Lambeth Site Allocations DPD – Proposed Submission Version

Design Evidence

<u>Site 18</u> 286 – 362 Norwood Road, SE27



September 2023



Contents

Part	Content	Page
1	Introduction	3
2	Site Appraisal / Analysis	5
2.1	Site Overview	5
2.2	Site Context Photographs	6
2.3	Site Character and Brief History	10
2.7	Historical Maps	11
2.8	Site Context	12
2.12	Heritage Assets	13
2.22	Designated Views	15
2.24	Routes, Access, Servicing and Public Realm	15
2.25	Planning and Emerging Context	16
2.26	Site Constraints and Opportunities	16
3	Design Approach	17
3.1	Key Principles	17
4	Indicative Approaches	18
4.1	Site Layout and Access	19
4.3	Heights and Massing	19
4.4	Daylight and Sunlight	19
5.	Appraisal of Indicative Approach	20
5.1	Townscape and Visual Impact Assessment	20
5.7	Effect on Heritage Assets	23
6	Conclusion	26
Appendix	Townscape and Visual Impact Assessment	

1. Introduction

SADPD Objectives

- 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.
- The indicative approach massing, in combination with land use analysis, has informed the approximate land use quantum 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 quantum 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 following changes have been made following the Regulation 18 Consultation:
 - Site boundary amended to reduce scale of allocation to exclude existing housing at north east corner and south west corner, also 'laundry' site which is already under construction.
 - Reduction in the number of residential units proposed. Decreased from 390-470 units to 150-170 units.

- Quantum of commercial/community floorspace including light industrial workspace, reduced from 5,000-7,000 sqm to 3,000 4,000 sqm to include at least 1,123 sqm GIA light industrial workspace (to achieve no net loss of existing industrial floorspace capacity).
- Additional wording proposed to clarify that a tall building will only be considered appropriate on the site if certain conditions are met e.g. public benefits are achieved.
- No significant change to other development principles.
- 1.7 The maps in this document are reproduced by permission of Geographers' A-Z Map Co. Ltd. Licence No. C0466
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2. Site appraisal / analysis

Site Overview

2.1 Principal details of the site are outlined below:

Site Address

Site 18 – 286 – 362 Norwood Road, SE27



Figure 1 – Site boundary plan

Site Context Photographs

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

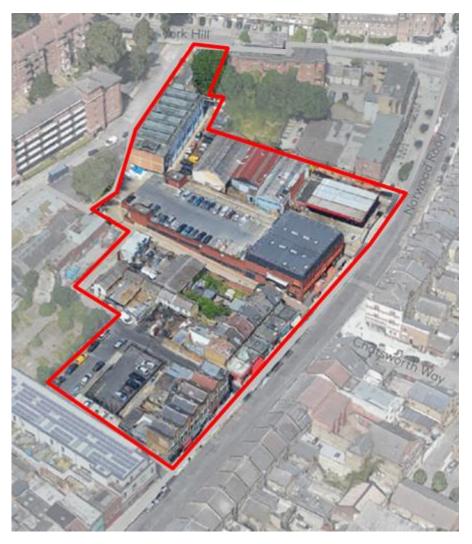


Figure 2 - Site overview image from the south.



Figure 3 - Looking south along Norwood road with the site on the right



Figure 4 - Along the Norwood Road frontage of the site some of the pavement is narrow.



Figure 5 - The Norwood footway to the northern end of the site is generous and tree-lined



Figure 6 - The architectural quality of buildings on the site is generally low to average.



Figure 7 - Waylett Place looking towards Norwood Road

Site Character and Brief History

- 2.3 The site fronts the western side of Norwood Road, is bounded to the north by York Hill and to the South by Lansdowne Hill. Its western side is bounded by the York Hill Estate which sits on higher ground (the site sits at the foot of a hill which rises to the west. The properties mostly date form the late 19th Century through to the mid / late 20th Century.
- 2.4 The site is located on a main road equidistant between Tulse Hill Railway Station and West Norwood Railway station.
- 2.5 The site is urban in character and the majority of properties contain town centre uses at ground floor retail and commercial premises with residential accommodation to the upper floors. There is one large purpose-built retail unit at 304 322 Norwood Road. There is no green open space. There is a small council owned car park at Waylett Place, a petrol filling station at nos. 300- 302 Norwood Road and an electricity substation west on Thanet House on York Hill.
- 2.6 Although the site is large it is fragmented into multiple ownerships and there are no through routes north or south across it. There is a significant level change between the site and the York Hill Estate to its west which sits on higher ground.

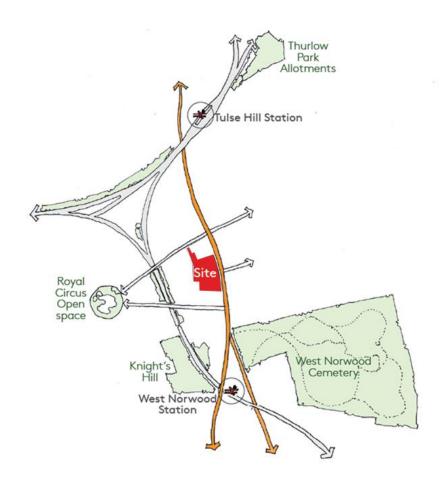


Figure 8 - Site context map

Historical Maps

2.7 The maps below illustrate the historical development of the site.

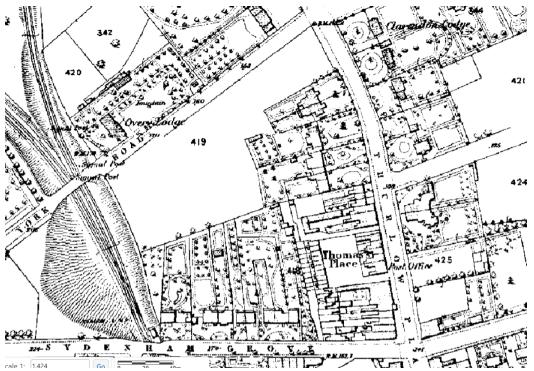


Figure 9 - 1870s OS map – locality is largely residential with villas the predominant building type.

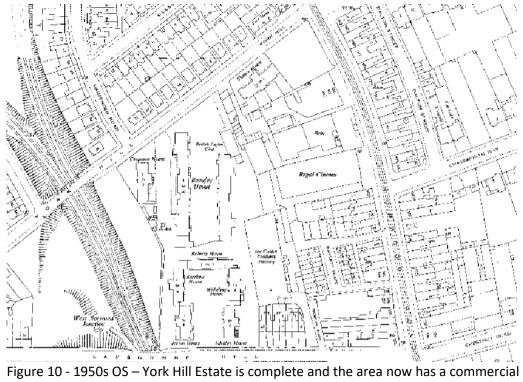


Figure 10 - 1950s OS – York Hill Estate is complete and the area now has a commercial character including a cinema. The commercial uses have crept northwards from the original centre.

Site Context

Local Character

2.8 West Norwood developed as a commuter suburb in the mid to late 19th Century and is largely residential in character. A significant feature of the locality is its hilly topography. The site sits at the foot of York Hill which rises to the west, Knights Hill starts rising a little to the south, Auckland Hill rises to the South East and Pilgrim Hill (with it a significant part of West Norwood Cemetery) sits on rising ground to the East. The rising ground presents numerous opportunities to view the site from elevated positions. Knights Hill is the location of a number of locally designated views which are examined in the later sections.

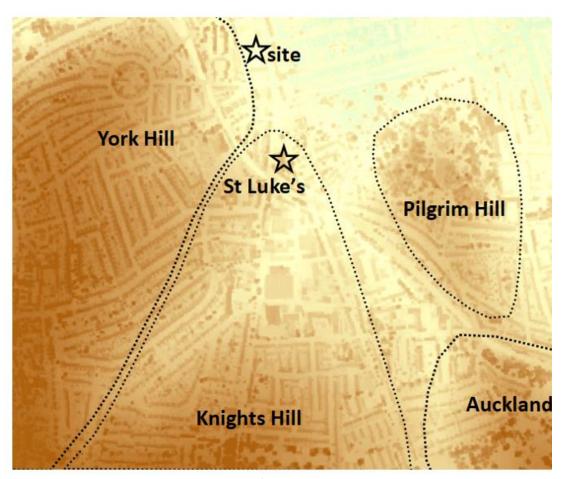


Figure 11 – local topography and landmark's

Building Heights

2.9 The 19th Century residential development in the locality is generally two, three and four storeys in height. Inter-war and post-war blocks of flats in the locality generally rise to four or five storeys (plus lift over-runs / tank rooms).

2.10 The principal landmark building in West Norwood is St Luke's Church which sits on an elevated, prominent position at the foot of Knights Hill. It is the subject of a number of local views examined in the later sections.

Building Uses

2.11 Norwood Road is an active high street made up of lively ground floor retail and workspace units with residential upper floors. Waylett Place has a number of commercial garages and a public car park. The frontages to York Hill and Lansdowne Hill are largely residential.

Heritage Assets

Designated Heritage Assets

- 2.12 There are no designated heritage assets within the site.
- 2.13 The Lancaster Avenue Conservation Area lies to the NE of the site. It is characterised by 19th Century suburban housing lining a broad, curving road. Its special interest is set out in detail within the Lancaster Avenue Conservation Area Character Appraisal, 2017 which is considered to be up-to-date. The setting of this conservation area is a material planning consideration.
- 2.14 The West Norwood Conservation Area sits to the SE of the site. It is characterised by the extensive West Norwood Cemetery and historic development around its perimeter. Its special interest is set out in detail within the Draft West Norwood CA Character Appraisal, 2020. Appendix 6 of that document also proposes the extension of the conservation area boundary. The setting of this conservation area is a material planning consideration.
- 2.15 The West Norwood Cemetery is a registered landscape. A purpose-designed cemetery (one of London's Magnificent Seven) it contains a high concentration of historic monuments many of which are individually statutory listed. The landscape is undulating and the roads within the Cemetery are general serpentine and informal. Mature landscaping is another key aspect of its landscape character. The setting of this landscape is a material planning consideration.
- 2.16 There are around 70 individually listed structures within West Norwood Cemetery mostly monuments and mausolea but also including gates and railings. Their settings are a material planning consideration. This evidence has looked in particular at the effect of potential development on two listed monuments described below:

Longsdon Mausoleum



1892, architect unknown. This structure is located in the northwestern part of the cemetery on the north side of the principal road entering the Cemetery from Norwood Road. The door of the mausoleum faces west towards the Cemetery gates. The stone structure has a square base and a domed roof. It is near an intersection of cemetery roadways and is highly visible and readily appreciable in close views from the west, south and east. Its presence within the Cemetery contributes to its

Figure - 12

significance especially the mature planting and high concentration of other historic in the immediate vicinity.

Gilbart Mausoleum



1836 to design by Sir William Tite. This structure is in the northwestern part of the cemetery situated prominently at the first fork in the roadway that enters from Norwood Road . The door of the mausoleum faces north. The stone structure has a spire and pinnacles giving a Gothic silhouette. It is highly visible and readily appreciable in close views from the northwest, south and east. Its presence within the Cemetery contributes to its significance especially the mature planting and high concentration of other historic in the immediate vicinity.

Figure - 13

- 2.17 St Luke's Church, Knights Hill is a grade II* listed building. It stands some distance to the south of the site. Its Neo-Classical tower is a prominent local landmark and the focus of a number of locally designated views. The building makes a positive contribution to the character and appearance of the West Norwood Conservation Area and to the setting of the Cemetery as a registered landscape.
- 2.18 The former West Norwood Fire Station at no. 445 Norwood Road is a grade II listed building. It stands a little distance to the north of the site allocation site.





Figure 14 - St Luke's Church, Knights Hill

Figure 15 - Former Fire Station, Norwood Rd

Non-designated heritage Assets

- 2.19 There are no non-designated heritage assets within the site.
- 2.20 No. 363-363 Norwood Road (local heritage list structure) sits to the immediate south of the site. Its special interest is in its Art Deco façade to Norwood Road.
- 2.21 Archaeological Priority Area 14 Levehurst Medieval Manor House.

Designated Views

Strategic Views

2.22 The site is not subject to any strategic views.

Local Views

- 2.23 Policy Q25 of the Lambeth Local Plan identifies a number of views which require consideration:
 - Landmark Silhouette (ii) View north along Knights Hill to St Luke's Church tower here the viewer is at a similar level to St Luke's tower and the tower is seen in silhouette against clear sky. The site is on lower ground off to the left.
 - <u>Landmark Silhouette iii)</u> View S along Norwood Road of St Luke's Church tower The viewer is to the north of the church and standing opposite the site looking south towards the church. The church's principal façade and tower of the church terminate the vista down Norwood road. The buildings within the site frame the right side of the view.
 - Landmark Silhouette (iv) View north from Chapel Road along Weaver Walk of St Luke's church tower the tower of the church is seen in silhouette against clear sky.
 - Panorama (iv) View N from Knights Hill (across LB Southwark) to the city Knights hill looking north - In this view St Luke's Church tower terminates the vista with the city's tall building cluster behind. The viewer is on an elevated position on Knights Hill. The site sits on lower ground to the left of the church tower.

Routes, Access, Servicing and public realm

2.24 Commercial / retail access and servicing is largely via Norwood Road. There are no direct vehicular or pedestrian routes through the site at present. The limited public realm away from Norwood Road is generally poor. On Norwood Road the Victorian building line along the southern end of the site frontage limits the opportunity for generous public realm. At the northern end of the site, inter-war and post-war buildings are set back to provide a more generous public realm.

Planning and Emerging Context

2.25 Policy PN7 of the Lambeth Local Plan sets out the neighbourhood policies for the locality.

Site Constraints and Opportunities

2.26 The following constraints and opportunities exist:

Constraints	Opportunities	
Impermeable	Improved connectivity	
Level changes / topography	Town centre location	
Narrow footways	Improved public realm	
Neighbour adjacencies	Improved architectural quality	

3. Design Approach

Key Principles

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

Α	Respect Heritage Assets
	Cause no harm to the setting of designated or non-designated assets.
	In relation to this site that largely relates to the bulk, scale and mass
	of the blocks. Particular attention has been paid to the setting of
	West Norwood Cemetery as a conservation area, registered landscape
	and site of nearly 70 listed structures.
В	Improve Pedestrian Experience on Norwood Road
	This can be achieved by pulling back the building line to Norwood
	Road – allowing for a generous pedestrian footway which might be
	able to accommodate street trees, seating and other, similar
	amenities for town centre visitors.
С	Improve permeability
	This is considered important in order to optimise site potential and
	avoid undue reliance on Norwood Road, York Hill or Lansdowne Hill
	for servicing.
D	Ensure new routes / spaces are safe and legible
	Arranging buildings in a conventional manner to the street with clear
	entrances and good natural surveillance is considered essential.
E	Transport
	Deliver a more legible and permeable layout of streets which allows
	for the effecting servicing of development and integrates with the
	wider area.
_	
F	Neighbour and future occupier amenity
	Ensure acceptable levels of amenity for new and existing residents.

4. Indicative Approach

Site Layout and Access

- 4.1 This Indicative Approach layout comprises a new commercial / retail frontage to Norwood Road with a more generous footway to provide increased public realm. New public realm along new routes within the site is also anticipated with west-east connections aligning with the approval on the adjoining former laundry side to the west side of the allocation site which is currently under construction. Servicing is from Norwood Road. The street layout allows for a variety of ground floor commercial unit sizes with residential units above. The layout aligns with pedestrian connections established through to the York Hill Estate (via the former Laundry site).
- 4.2 The Indicative Approach layout follows conventional perimeter block development practices with entrances to street frontages and good natural surveillance. A high level of dual aspect accommodation is anticipated. Residential amenity space is provided at podium and roof-top level with defensible space at street level.



Figure 16 Plan view showing indicative street connections and heights

Building Heights and Massing

4.3 The lowest building heights (ranging from 17m – 21m) are to the Norwood Road frontage. Within the site the heights increase to 25m with tallest block being around 31m. The indicative approach includes two commercial podiums which are not shown below but are shown on Figure 16 above.



Figure 17 - Indicative Approach - overview

Indicative Approach - Daylight and Sunlight

- In planning the Indicative Approach Option 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.
- 4.5 A detailed assessment of the daylight and sunlight implications of this Indicative Approach, undertaken by the Council's specialist advisers, is provided separately.

4.6

Use	Amount
Residential units	160
Office	3000

5. Appraisal of the Indicative Approach

Townscape and Visual Impact Assessment (TVIA) Summary

- 5.1 The appraisal of the visual effects of the Indicative Approach has been informed in large part by use of the VU CITY 3D digital model of London. The model is a very accurate representation of London today as a series of simple, grey built forms. Approved schemes can be added to the model for assessment purposes; these are generally coloured yellow.
- 5.2 A simple scaled model of the Indicative Approach in the form of a basic extrusion of the Indicative Approach footprint, is dropped into the model and its visual impact captured from a range of vantage points. For ease of identification, it is coloured. The resulting impact is assessed and model refined until an acceptable impact is achieved in all tested views.
- 5.3 The 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.
- 5.4 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.
- 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.
- 5.6 Sixteen 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:

TVIA View	Indicative Approach
TVIA IMAGE 1– Lambeth	The Indicative Approach is not visible. No effect.
Local View – Landmark	

Silhouette (ii) View N along Knights Hill	
TVIA IMAGE 2- Lambeth Local View – Landmark Silhouette (iii) View S along Norwood Road	The increase in mass and height on the right hand side of the view does not compromise the viewer's ability to appreciate the church. No harm to the view. No harm to the setting of the Grade II* listed church. No harm to the setting of the West Norwood Conservation Area whether existing or proposed.
TVIA IMAGE 3 - Lambeth Local View – Landmark Silhouette (iv) View along Weaver Walk from Chapel Road	The highest part of the Indicative Approach is visible to the left of the church. However, it is not so large as to be dominant or distracting in the view as to cause harm. Nor does it prevent the viewer from appreciating the church tower in silhouette. No harm to the view. No harm to the setting of the church as a listed building.
TVIA IMAGE 4- Lambeth Local View – Panorama View (iv) View N from Knights Hill	The highest part of the Indicative Approach is visible off to the left of the view. It is well off to the left and will be largely screened by trees, if glimpsed it is not so large as to be dominant or distracting in the wider townscape. Nor does it prevent the viewer from appreciating the church tower's silhouette. No townscape harm. No harm to the view. No harm to the setting of the church as a listed building.
TVIA IMAGE 5- West Norwood Cemetery - Western Perimeter Path	The highest element of the Indicative Approach will be visible on the ridgeline with the lower parts glimpsed to its right and 6 Lansdowne Way development to its left. The Indicative Approach will neither be dominant nor distracting in this view because of the partial tree screening and general low form / horizontal emphasis. No harm to the setting of the grade II* listed St Luke's church as it retains its dominance off to the left. No harm to the setting of the West Norwood Conservation Area existing or proposed. No harm to the setting of the Cemetery as a registered landscape.
TVIA IMAGE 6 - West Norwood Cemetery – west side near boundary wall	The upper parts of the Indicative Approach are visible in the distance but are not dominant or distracting. In reality, due to the significant tree screening within the Cemetery, the Indicative Approach will have a negligible effect on the appreciation of the landscape or significance of the cemetery. No harm to the setting of the West Norwood Conservation Area. No harm to the setting of the Cemetery as a registered landscape.
TVIA IMAGE 7 - West Norwood Cemetery – Main roadway leading to entrance	The tallest part of the Indicative Approach sits behind the dome of the Longsdon mausoleum in this view. This is a momentary alignment on this section of the serpentine roadway; as the viewer proceeds the roadway continues to sweep the two forms will separate; the effect in the backdrop of the Longsdon mausoleum is therefore fleeting. Furthermore, the presence of the mature trees in the Cemetery behind the Longsdon Mausoleum's the dome will add screening. The Gilbart Mausoleum derives some significance from its group value with Longsdon, that significance is not compromised by the presence of the Indicative Approach in this view. The Indicative approach is clearly a distant, separate structure which sits well within the tree screen and is not eyecatching or unduly discordant. No harm to the setting of the

	Consequentian Anna the active of the Conse
	Conservation Area, the setting of the Cemetery as a registered
TV//A IN /A CE C	landscape or to the settings of the grade II listed mausoleums.
TVIA IMAGE 8 – High Street	The highest part of the Indicative Approach is glimpsed across the
at St Luke's Churchyard	rooftops. It is marginally taller than the chimneypots of the middle
	ground building in front which is proposed for inclusion within the
	conservation area. The Indicative Approach is noticeable but not
	unduly dominant or distracting. No townscape harm. No harm to
	the setting of the West Norwood Conservation Area or its
	proposed extension.
TVIA IMAGE 8 – High Street	The tallest element of the Indicative Approach provides a visual
at Dunbar Street	termination at the end of the vista and announces the retail /
	commercial heart of the town centre. The rooftops of the lower
	buildings of the Indicative Approach are glimpsed. The careful
	selection of locally distinct materials will ensure that the buildings
	of the site allocation integrate well into the established townscape
	context with comprises existing conservation area and its proposed
	extension. No harm to the setting of the West Norwood
	Conservation Area or its proposed extension. No townscape harm.
	No harm to setting of St Luke's Church.
TVIA IMAGE 10 – Norwood	The tallest element of the Indicative Approach can be seen over
High Street at northern end	the rooftops. It announces the retail / commercial heart of the
of West Norwood Library	town centre. The rooftops of the Indicative Approach blocks
	fronting Norwood Road can also be glimpsed. The collective effect
	is neither distracting nor dominant. The careful selection of locally
	distinct materials should ensure that any proposal coming forward
	here integrates well into the townscape. No harm to the setting of
	the West Norwood Conservation Area or to its proposed
	extension. No townscape harm.
TVIA IMAGE 11 – Norwood	The Indicative Approach is seen ahead enclosing the western side
Road at Cemetery Entrance	of the Norwood Road frontage. Additionally, the highest part can
Gates	be glimpsed above the roof of the locally listed (Sainsbury store at
	364 Norwood Road). The Indicative Approach is neither dominant
	nor distracting. The townscape effect is acceptable. No harm to
	the setting of the West Norwood Conservation Area or to the
THA INAACE 42 CL :	setting of the locally listed building.
TVIA IMAGE 12- Chatsworth	Three blocks of the Indicative Approach are visible terminating the
Way at corner of Idmiston	view. The two nearest front Norwood Road with the tallest
Road	standing further away within with site. Collectively they provide a
	visual termination at the end of the road – announcing the
	presence of the town centre's commercial / retail heart. It is
	clearly a noticeable change but not discordant and the breadth of
	Chatsworth Way ensures it that does not appear unduly dominant.
	Tree screening will soften the effect further. The careful selection
	of locally distinct materials should ensure that any development
	that comes forward here will integrate well into the locality. Subtle
	variety in the materials of each block will differentiate them from
TVIA INAACE 12 De see	one another. No townscape harm.
TVIA IMAGE 13 – Devane	The Indicative Approach's highest part will appear as a distant form
Way open space at rear of	which is partially screened by the Leisure Centre in this view.
Julian's Primary School	Technically, should the viewer move to the right the whole of the
	Indicative Approach roofscape will be revealed. However, in

	reality, foreground and middle ground planting provides a strong
	degree of screening. The high quality contemporary architecture of
	the leisure centre is not sensitive to the presence of additional
	complementary modern development. No townscape harm.
TVIA IMAGE 14 –Norwood	The Norwood Road frontage blocks of the Indicative Approach are
Road near junction with	pulled back from the existing building line to provide a more
Chestnut Road	generous footway and reveals the distant grade II listed former
	West Norwood Fire Station. The set-back upper floors of the
	blocks fronting Norwood Road help integrate these blocks with
	their context. The highest part of the Indicative approach is
	glimpsed in the backdrop. The whole appears as a coherent,
	contemporary group. Townscape effect is beneficial.
TVIA IMAGE 15 – Norwood	The Norwood Road frontage blocks of the indicative approach are
Road near corner with	seen on the western side of the road. The set-back upper floors
Lancaster Avenue	help integrate the massing with their context and the building line
	follows the curved road alignment and reinforces a sense of
	enclosure. Townscape effect is beneficial.
TVIA IMAGE 16 –Lancaster	The Indicative Approach is technically visible at the end of the
Avenue near junction with	vista although, in reality, trees will largely screen most of it from
Thurlow Park Road	view. The highest part of the Indicative Approach will be
	appreciable across the rooftops in the distance. It is a compact
	form which is not dominant or distract. It announces the presence
	of the town centre at the end of the vista. No harm to the setting
	of the conservation area. No townscape harm.

Effect on Heritage Assets

- 5.7 The Indicative Approach has been assessed for its effect on the significance (including setting) of heritage assets. This 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 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 asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2: Glossary).'
- 5.9 Historic England's guidance 'The Setting of Heritage Assets' states:

 '9 Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated (see below Designed settings). Its importance lies in what it contributes to the significance of the heritage.

 Views and setting

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

- 11 Views which contribute more to understanding the significance of a heritage asset include:
 - 1. those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.
 - 2. those where town- or village-scape reveals views with unplanned or unintended beauty.
 - 3. those with historical associations, including viewing points and the topography of battlefields.

those with cultural associations, including landscapes known historically for their picturesque and landscape beauty, those which became subjects for paintings of the English landscape tradition, and those views which have otherwise become historically cherished and protected those where relationships between the asset and other heritage assets or natural features or phenomena such as solar or lunar events are particularly relevant'.

- 5.10 The HE guidance suggests the steps are as follows:
 - Step 1: Identify which heritage assets and their settings are affected.
 - **Step 2:** Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
 - **Step 3:** Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it.
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm.
 - Step 5: Make and document the decision and monitor outcomes.
- 5.11 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.

Heritage Asset	Effect of Indicative Approach on significance
St Luke's Church, Knight's Hill (Grade II*)- With an imposing local landmark spire which is the subject of a number of local views., this buildings stands some distance to the south of the site allocation.	The bulk and massing is not harmful to setting in the relevant locally designated views (Views 2 and 3). In views from west Norwood cemetery the Church tower's landmark status is not undermined by the highest part of the Indicative Approach. No harm to setting.
445 Norwood Road (Grade II) – this is the former fire station which stands on the eastern side of Norwood road some distance to the north of the site allocation.	Site is some distance to the south and forms part of the wider urban context of this building. However, the best views to the listed building are looking eastward, north eastward and south eastward. A set-back building line to Norwood Road within the allocation would open up the view from the South. No harm to setting.
Lancaster Avenue Conservation Area – a wide, Victorian suburban road to the east of the site. The conservation area is not	The Indicative Approach will be visible as a distance form in long views from the eastern end of Lancaster Avenue. However, it won't diminish

particularly reliant on its wider setting for its	the townscape or architectural qualities of the
significance.	conservation area. No harm to setting.
West Norwood Cemetery (registered	The landscape is extensive and experienced along
landscape) - The cemetery occupies a	serpentine drives and walks through mature trees.
hillside topography transverse with	The Option will only be visible in views N from the
serpentine drives and walks. There is much	cemetery where the tree cover is at its thinnest.
mature tree planting. The historic	The highest part of the Indicative Approach will be
monuments are a key feature of the	a modest addition to the distant townscape in
landscape character.	views from the low grounds northern end of the
	cemetery (see views 6 and 7). It will be most
	noticeable in View 5 but even then, its modest
	presence in relation to the expansive landscape is
	not distracting or dominant. No harm to setting.
West Norwood Conservation Area – This	The Indicative Approach will appear as a natural
designation comprises the cemetery and	extension of the urban character when viewed
some surrounding urban development	from within the conservation area at, Norwood
including parts of the town centre to the	Road and Norwood High Street. Within the
west of the cemetery. Proposed extensions	cemetery the highest part will be visible at times as
to the conservation area would see it	a distant, contemporary form which is neither
expanded to the north, east, south and	distracting nor dominant, but for most part will be
west.	screened by trees and not visible. See Views 5, 6,
	7, 8, 9, 10, 11. No harm to setting.
Longsdon Mausoleum	The indicative approach appears in the backdrop as
	the view moves along the road towards the
	Cemetery main gates. However, given the distance
	and the mature trees its fleeting effect is not
	considered harmful. No harm to setting.
Gilbart Mausoleum	This mausoleum derives some group value form its
	proximity to Longsdon Mausoleum. No harm to
	setting.
364-366 Norwood Road (local list) - this is a	This building is best appreciated when viewed from
former Woolworth's store with an Art Deco	the northeast (where the front and flank can be
frontage. It is an established feature on the	viewed together obliquely). In that view the tallest
Norwood Road frontage to the south of the	part of the Indicative Approach will be off to the
site and sits in a row of relatively low quality	right and not affect the viewers appreciation of
buildings. It is not reliant on its setting for	the facades. In more general views such as that
its architectural significance. The site is to	from the south (View 11) the Indicative Approach
the north.	will improve the general townscape / architectural
	quality and thus enhance the setting. No harm to
	setting.
Archaeological Priority Area 14 – Levehurst	No effect.
Medieval Manor House – this is located to	
the south west of the site on the other side	
of the railway line. This asset does not have	
a setting	
a secting	

6. 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
Built heritage	The settings of heritage assets should not be harmed. Especially St Luke's Church and West Norwood Cemetery.
Height	The central part of the site is appropriate for a tall building of a general building height of 31m (75m AOD), set within new public space
	Other buildings slightly exceeding the threshold definition of tall buildings in this part of the borough (25m) may be acceptable in the central part of the site The rest of the site should create a coherent roofscape rising from the perimeter street frontages to a single highest point within the site
	Provide a clearly defined parapet line to Norwood Road to respect context and create a balanced townscape with the Victorian frontage opposite Provide a varied roofscape that integrates well with the locality in townscape views
Design quality	High quality design using brick (the prevailing local material) will help integration with the locality
Connectivity	A new street network which better integrates with the wider locality and allows for in-site servicing
Public realm	Widened footways to Norwood Road, a new public off Norwood Road present significant opportunities to improve the quality of the visitor experience to West Norwood Town Centre.
Enhanced environment	Public realm improvements and new routes present opportunities for tree lined streets and other urban greening.
Activation and natural surveillance.	Active ground floor frontages and good overlooking to all public routes and spaces.