – these are situated to the immediate north of the entrance gates and are best appreciated in views from the Southeast, east and northeast.	The indicative approach is located some distance to the south and will not be visible in relation to these buildings. No heritage harm.
South Lodge to Lambeth Hospital and south reception building - these are situated to the immediate south of the entrance gates and are best appreciated in views from the Southeast, east and northeast	The site adjoins these buildings to the southeast and will be visible in their settings in views from the north. At present Woodenspoon House and the sheds on the site have a negative effect on their setting in these views. With high quality design, calm and recessive detailing, and the selection of locally distinct materials the effect should be positive. No heritage harm.
Former Court Tavern, no 42 Renfrew Road – this locally listed building is on the northern side of the junction of Dugard Way and Renfrew Road. It is bets appreciated in views from the South.	The indicative approach is located some distance to the south and will not be visible in relation to the best views of this building. When glimpsed in the backdrop n views form the north the effect on setting, due to distance and massing, will be negligible. No heritage harm.

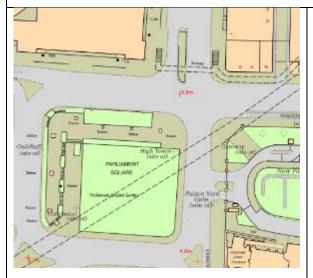
6.0 Conclusion

6.1 The indicative approach has been informed by site constraint analysis and has been tested at the level of general massing and height to ensure acceptable impacts in relation to daylight and sunlight, views, townscape, and heritage. This analysis has found the approach to successfully address the various opportunities and constraints identified. In light of this work, it is recommended that the site allocation policy includes the design points outlined in the table below.

Topic	Recommendation
Heritage	Integrate well with the locality in order to ensure a positive response to context and to preserve the significance (including settings) of heritage assets especially the former magistrates court and fire Station on Renfrew Road.
Townscape, views and heights	The central part of the site can accommodate a general building height of c50m with low-rise and midrise development elsewhere in order to integrates well with neighbouring buildings
	There is benefit in the two parts of the site coming forward together in order to optimise design options. If phased development is necessary it is important that the first phase does not comprise the efficient development the second part of the site.
	Given the heritage sensitivity design and materiality need to reflect local distinctiveness and provide a strong sense of place.
	The removal of the billboard on site will enhance visual amenity.
Public realm	Improve the public realm provision along Kennington Lane through footpath widening and greening
	Analysis suggests that new public routes north to south or west to east through the site are not necessary. It is preferable to sustain existing routes (Dugard Way and Renfrew Road) rather than reduce their use by creating new routes.

APPENDIX 1 - Townscape and Visual Impact Assessment Analysis

TVIA view 1 - Townscape View 27(b) Parliament Square (north pavement) to Palace of Westminster



View location narrative

View location is the northern side of Parliament Square.



Digital twin view (VuCity)

This location provides some of the best overall and internationally renowned views of Westminster World Heritage Site. This location allows the appreciation of the grandeur and dominance of the Clock Tower and Victoria Tower, and for all the major buildings of the World Heritage Site, including Westminster Abbey and St Margaret's Church to be sharply delineated against clear sky.

Narrative on Effect

The indicative approach is completely screened by the Palace of Westminster. No effect. No harm to the view.

TVIA view 2 - Local View Q25 (c) (i) views N and NNE from Brockwell park to the City



View location narrative

Brockwell Park is a historic open space (grade li registered landscape) and forms the main part of the Brockwell Park Conservation Area. The landscape is extensive with the hill to the centre of the park topped by a grade II listed mansion.





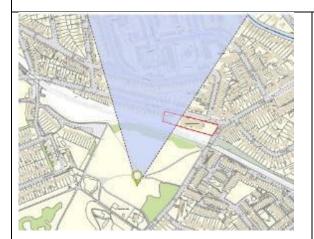


Viewing Location (c) The hillside path running parallel to Dulwich Road is one of the principal routes through the landscape. Its elevated positing allows great kinetic views N and NNE to the city. The whole path is the view location

Narrative on Effect

The tallest element of the indicative approach is lost within the middle ground development of the view. It is unlikely to be visible to the naked eye given the distance and tree cover. No harm to view.

TVIA view 3 – Local View Q25 (c) (ii) View NNE from Norwood Park to the City



View location narrative

Norwood park sits on Salters Hill with its northern section sloping northwards from the ridge. This side of the park has commanding views across low-lying broad expanse of Southwark towards the distant cluster of tall buildings at the City of London and St Paul's Cathedral dome.



Digital twin view (VuCity)



The view location is an area of open lawn roughly at the centre of the slope near where the paths converge.

Narrative on Effect

The tallest element of the indicative approach is lost within the middle ground development of the view. It is unlikely to be visible to the naked eye given the distance and tree cover. No harm to view.

TVIA view 4 – Local View Q25 (c) (iii) view N from Gipsy Hill to the City



View location narrative

As a landform Gipsy Hill is the northern slope of the elevated ground known as the Norwood ridge. Today the name is given to the principal roadway that ascends the hill.



Digital twin view (VuCity)



Gipsy Hill, with its highway enclosed by properties on either side forms the foreground to the viewer. The foreground is terminated by mature trees at the foot of Gipsy Hill. The middle ground comprises the low lying districts of Dulwich, Camberwell and Walworth. The focus of the view are the distant towers of the City of London and St Paul's Cathedral's dome. The effect is a striking one and the experience changes as the view descends.

Narrative on Effect of Option

The indicative approach is screened from view by foreground buildings. No effect on view.

TVIA view 5 – Local View Q25 (d) (i) view SE and SSE from Westminster Bridge Road to the Lincoln Tower



View location narrative

The pavement on the northern side of Westminster Bridge Road which is within the Lower Marsh Conservation Area



Digital twin view (VuCity)

The view SE is to the Lincoln Tower – a landmark church tower on the corner of Kennington Road. The tower is grade II listed is in rock faced Kentish Ragstone and carries an ashlar finished, banded spire. The tower and spire have a strong silhouette.

The indicative approach is screened by foreground development and is not visible in this view.

TVIA view 6 - Local View (d) (xiii) (a) view E from Victoria Tower Gardens



View location narrative

View location is an open space within Westminster directly across the River Thames from Lambeth Palace.





From the northern end of Victoria Tower gardens the Palace is viewed from the northwest. The picturesque north elevation of the Blore building is clearly visible. It as Cranmer's tower are appreciated against clear sky. The Chapel, Lollard's Tower and the Great Hall are next in the composition. The upper storey of no. 109 Lambeth Road is visible in the backdrop of the Chapel and the Great Hall. Whilst it is grey and fairly plain its horizontal emphasis blunts the richness of the silhouette. The tops of distant residential tall buildings on Lollard Street are also glimpsed within the Palace's roofscape – their distance and white finish diminishes their visual presence further.

Narrative on Effect

The indicative approach is screened by Lambeth Palace with inly a small part glimpsed on the model. However, in reality with the distances involved and the amount of tree screening the effect ill be nil. The silhouette of Lambeth Palace will remain unaltered. No impact or harm on view

TVIA view 7 – Local View (d) (xiii) (b) SE from Members' Terrace of Houses of Parliament to Lambeth Palace



View location narrative

The Member's Terraces of Houses of Parliament sit at ground floor level on the eastern elevation of the building overlooking the River Thames. They are an important outside space for Parliament affording extensive views 180 degree views. Whilst they are partially occupied by marquee type structures the area of terrace along the river retaining wall is accessible.



From the members' terrace the Palace is viewed from the north-west. The picturesque north elevation of the Blore building is visible. It at Cranmer's tower are appreciated against clear sky. The Chapel, Lollard's Tower and the Great Hall are next in the composition. The upper storey of no. 109 Lambeth Road is visible in the backdrop of the Chapel and the Great Hall. Whilst it is grey and fairly plain its horizontal emphasis blunts the richness of the silhouette

Narrative on Effect of Option

The indicative approach is located off to the left and is not within the silhouette of Lambeth Palace in the view. No effect.

TVIA view 8 – Local View Q25 (d) (xiv) view ESE from Millbank to 8 Albert Embankment



View location narrative

On Millbank in the triangular garden on the south side of Lambeth Bridge. This is a public location with good views across the River Thames. This is within the Millbank Conservation Area.



Digital twin view (VuCity)

The viewer has a face-on appreciation of the tiered façade of the former London Fire brigade HQ silhouetted against clear sky. The symmetrical Grade II landmark building has a formal stepped silhouette terminating in a central viewing tower with flagpole

Narrative on Effect of Option

The indicative approach is off to the left of the view and will not be visible within the view. No effect on the landmark silhouette.

TVIA view 9 Dugard Way

View location map



View location narrative

This view location is on Dugard Way looking South between two residential blocks towards the site. It is not in a conservation area. There are no listed buildings in the view. The view is not considered sensitive in townscape terms.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

Existing view. The block framing the view are four storeys high. Wood Spoon House terminates the view currently. Whilst there is a locally listed view to the right of the view the townscape is of low value.

Narrative on Effect of Option

The indicative approach (pink) will continue the scale of foreground buildings adding to the view a lower middleround building and a taller one beyond. The middleground building is of similar height to the foreground buildings. The view south to the distant trees is retained. The effect is considered acceptable.

TVIA view 10 Dante Road / George Mathers Road

View location map



View location narrative

View location on Dante Road in Southwark looking along George Mathers Road into Lambeth. It is not in a conservation area. There are no listed buildings in the view. The view is not considered sensitive in townscape terms.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

All the visible foreground development is relatively modern in character, dating from the 1990s / 2000s. In the distance the tops of the towers of the Cotton Gardens Estate.

Narrative on Effect of Option

The indicative approach is visible above the two storey roof tops in the foreground.

The view is not sensitive to change with the taller building appearing a good distance from the low-rise buildings and viewed in relation to the towers on the distant Cotton Gardens Estate. The impact is acceptable.

TVIA view 11 Renfrew Road – opposite no. 42 Renfrew Road

View location map



View location narrative

The view location is just outside the Renfrew Road Conservation Area and looking into the conservation area. The middlgorund builfings (former Magistrates Court and former Fire Station) are grade II listed and within the Renfrew Road CA. This is a heritage sensitive view.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

Townscape value is medium / high. This view is part of a kinetic viewing experience as the viewer moves southwards along Renfrew Road.

The viewer is on the western wide of Dugard Way in this view and has turned their gaze to look at the former courthouse building and beyond is the former fire station.

At this moment the viewer can appreciate is façade and flank. The tall buildings of the Elephant and Castle cluster can be viewed in the backdrop.

Narrative on Effect of Option

In this moment of the kinetic view the indicative approach can be seen peeking up behind the roofline. However, as the viewer moves forward the two built forms will separate.

The effect on the significance of the listed building is negligible the massing of the indicative approach is neither dominant nor distracting and its effect in the roofline is fleeting.

As the view proceeds south along Renfrew Road the proposal is visible in gaps between buildings. Between Magistrates Court and listed former Fire station. The effect is acceptable. No heritage or townscape harm.

TVIA view 12 Renfrew Road opposite former Fire Station

View location map



View location narrative

The view location is just outside the Renfrew Road Conservation Area and looking into the conservation area. The middlgorund buildings (are the former Fire Station which is grade II listed and within the Renfrew Road CA. This is a heritage sensitive view.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

The facades of the two listed fire station structures are clearly visible with the asymmetrical, ornamental façade of the later structure being the focus of the view. Its principal decorative principal gable, dormers and chimneys are discernible.

Narrative on Effect of Option

The Indicative approach is not visible. No effect.

TVIA view 13 Dante Road / Longfield Road

View location map



View location narrative

The view location is on Dante Road at its junction at Longfield road in Southwark. It looks south over te rooftops of Dante Road. It is not in a conservation area. The listed water tower is just out of sight on the right. The view is not considered sensitive in townscape terms.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

The foreground buildings are all modern. If the viewer was to look left (off camera) the tall buildings of the Elephant and Castle cluster is visible rising sharply on the left. The townscape is not particularly noteworthy and is of low / medium value. It is not particularly sensitive to change.

Narrative on Effect of Option

The highest part of the indicative approach is visible above the two storey roof tops in the foreground. The townscape impact is not discordant given the context. No townscape harm.

TVIA view 14 Kennington Lane at Brutus Court

View location map



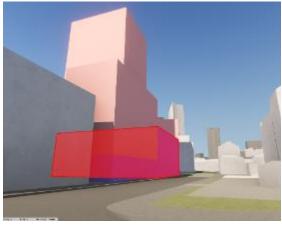
View location narrative

View location is on south side of Kenninton Lane just South west of the site. The foregournd buildings are not heritage assets. The view is not a sesnitive one.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

The current site appears as a gap in the established building line and is discordant

Narrative on Effect of Option

The indicative approach (pink) will reintroduce a building frontage to Kennington Lane bringing with it muchneeded enclosure and animation. The massed frontage has a varied roof height reducing the massing down to a scale and form compatible with the surrounding buildings. The highest part is viewed with the Elephant and Castle tall buildings in its backdrop. The townscape effect is beneficial.

TVIA view 15 Newington Butts at Canterbury Place

View location map



View location narrative

View location is on the main road in Southwark looking west along newington Butts towards the site. There are no heritage assets in the view.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

The townscape has a mixed character and of low / medium value. The foreground building is modern (c2015), the middle ground buildings date from c1800 and the distant tall buildings are on the 1960s Cotton Gardens Estate.

Narrative on Effect of Option

The Indicative approach (in pink) occupies the middle ground and re-establishes a building line to Kennington Lane. The highest part peeks over the existing roofline but is pulled back from the street frontage and thus is not unduly dominant. There is noticeable townscape change but no harm results.

TVIA view 16 Newington Butts at Hampton Street

View location map



View location narrative

This view location is on the edge of the Elephant and Castle Town Centre looking SW towards the site. There are no heritage assets. It is not a heritage sensitive view.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

The townscape has a mixed character and of medium value. The foreground building is modern (c2000), the distant buildings date from c1800.

Narrative on Effect of Option

The highest part of the indicative approach (pale pink) is glimpsed over the roof tops of the contemporary buildings in the foreground and is no higher than the foreground gables. The effect is neither jarring nor discordant. No harm results.

TVIA view 17 Elliotts Row at no. 58

View location map



View location narrative

The view location is within Southwark's Elliots Row Conservation Area which is a small CA comprining all of elliotts row, part of Brook Drive and the southern end of Hayles Street and Astral Street. The linear nature of the streets within the CA mean that views are channelled north and south. This is a heritage senstive view.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

The very strong sense of enclosure is an important feature of the townscape within the conservation area. Townscape has high value. At present this canyon-like vista is disturbed slightly by the visual presence of the UNCLE tower on the left

Narrative on Effect of Option

The tallest element of the indicative approach is visible in the distance at the end of the street, with the lower elements of the massing being hidden behind middle ground buildings. The massing is noticeable but not unduly dominant – terminating the vista as it does and not rising to a height that might be considered eye catching or distracting. No townscape harm. No harm to the setting of Elliots Row CA.

TVIA view 18 Hayles Street

View location map



View location narrative

The view location is within Southwark's West Square Conservation Area which is an extensive CA The linear nature of the streets within the CA mean that views are channelled north and south. This is a heritage senstive view.

Existing view photo



Narrative on Existing View

The strong sense of enclosure is a key characteristic of the townscape of this part of the CA.

Digital twin view (VuCity)



Narrative on Effect of Option

The indicative approach is off to the left in this view and is screened by foreground buildings. No effect.

TVIA view 19 West Square

View location map



View location narrative

The view location is within the West Square conservation area. The viewer is looking south from the central garden. The square itself is a heritage asset and there are listed buildings enclosing its southern and eastern sides. The view is heritage sensitive.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

Location has high townscape value. All of the visible foreground buildings are grade II listed. The UNCLE tower can be glimpse din the backdrop.

Narrative on Effect of Option

The indicative approach is concealed by foreground development. No effect.

TVIA view 20 Walcot Square

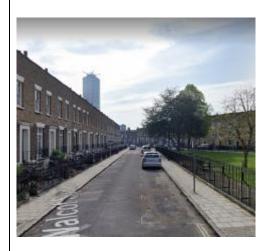
View location map



View location narrative

This is the NW corner of Walcot Square looking SE. The historic square is in the foreground. The foregorund and middle gorund housing is locally or nationally listed. The view is within the Walcot CA. This is a eritage sensitive view

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

The UNCLE tower is a distracting presence. T the end of the vista the roof of the grade II listed water tower is visible,

Narrative on Effect of Option

Upon close scrutiny, the highest part of the Indicative approach is glimpsed between the chimney stacks of the terraced houses on the right. Should the viewer be situated in the culde-sac space further to the north the model may increase slightly in prominence. However, even then , it is unlikely to noticeably exceed the height of the chimneypots. Given the very modest visual impact the effect on the character and appearance of the Walcot Conservation Area here is negligible. Slight change but no harm.

No harm to the setting of the listed buildings or Walcot CA.

TVIA view 21 Geraldine May Harmsworth Park

View location map



View location narrative

The view location is within the West Square Conservation Area looking south across the Park..

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

Medium townscape value. The Elephant and Castle tall buildings cluster has a noticeable effect on the view currently. The view has some heritage sensitivity primarily in relation to the amenity value of the open space with the CA

Narrative on Effect of Option

The highest element of the indicative approach is seen over the low-rise roofscape to the right of centre. It is a modest addition in a variegated low-rise roofscape. The view is ultimately dominated by the tall buildings of the Elephant and Castle cluster. The effect on the view as a whole is negligible. No adverse effect on West Square Conservation Areas' character or townscape.

TVIA view 22 Geraldine Mary Harmsworth Park – dog exercise area

View location map



View location narrative

The view location is to the east of the main entrance to the Museum. It is within the West Square Conservation Area looking south across the Gereldine Mary Harmsworth Park.

Existing view photo



Digital twin view (VuCity)



Narrative on Existing View

Medium townscape value. NB this is an old view when the UNCLE tower was under construction and only partly built.

Narrative on Effect of Option

The highest element of the indicative approach is seen over the low-rise roofscape to the right of centre. It is a modest addition in a variegated low-rise roofscape. The view is ultimately dominated by the UNCLE tower of the Elephant and Castle cluster with the towers of Cotton Gardens Estate visible off to the right. The effect on the view as a whole is negligible. No adverse effect on West Square Conservation Areas' character or townscape.