

Elephant and Castle

Background paper: Urban design

Revision 1, March 2012

Draft Supplementary Planning Document (SPD) and Opportunity Area Planning Framework (OAPF)



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1.1 What does this document do

This document sets out the approach and analysis to establish the urban design and building height strategy in the Elephant and Castle Opportunity Area.

The purpose of the document is to set out:

- The policy context for this study and the background to planning policies which apply at Elephant and Castle.
- Our approach for preparing an urban design study.
- Our understanding of the character of Elephant and Castle Opportunity Area.
- Urban design principles for new development.
- Our approach to building heights and tall buildings in the Opportunity Area and the sensitivities for tall buildings.

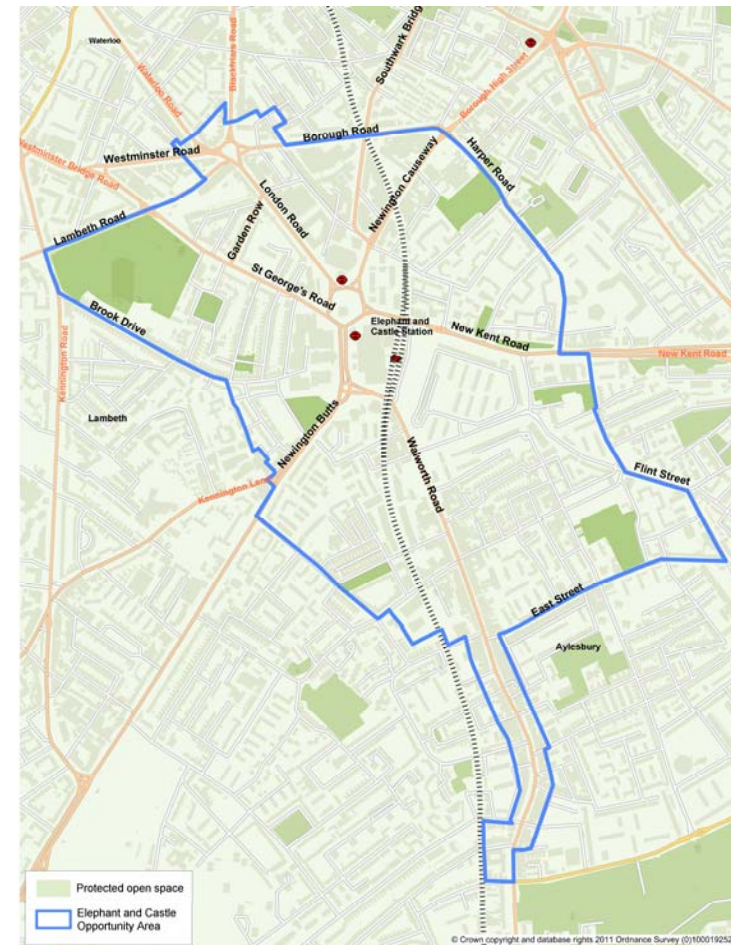
The findings of this document have informed the guidance set out in the Elephant and Castle Supplementary Planning Document (SPD) / Opportunity Area Planning Framework (OAPF).

This document should be read alongside the Elephant and Castle Opportunity Area Characterisation Study, November 2011, as well as relevant conservation area appraisals.

1.2 Area covered

This document covers the Elephant and Castle Opportunity Area as shown in Figure 1.

Figure 1. Elephant and Castle Opportunity Area



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1.3 How to find your way around this document

Section	Content
Section 1: Introduction	Sets out the role and purpose of the study.
Section 2: Policy background	Sets out the current policy context as well as background to Elephant and Castle specific policies, as well as what has changed that requires us to produce a new evidence base.
Section 3: Approach to preparing new guidance	Sets out our approach to producing an urban design study, in accordance with CABE and English Heritage (EH) guidance and Planning Policy Statement 5.
Section 4: Character of the opportunity area	Analysis to understand local character and historic context and what is important to sustain, protect or enhance through managed change.
Section 5: Built form	Analysis to identify urban design principles which will inform our approach to built form guidance.

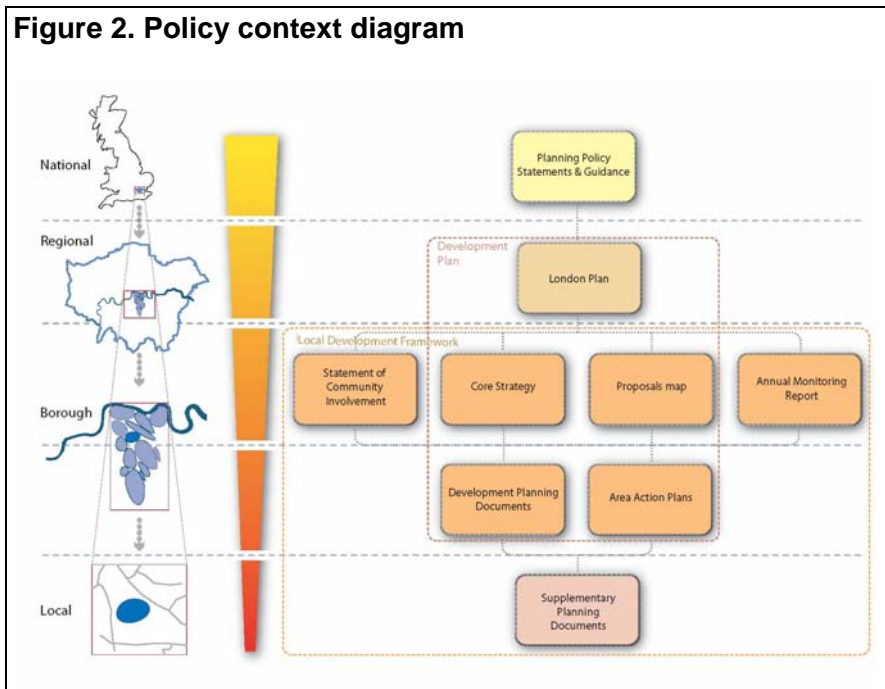
Section	Content
Section 6: Building height and tall buildings	Analysis to identify the approach to tall buildings guidance and understand the areas where tall buildings will be sensitive. Through a view assessment we can determine the potential impact of tall building development on local character and historic context including heritage assets and their settings which will inform our building height and tall building guidance.
Appendices	Background evidence which has informed this report including: <ul style="list-style-type: none"> • Reference list • Policy Background • Study of contextual tall building heights • Assessment of potential conservation area designation • Views assessment

2.1 Policy context

The following section sets out:

- The context for national, regional and local policies and guidance which has informed our urban design analysis.
- The existing frameworks and guidance that cover the Elephant and Castle area.
- What has changed since these frameworks were produced that has required us to undertake the current review.

More detail on the policy background and context is set out in appendix 2 of this paper.



2.1.1 National policy, such as Planning Policy Statements (PPS) including PPS1, PPS5, PPS12 and associated guidance, advise that when preparing our development plans that local authorities should:



Planning Policy Statement (PPS) 1 : Delivering Sustainable Development



PPS 5 : Planning for the historic environment

- Ensure that we recognise the importance of local distinctiveness, the historic environment and townscape character.
- Prepare policies to ensure that new development can conserve or enhance these features and qualities.
- Ensure that we have a robust evidence base which considers impact of development on the historic environment.
- Optimise the potential of a site to accommodate development.
- Not be overly prescriptive and provide more general guidance.
- Prepare a robust evidence base which is proportionate to the task, relevant to the place and up to date as practical.

2.1.2 Regional policy which in The London Plan and associated supplementary planning guidance (SPG) establishes the planning framework for London. The policies and guidance in these documents need to be considered when preparing the local development framework. The key messages in these documents are:



The London Plan



Revised London View Management Framework (LVMF) SPG



Draft London World Heritage Sites SPG

- Elephant and Castle is located in the Central Activities Zone (CAZ). It is an Opportunity Area and is a focus for development. It is also important to sustain and enhance the distinctiveness of this area as part of Central London.
- Tall and large buildings may be appropriate in the CAZ and in opportunity areas. Boroughs should work with the Mayor to identify appropriate, inappropriate and sensitive locations for these buildings.
- It is important to sustain, protect or enhance the historic context and local character of an area through managed change. Undertaking a characterisation study can assist in understanding this character.
- The design of new development including public realm and built form is an important part of ensuring that designs make a positive and successful contribution.
- Tall and large buildings should meet a series of design criteria to ensure that they are positive and successful contributions. This includes that they relate well to the local character and context and do not impact negatively on strategic views or their surrounds. They are likely to be sensitive in areas such as in the vicinity of heritage assets and their settings or other areas identified by local boroughs.
- The importance of conserving and enhancing

the Outstanding Universal Value of World Heritage Sites.

2.1.3 Local policy, which collectively is known as the Local Development Framework (LDF) includes the following documents:

- Core Strategy
- Southwark Plan (saved policies)
- Area action plans (AAPs)
- Supplementary planning documents (SPDs) and guidance (SPGs).

The LDF sets out the strategy and guidance for development in Southwark including:



Core Strategy

Core Strategy

- The vision for Elephant and Castle Opportunity Area promotes the regeneration of the area and identifies a number of new commercial, housing and retail opportunities, as set out in Figure 3.
- The vision indicates that tall buildings could be appropriate in the Opportunity Area and that more detail on where tall buildings will be appropriate, inappropriate and sensitive will be set out in a supplementary planning document.
- The density for new developments in the Elephant in Castle should normally be in the range of 650-1,100 habitable rooms per hectare in the CAZ and between 200 and 700 habitable rooms per hectare in the Urban Density Zone. Figure 4 sets out the density areas in the borough which are identified in Core Strategy Strategic Policy 5.
- The design of development is guided by

policies and the need to consider efficient use of land, design and conservation, approach to tall buildings and important local views. Figure 5 sets out an overview of design and conservation considerations as set out in Core Strategy Strategic Policy 12.

- Core Strategy Strategic Policy 12 defines tall buildings as those which are higher than 30 metres (or 25 metres in the Thames Policy Area) and/or which significantly change the skyline. 30 metres is approximately the height of a 10 storey block of flats or a 7-10 storey office building. In areas which have a low scale character, any building that is significantly higher than surrounding buildings will be regarded as a tall building even if it is lower than 30 metres.

- street level
- Contribute positively to the skyline as a whole while consolidating a cluster within that skyline or providing key focus within views



The Southwark Plan

Southwark Plan (saved policies)

Sets out more detailed development management policies by which planning applications in the borough will be assessed including policies for:

- Urban design
- Architecture
- Public realm
- Heritage conservation
- Tall Buildings

Policy 3.20 sets out that tall buildings:

- Should have links to public transport
- Make a positive contribution to landscape
- Be located at point of landmark significance
- Relate well to surroundings, particularly at

Figure 3. Core Strategy Elephant and Castle vision

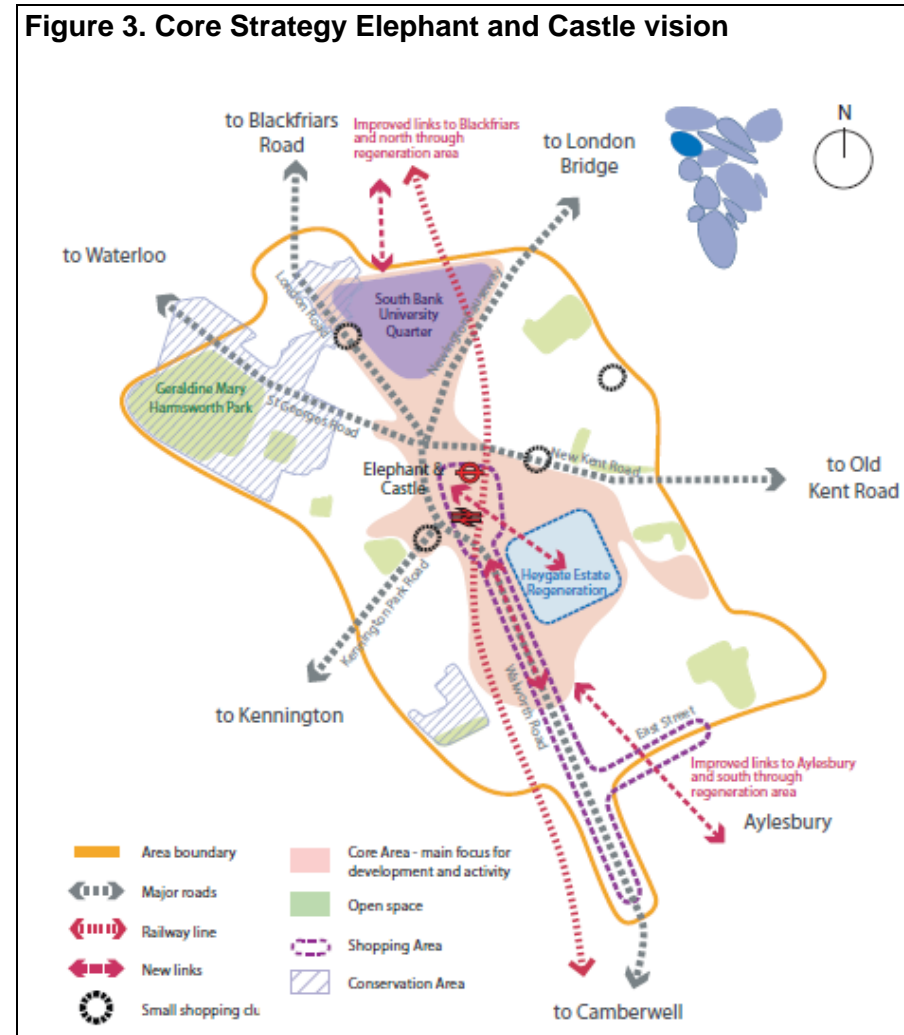
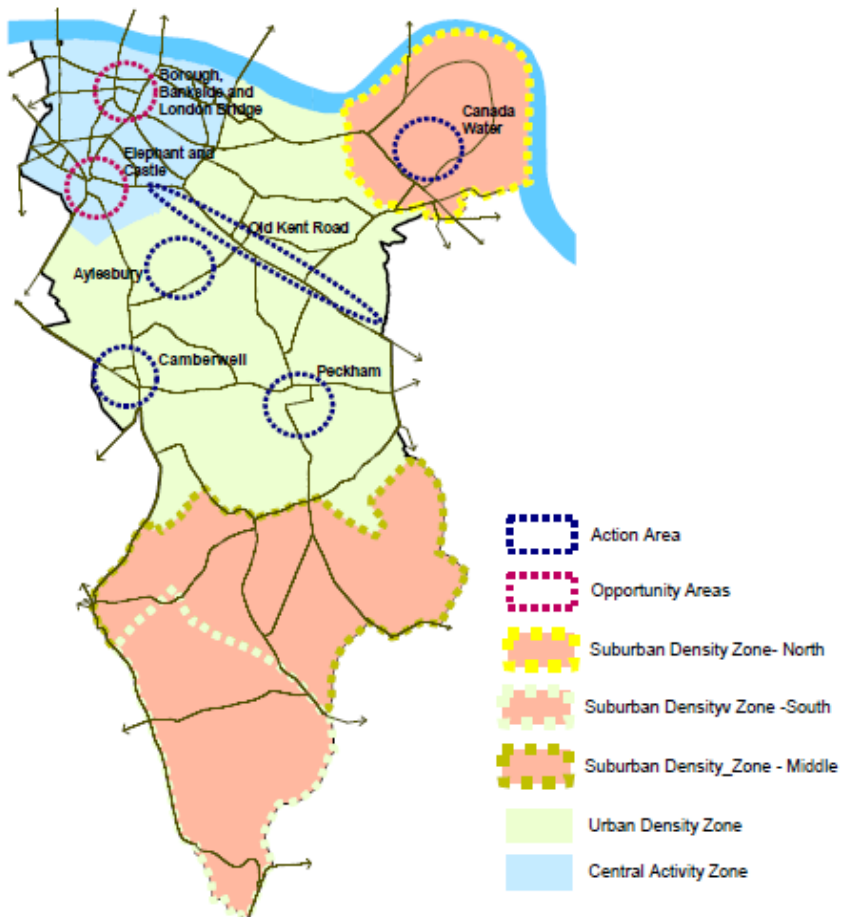
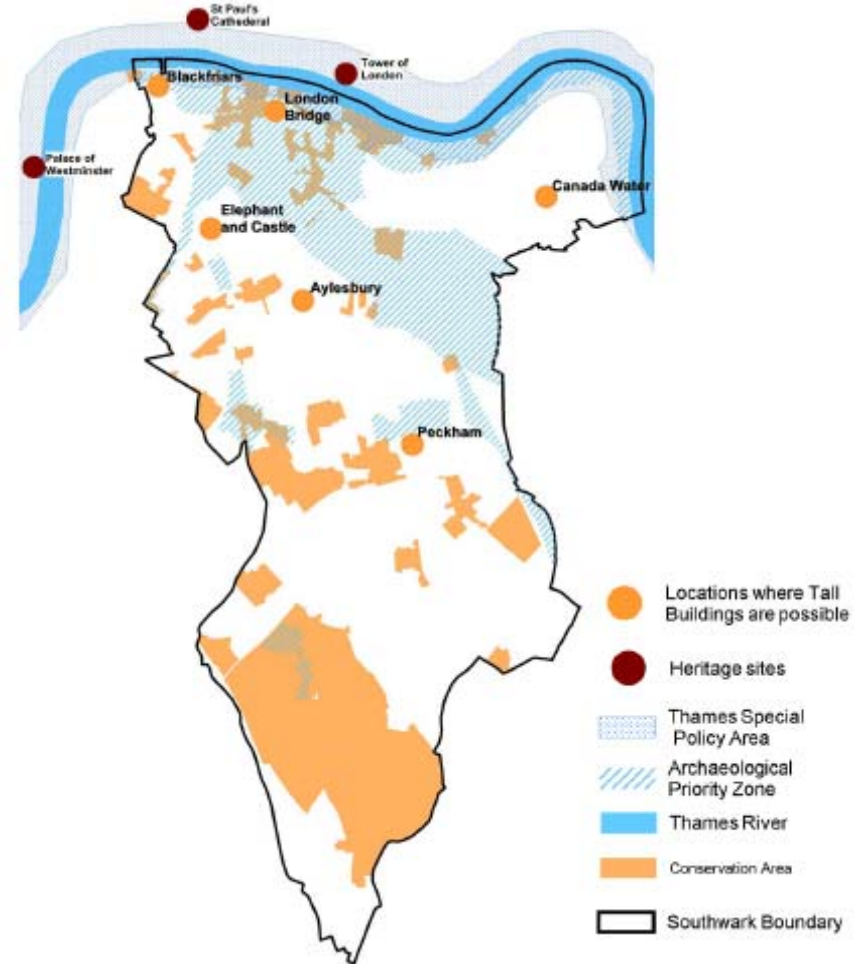


Figure 4. Core Strategy Strategic Policy 5 - Providing new homes

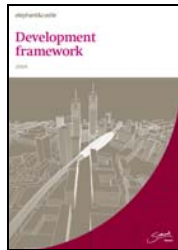


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Figure 5. Core Strategy Strategic Policy 12 – Design and conservation



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Elephant and Castle SPG



Enterprise Quarter SPD



Walworth Road SPD

Elephant and Castle area frameworks and guidance

There are three existing policy documents which set out guidance for the Elephant and Castle area, which are:

- Elephant and Castle Development Framework, Supplementary Planning Guidance (SPG), 2004
- Enterprise Quarter Supplementary Planning Document (SPD), 2008
- Walworth Road SPD, 2008

Figure 6 shows the extent of these areas.

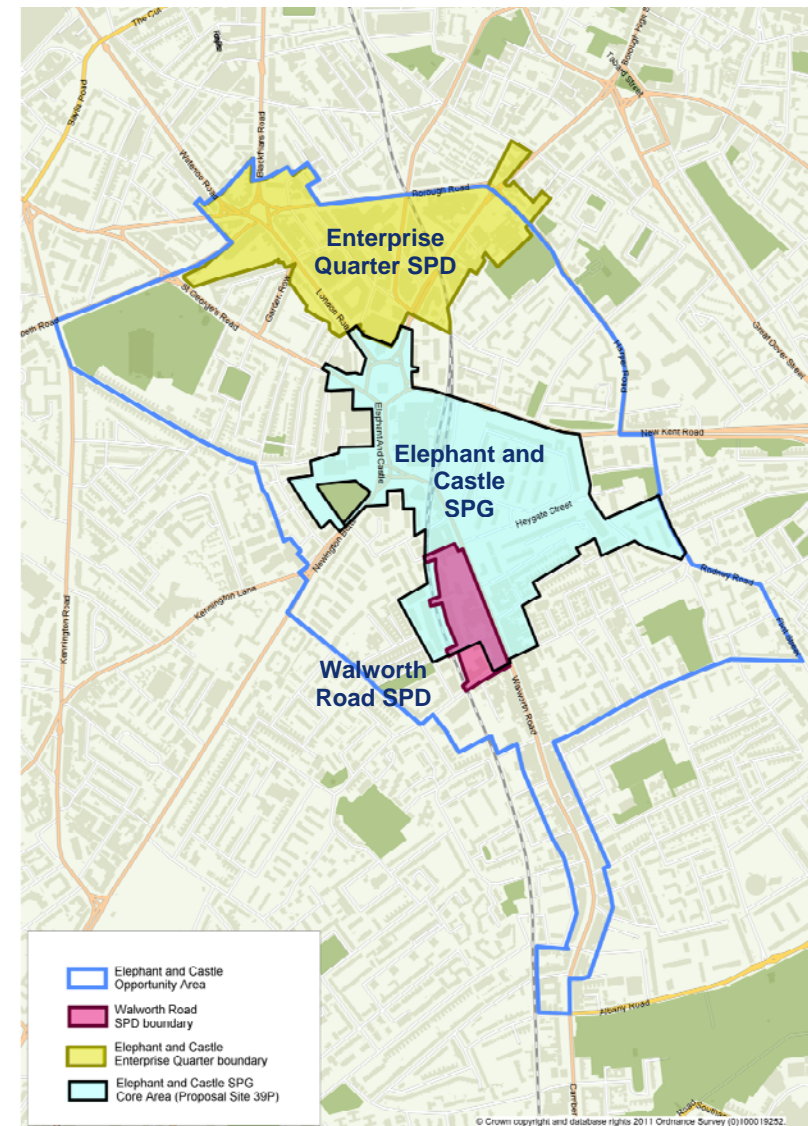
These documents set out a policy background for urban design, conservation and building height guidance for the areas and establish:

- That a core cluster of tall buildings along Walworth Road could form a focal point at the town centre and would be surrounded by a lower height secondary cluster with a number of local tall buildings.
- The cluster could be extended north into the Enterprise Quarter where there are potential locations for landmark tall buildings. The secondary cluster could also be extended into this area.
- Guidance for development along a small section of the Walworth Road

Conservation areas

There are also three conservation areas in the Opportunity Area. Where appraisals are adopted for the conservation areas, these set out the character of the area as well as principles for managing change. More information on conservation areas is set out in section 4 of this paper.

Figure 6. Area covered by existing Elephant and Castle frameworks and guidance



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2.1.4 Other guidance documents, including the CABE and English Heritage (EH) Guidance on tall buildings and other English Heritage guidance on understanding places and settings set out best practice guidance. These establish:



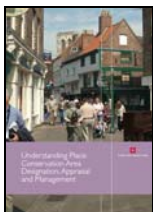
CABE and EH Guidance on tall buildings



Seeing History in the View



The Setting of Heritage Assets



Understanding Place: Conservation Area Designation, Appraisal and Management

- That when local authorities are preparing an evidence base to identify appropriate, inappropriate and sensitive locations for tall buildings that as a matter of good practice a detailed urban design study should be conducted. This includes analysis of the historic context of the wider area, local character, opportunities and identification of mistakes of the past.
- There are a series of criteria for evaluating tall building proposals including:
 - Relationship to context
 - Effect on the historic context
 - Effect on World Heritage Sites
 - Relationship to transport infrastructure
 - Contribution to public space and facilities
 - Effect on the local environment
 - Contribution to permeability
- Best practice guidance, including examples, to assist in preparation of heritage area assessments, designation and management of conservation areas, identifying and assessing views, and understanding the character of an area and setting of heritage assets.

2.2 What has changed since the Elephant and Castle frameworks and guidance were produced

Since the production of the Elephant and Castle SPG, Enterprise Quarter SPD and Walworth Road SPD there have been a number of changes to the context for these documents including:

- Updates to policy and publication of new national, regional and local policy documents, including a new strategic view which sits across the Opportunity Area.
- Publication of new guidance on producing heritage assessments, urban design and tall building studies.
- A number of new tall buildings have been given planning permission and constructed.

Sections 2.21 to 2.25 set out these changes and how we are to address them in this paper and in the SPD / OAPF document.

2.2.1 Updates to planning policies

Since the production of the original Elephant and Castle SPD and Enterprise Quarter SPD the following changes have occurred in national, regional and local policies and guidance:

National	<ul style="list-style-type: none"> • PPS5 is adopted in March 2010 setting out detailed policies for conservation of the historic environment. • Draft National Planning Policy Framework (NPPF) July 2011. The government has recently consulted upon its draft National Planning Policy Framework. The Government wants to produce a simple national planning policy framework setting out their priorities for the planning system in England in a single document covering all major forms of development proposals handled by local authorities. The NPPF will set out the Government's economic, environmental and social planning policies. The policies will apply to the preparation of local and neighbourhood
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	plans, and to development management decisions.
Regional	<ul style="list-style-type: none"> • The London Plan was adopted in July 2011 setting out updated design and conservation policies. • The Revised London View Management Framework (LVMF) SPG was adopted in July 2010 and identifies a protected vista for the strategic view from the Serpentine. The wider consultation assessment area for this view falls over the Elephant and Castle Opportunity Area. • The Draft London View Management Framework (LVMF) SPG was published for consultation in July 2011 and identifies a new strategic view from Parliament Square • The Draft London World Heritage Sites – Guidance on Settings SPG was published for consultation in October 2011 and sets out guidance for how the dynamic relationship between protecting heritage and encouraging change can be managed so that the value of the World Heritage Sites can be protected while the city around it continues to develop.
Local	<ul style="list-style-type: none"> • The Core Strategy was adopted in April 2011 and set a vision for the Elephant and Castle Opportunity Area. • The Southwark Plan was adopted in 2007 and sets out the detail development management policies for design and conservation, including specific criteria for the location of tall buildings.
Guidance	<ul style="list-style-type: none"> • CABE and EH Guidance on tall buildings was published in July 2007. These establish best practice for preparing analysis to identify the locations where tall buildings would be

	<p>appropriate, inappropriate and sensitive.</p> <ul style="list-style-type: none"> • Other English Heritage Guidance has been published setting out best practice for preparing heritage area assessments, identifying and assessing views and understanding the character of an area.
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To ensure that our evidence base is robust and up to date in accordance with national guidance including PPS 5 and PPS12, we are updating our analysis and evidence in order to:

- Consider the changes in local context and character.
- Prepare our evidence base in accordance with current guidance and policies, particularly the following:
 - PPS 5
 - London Plan
 - LVMF SPG
 - Southwark Core Strategy
 - Southwark Plan
 - CABE & EH Guidance on tall buildings
 - English Heritage Guidance

2.2.2 Guidance for the whole Opportunity Area

The previous frameworks and guidance only proposed guidance for the Central area and Heygate Estate, Enterprise Quarter and Walworth Road.

The SPD will review the existing guidance for these areas and prepare a single document which will set out guidance for the whole Opportunity Area.

2.2.3 Our SPD will also be an Opportunity Area Planning Framework

In accordance with London Plan Policy 2A.5, the Elephant and Castle planning document will need to be both an SPD and an Opportunity Area Framework (OAPF). We have worked closely with the GLA in preparing the new SPD and this document.

2.2.4 New tall building development in the area

Since the initial Elephant and Castle framework documents were produced the context for tall buildings has changed, due to a number of schemes which have been completed or received planning approval. These are identified in the table below. More information on context for building heights is set out in appendix 3.

Status	Name	Height (mAOD)	Storeys
Completed	Strata tower	147.8m	43
	Vantage Tower (at Metro Central Heights)	55m	16
Under construction	50 New Kent Road	87.5m	23
Consented	Former London Park Hotel	145.5m	44
	80-93 Newington Causeway	69.8m	22
Applications submitted but not yet determined	Eileen House	128.7m	41

2.2.5 Designation of a new protected vista for the strategic view from the Serpentine Bridge

The Draft Revised LVMF SPG (May 2009) established a new Protected Vista for the strategic view 23A.1 from the Serpentine Bridge towards the Westminster World Heritage Site. The Revised LVMF SPG has since been adopted in July 2010.

The wider consultation assessment area of the protected vista extends across the Elephant and Castle Opportunity Area.

The Revised LVMF sets management guidance for this strategic view including:

- Detailed guidance for managing development in the background of the view, which would include development in the opportunity area.
- A threshold height for the protected vista, which ranges from 60m to 65m AOD across the opportunity area.

The previous tall buildings strategy set out in the Elephant and Castle SPG and Enterprise Quarter SPD identified two tall buildings at the core of the Elephant and Castle and a number of landmark buildings located around the existing Elephant and Castle shopping centre and along the Walworth Road and Newington Causeway.

Figure 7 and 8 show indicative diagrams of how the protected vista of the strategic view would relate to the proposed building height strategies of the SPD and SPG.

These figures show that the locations identified as the Core Cluster and other possible locations for the tallest buildings would sit within the protected vista of the strategic view. The SPG guidance identified that heights for tall buildings around the shopping centre could be up to 135m AOD. At these heights, any such proposals in the protected vista would sit above the threshold heights of 60m to 65m AOD and would be likely to be visible in the background of the strategic view. Therefore buildings at this height have the potential to harm the viewer's ability to recognise and appreciate the Palace of Westminster.

Therefore any review of tall buildings in the opportunity area needs to review the approach to the proposed building, locations identified as suitable for tall or landmark buildings and the proposed height ranges for these buildings.

Figure 7. Elephant and Castle SPG – Indicative approach to building heights showing strategic view 23A.1

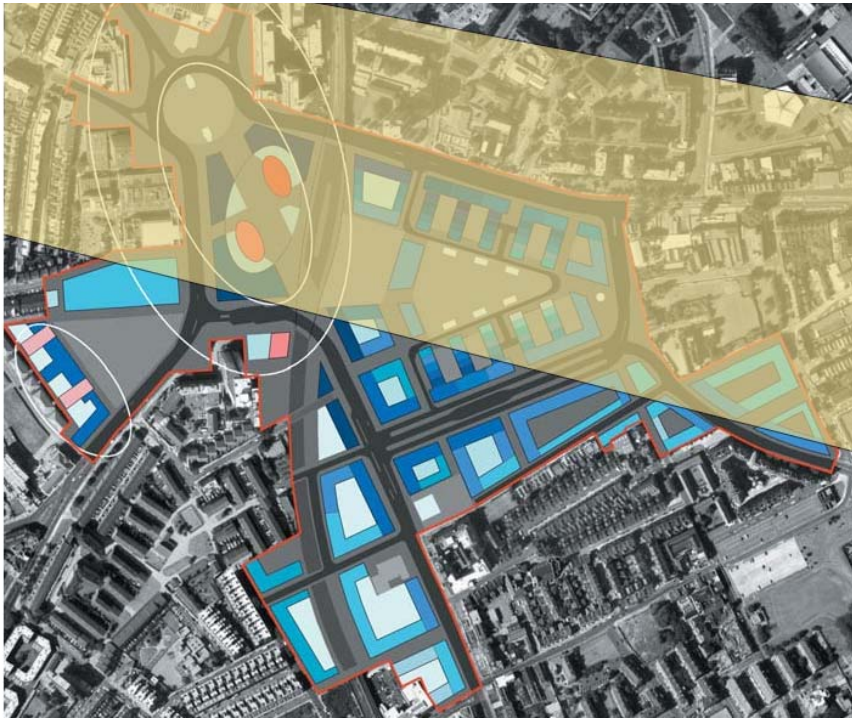
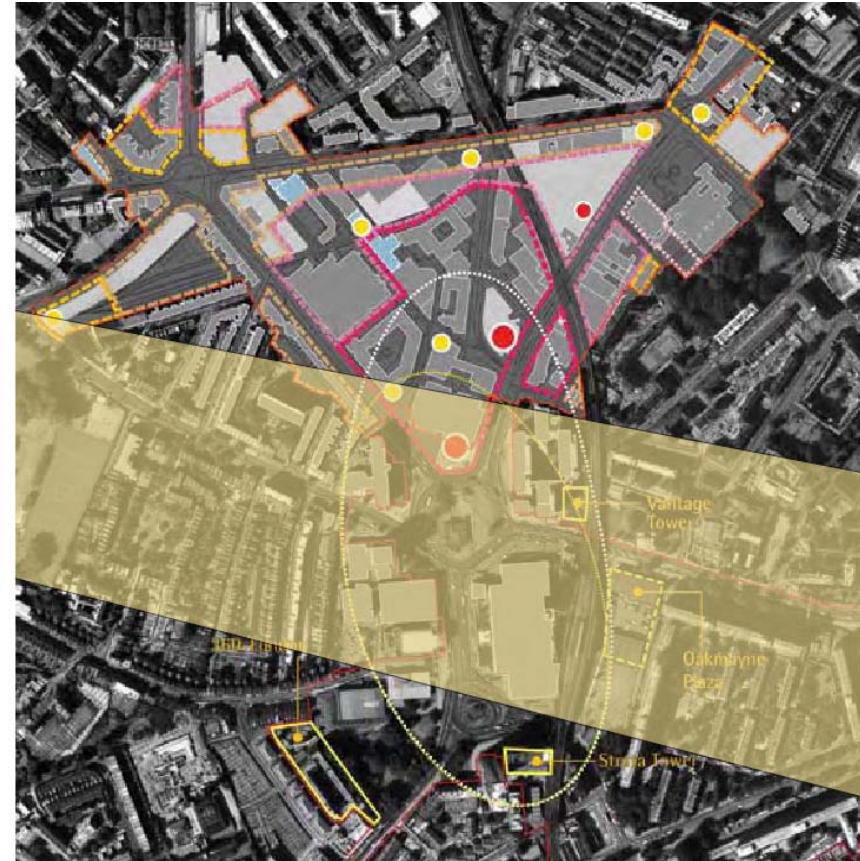


Figure 8. Enterprise Quarter SPD – Indicative approach to building heights showing strategic view 23A.1



3.1 Our approach to producing new guidance

The existing Elephant and Castle frameworks have established a background context for design and tall building guidance in the opportunity area.

Section 2 has established that further work is required in order to ensure that the production of new policy guidance for the Elephant and Castle Opportunity Area is robust and up to date.

This section sets out the approach we have followed to prepare new guidance which will inform the production of an updated Elephant and Castle SPD.

We have looked at the following analysis:

- Understanding of the local character and historic context of the local and wider area through a detailed characterisation study.
- Identifying areas with the capacity to accommodate substantial change and the sensitivities for new development in these locations.
- Assessing the potential impact of new buildings in the opportunity area including tall buildings.
- Producing design, conservation and building height guidance in order to manage change in the area.

3.2 Methodology for an urban design study



CABE and English Heritage Guidance on tall buildings suggests that local authorities conduct a detailed urban design study in order to identify locations where tall buildings are “appropriate, inappropriate and sensitive”.

In accordance with CABE and English Heritage guidance and PPS5 policies for conservation of the historic environment, we have conducted a detailed urban design and building height study. Our approach is also informed by other relevant English Heritage guidance on settings, views, heritage conservation and understanding place.

Our urban design study consists of two parts :

- Character appraisal and evaluation of the analysis.
- Assessment of options for building heights and tall buildings.

Section 3.2.1 sets out our approach to a characterisation study and section 3.2.2 our approach to assessing building height and tall building options.

3.2.1 Character appraisal and evaluation

A characterisation study has been prepared which sets out analysis that allows us to understand the local character and historic context of the opportunity area and surrounding area. Through our analysis we have identified what is important to sustain, conserve or enhance and set out principles which will guide new development.

The following table sets out general approach to a character study and the sections of this document where more detailed information can be found :

Section 4	<p>Analysis of character and historic context of the local and wider area</p> <p>An understanding of the significance of historic environment heritage assets and their settings in accordance with EH historic characterisation methods.</p> <p>A detailed Characterisation Study which includes an understanding of the existing context and the historic environment and heritage assets. The approach to this study has been prepared in accordance with PPS 5.</p>
Section 4.3	<p>Evaluation of the heritage assets and their settings</p> <p>The characterisation study as well as any conservation area appraisals and other studies on the local area, have informed our understanding of heritage assets. In accordance with EH guidance on settings, we have also considered how their settings are experienced and how this contributes to the significance of the asset.</p> <p>Through this process we have also identified areas,</p>

Section 5.1	<p>buildings and structures of significance which may be worthy of designation as conservation areas or with the potential to be added to our local list.</p> <p>Identify the issues, constraints and opportunities in the built environment</p> <p>From our understanding of the character of the area we identify the issues, constraints and opportunities that occur in the built environment.</p>
Section 5.2	<p>Establish principles to guide the design of new development</p> <p>We can then set out general principles for the design of built form which can be used to generally guide new development or to sustain, protect or enhance the local character of an area.</p> <p>These principles are used to inform the general and area specific built form guidance in the SPD.</p>

3.2.2 Assessment of building heights and tall buildings

The Core Strategy and previous area specific Elephant and Castle policies have identified that the Elephant and Castle Opportunity Area vision is a location which can support more intense form development and is a suitable location for tall buildings.

The characterisation study has established the local character and the historic context of the opportunity area and informs our identification of areas where tall buildings could be located, where they would not be suitable and where they would be sensitive.

We have identified and tested strategic options for building heights including tall buildings in order to understand the potential impact on sensitivities in the area. This analysis has informed our approach to building height and tall building guidance in the SPD.

The following table sets out the general approach followed and the sections of this document where more detailed information is found:

<p>Section 6.2 & 6.3</p>	<p>Understanding the areas where tall buildings could be located in the opportunity area and the sensitivities for tall buildings</p> <p>We analyse the constraints and opportunities for tall building development which help us understand where tall buildings would be appropriate, inappropriate and sensitive.</p>
<p>Section 6.4</p>	<p>Identification of strategic building height options</p> <p>From the urban design analysis and understanding of opportunities and constraints, we set out the strategic options for the location and height of tall buildings.</p>

<p>Section 6.4.3</p>	<p>Testing strategic building height options</p> <p>Using a three dimensional digital model of inner London, we have tested different building height options in testing views.</p>
<p>Section 6.4.4 Appendix 5</p>	<p>Identification of testing views</p> <p>We have identified views from the local and wider area, including strategic views and views of or from a World Heritage Site, heritage asset and their settings. We have used the views identified to test and assess the potential impact of the strategic tall building options.</p>
<p>Section 6.4.5, 6.5 & 6.6 Appendix 5</p>	<p>Views assessment</p> <p>Using a three dimensional digital model of the opportunity area and wide London context we can test the strategic options in the testing views and understand the potential impact of tall building development when seen in these views.</p>
<p>Section 6.9</p>	<p>Establish an approach to building height and tall building guidance</p> <p>From the testing we set out an approach for building heights and the principles that will guide the locations where tall buildings could be located.</p> <p>We will also identify the specific sensitivities for tall buildings in these locations that need to be considered when assessing applications for new tall building and large scale development.</p>

4.1 Characterisation Study

In order to have a clear understanding of the character and local context of the opportunity area, a Characterisation Study has been undertaken for the area.

This study draws on previous area-based analysis and existing conservation area appraisals and has been prepared in accordance with current policies and best practice guidance.

The characterisation study has covered the following:

Section	Content
Part 1.0 Introduction	Sets out the purpose and structure of the document.
Part 2: Physical Context	Sets out an overview of the physical context of the opportunity area and relationship to surroundings.
Part 3: Social and economic context	Sets out the social and economic context.
Part 4: Planning policy context	Provides a brief planning policy context.
Part 5: Heritage context	Provides an overview of the heritage analysis of each character area.
Part 6: Character areas	Provides a detailed analysis of each character area.
Part 7: Character area management	Sets out the potential management framework for the area, informed by the character analysis.

4.1.1 Character Areas

Nine different character areas have been identified in the opportunity area, as shown in figure 9. The identification of boundaries for each character areas have been established by the following criteria:

1. Historical development (for example identifiable phases of development)
2. Existing development, building typologies and townscape character
3. Land use and functional characteristics
4. Physical containment or edges leading to a form of enclosure or area definition
5. Existing area-based policy or statutory definitions (for example conservation areas)

The character areas identified in the opportunity area are as follows:

- Central area
- Heygate Street
- Rail Corridor
- Enterprise Quarter
- Rockingham
- Brandon Street
- Walworth Road
- Pullens
- West Square

The characterisation study summarises the character of each area in Part 6 of the document. This section is supported by overlay maps and photos of the area, which set out more information on the following:

- A brief summary capturing the essence of each area.

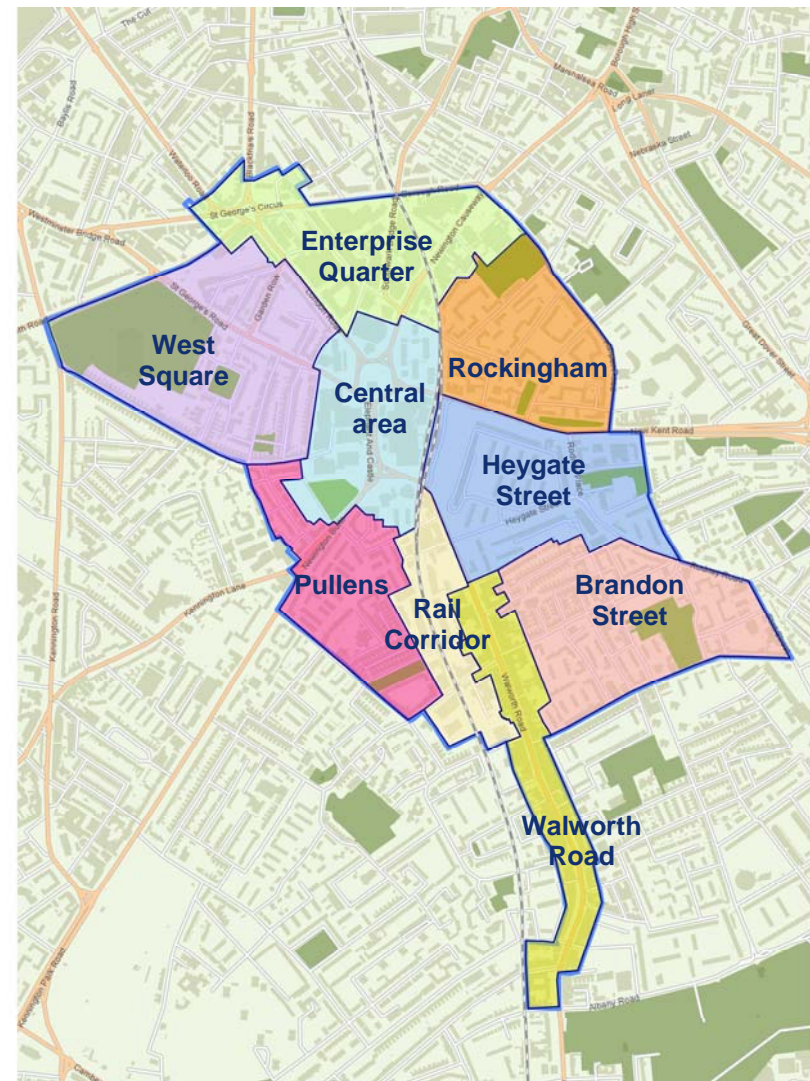
- An understanding of the historic development of the area.
- A discussion on the key urban design and movement issues that characterise the area.
- A description of the prevailing built form.
- The prevailing land uses within each area.
- A review of heritage assets (conservation areas, listed buildings, possible locally listed buildings and buildings of townscape merit).
- The open space and landscape features of each area.
- Views that may feature within the areas.
- Potential opportunity sites.

The character area appraisals are also supplemented by a detailed heritage audit, in Appendix 1 of the characterisation study, which should be referred to when reading the appraisals.

The audit provides more information on the following :

- Conservation Areas
- Archaeological Priority Zones
- Listed buildings
- Proposed locally listed buildings
- Buildings of townscape merit
- Views
- Tree Preservation Orders

Figure 9. E&C Character areas



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4.2 Overview of the character of the opportunity area

A detailed discussion on the physical and socio economic context and history of development in the opportunity area is set out in the characterisation study.

The following sections 4.2.1 to 4.2.9 set out more detailed information about how the overview of the opportunity area has informed our analysis.

4.2.1 Topography

Given its proximity to the River Thames the northern part of Southwark is generally low lying land (less than 5m AOD). The opportunity area is relatively flat with heights ranging from around 2.3m AOD to 4m AOD across the area.

As the areas outside the opportunity area vary in height with higher land located along the southern edge of the borough including One Tree Hill (approximately 90m AOD) and Dawson Heights (approximately 77m AOD).

The area north of the River Thames steps up away from the river with the heights around the north bank rising from 10 to 20m AOD, where the strategically important landmarks of St. Paul's Cathedral, the Tower of London and Westminster World Heritage Sites are located.

The low lying nature of the opportunity area means that taller buildings within the area may be seen from higher ground in the surrounding area, as has been the case with Strata tower.

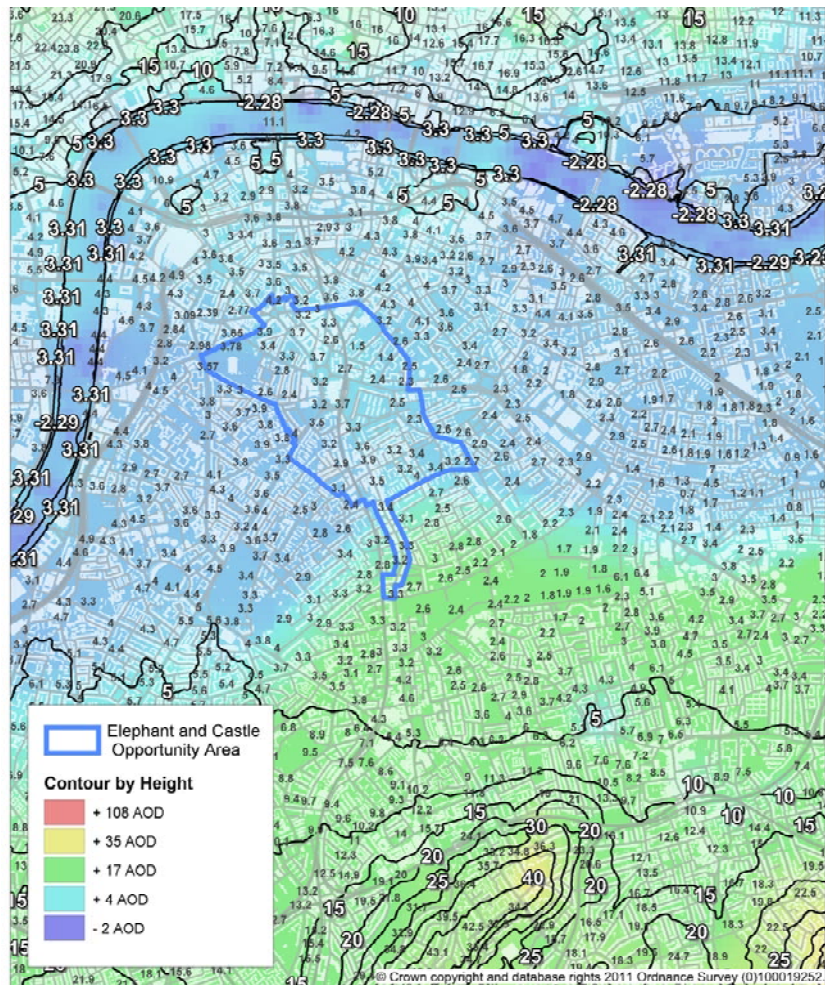
This is particularly of importance when considering the potential impact of development within strategic views of the strategically important landmarks which are located on the higher north bank of the river. From further south in the borough the taller buildings at Elephant and Castle can be seen, particularly from views along

main axis routes and from high points such as One Tree Hill and Dawsons Heights. Strata Tower has become a landmark feature on the skyline, orienting people towards the Elephant and Castle central area. With the southbank of the river quite low, key central London landmarks likely to be visible in the background of views, such as St. Paul's Cathedral with the dome visible in views from Camberwell Road looking towards the north. Other prominent tall buildings on both the south and north banks are also likely to be visible on the skyline with new development at Blackfriars Road, London Bridge, Waterloo and the City appearing on the skyline. As the Shard nears completion, it has already become a new prominent feature on London's skyline.

Figure 10 shows the topography of the opportunity area and surrounds.

Our understanding of topography has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 10. Topography



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4.2.2 Land use

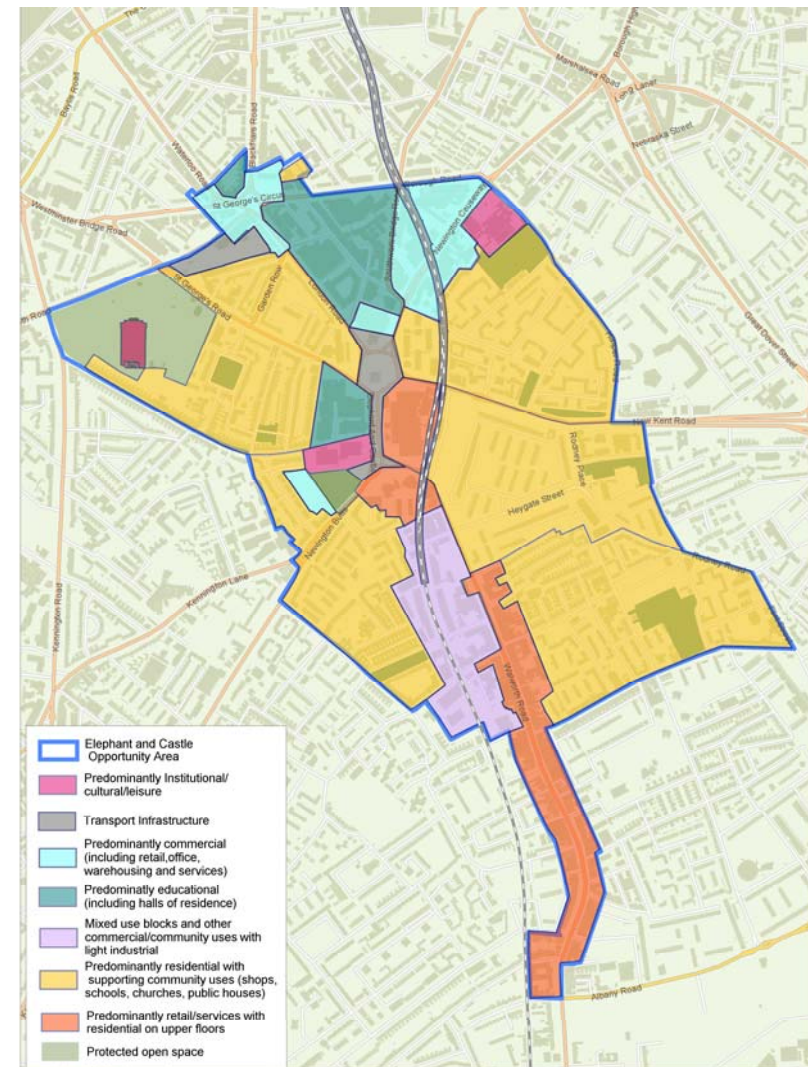
The opportunity area contains a mix of uses including:

- Shopping and town centre uses around the Elephant and Castle junctions and on Walworth Road
- Educational uses in the London South Bank University campus on Keyworth Street and Borough Road and in the London College of Communication
- Commercial uses around Newington Causeway
- Residential use around the Heygate estate, Brandon Street, West Square and the Pullens Estate

Figure 11 shows the indicative land uses in the opportunity area.

Our understanding of land use has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 11. Land use



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4.2.3 Heritage

There opportunity area features a number of heritage assets including:

- Conservation areas
- Listed buildings
- Archaeology Priority Zones

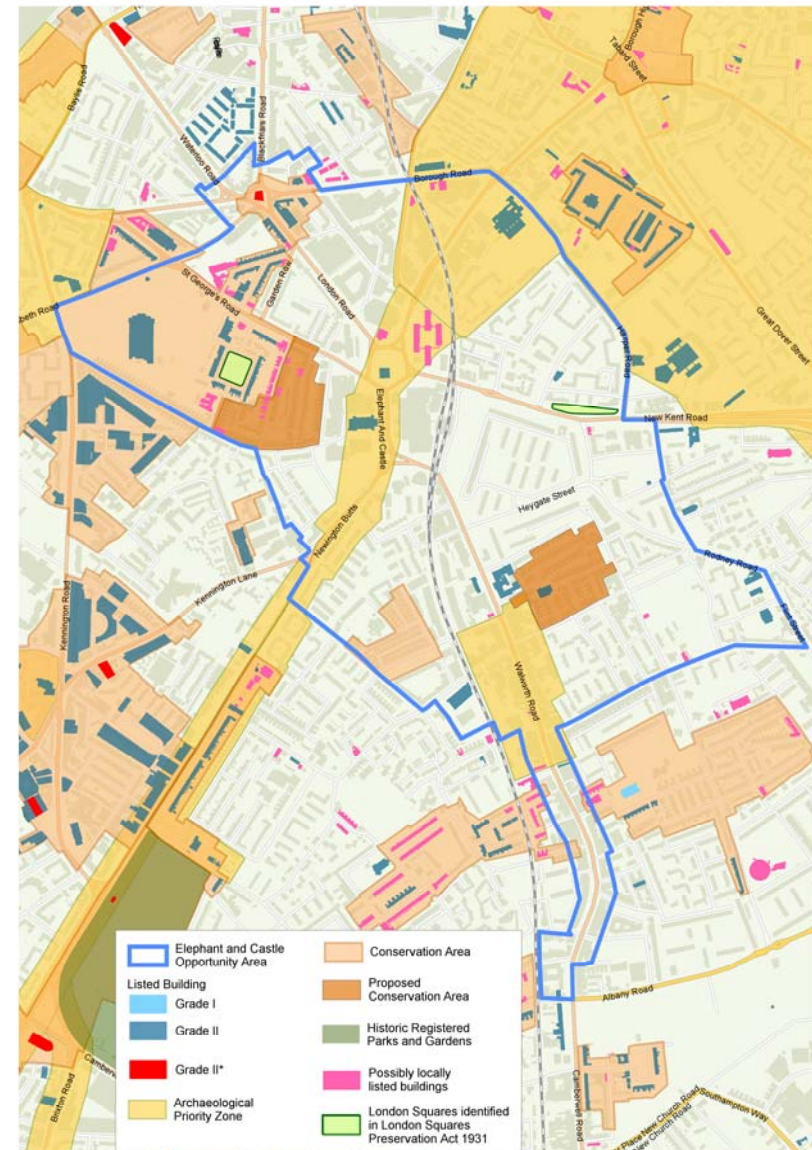
Through our characterisation study we have also identified areas that might have the potential to be designated as conservation areas as well as buildings and structures with the potential to be included on the council's local list.

More information on heritage assets and their settings in the opportunity area and surrounding area is set out in section 4.3.

Figure 12 sets out the heritage assets in the opportunity area and surrounds.

Our understanding of heritage assets and their settings has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 12. Heritage



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4.2.4 Urban grain

Around the central area of the shopping centre and university and commercial buildings around the Enterprise Quarter, buildings tend to be large solid blocks with either large floor plates from ground to higher levels, such as London Southbank University buildings or podium blocks which have larger floor plates at lower levels with taller towers of smaller floor plates above, such as at the shopping centre and Hannibal House and Eileen House. These larger plots provide limited permeability through the area and generally have minimal set backs from the footpath. Where the existing industrial buildings exist around the railways viaducts these tend to be large footprints, sheds or similar large buildings.

Residential blocks vary in size and shape from tall towers such as Draper House, long linear blocks of Heygate Estate, large footprint apartment buildings of new residential development, or small grain of terraced housing. The Heygate Estate covers a large area which is enclosed by large long liner blocks set within large areas of green or hard surface open space. Around the railway viaducts are a number of new residential developments generally long thin buildings which follow the curve of the viaduct, such as the Printworks development. There are several areas of long rows of terraced houses with rear gardens such as around the West Square Conservation Area and also areas of Walworth Road. Estates such as the Rockingham Estate provide large footprint blocks with generous spaces around buildings but limited permeability.

The shops along Walworth Road (south of the Old Town Hall) present a linear shopping parade generally of a very small grain except for some of the larger retail units such as Morrisons supermarket. As a group, the units are tightly packed to form a continuous street frontage for the length of Walworth Road.

Figure 13 shows the urban grain of the opportunity area.

Our understanding of the urban grain has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 13. Urban grain



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4.2.5 Building heights

Generally existing building heights are tallest around the central area focused around the shopping centre and train station and north along Newington Causeway. The tallest is Strata at 147m. Others include Draper House (75m), Metro Central Heights (55m), Hannibal House (54m), London College of Communication (51m), the Salvation Army building (43m), Keyworth 2 (37m), the Heygate Estate (35m) and Perronet House (30m).

Planning consent has been granted for buildings of 87m on 50 New Kent Road and 145m on the former London Park Hotel.

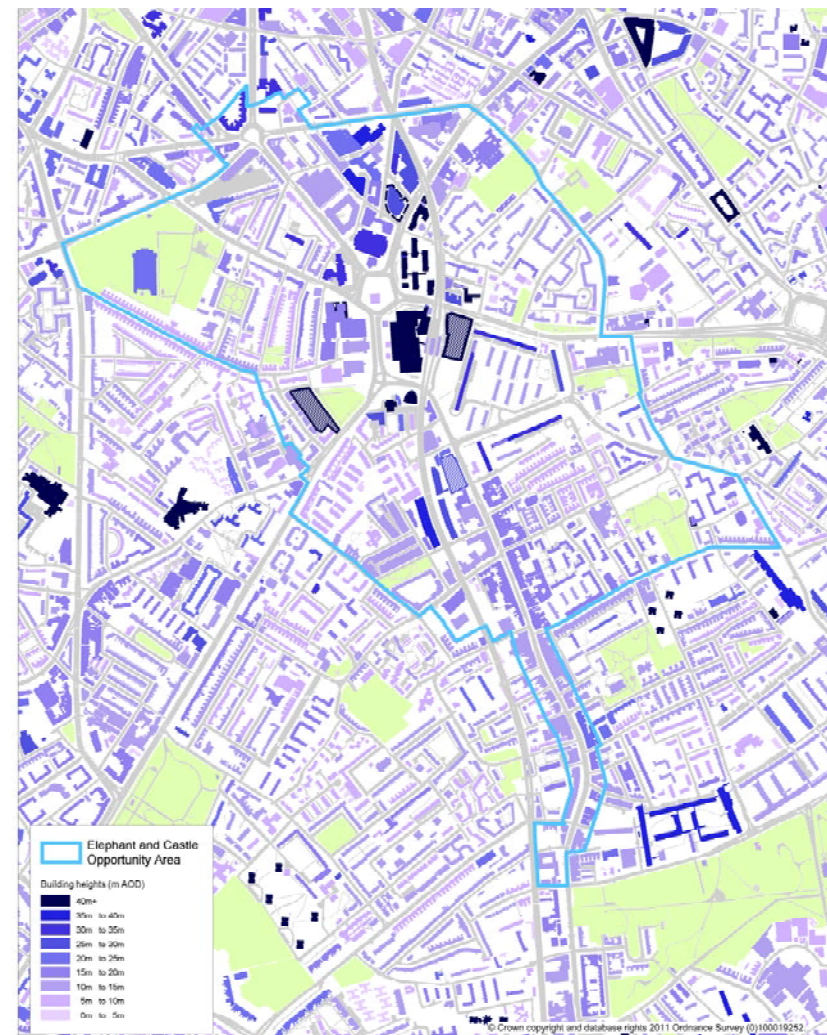
A schedule of existing, consented and recent applications for tall buildings is set out in Appendix 3 of this document.

To the west, south and east of the wider opportunity area, which comprises of low scale residential development, conservation areas or open spaces the heights are generally lower at 3 to 4 storeys, with a few of the housing estate blocks taller at 5 to 8 storeys.

Figure 14 shows the building height context in the opportunity area and surrounding area.

Our understanding of building heights has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 14. Existing and consented building heights



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4.2.6 Landscape and open space

The area has a limited range of open spaces, consisting mainly of small parks. The north west of the area contains the largest park, Geraldine Mary Harmsworth Park (5.6ha) which is the setting of the grade II listed Imperial War Museum. Other parks in the opportunity area include Nursery Row Park, St. Mary's Churchyard, Victory Community Park, Pullens Gardens and Newington Gardens.

A number of the open spaces, parks and gardens are of local historic interest and contribute positively to the character of the area. More information on the historic significance of these spaces is set out in section 4.3.3.

There is currently 6.4ha of designated natural green space (Sites of Importance for Nature Conservation (SINCs)) on two sites: Geraldine Mary Harmsworth Park and Victory Community Park.

Trees are an integral part of the historic townscape in the larger streets, such as on London Road, Borough Road, Blackfriars Road and New Kent Road. There is only one tree preservation order in the opportunity area on the open space at Carter Place off Walworth Road. Mature trees and informal landscaped spaces, such as those located on housing estates like the Heygate estate, are features which contribute to the local character of the area.

Figure 15 shows pictures of open spaces in the opportunity area and figure 16 shows the locations of protected open spaces and SINCs.

Our understanding of the open spaces has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 15. Local open spaces

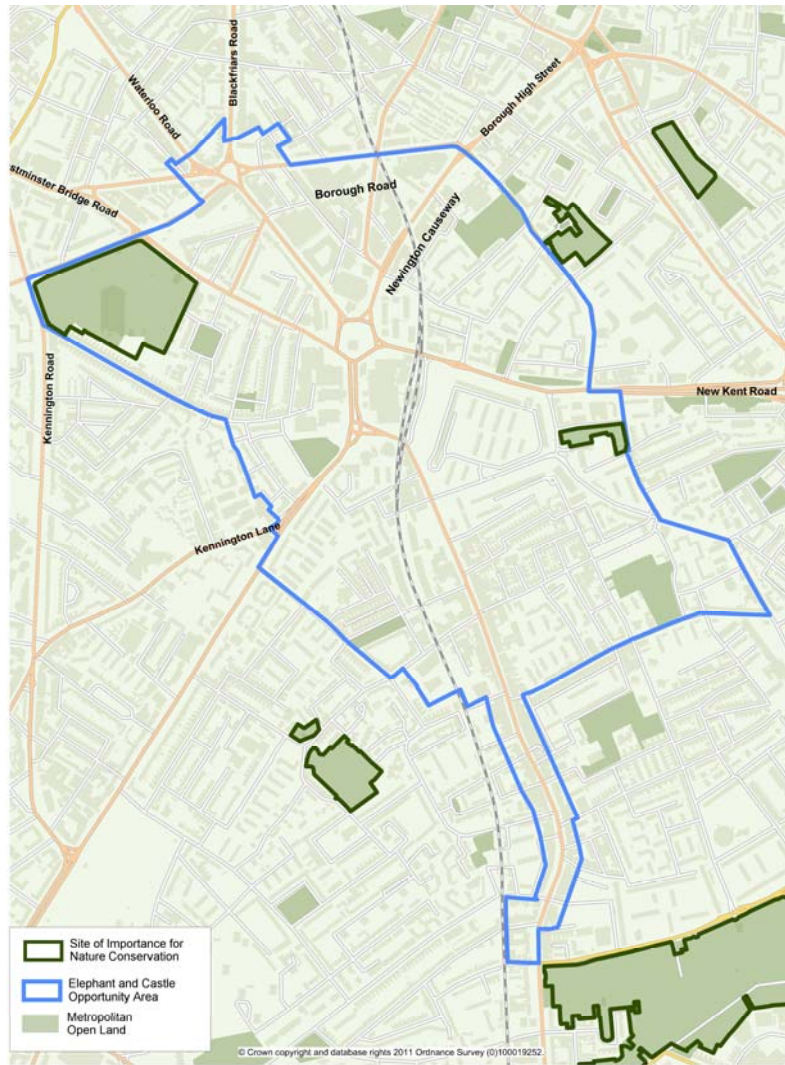


Geraldine Mary Harmsworth Park



Nursery Row Park

Figure 16. Protected open space and SINCs



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4.2.7 Transport and movement

The area includes a complex road junction system, which forms part of the London Inner Ring Road. There are two tube stations located at the Elephant and Castle intersection which serve the Northern and Bakerloo lines.

The shopping centre is connected to the mainline rail station which serves Thameslink and Southeast Train, with connections to central London and regional stations.

Elephant and Castle is a significant bus interchange, with 24 bus services travelling through the area, eight of which terminate there. The bus stops for these services are widely distributed around all of the approach roads to Elephant and Castle. However, the majority of bus services use either the bus stops located between the shopping centre and the London College of Communication, or the bus stops on New Kent Road.

There is intensive pedestrian movement in the town centre focused around the transport interchanges and main shopping centres including the Elephant and Castle train station as well as along Walworth Road, London Road, St. George's Road and Newington Causeway. Secondary pedestrian routes exist around the periphery of the opportunity area to facilitate movement around the predominantly residential character areas.

Significant barriers to movement are caused by the railway viaduct, the heavily trafficked road network within the town centre and the built form from the latter part of the 20th Century which has contributed to a lack of permeability throughout the area. This can be seen around the large housing estate blocks of Newington and Heygate Estates, the Elephant and Castle Shopping Centre and London Southbank University Campus.

Figure 17 shows the public transport network in the opportunity area, figure 18 the Public Transport Accessibility Levels (PTALs) and figure 19 the traffic movement network.

Our understanding of the transport and movement networks has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 17. Public transport network



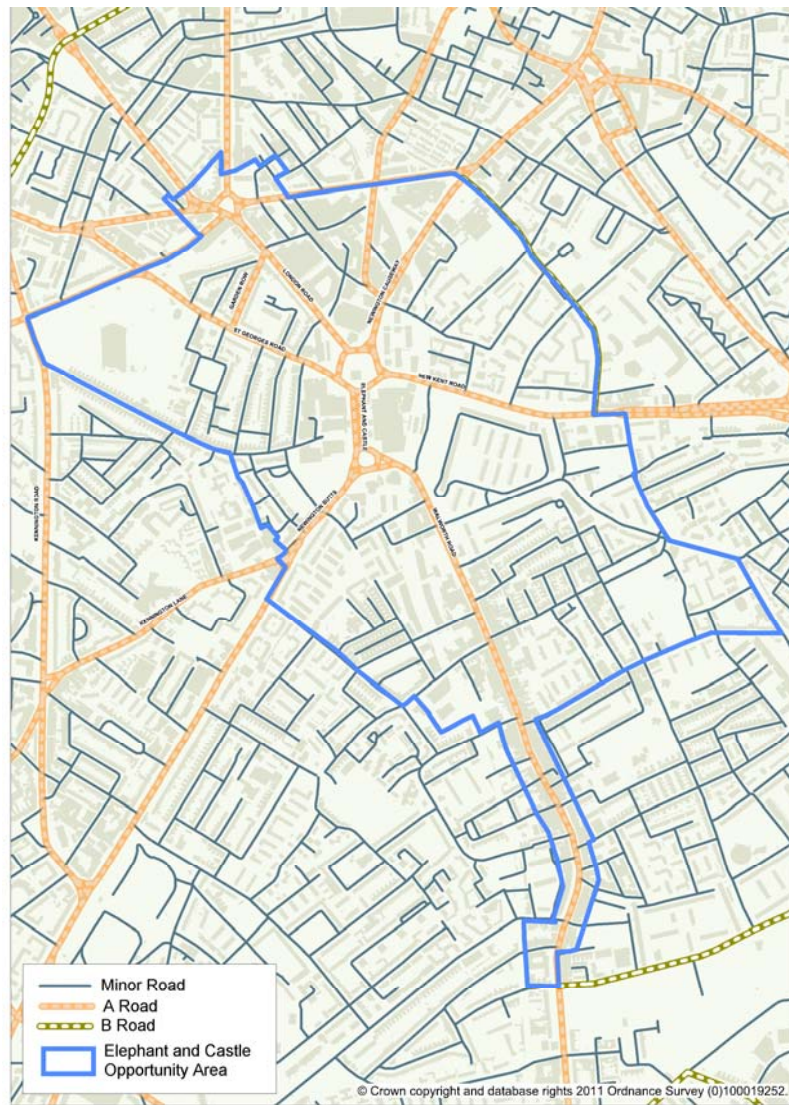
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Figure 18. PTALs



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Figure 19. Traffic movement network



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4.2.8 Opportunity sites

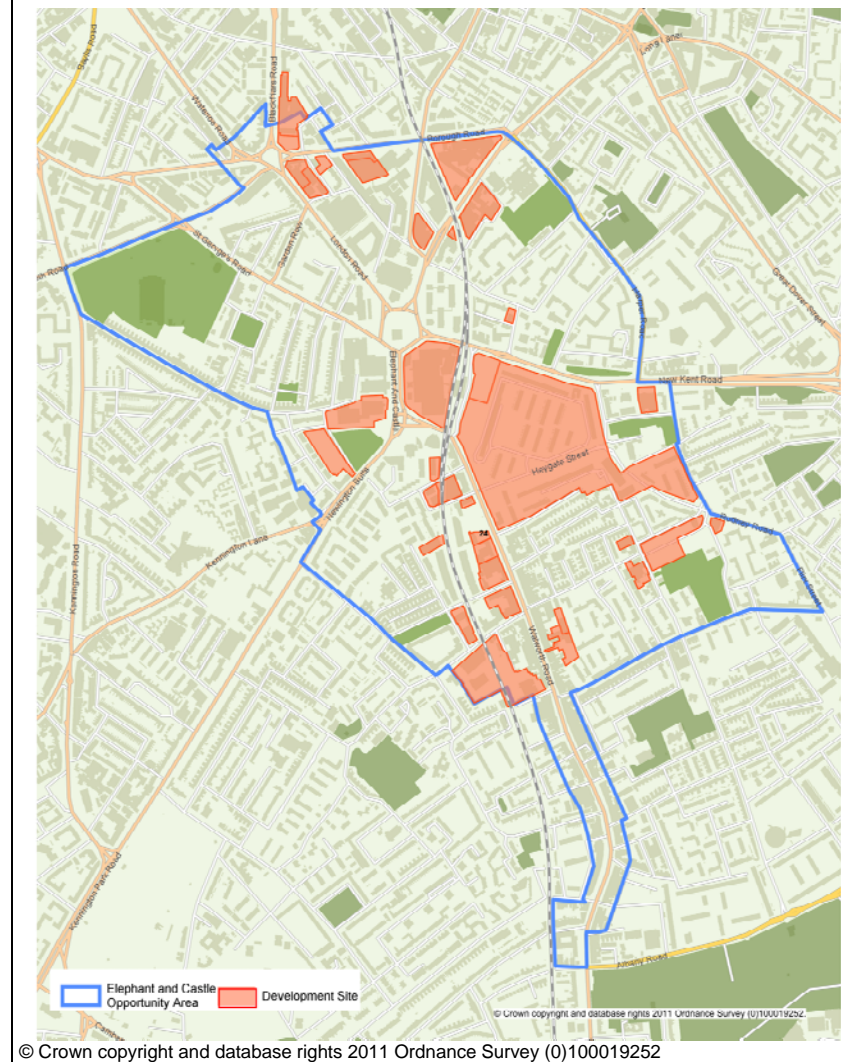
There are a number of opportunity sites which offer opportunities for development across the opportunity area, as shown in figure 20.

These sites have been identified through:

- Proposal sites as identified in Core Strategy
- Housing sites identified through the borough's Development Capacity Assessment (DCA)
- Approved planning applications
- Stakeholder identification
- Character and site analysis

Our identification of opportunity sites has been used to inform the further stages of the building height and tall building analysis in Section 6 of this paper.

Figure 20. Opportunity sites



4.2.9 Views in the local and wider area

Views are important for understanding the character of an area. These views may relate to particular routes or views established through history. They may also be views of a specific focal point, such as a landmark or a space, or may be wider ranging views from high points in the area. In the Elephant and Castle area a number of views have been identified through site visits, the work on the characterisation study and other area based studies.

Some of the views identified include:

1. View of St. Paul's Cathedral from Camberwell Road

There is a view of the dome of St Paul's Cathedral when seen in an axial view from a location further down Camberwell Road. The dome is visible over the roofline of buildings in the background of the view.

2. Views which inform our understanding of local character

There are also a number of other views in the area which enable us to understanding the local character of the area, and can aid orientation and way finding. These views can be from inside the opportunity area or from the wider area.

These include:

- Historic views which are axial or focused views to particular heritage assets or landmarks
- Views along main axis or key approaches into the opportunity area
- Views of or from within the setting heritage assets
- Views of or from within open or public spaces
- Views of buildings of local importance

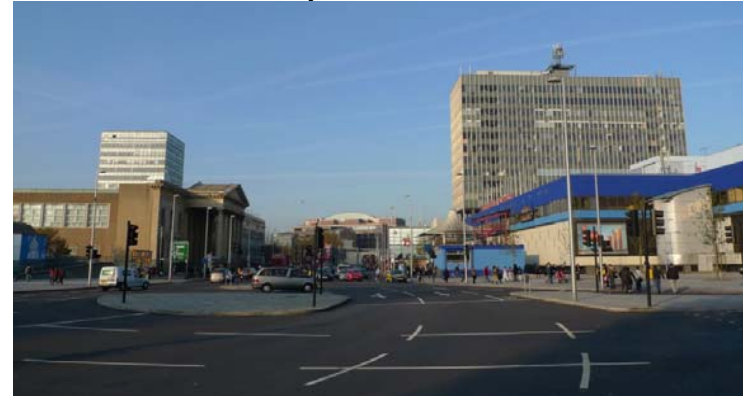
The identification of views has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 21 and 22 show examples of the views identified.

Figure 21. View of St. Paul's Cathedral from Camberwell Road



Figure 22. View of the Elephant and Castle south intersection



4.3 History and heritage

Part 5 of the characterisation study provides an overview of the historic development of the opportunity area and covers a number of areas including:

- Historic development
- Listed buildings
- Locally listed buildings
- Conservation areas
- Archaeology

The following sections have been informed by the characterisation study. In order to ensure that our analysis is robust and considers the potential impact of tall buildings on sensitivities in the wider area, our urban design analysis also includes heritage assets in the opportunity area as well as the wider area.

4.3.1 Setting of heritage assets

All heritage assets have a setting which is defined by National guidance (Planning Policy Statement 5 and English Heritage's guidance on setting of heritage assets) as the surrounds in which an asset is experienced and contribute to its significance.

As such the understanding of the degree and elements that contribute to the significance of an asset is an important part of understanding the character of an area. This includes considering the setting of a heritage asset beyond its visual relationship.

The characterisation study, has assessed the setting and significance of these assets proportionate to the nature of the research undertaken and been informed by a number of sources of information on settings and significance of heritage assets including conservation area appraisals, listed building listing information and assessments of potential locally listed buildings.

Any development proposals will need to consider the potential effect on the significance of a heritage asset and its setting. Where possible proposals should consider how a heritage asset and its setting can be positively utilised as part of the proposal.

Where there is the potential for a development to impact on a heritage asset, an assessment of the significance of the heritage asset affected and the contribution of the setting to that significance should be included with a planning application. The level of detail should be proportional to the importance of the heritage asset and no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset.

4.3.2 World Heritage Sites and their settings

While there are no World Heritage Sites in the opportunity area, though there are two sites which are located in the surrounding area, as shown on figure 23. These are :

- Tower of London
- Palace of Westminster, Westminster Abbey and St Margaret's Church

The Mayor's London Plan, the London View management Framework (LVMF) SPG and Draft London World Heritage Sites SPG set out guidance for the management of development within the setting or buffer zones of the World Heritage Sites. They also identify strategic views of the sites and management guidance for these views. Other guidance establishes the setting and Outstanding Universal Value of the World Heritage Sites, as well as the management of the setting, including:

- Circular 07/2009 - Protection of World Heritage Sites & Guidance Note
- Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS
- World Heritage Impact Assessment: experience from the UK Mayors Draft London World Heritage Site SPG (published for consultation October 2011)
- Tower of London World Heritage Site Management Plan
- Tower of London Local Setting Study
- Westminster World Heritage Site Management Plan

The Tower of London World Heritage Site Management and Local Setting Study identify a number of local views from within the Tower as well as views from around the Tower.

The City of Westminster has prepared its own guidance for important local views of the Palace of Westminster, Westminster

Abbey and St Margaret's Church, through the Metropolitan Views Draft SPD.

New development in the opportunity area, particularly tall building development, may impact on the appreciation of the setting of the World Heritage Sites, the Outstanding Universal Value, integrity and authenticity of the sites.

Our understanding of the setting of the World Heritage Sites has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 23. World Heritage Sites in the wider area



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4.3.3 Strategic views

There are a number of strategic views including panorama, townscape and river prospect views which proposals for tall buildings in the opportunity area will need to consider when assessing potential impacts.

There are two strategic view protected vistas which lie across the opportunity area, as shown in figure 24. These are:

London Panorama Views

1A.2 Alexandra Palace: the viewing terrace

Strategic view 1A.2 from Alexandra Palace sets a threshold height for development across the opportunity area, which ranges from 52.1m Above Ordnance Datum.

Townscape Views

23A.1 Bridge over Serpentine to Westminster

Strategic view 23A.1 from the Serpentine Bridge sets a threshold height for development across the opportunity area, which ranges from 60m to 65m Above Ordnance Datum.

More information on the threshold heights of these views is set out in appendix 3 of this report.

There are also two new townscape views from Parliament Square to Palace of Westminster which were identified in the draft guidance published for consultation in July 2011 and additional information published January 2012.

Draft Townscape Views

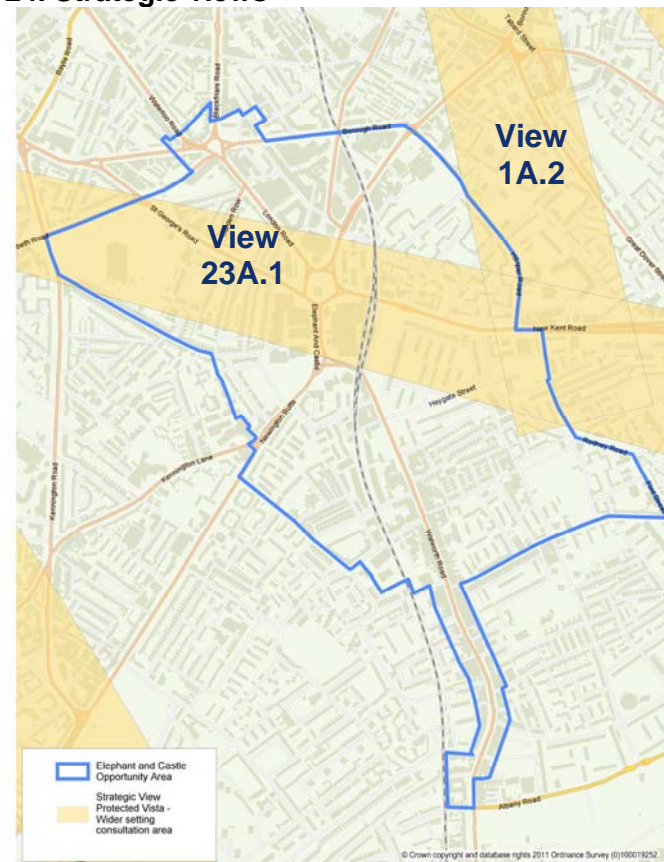
27A.1 Parliament Square south west

27A.2 Parliament Square: North Pavement

These views do not have protected vistas, but 27B identifies a protected silhouette across the Palace of Westminster and tall buildings in the Elephant and Castle area will need to consider the potential impact in this view.

Our understanding of the setting of the strategic views has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 24. Strategic views



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4.3.4 Historic parks and gardens and their settings

There are a number of parks and gardens in the opportunity area which have historic local interest, such as the Old St. Mary's Burial Ground at St. Mary's Churchyard and David Copperfield Gardens.

There are two London Squares of local historic interest in the opportunity area, West Square and David Copperfield Gardens (previously known as County Terrace) which are protected under the London Squares Preservation Act (1931). This act seeks to protect certain squares, gardens and enclosures in Greater London by limiting use of the squares and restricting building in these spaces. These spaces are also identified as protected open spaces with more information set out in section 4.2.6 and figure 16.

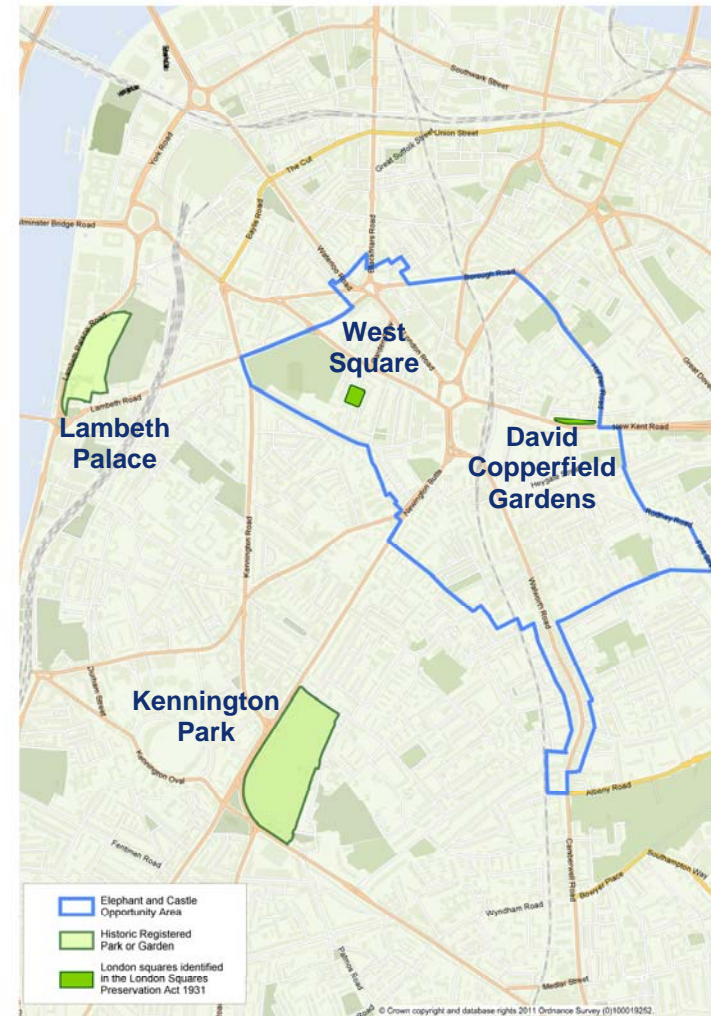
While there are no registered historic parks in the opportunity area there are two located in the wider area, as shown in figure 25. Both are located in Lambeth:

- Grade II* Lambeth Palace
- Grade II Kennington Park

More information on the setting of these parks can be found in their relevant listing information.

Our understanding of the setting of these parks and gardens has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 25. Historic registered parks and gardens in the wider area



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4.3.5 Scheduled ancient monuments and their settings

Within the immediate area of the Elephant and Castle there are no scheduled monuments.

There are some potential archaeological sites within the opportunity area which may preserve remains of schedulable quality. The most significant potential site is that of the Newington Butts Theatre. This is a Shakespearian period theatre, which may predate The Theatre or the Curtain, both in Shoreditch. The most likely location of this site is to the north side of the Walworth Road, west of Elephant Road. The site is likely to be in the area of the railway viaduct or the shopping centre.

Other archaeology which may meet the necessary significance for scheduling may relate to the Roman use of the area or remains of the Civil War defense lines which incorporated a fortification most likely to be located in the area of the north roundabout. These sites, as with the potential remains of the Newington Butts Theatre are estimates of potentially significant archaeological remains based upon information from the Greater London Historic Environment Record.

4.3.6 Archaeology and Archaeological Priority Zones

There are three archaeological priority zones (APZs) are within the opportunity area, shown on figure 26, which are:

- Borough, Bermondsey and Rivers
- Elephant and Castle / Kennington Park Road
- Walworth Village

Part 5 of the characterisation study sets out more information on archaeology in the area and the character of these archaeological priority zones.

Figure 26. Archaeology Priority Zones



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4.3.7 Conservation areas and their settings

The opportunity area contains three existing conservation areas within its boundary:

- St. George's Circus
- Pullens Estate
- West Square

Appraisals have been adopted for St. George's Circus and Pullens Estate Conservation areas which provide detail on the setting and significance of the asset and set out how change in the conservation area and its setting can be managed.

An appraisal for West Square Conservation Area is yet to be completed and will be published for consultation in 2012.

In addition to the conservation area appraisal for St. George's Circus, English Heritage's funded Urban Design Framework for St George's Circus (produced by Urban Practitioners and Alan Baxter and Associates, 2004) and sets out more information on the Circus and considerations for any new development in the conservation area.

The opportunity area has an urban character setting. Areas with an urban character setting are defined in London Plan Policy 3.4 as being areas with predominantly dense development such as terraced houses, mix of uses, medium building footprints, typically buildings of two to four storeys and located within 800 metres walking distance of a district centre or along main arterial routes.

Therefore while the character of these conservation areas is mainly low scale residential dwellings, the setting of the conservation areas is within an urban context.

New development in or adjacent to the setting of a conservation area will need to consider the relationship between the urban

surrounds and the sensitivity of the conservation area and any listed or locally listed buildings in that location.

The character of these conservation areas as established through the relevant conservation area appraisals can be summarised as follows:

St George's Circus

Although much of the early 19th century development around the Circus itself no longer survives, its planned, Georgian origins are still apparent in the terraces in London Road and on the south side of Borough Road, in the layout of the roads around the obelisk, and in the curved façade of the Duke of Clarence public house. The grade II* obelisk provides a focus to the views from the roads leading into the Circus.

Pullens Estate

Characterised by tenement blocks of three bays four-stories fronting onto the main streets as long terraces. The side streets, running to the rears of the main blocks are wide yards with two-storey workshops in ranges backing onto the tenement blocks. The tenement blocks range in length from three to twelve units with elaborately decorative frontages of London stock brick laid in Flemish bond with rendered plinths, nailhead decoration and paired fenestration with painted terracotta heads. The area retains the character of a densely occupied, late Victorian, area of mixed use development. This type of development, combining workshops with housing is unusual at this date due to the many economic changes which had separated productive work from housing and placed it in specialist locations, such as mills or factories, during the 19th century as industry increased in scale.

West Square

Has a predominantly suburban residential character, with larger houses, now divided into flats interspersed through the area in a pattern typical of an early London suburb, with thoroughfares of shops, public houses, schools and business services. A number of

landmark listed buildings are located in the area including grade II Imperial War Museum, formerly the Bethlehem Hospital, and West Square, which is one of the oldest surviving Georgian squares on the south side of London.

Through the work of the characterisation study we have identified the need for protecting the existing character of two additional areas as potential conservation areas, around Larcom Street and Elliott's Row. More information is set out in appendix 4.3.7 and appendix 4 of this paper.

Sunderland Square and Liverpool Grove Conservation Areas within Southwark and Walcot Conservation Area within Lambeth abut the edges of the opportunity area.

Other conservation areas within the immediate vicinity of the opportunity area are:

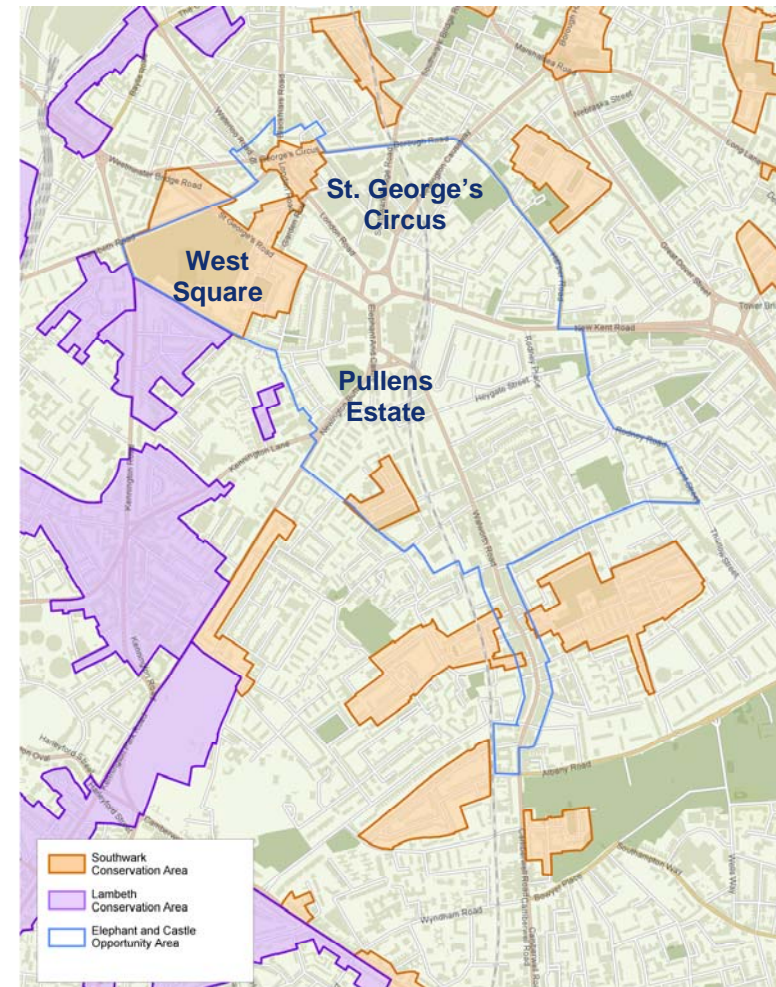
- Kings Bench, Southwark
- Trinity Church, Southwark
- Addington Square, Southwark
- Grosvenor Park, Southwark
- Kennington Park, Southwark
- Renfrew Road, Lambeth
- Kennington, Lambeth
- Walcot, Lambeth
- Lambeth Walk, Lambeth

Where conservation areas are located outside of the opportunity area, we have consulted any published conservation area appraisals in order to understand the setting of these conservation areas.

Our understanding of the setting of these conservation areas has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 27 shows the conservation areas in the opportunity area and surrounds.

Figure 27. Conservation areas in the opportunity area and surrounds



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Proposed conservation areas and their settings

During the process of characterisation, we also considered whether there any other areas outside of the existing conservation areas that have special architectural or historic interest and should be conserved or enhanced by designating them as conservation areas.

There are two such areas that were considered through the characterisation study to determine whether they would suit designation:

- Area around Larcom Street
- Walworth Road

The existing West Square conservation area was considered to determine whether this suited extension further to the east around Elliott's Row with a summary of the information set out below.

The assessment of whether these areas would be suitable for designation is set out in appendix 4 of this paper. The findings of the assessment are that:

- The area around Larcom Street would be suitable for designation status.
- The area around Elliott's Row was considered worthy of designation as a separate conservation area in its own right.
- Walworth Road is not a clear example of an area that would suit designation.

The proposed conservation areas are shown on figure 30.

The definition of special interest / significance of the character of these proposed conservation areas as set out in the relevant conservation area appraisals can be summarised as follows:

Larcom Street

The Larcom Street Conservation Area is notable as a surviving piece of well-enclosed mid to late 19th century urban fabric. Narrow streets fronted by terraced houses are interspersed with buildings associated with St. John's church; a vicarage, school, institute and a pair of symmetrical residential properties enclosing the eastern end of the church. Building heights across the area are generally uniform. The typical terraces are three-storey with canted ground floor bay windows, traditional Victorian detailing and small front gardens.

Figure 28. Photographs of Larcom Street area



Elliott's Row

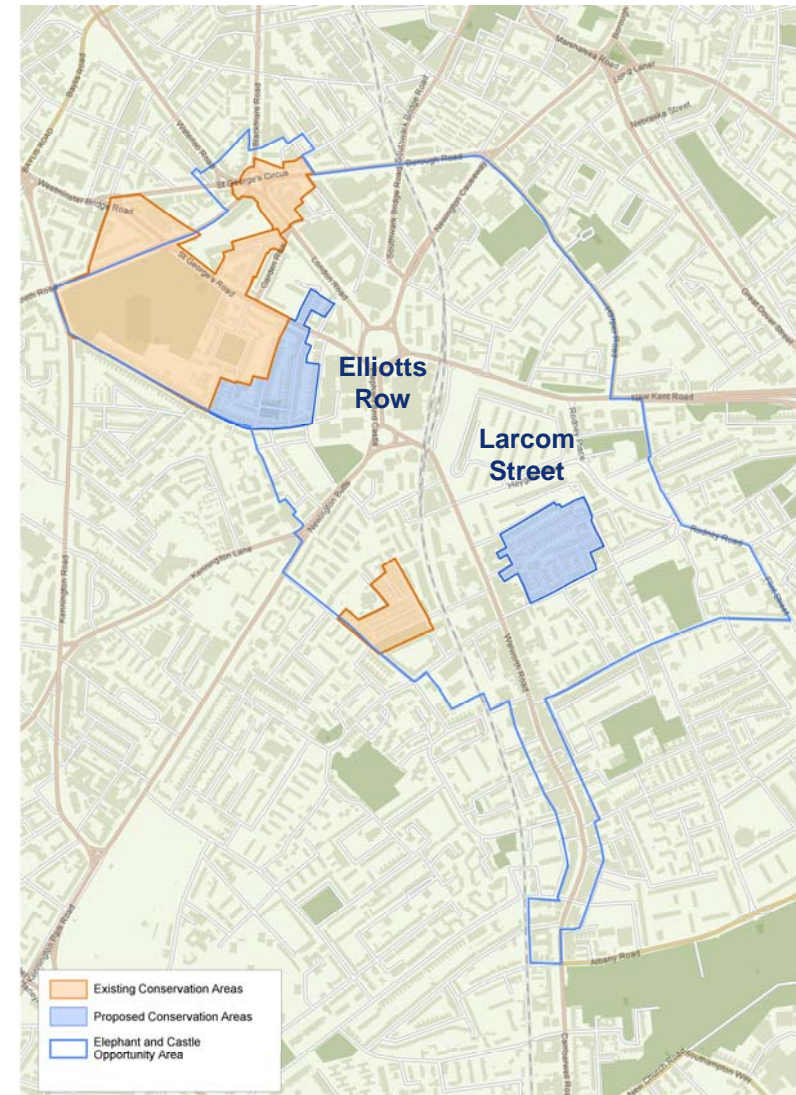
This is a cohesive townscape comprising development from throughout the 19th and early 20th centuries. The historic street layout remains, creating a legible and permeable environment. Well defined streets are a feature with high quality and architecturally interesting frontage development. This is a highly urban environment with little in the way of soft landscaping. The streets are narrow, generally between 5 to 6 metres in width, and well enclosed by housing which generally ranges in height from two to three and a half storeys, with examples of five and six storey tenement blocks.

Figure 29. Photographs of Elliott's Row area



Our understanding of the setting of these proposed conservation areas has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 30. Proposed conservation areas



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4.3.9 Listed buildings and structures and their settings

There are over 150 statutorily listed buildings within the opportunity area. A full list of these buildings is set out in the characterisation study section 6 and the accompanying heritage audit. All buildings are grade II listed with the exception of the Obelisk at St. George's Circus which is grade II* listed.

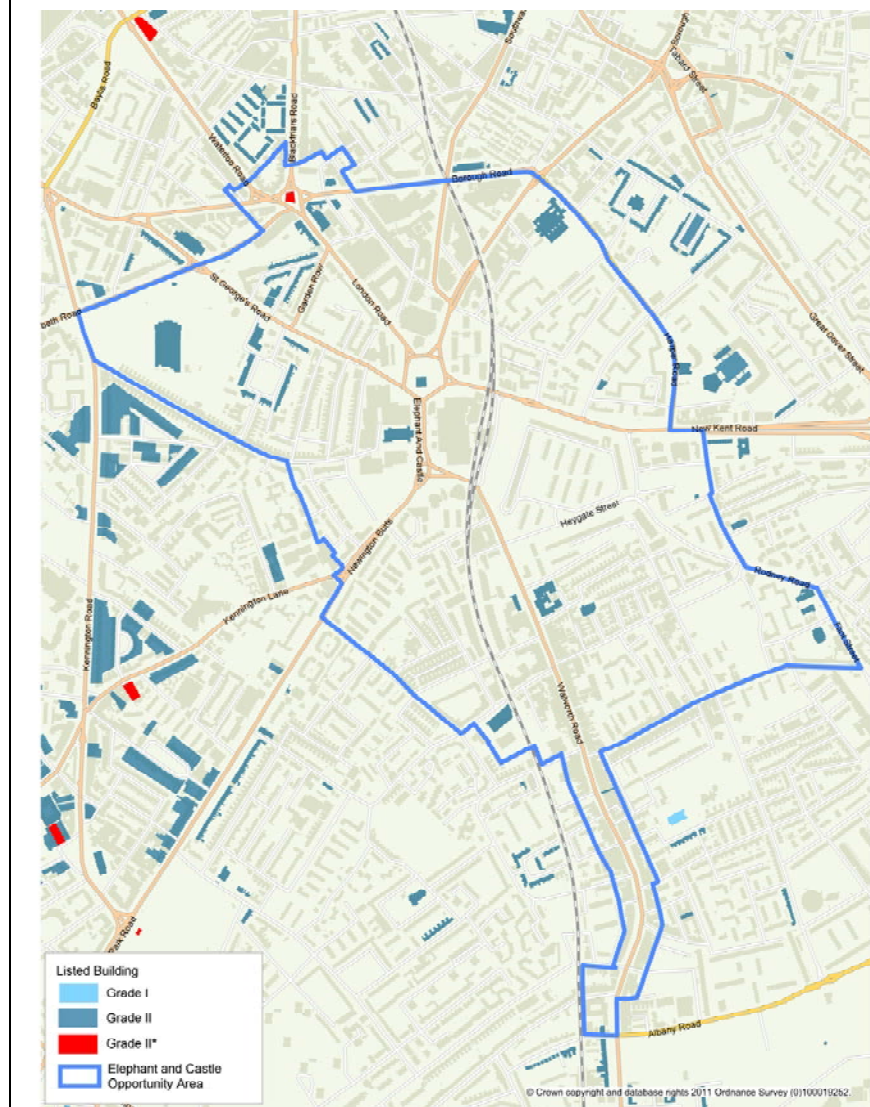
Other landmark grade II listed buildings which have helped define the character of the opportunity area include:

- The Metropolitan Tabernacle, Elephant and Castle
- Michael Faraday Memorial Electricity Sub-Station, Elephant and Castle
- 140-152 Walworth Road (John Smith's House)
- Manor Place Baths and attached walls, piers and railings (now Council Offices)
- St. George the Martyr Library, Borough Road
- The Star and Cross Church, Falmouth Road
- St John's Church, Larcom Street
- Church of the English Martyrs, Rodney Road
- Old Town Hall, now Council Offices, Library, Health Care Centre Walworth Road
- Inner London Sessions Court, Newington Causeway
- Imperial War Museum and gatehouse
- St Jude's Church, St George's Road

There are also a number of listed buildings that lie outside the boundary of, but in close proximity to the opportunity area both within Southwark as well as in neighbouring Lambeth as shown in figure 31.

Our understanding of the setting of listed buildings has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 31. Listed buildings and structures



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4.3.10 Possible locally listed buildings and their settings

Buildings with the potential to be included on the Council's local list have been identified as part of the characterisation study with a full list of these building set out in the characterisation study section 6 and the accompanying heritage audit.

In accordance with PPS 5, which encourages local authorities to identify buildings with local value, we have identified buildings which make a positive contribution to the character or appearance of the area due to their architectural or historic interest, or because they form part of an interesting group.

The broad criteria for inclusion on the 'Local List' for Southwark are as follows:

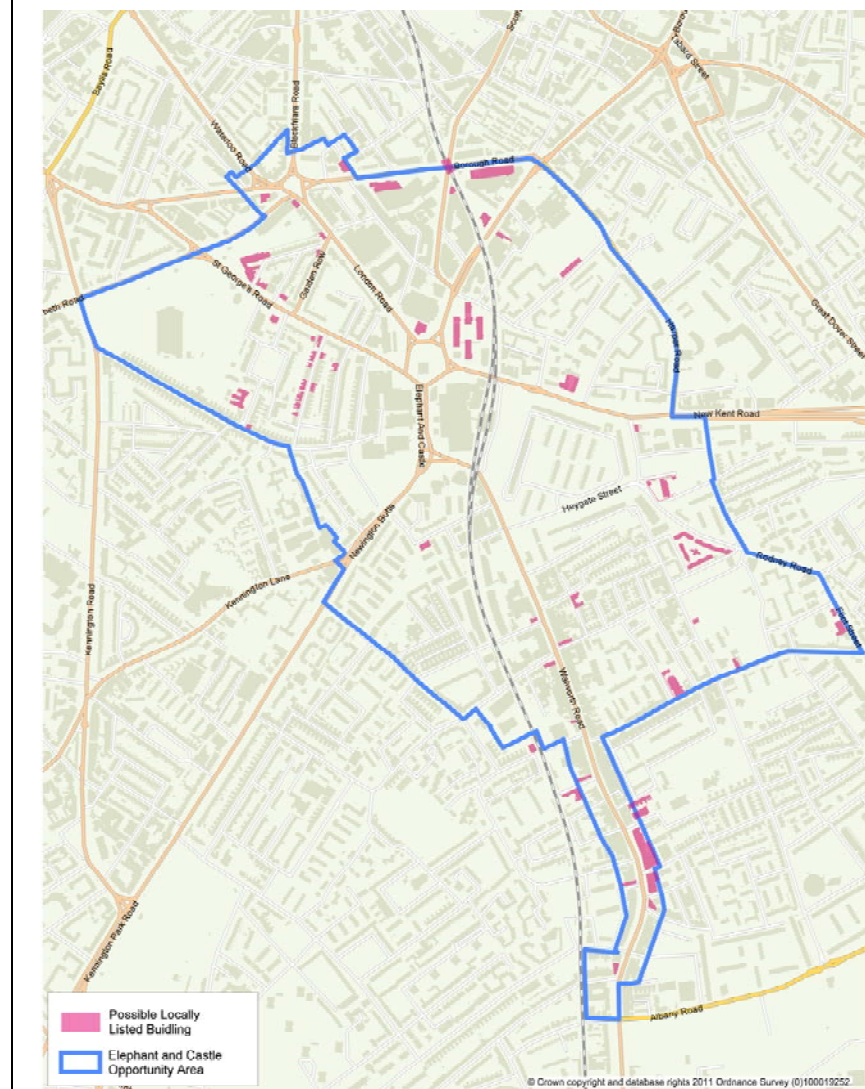
- Age and Rarity
- Aesthetic Value and Landmark Status
- Group Value
- Historic, evidential, communal and social value
- Archaeological interest
- Associations with designed landscapes.

The identified buildings and structures with the potential for local listing are shown in figure 32 and include:

- The Crown & Anchor public house, New Kent Road
- The Tankard public house, Walworth Road/Amelia Street
- Bakerloo Line Depot
- Railway Way Bridge crossing Borough Road
- Peabody Buildings, Content Street
- The Hampton Court Palace public house, Hampton Street
- The Crown Public House, Brandon Street
- The Masons Arms Public House, East Street

Our understanding of the setting of possible locally listed buildings has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 32. Possible locally listed buildings



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4.3.11 Buildings of townscape merit

These are defined as buildings of merit that contribute to the quality of the townscape but might not meet the local listing criteria on an individual basis. They may also include buildings constructed recently that are examples of high quality architecture.

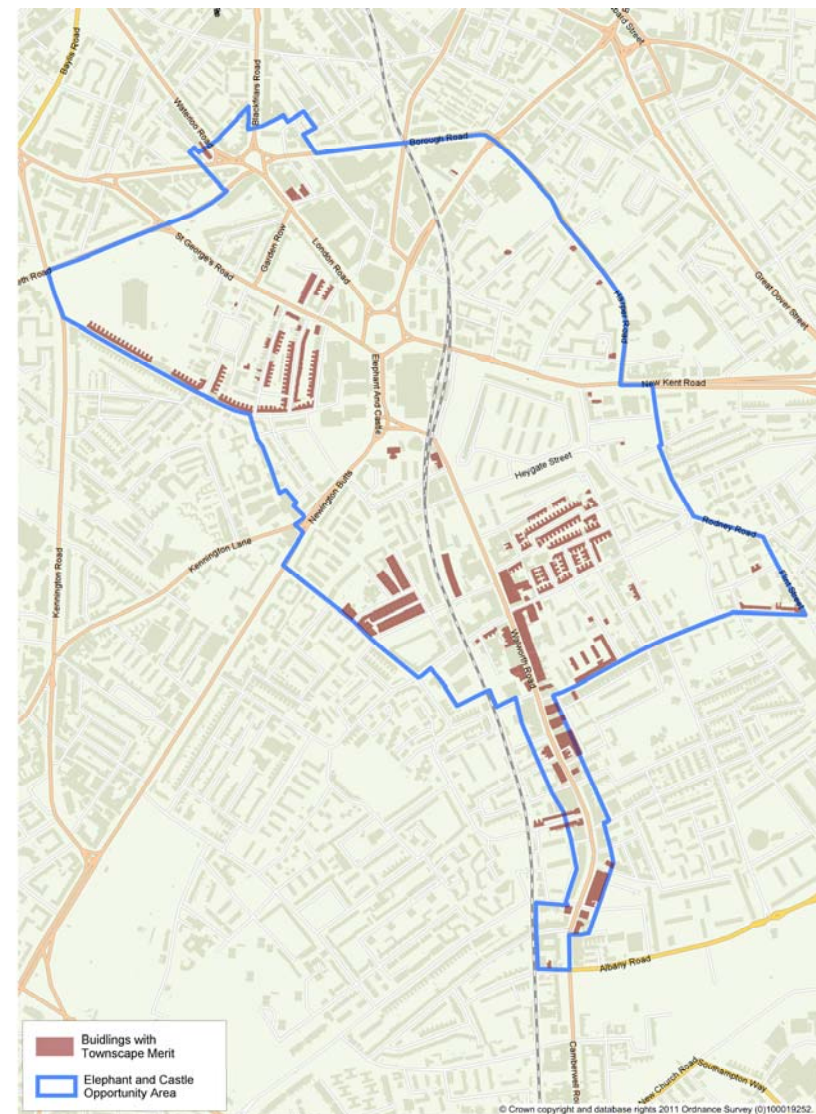
More information on identified buildings of merit can be found in the characterisation study, character area appraisals and heritage audit.

The buildings identified as being buildings of townscape merit are shown on figure 33 and include:

- Draper House, Elephant and Castle
- The Royal Standard Public House, Harper Road
- H10 Hotel, Waterloo Road
- Printworks, Robert Dashwood Way
- O Central, Crampton Street
- The Newington Arms Lodge Public House, King and Queen Street
- Peabody Trust, Piton Place Estate, East Street
- Pullens Estate buildings
- A number of buildings on the Walworth Road

Our understanding of buildings of townscape merit has been used to inform the further stages of the building height and tall building analysis in section 6 of this paper.

Figure 33. Buildings of townscape merit



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5.1 Issues, constraints and opportunities in the built environment

The characterisation study has provided a basis for understanding some of the issues, constraints and opportunities in the built environment and sets out more detailed information for the management of new development in each character area in Part 7 of the characterisation study report. This section looks at a set of criteria to be applied to the future management of the area.

This section looks at the protection of positive aspects of existing character and addressing negative factors as well as other opportunities for development, such as identifying opportunity sites. There is also the potential for existing aspects of character which have a neutral impact or contribution and should also be considered.

A summary of the issues, constraints and opportunities across the opportunity areas is set out below:

5.1.1 Issues and constraints

- Pedestrian movement around the Central area, Heygate Street and Enterprise Quarter areas is hampered by major barriers, such as dominance of vehicular movement, impermeable large blocks of development and the access subways around the northern roundabout. Other areas of pedestrian movement are not clearly defined particularly around some of the larger housing estates.
- Railway viaducts are a visual and movement barrier.
- Poorly fronted streets with minimal active uses, particularly around areas of larger non-residential uses, such as the Central Area, Enterprise Quarter and Rail Corridor.
- Poor access through to the existing railway station at Elephant and Castle.

- Poor public realm and lack of soft landscaping in the public realm.
- A number of heritage assets, buildings and spaces of local importance and their settings, which contribute to the local significance of the area which may be harmed by new development.
- Loss of historic street pattern to large footprint development.
- 1960s and 1970s architecture and urban design which creates a poor streetscape.
- A number of opportunity sites, such as areas of industrial sheds or carpark sites.
- Large areas of housing estates which do not contribute positively to the character of an area through poor design of buildings and public realm.
- Prominent views in the area particularly those of heritage assets or buildings / spaces of local importance, particularly strategic views or views of or from the World Heritage Sites looking towards the opportunity area.

5.1.2 Opportunities

- Vibrant mix of uses throughout the area.
- A number of heritage assets, buildings and spaces of local importance and their settings, which contribute to the local significance of the area the settings of which could be enhanced by new development proposals.
- The gateway opportunities which focus around the central parts of the area, particularly around the hub of the shopping centre, around the future redevelopment of the Heygate Estate and approach under the viaduct through the Enterprise Quarter area.
- The role of the Central area as a major transport hub.
- Character of the historic brick viaducts, with the potential to explore new uses for these spaces.

- Some streets have boulevard feel derived from mature street tree planting.
- Areas, such as conservation areas, where the character is defined by a clear style of architecture, consistent use of materials or historic features where new development should protect and enhance this distinctive character.
- Conservation or enhancement of heritage assets including positively utilising their contribution to the character of a place as part of heritage led-regeneration.
- Some areas where the historic street pattern is still evident.

5.2 Key built form principles to guide new development

Having identified the issues and opportunities in the built environment we have established some key principles for the design of new development, particularly built form and public realm, which will inform the guidance in the SPD.

5.2.1 General principles

- Ensure that heritage assets and their settings, both in the opportunity area as well as beyond, are appropriately conserved or enhanced by new development in the Elephant and Castle. Consider the opportunities to positively utilise the assets and their settings in order to contribute to the character of a place as part of heritage led-regeneration.
- Ensure that we retain or enhance buildings or spaces which are valuable in contributing to the local character and distinctiveness.
- Break down some of the large impermeable blocks to allow for more permeability and clear routes through the area, reintroducing or extending the historic street pattern where appropriate.

- Humanise the scale of development away from large solid walls of development which have little variety in architecture by articulating elevations and allowing gaps and spaces between buildings.
- Encourage new development to consider how they address the street at ground level, either through active uses or treatment of residential frontages, particularly in areas where this is currently not well addressed.
- Improve pedestrian and cycle movement in areas where these are restricted, ill-defined or areas of poor or inhospitable public realm.
- Improve overlooking of open spaces and public realm in areas where safety and security may be seen is an issue.
- Where shopping areas appear cluttered ensure that new retail units consider their appearance in the local context. In particular where shopfronts have existing features that contribute to the character of the area, ensure that these are retained or enhanced.
- Ensure that existing areas of landscaping of value are sustained or enhanced.
- In areas lacking in soft landscaping new development should consider how new public realm can contribute to softening the urban environment.

5.2.2 Area specific considerations

Some of the area specific principles that can guide new development are:

Central area	<ul style="list-style-type: none"> • Consider the impact on the local context such as setting of adjacent conservation areas including West Square and proposed Elliott's Row and also local heritage assets and their settings including Tabernacle and the Faraday Memorial. There should also be consideration on impact on heritage
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	<p>assets and their settings in the wider area.</p> <ul style="list-style-type: none"> Consider the impact on the strategic view from Serpentine Bridge towards Palace of Westminster World Heritage Site. Tall building proposals in this location will need demonstrate that the proposal conserves the Outstanding Universal Value (OUV), integrity and authenticity of the World Heritage site and its setting.
Heygate Street	<p>Much of this site comprises the Heygate development site. Guidance should:</p> <ul style="list-style-type: none"> Ensure that proposed development blocks provide a variety of articulation, materials and building heights and do not comprise walls of development. Provide opportunities for new public urban space and green space that should aim to retain existing landscape of value where possible. Provide new clear routes through the site that are easy to understand and assist in establishing the new character of the area. Consider the impact on the local context such as surrounding scale of low height residential development. Conserve or enhance the setting of proposed Larcom Street conservation areas and any local heritage assets and their settings including Old Town Hall. Ensure that the view of St. Paul's from Camberwell Road is maintained.
Walworth Road	<ul style="list-style-type: none"> Consider the relationship to existing building line, material use, setbacks and building heights. Consideration the character of upper floors of building frontages along Walworth Road

	<p>and their historic and architectural interest.</p> <ul style="list-style-type: none"> Improve the consistency and quality of shop fronts. Conserve or enhance the Liverpool Grove, Sutherland Square and proposed Larcom Street Conservation Areas and any heritage assets and their settings including the Old Town Hall and John Smith House.
Rail Corridor	<ul style="list-style-type: none"> On larger industrial sites by the viaducts, new development should be broken down and humanised and activated at ground level and relate to the surrounding context. Public realm should consider softening and greening the urban environment. Manor Place Baths should be retained and enhanced should the site be developed.
Enterprise Quarter	<ul style="list-style-type: none"> Sustain and enhance the main axial landscaped routes leading to St. George's Circus. Encourage clear routes and enhanced public realm for pedestrians by breaking down some of the larger footprint buildings, and activity at street level. Conserve or enhance the St. George's Circus Conservation Area and any local heritage assets and their settings, with particular consideration of views towards St. George's obelisk. Proposals should consider enhancing the area as a coherent whole, reflecting its historic qualities, and consider the guidance set out in the St. George's Circus Urban Design Framework.
Rockingham	<ul style="list-style-type: none"> Sustain or enhance the existing character of the Rockingham area, in particular the building heights, massing, materials, the treatment of public realm and landscaping.

	<ul style="list-style-type: none"> • Improve pedestrian movement and permeability through the area by providing smaller footprints. • Conserve or enhance any local heritage assets and their settings including grade II listed buildings such as the Presbyterian chapel and David Copperfield Gardens.
Brandon Street	<ul style="list-style-type: none"> • Improve pedestrian movement by breaking down some of the larger footprint buildings, and increasing activity at street level. • Conserve or enhance the proposed Larcom Street Conservation Area and any local heritage assets and their settings including the grade II listed buildings in the area.
Pullens	<ul style="list-style-type: none"> • Conserve or enhance the existing estate buildings and their setting, particularly considering the relationship of new design to the character of the existing buildings and for the enhancement of the open spaces and public realm on the Pullens estate and surrounding area. • Conserve or enhance any local heritage assets and their settings, including Manor Plance baths.
West Square	<ul style="list-style-type: none"> • Conserve or enhance the existing West Square and proposed Elliott's Row Conservation Areas and any local heritage assets and their settings, particularly West Square and surrounding listed buildings, Imperial War museum and gardens, St. Judes Church, Notre Dame School and St. George's Cathedral.

6.1 Evaluation of building heights and tall buildings

The Core Strategy and existing area specific Elephant and Castle policies and guidance have identified that the Elephant and Castle Opportunity Area is suitable for more intense development and tall buildings.

In section 2 and 3 of this paper we have set out that we are producing more detailed analysis to understand where tall buildings could be located in the opportunity area and the sensitivities for tall building development in these locations.

Section 4 of this paper, establishes our understanding of the local character and historic context of the opportunity area and surrounding area, as informed by a characterisation study.

This section of the document sets out the further analysis that will inform our approach to building heights and potential locations for tall buildings which will inform our guidance in the SPD.

6.2 Summary of building height and tall buildings opportunities and constraints

As set out in Section 4, the character area already has an established context for building heights and tall buildings. There are also areas where there are opportunities for change which may inform where tall buildings may be more suitable. There are also policy constraints and other areas where tall buildings are likely to be sensitive.

Sections 6.2.1 to 6.2.7 set out a summary of these considerations and includes analysis of the following:

- Locations with the capacity to support intense development
- Contextual building heights
- Strategic views
- Heritage assets and their settings
- Open spaces
- Public Transport Accessibility Levels (PTALs) and public transport network
- Opportunity sites

6.2.1 Locations with the capacity to support intense development

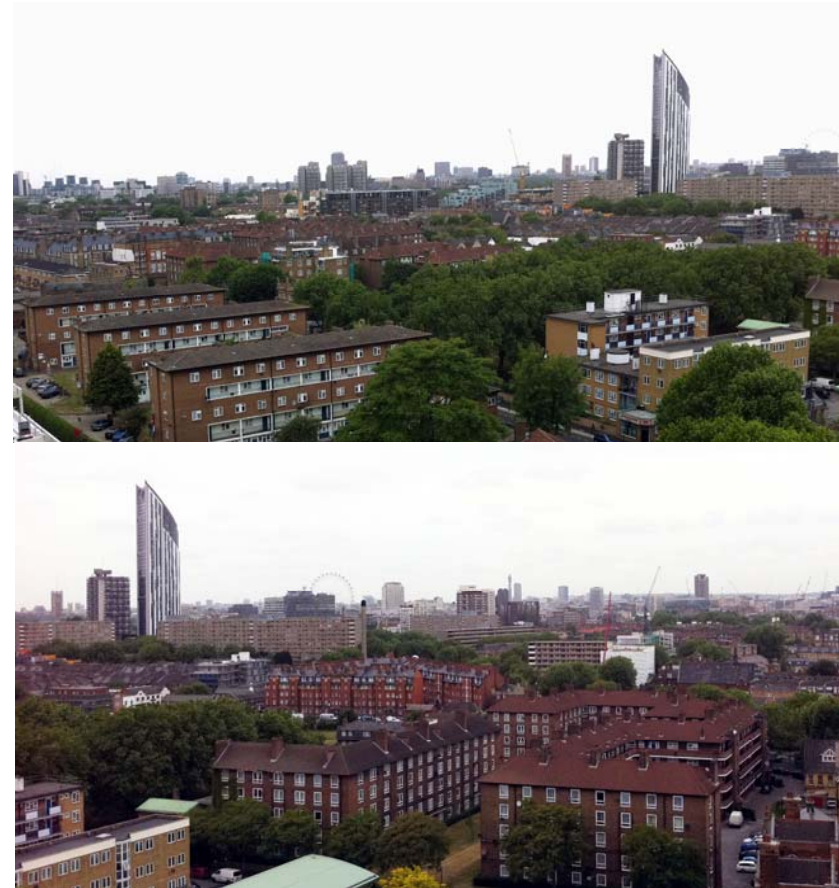
The characterisation establishes that the area around the Central area, Heygate Street and Enterprise Quarter character areas, particularly around the train station and main Elephant and Castle junctions, the Heygate Estate and north end of Walworth Road have the potential for regeneration and more intense forms of development, as seen with the completion of Strata and approval for tall buildings at the former London Park Hotel and 50 New Kent Road.

Therefore these areas provide more potential locations for tall buildings to be appropriate. This is explored further in the following sections.

In the character areas which are generally residential and of a character that is lower scale and smaller grain, taller development would be likely to harm the existing character.

These areas would be in the Rockingham, Brandon Street, Walworth Road, Pullens and West Square character areas.

Figure 34. Overview of the opportunity area when seen from the south east



6.2.2 Contextual building heights

As is set out in section 4.2.5 there are a number of existing tall buildings in the Central area, Heygate Street and Enterprise Quarter character areas. These areas will be able to accommodate additional tall buildings, as demonstrated by the consented schemes on 50 New Kent Road and the former London Park Hotel.

Generally the wider area is of a lower height, ranging from two to six storeys. As the heights in the wider area are relatively consistent new development should be designed with consideration of the existing scale and height of buildings.

Therefore tall buildings would not be appropriate in the rest of the opportunity area.

6.2.3 Strategic views

These threshold heights of the strategic view from the Serpentine Bridge establish a constraint for tall building development in the opportunity area. In particular the view 23A.1 from the Serpentine has created a constraint across the area which has impacted on the tall building strategy proposed in the Elephant and Castle SPG and the Enterprise Quarter SPD.

Therefore new tall building above these threshold heights would be sensitive when they are located in the protected vista of these strategic views.

6.2.4 Heritage assets and their settings

The conservation areas in the Elephant and Castle are generally of consistent character with lower scale terraced housing.

Tall building development in these areas would likely to be out of context with the existing scale and height of development in these areas and would not be appropriate.

Tall buildings would be sensitive when located in views from the setting of a conservation area, a listed or locally listed building, which are located in the opportunity area and also in the surrounding area. The potential impact of these tall buildings can be understood when seen in views from the setting of the heritage assets.

When considering the impact of tall buildings on the setting of heritage assets proposals should also consider that the impact on the significance of the asset may be not only visually but also on other ways that we experience that significance.

6.2.5 Open spaces

The area has a limited number of protected open spaces as set out in section 4.2.6. of this paper, two of which are identified as London Squares and others which have local heritage significance. There are also two Historic Registered parks and gardens in the areas outside of the opportunity area with information set out in section 4.3.3.

These open spaces would be sensitive to tall building development, particularly when tall buildings are visible when seen in views from the open spaces.

6.2.6 Public Transport Accessibility Levels and public transport network

The whole of the opportunity area has a high public Transport Accessibility Level (PTAL). However the main focus for transport is the Central area at the train station and tube stations. The main bus interchange is also located in this location.

It would generally be more appropriate to locate tall buildings close to public transport nodes.

6.2.7 Opportunity sites

There are a number of opportunity sites across the opportunity area as set out in section 4.2.8. The larger sites which would suit more intense development, as well as new public realm opportunities, are located around the Central area, Enterprise Quarter and Heygate Street.

There are a number of large sites around the Walworth Road and Rail Corridor, though due to the context and character of the area, tall buildings would not be appropriate in these locations.

While the sites in the Central area, Enterprise Quarter and Heygate Street area are more suitable for new tall buildings, tall building policies will need to be considered when assessing where these tall buildings may be appropriate. This assessment will also need to then understand how tall buildings located on these sites may impact on the sensitivities in the area.

A number of criteria will inform this assessment, including relationship to existing building heights and proximity of other tall buildings, the relationship to transport hubs and potential impact in the wider area.

Southwark Plan Policy 3.20 sets out criteria regarding the specific location of tall buildings. These include that tall buildings should:

- Be located at point of landmark significance.
- Contributes positively to the skyline as a whole while consolidating a cluster within that skyline or providing key focus within views.

Evidence submitted at a No. 1 and 20 Blackfriars Road Public Inquiry has defined the location of landmark significance as a location “where a number of important routes converge, where there is a concentration of activity and which is or will be the focus of views from several directions.”

Therefore while there are opportunity sites that could accommodate more intense development or taller buildings located around the Central area, Enterprise Quarter and Heygate Street, further analysis needs to be conducted to determine where tall buildings on these sites would be appropriate.

6.3 Locating tall buildings in the opportunity area

The opportunities and constraints set out in Section 6.21 to 6.27 have informed the identification of the character areas where tall buildings could be located, where they would not be appropriate and some of the areas where they would be sensitive:

6.3.1 Tall buildings would not be appropriate in areas where they would be out of context in areas of existing low height development, in areas with limited access to public transport, in conservation areas or areas of open space.

Therefore tall buildings would generally not be appropriate in the following areas:

- Rail Corridor
- Rockingham
- Brandon Street
- Walworth Road
- Pullens
- West Square

6.3.2 Tall buildings could be located in areas where there is an existing context of tall buildings, in areas in close proximity to the main transport hub and sites which have the capacity to accommodate intense development and are a focal point at locations of landmark significance.

Therefore tall buildings could be located in the following character areas:

- Central area
- Enterprise Quarter
- Heygate Street

In these locations there are also likely to be sensitivities which will impact on the potential location and design of tall buildings. These sensitivities are identified in 6.3.3.

6.3.3 Tall buildings would be sensitive in locations where they would impact on the amenity of existing development, open and public spaces, in the setting of heritage assets or when viewed from the setting of a heritage asset.

Therefore tall buildings would be sensitive when located in the following areas:

- Adjacent to lower height development
- Within a Protected Vista of a strategic view
- Setting and views of or from conservation areas
- Setting and views of heritage assets
- Setting and views of open spaces
- Setting and views of buildings of local importance
- Setting and views of spaces of local importance

In order to determine the potential locations where tall buildings could be located on sites in these areas, as well as the heights that would be appropriate further analysis is required. In section 6.4 we outline the testing we have carried out. In preparing planning applications, developers will also need to undertake further testing.

6.4 Identifying strategic building height options

We have identified a number of strategic options for building heights in the opportunity area, including tall buildings. These testing options have been identified through our evaluation of:

- Context for tall building heights
- Relationship to low scale surrounds
- Gateway opportunities into the Central area
- Proximity to the transport hub
- Opportunity sites which have the capacity to support intense development, as well as open space
- Locations which we can test tall buildings against the criteria established in policies and guidance, particularly Southwark Plan Policy 3.20

6.4.1 Context for tall buildings

Core Strategy defines a tall building as being over 30m or of a height that would be taller than the surrounds. Due to the existing tall buildings and consents in the Elephant and Castle Opportunity Area we can identify a range of heights that would establish the tall building context for our analysis.

The context for tall buildings is set out in section 4.2.5 and appendix 3 of this paper, and establishes the following range of building heights in the area:

Height (m AOD)	Context
0 to 30m Low	<ul style="list-style-type: none"> • Low height development • A tall building in this context would be over 30m • Development along Walworth Road and in predominantly residential areas
30m to 65m Medium	<ul style="list-style-type: none"> • Medium height development • Buildings such as the Heygate estate and LSBU buildings in the Enterprise Quarter. • The threshold height of the strategic view 23A.1 sets a constraint over the opportunity area at a height range from 60m to 65m
65 to 90m High	<ul style="list-style-type: none"> • Local tall buildings which are visible from the local area • Buildings such as Draper Estate and the consented scheme at 50 New Kent Road.
90m to 150m Very high	<ul style="list-style-type: none"> • Prominent taller buildings that are visible on the London skyline. • These tall buildings are significantly taller than their surrounds • Strata tower and the consented scheme on the former London Park Hotel site.

6.4.2 Strategic building height options

We have identified the following options which take account of the context for building heights and tall buildings to identify medium and high options. A low option would have minimal impact on the surrounds as the heights would be within or lower than the heights of the existing context. Therefore we have tested the existing option as our baseline for analysis.

Existing	<p>Baseline for testing</p> <ul style="list-style-type: none"> The existing context of existing building heights Heights of consented schemes are considered as they establish how the context for heights will change should the schemes come forward as approved.
Testing Option 1	<p>Medium option (heights tested up to 65m AOD)</p> <ul style="list-style-type: none"> This option tests development at a medium height, stepping down towards lower height surrounds. Heights tested are lower than that of the threshold height of the protected vista of the strategic view from the Serpentine Bridge. Taller buildings are proposed at locations of landmark significance to create new focal points which emphasise the gateway opportunities along major routes into the Central area and step down to lower height surrounds
Testing Option 2	<p>High option 1 - Elephant and Castle SPG tall building strategy option (heights tested up to 120m AOD on the shopping centre site)</p> <ul style="list-style-type: none"> This option tests the building height strategy proposed in the Elephant and Castle SPG and elements of that from the Enterprise Quarter SPD. The SPG establishes that the significantly taller buildings are focused in the core cluster, with 2 tall buildings proposed on the shopping centre site, up

	<p>to 120m AOD in height.</p> <ul style="list-style-type: none"> Heights in this option step down from the core cluster towards the lower height surrounds. Tall buildings on the Heygate development site step down towards the south along Walworth Road from 100m AOD and east along New Kent Road. Heights in the Enterprise Quarter are tested at locations identified in the Enterprise Quarter SPD and stepping down to the north along Newington Causeway, from heights of 80m AOD.
Testing Option 3	<p>High option 2 (heights tested up to 135m AOD)</p> <ul style="list-style-type: none"> This option tests building heights in the core cluster which take into account the potential impact of the tall buildings on the strategic view from Serpentine Bridge. Very high tall buildings are proposed at locations of landmark significance to create new focal points which emphasise the gateway opportunities along major routes into the Central area, Heygate Street and Enterprise Quarter. Tall building heights tested step down towards the south along Walworth Road from 120m and towards the east along New Kent Road from 87.5m, the consented height of 50 New Kent Rd. Heights step down in the Enterprise Quarter towards the north along Newington Causeway from 135m AOD in height. Development in this option is envisaged to provide a transition from taller development down to the lower height surrounds. Heights tested which are in locations around the tallest element of development range from 30m to 60m.

Figures 35 to 37 show indicative diagrams of the approach to the testing options.

Figures 38 and 39 show diagrammatic cross sections indicating the heights of the options tested and a plan of the location of the section. Additional cross sections are shown in appendix 5.

Figure 35. Indicative diagram of testing option 1: Medium option

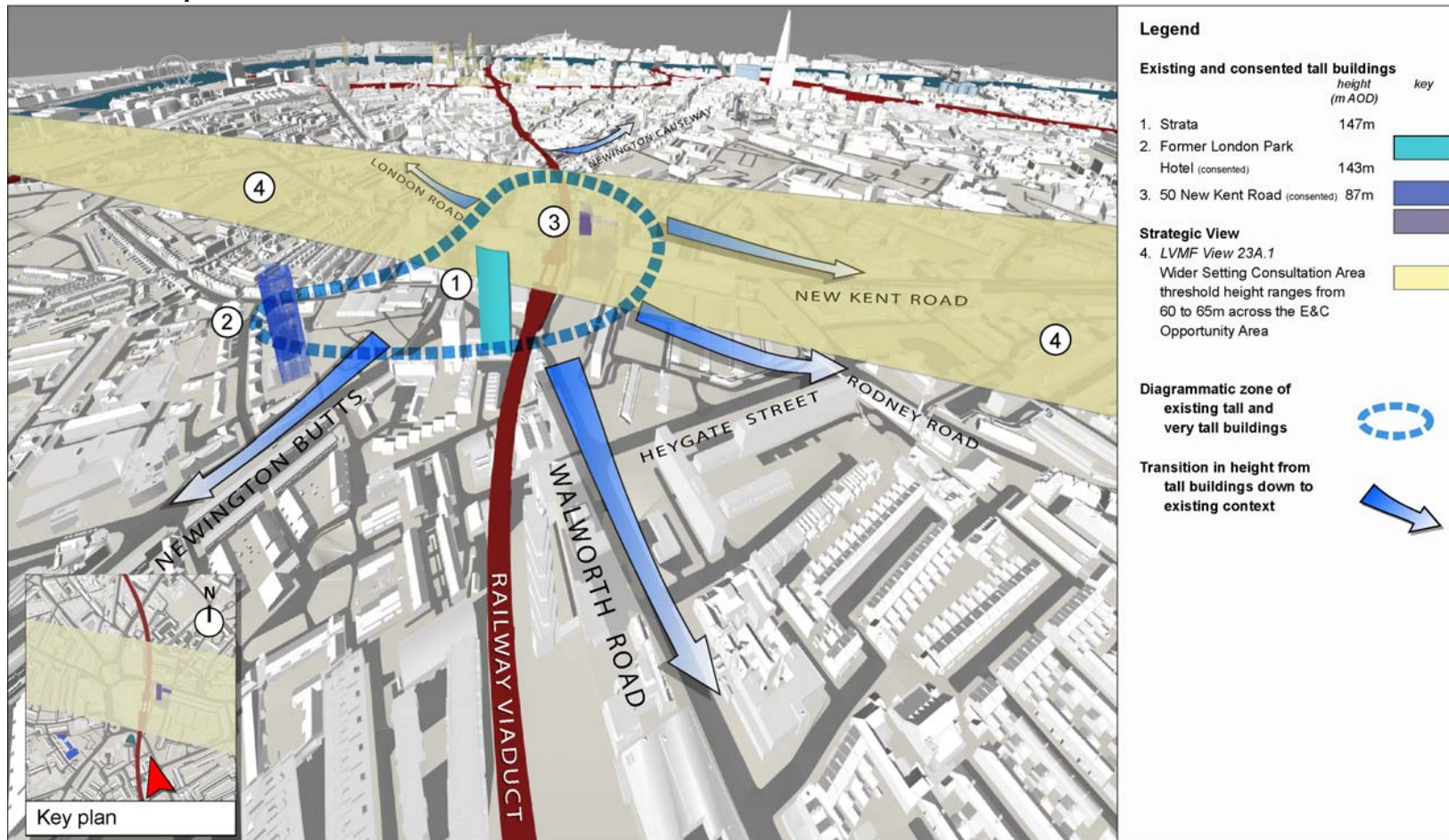


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**Figure 36. Indicative diagram of testing option 2:
High option 1**

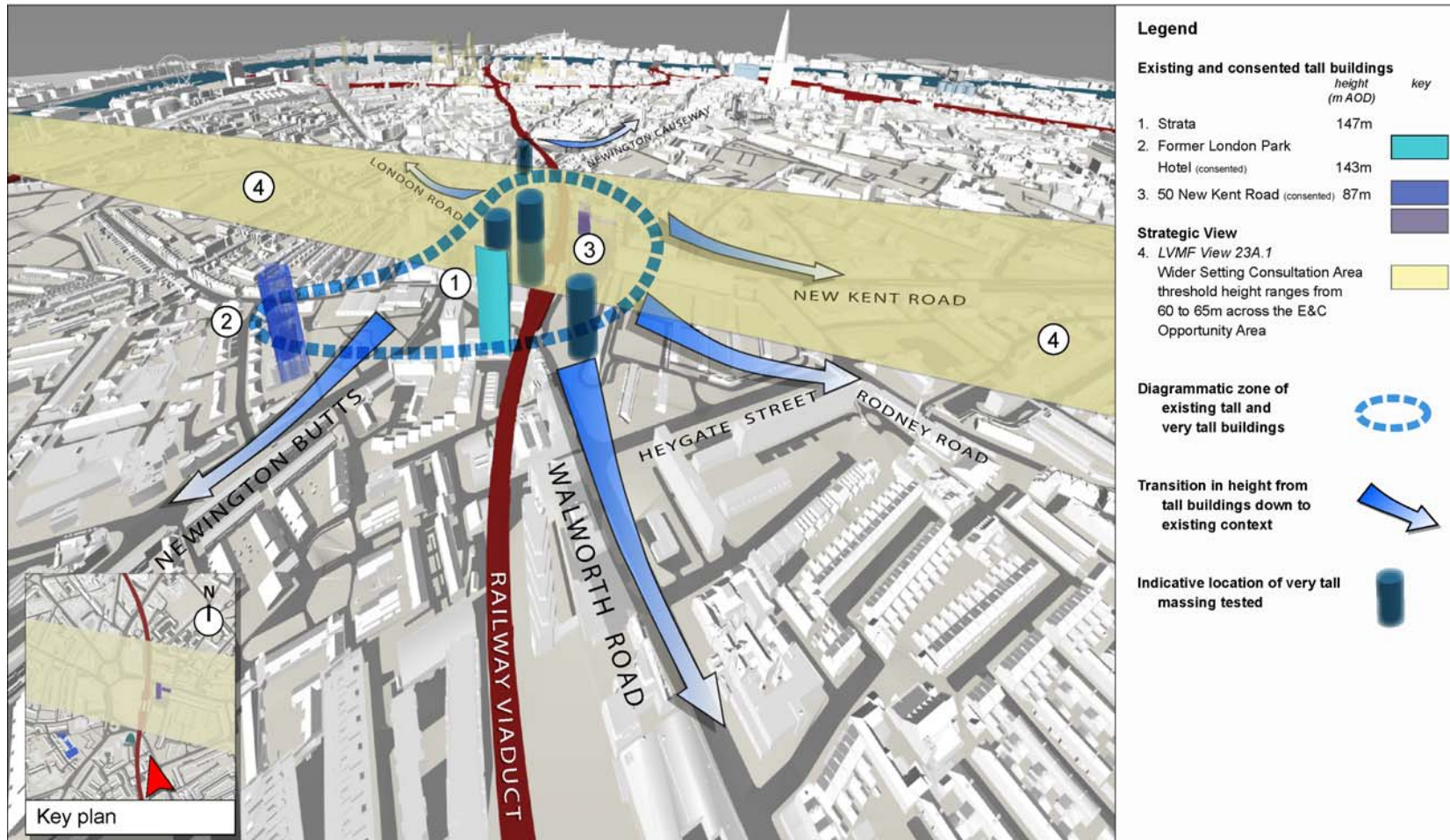


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**Figure 37. Indicative diagram of testing option 3:
High option 2**

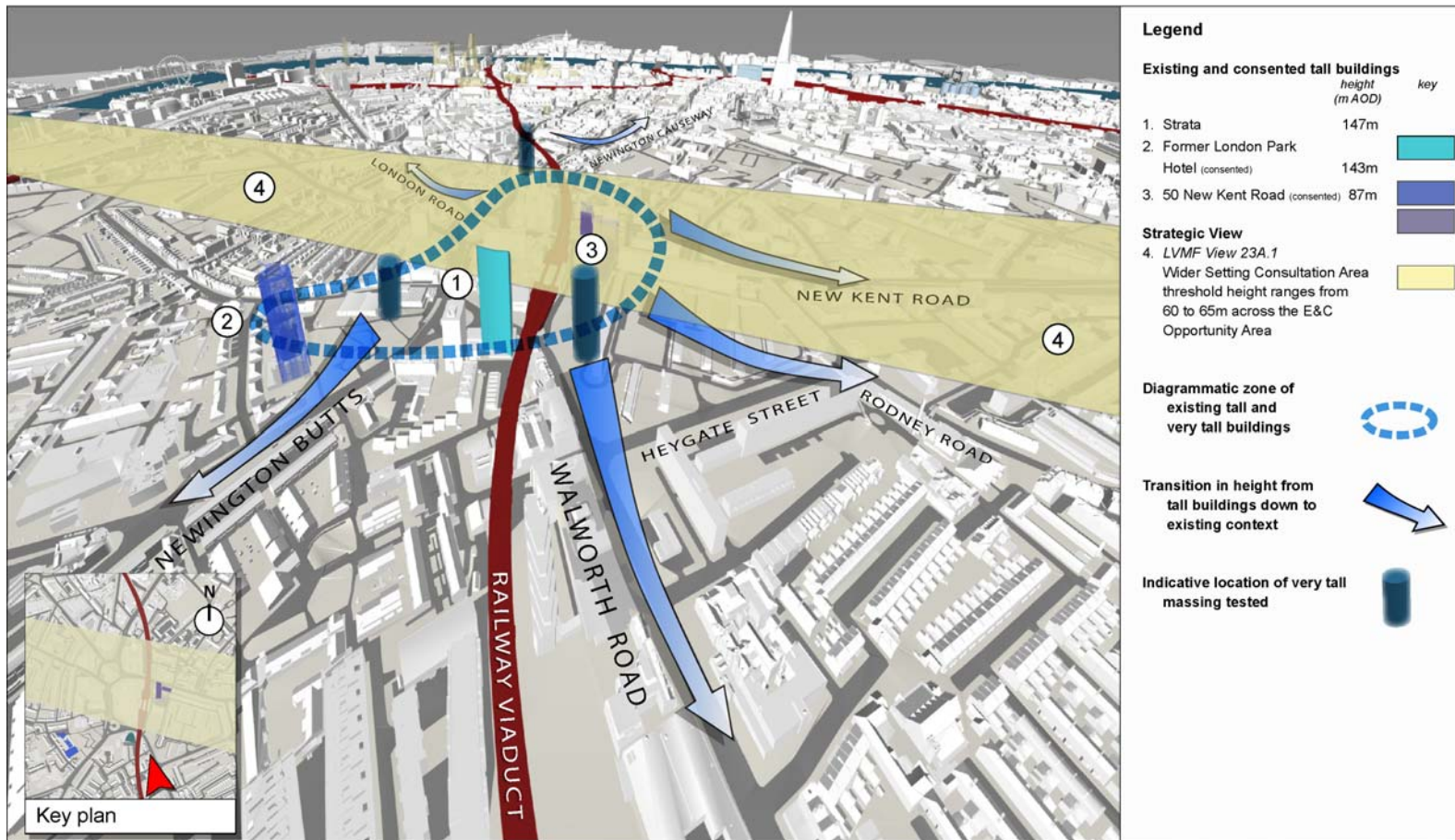
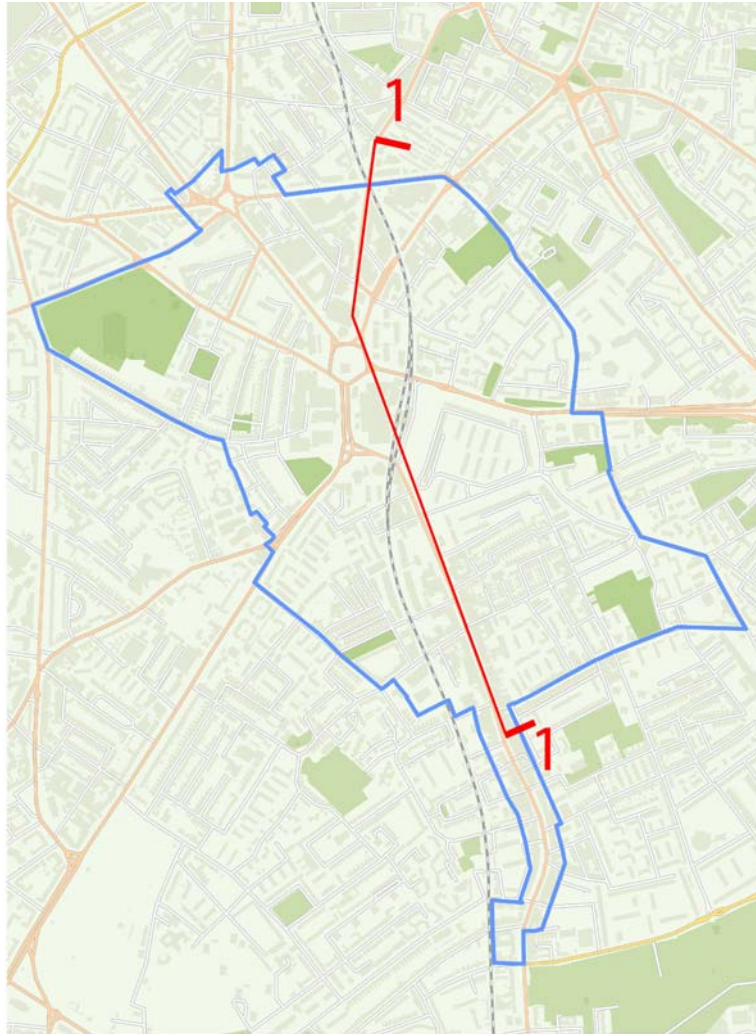


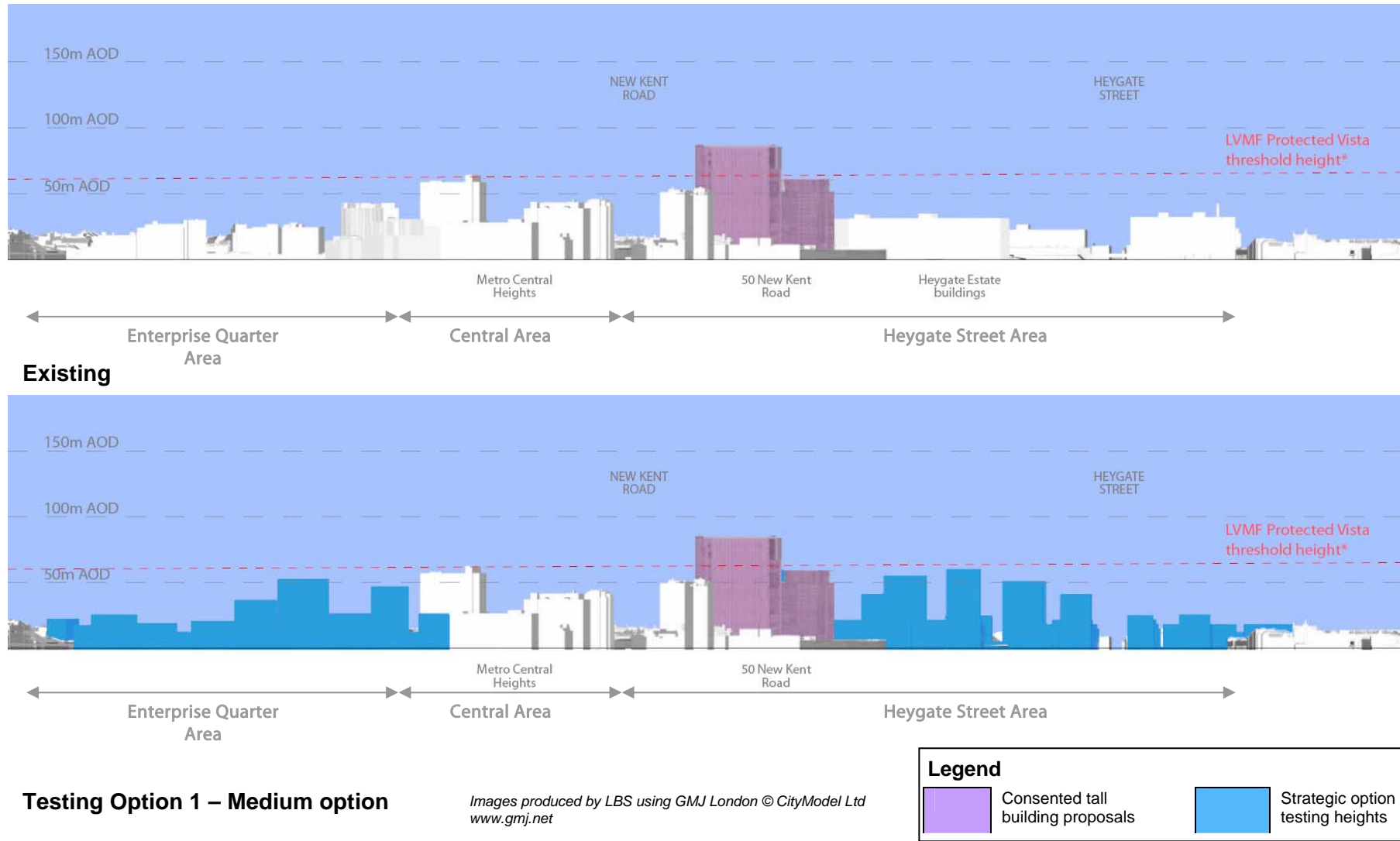
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Figure 38. Plan showing location of Diagrammatic cross section 1



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Figure 39. Tall building strategic testing options - Diagrammatic section 1



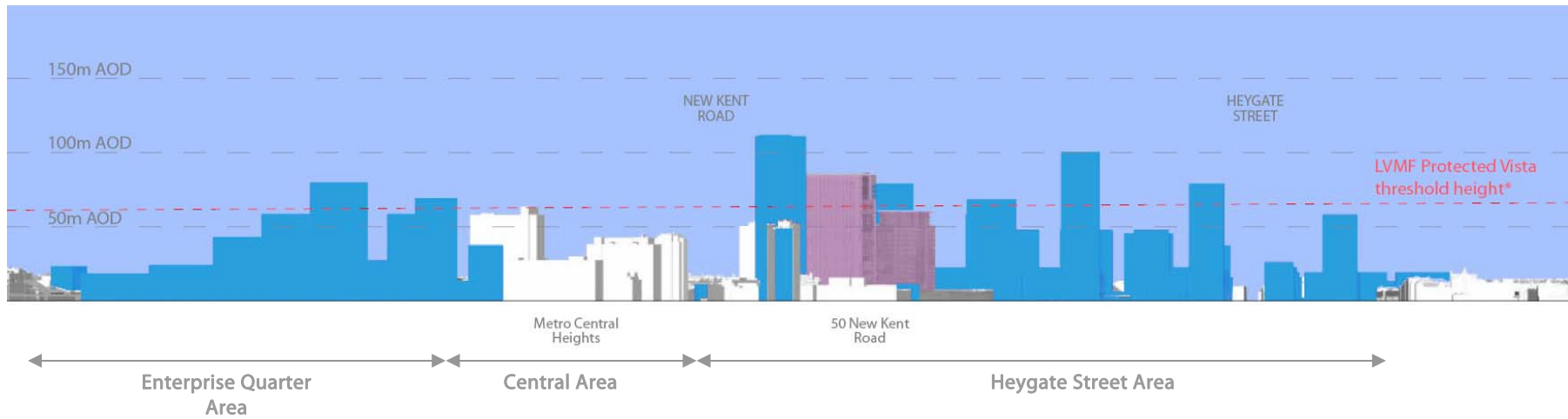
Testing Option 1 – Medium option

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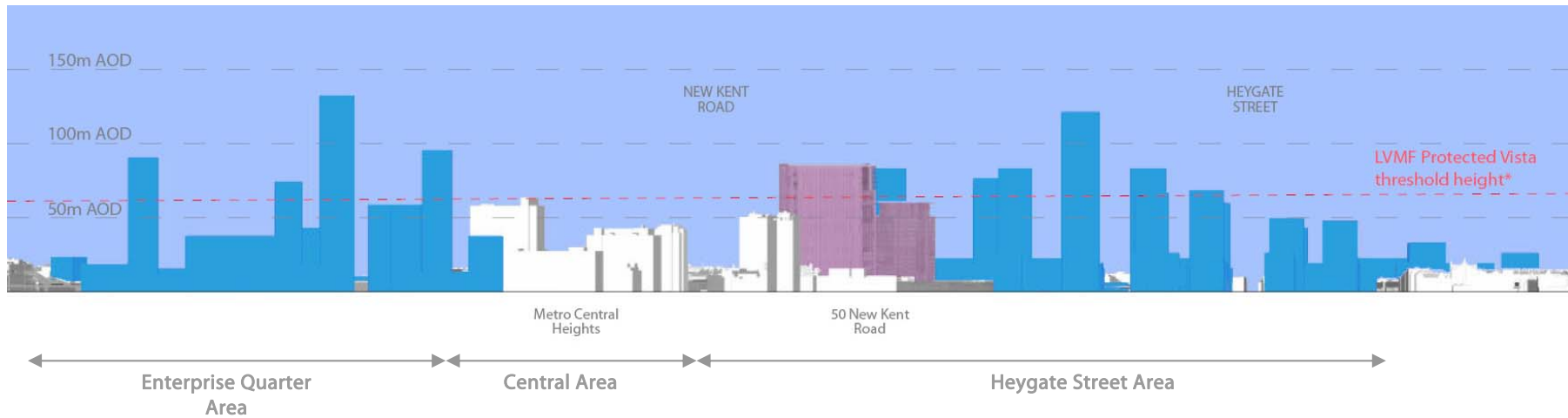
Legend

	Consented tall building proposals		Strategic option testing heights
---------------------------------------------------------------------------------------	-----------------------------------	---------------------------------------------------------------------------------------	----------------------------------

* Protected vista height range shown is indicative only. Buildings shown in section may sit outside of the extent of the protected vista.



Option 2 – High option 1



Option 3 – High option 2

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Legend

- Consented tall building proposals
- Strategic option testing heights

* Protected vista height range shown is indicative only. Buildings shown in section may sit outside of the extent of the protected vista.

6.5 Testing strategic building height options

In order to assess the potential impact of these building height options on the local context and heritage assets, we have tested these options in:

- Diagrammatic cross sections of the opportunity area.
- A range of views from the local and wider area used to test the potential impact of building heights when seen in the views.

Using a three dimensional digital model of the opportunity area and surrounds we have been able to visualise how these options would look in three dimensions. Using this digital model we have assessed the potential impact of tall buildings by analysing and evaluating the options in each of the identified testing views.

We have modeled these options with the following considerations:

- Ensuring larger distances between tall buildings elements over 60m AOD.
- Tall building elements over 60m AOD will have a consistent footprint size.
- Buildings adjacent to each other are modeled at + / - a target height to provide more realistic testing, eg: 57m, 60m and 63m in height.
- Testing massing where tall elements are part of lower height massing as well as testing an approach where the tall element is separated from lower level massing.

6.5.1 Identifying testing views

We have identified a number of views of the local and wider area which will allow us to understand the potential impact of tall building development on local character and historic context.

We are not looking to protect these views through the work of this study. We have used these views to understand the local character and historic context of the area and to assess the impacts on areas that are sensitive to new tall building development.

We have identified views that are commonly experienced by residents and users in the local area, such as main routes into the area and also areas which are sensitive to new development such as the setting of heritage assets including the World Heritage Sites, conservation areas, listed buildings and also historic and protected open spaces. We have also considered views from outside the opportunity area to understand the impact on the surrounding area.

The views that we have identified are:

Strategic Views

As designated through the London Plan with additional guidance for the views set out in the London View Management Supplementary Planning Guidance (LVMF SPG).

Views of or from World Heritage Sites

Views identified in World Heritage Site Management Plans or other borough specific guidance which identifies views, such as the Westminster Metropolitan Views Draft SPD.

Testing views of the local and wider area

Views identified through character area appraisals, conservation area appraisals and other area based studies. These views are informed by studies both in Southwark as well as neighbouring borough studies and policy documents. The identification of views has also been informed by views identified through the planning application process on tall building proposals such as Strata Tower, 50 New Kent Road and former London Park Hotel proposals.

The views identified include:

- Historic axial views in the area
- Views along main axis or key approaches into the opportunity area
- Views of or from conservation areas or their settings
- Views of or from the setting of a listed building
- Views of buildings of local importance
- Views over or from public or open spaces
- Other key views from the wider area where we can test tall building development when seen from a wider context

A full list of views identified is set out in appendix 5.

Figure 40. Example of a testing view from the local area – View from Walworth Road



Figure 41. Example of a testing view from the local area – View of St George's Circus



6.5.2 Views assessment

We have produced an assessment of each of the testing views. This assessment has been informed by English Heritage guidance Seeing The History In The View. We are not seeking to use the identification of views or this assessment to identify important local views for protection. We will use this assessment to understand the potential impact of development when seen in these views in order to inform the production of our building height policies.

We have assessed each of the testing views to understand:

- What is important in the view or why is the view of importance.
- What type of view is it and what is visible in the view.
- What is the management guidance for the view, if relevant, eg: London View Management Framework guidance.
- How have consented schemes changed or likely to change the view.
- What is the potential impact of new development in the view.

Appendix 5 sets out an assessment of the testing views. This assessment has provided detailed analysis for a number of the main views in the area which provide a better understanding of the potential impact for development. Others views which were considered as part of this study are listed for information.

Where possible indicative photographs of the views tested are included in the assessment as well as illustrative representations of the view produced using a three dimensional digital accurate model of the area. An example of this is shown in figure 42. These images of the digital model show existing and consented schemes to assist our understanding of how this view is likely to change once these developments are completed.

The following section 6.4.6 provides more information on this assessment.

Figure 42. Example of view tested – View from the Walworth Road

Indicative photograph of the view



Indicative view (including consented schemes)

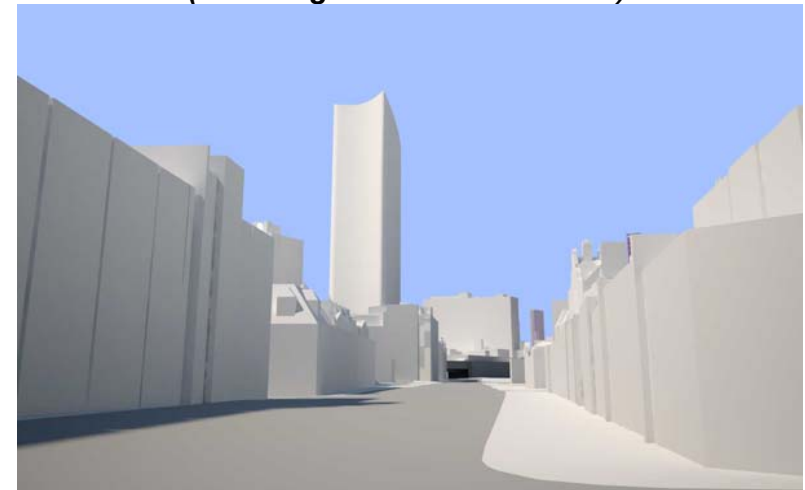


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6.5.3 Testing strategic options in testing views

Having identified our strategic building height options (Section 6.4) we then are able to test each of these options in the testing views.

We have used our three dimensional digital model to see how the proposed options will appear in each of the views.

Informed by the view assessment which has allowed us to understand what is important in a view, we can assess the potential impact of the building heights in each of the testing options when they appear in a view.

As is noted in Section 6.5,2 our assessment of the potential impact of these options has been informed by guidance such as Seeing The History In The View and Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, which set out an approach to determine the significance of heritage assets as well as assessing the magnitude of potential impact.

We have also considered the potential impacts set out in the Environmental Impact Assessment Regulations 2011 though any detailed EIA screening and assessment would be carried as required during a planning application process for development on a particular site.

As the testing views include both general views of the local area, as well as views of a range of heritage assets, our assessment therefore takes into account the differing levels of significance of the important aspects of the view when considering potential impact, whether it be to character and context of an area, the setting of a heritage asset or setting of an open space.

For each of the testing views we tested each of the strategic options to understand the potential impact, whether adverse or beneficial:

- **Individual and cumulative impact** - The impact of the massing of the option as individual elements as well as the cumulative impact of the massing when seen as a group. This impact also needs to be considered in the context of existing massing and tall buildings and consented tall buildings.
- **Negligible or no impact** - Where building heights or tall buildings in the testing option will have no impact or negligible impact when seen in the view, eg: the mass of the development is not visible in the view or a slight change is visible but is hardly affected by development.
- **Minor impact** - Where building heights or tall buildings in the testing option are visible in the view and may noticeably change the context or setting of assets in the view.
- **Moderate impact** - Where building heights or tall buildings in the testing option are visible in the view and may significantly change the context or setting of assets in the view.
- **Major impact** - Where building heights or tall buildings in the testing option are visible in the view and may significantly change the appreciation of the Outstanding Universal Value of a World Heritage Site.

In considering whether the heights tested have either beneficial or adverse impacts when seen in the views we have made the following judgements:

- **Beneficial impact** – The massing tested in the option contributes to the strategic vision for the area and enhances or reinforces existing streetscape and townscape qualities.
- **Adverse impact-** The massing tested in the option detracts or erodes the existing streetscape and townscape qualities, particularly the setting of heritage assets or open spaces

More detail on the assessment of the potential impact of these options is set out in appendix 5.

A summary of the potential impacts is set out in the following section 6.6.

Figure 43 and 44 show examples of the building height options seen in the testing views.

Figure 43. Example of options seen in a testing view

Indicative view (including consented schemes)

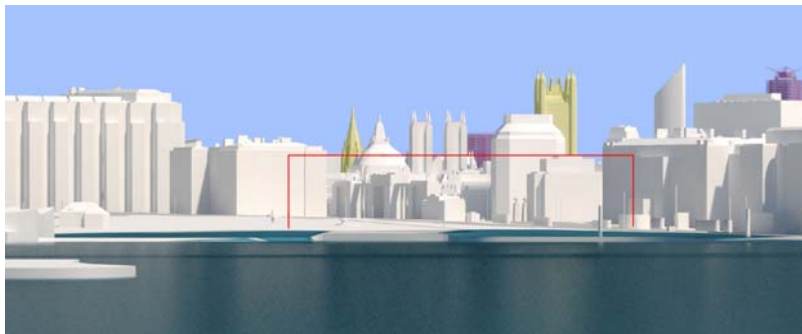


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Indicative view – Option 2

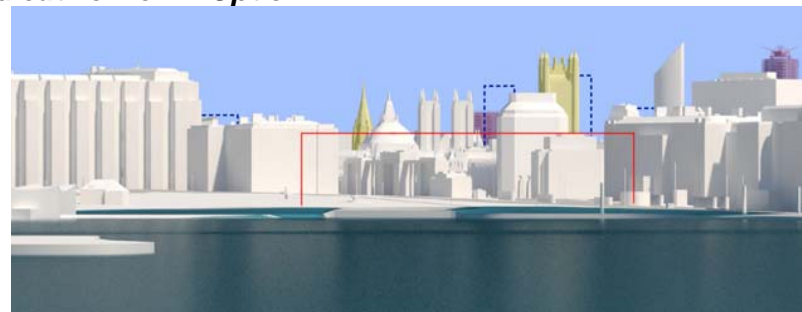


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Figure 44. Example of options seen in a testing view

Indicative view (including consented schemes)

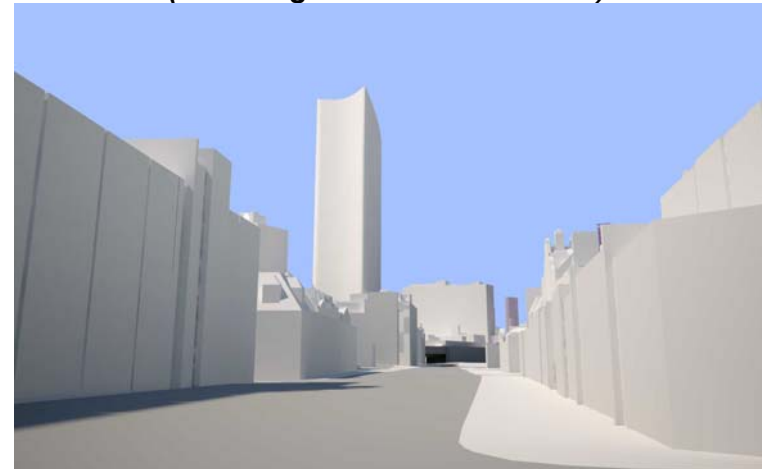


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Indicative view – Option 1

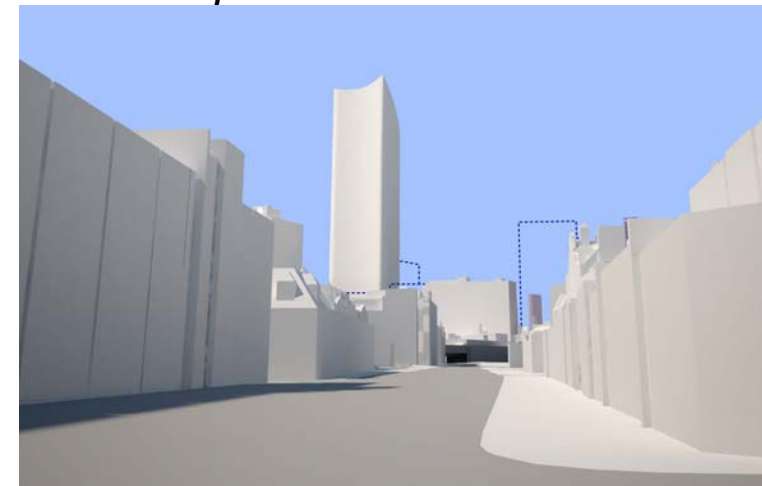


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6.6 Evaluation of strategic building height options

Our analysis of the testing has produced the following results:

Testing Option 1 - Medium option (heights up to 65m AOD)

- Due to the existing heights of development, heights up to 65m will have a negligible impact when seen in local views or views from a wider area, as buildings of these heights are not always visible above the roof line of existing buildings. At these heights proposals will have no impact on the strategic view of the Westminster World Heritage Site or views from the Tower of London World Heritage Site.
- Heights up to 65m are more likely to have a minor or moderate impact when seen in local views from the area immediately surrounding the sites where we have tested the option.

Depending on the location, buildings at these heights can provide beneficial impacts by:

- Providing a relationship between taller buildings in the Central area down to lower height buildings, such as when seen in the context of very tall buildings, Strata tower and the former London Park Hotel proposal.
- Enhancing gateway opportunities into the Central area.
- Creating new focal points in views from the local area or at locations of landmark significance

Development at these heights can also have an adverse impact :

- When located in the immediate setting of heritage assets including the Peabody Estate buildings on Rodney Road and the proposed Elliott's Row Conservation Area by noticeably changing the appreciation of the setting of the asset.
- When located adjacent to lower height surrounds, such as where these heights will appear above the roof line of existing low scale buildings noticeably changing the character or streetscape of an area.

- At this scale the cumulative impact of a number of buildings proposed up to this height will have a moderate impact on the local character and will significantly change the context of existing height and scale of buildings in the area.

Therefore development up to 63m will need to consider :

- Where tall buildings can be located to enhance the character of the area by providing new gateway opportunities or new focal points in the area.
- The relationship to lower height buildings and other tall buildings in the opportunity area.
- The potential impact on the setting of heritage assets in the local area.

Testing Option 2 – High option 1 (heights up to 120m AOD)

- Heights up to 120m on the shopping centre will be visible in views from the local and wider area and the potential impact can range from minor to major, as at these heights proposals will impact on the strategic view of the Westminster World Heritage Site. There will be no impact on the view from the Tower of London World Heritage Site.
- Heights up to 90m in the Heygate Street area and 80m in the Enterprise Quarter area will be visible in views from the local and wider area and the potential impact can range from minor to moderate, and impact on the local character and setting of heritage assets in the local and wider area. At these heights proposals will have negligible impact on the strategic view of the Westminster World Heritage Site.
- Heights up to 80m will be visible in views from the local and wider area and the potential impact can range from minor to moderate. Impacts may occur on the local character and setting of heritage assets in the local and wider area. At these heights proposals will have negligible impact on the strategic view of the Westminster World Heritage Site.

Depending on the location, development up to 120m can provide beneficial impacts by:

- Providing a relationship between taller buildings in the Central area down to lower height surrounds, such as when seen in the context of Strata tower and the former London Park Hotel proposal.
- Enhancing gateway opportunities into the Central area.
- Creating new focal points in views from the local area or at locations of landmark significance.

However as the height of the testing increased the potential impact is also increased, with tall buildings likely to be seen from a wider area. Also there are likely to be cumulative impacts of a number of tall buildings. Some of the adverse impacts of tall buildings at these heights are :

- Heights up to 120m will be visible in the background of the strategic view of the Westminster World Heritage Site and due to their close proximity to Victoria Tower will have a major impact on the viewer's ability to recognise and appreciate the World Heritage Site.
- When visible from the setting of a heritage asset or an open space, when located in both the local and surrounding area, tall building heights will have a moderate impact by significantly changing the appreciation of the setting of the asset or the open space, such as when a large extent of the tall building is visible in a view above the roofline of buildings in view.
- When located in the context of lower height buildings, buildings that are significantly taller than their surrounds, will have a moderate impact by significantly changing the context of heights in the area.
- When seen in views from the local and also wider area, a number of tall buildings will have a moderate impact on the skyline and the definition of the cluster of tall buildings. One or more new very tall buildings will change the nature of the cluster of tall buildings from the existing context (including the

consented schemes) and potentially shift the main focus away from existing tall or landmark buildings.

- A number of tall buildings which are all located in close proximity to each other will have a moderate impact and will significantly change the appreciation of the buildings as individual elements or focal points when visible on the skyline. This loss of visual separation of buildings may also occur in views from the wider area. The design and height of Strata have resulted in the tower becoming a feature and landmark on the London skyline as an individual element. New tall buildings located in close proximity to the tower should consider how they will relate to Strata and also to other consented schemes and existing tall buildings when seen as a cluster.

Therefore development up to 120m will need to consider :

- Where tall buildings can be located to enhance the character of the area by providing new gateway opportunities or new focal points in the area.
- The potential impact on the strategic view of the Westminster World Heritage Site.
- The potential impact on the setting of heritage assets in the local area or surrounds.
- The potential impact on the appreciation of an open space in the local area or surrounds.
- The relationship to lower height surrounds.
- The relationship to other very tall buildings.
- The cumulative impact of a number of very tall buildings visible on the skyline and from the wider area.

Testing Option 3 – High option 2 (heights up to 135m AOD)

Generally the impacts identified above in testing Option 2 and the same general considerations would be applied.

The heights tested in this option were less visible on the skyline when seen in the strategic view from the Serpentine Bridge. Therefore while heights were still visible in the background of the view, there locations outside of the protected vista, has a reduced impact on the appreciation of the World Heritage Site.

6.7 Conclusions of the views assessment

Our testing and evaluation of the strategic building height options has concluded that we should consider guidance that addresses the following:

- **Strategic view from the Serpentine Bridge**
Tall buildings which are located within the protected vista in the background which are taller than the threshold height, are likely to be visible behind the towers of the World Heritage Site. Very tall buildings located in the background of the view will need to consider the potential impact on the setting of the World Heritage Site and on its OUV.
- **Heritage assets and their settings**
There are a number of heritage assets located within and surrounding the opportunity area. In some of these locations there is the potential that new buildings and particularly tall buildings may become visible when seen from the setting of these assets. Proposals will also need to consider the potential impacts on other aspects of setting which contribute to the significance of the asset, beyond the visual impacts. Particular consideration should be given to heritage assets in the immediate context of a proposed tall or very tall building. As very tall buildings are likely to be visible from a distance and can be prominent on the skyline, there is potential for these buildings to impact on the setting of heritage assets both in the local and wider areas. Therefore any assessment of impact on heritage assets should consider assets in the wider area outside of the setting of the heritage assets as well as those in the immediate context.
- **Impact on local amenity**
All new development must consider its potential impact on the amenity of surrounding development and public spaces. Where tall buildings are proposed, the potential impact on amenity can be increased and may be experienced more widely in the surrounding area. The design of proposals should consider any adverse impacts on the surrounding area. This would include consideration of impacts on any other buildings proposed within a single development.
- **Existing tall buildings and the cluster of tall buildings**
Strata is currently a main focal point at the Elephant and Castle. Other very tall buildings are prominent on the skyline and establish the context for tall buildings, including the consented schemes such as the proposal on the former London Park Hotel site. Any new tall buildings proposed in close proximity to another tall building will need to consider their relationship in the cluster, particularly when seen in views from the local area. When viewed as a group these buildings will need to consider their potential impact on the London skyline and how they are read as a group, particularly when viewed from a distance.
- **Gateway opportunities and focal points**
There are gateway opportunities along the main routes that lead into the Central area and main transport hub, particularly Walworth Road, Newington Butts New Kent Road and Newington Causeway. New very tall buildings will assist in creating focal points at locations of landmark significance and enhance the gateway opportunities. As very tall buildings can become focal points in the local area and on the London skyline their design and quality of building must be well considered and of the highest quality, collectively and as well as individual elements in the cluster.

- **Landmark buildings**

Very tall buildings are designed to be seen as individual elements within a cluster and on the skyline and likely to be visible over the roofline of existing buildings are therefore will be prominent on the skyline, with more height and mass visible. Therefore designs of very tall buildings will need to consider how these buildings are. Care must be taken to ensure that where there are a number of very tall buildings that these maintain their status as unique elements and that the silhouettes are not obscured by a new cluster of tall buildings. As the mass and bulk of these buildings is likely to be prominent on the skyline, consideration should be given to the design of visible elements of the buildings, ways to reduce the bulk on the skyline and also to articulate the top of the building so that it becomes a feature.

- **Large buildings**

Large development which maintains a consistent height and continuous frontage can be perceived as a solid wall of development particularly when viewed close to a development or when seen along tight urban street where buildings are less likely to be set back from the edge of pavement. The built form guidance set out in section 5 of this report sets out principles that should be considered when approaching design within this specific context.

- **Existing context and heights**

Where there are opportunities for taller development, the design of tall buildings must consider the relationship to the surrounding context, particularly the relationship to existing heights. Proposals should ensure that there is a well considered relationship between taller buildings and lower height surrounds. Where medium height development is proposed, proposals would need to consider how variety in height and massing of design can reduce the potential for massing to appear as a wall of development, particularly when viewed from street level.

6.8 Equalities Impact Assessment (EqIA)

When preparing our analysis to inform the policies and guidance in the SPD, the findings of the EqIA exercise were considered. The EQIA looked at both the impacts of consultation on the SPD and impacts associated with the implementation of the SPD. As we have been preparing the guidance for the SPD, we have considered the following issues to ensure we minimise the impact on groups with protected characteristics:

- If the public realm and the environmental quality of the area remain poorly designed, certain groups may continue to feel threatened walking through the area such as members of certain faith groups, members of the BME community, young people, older people and women.
- The needs of certain groups may not be properly considered which may mean that they are unable to use the services and facilities in and around the area. For instance, older people may not be provided with basic facilities such as accessible and safe places to meet, public toilets and street furniture, such as benches, which provide a respite when using the town centre.
- The built environment and the public realm may continue to ignore the needs of disabled people which results in creating barriers to inclusion in the wider community and opportunities to decent housing, jobs and access to leisure and community facilities. In contrast, the needs of disabled people may be considered but results in the public realm being designed in a way that segregates and separates disabled people from the wider community.
- The protection of areas for heritage and conservation purposes may limit development which may limit the opportunities for creating new jobs and housing for those that are seeking employment or better quality housing.
- High quality design standards in the area may result in higher costs for SME businesses e.g. by having to provide

high quality shop fronts, which may threaten the viability of these businesses.

- Different groups may have different priorities for how buildings and the public realm is designed to meet their needs. Tensions could arise if there is the perception that one groups needs are being prioritised over others e.g. older people and young people.

6.9 Sustainability Appraisal (SA)

We have also considered the findings of the sustainability appraisal when preparing guidance to inform the SPD. The appraisal found that the majority of the policies in the SPD will have a positive impact. For every policy, the positive impacts outweighed the negative impacts when assessed across the whole range of sustainability objectives. In some cases the policies have no significant impact on the sustainable objective.

- Policy 15 - Public Realm, scored the highest number of major positive impacts. This policy aims to create an attractive environment by linking spaces together and creating a defined town centre area. An improved environment will help attract more inward investment to the area as well as providing an improved landscape and townscape.
- Policy 16 - Built Form scored several positive impacts and also some uncertain impacts against the sustainability objectives. In particular, the policy scored positively with the sustainability objectives
- SDO6 - To mitigate and adapt to the impacts of climate change
- SDO7 - To improve the air quality in Southwark
- SDO8 - To minimise the (impact of) ambient noise environment

- SDO9 - To reduce waste and maximise use of waste arising as a resource SDO 12 To protect and enhance the quality of landscape and townscape,
- SDO 13 To conserve and enhance the historic environment and cultural assets and
- SDO 14: To protect & improve open spaces, green corridors & biodiversity. The uncertain scores were largely due to mitigation being required and/ or the impact being dependant on the detailed design of developments, which will not be known until the pre-application stage.

Policy 17 - Building Heights, scored a mixture of either having no significant impact, having uncertain impacts and having positive impacts against the range of sustainability objectives. The uncertain impacts were in connection with the sustainability objectives.

The appraisal concluded that development would need to ensure design measures were implemented to ensure any impacts were mitigated accordingly. The overall impact was therefore uncertain, and further assessment would need to be undertaken at the design stages of any new scheme.

The policy scored major positive impacts against SDO13 - To conserve and enhance the historic environment and cultural assets and SDO 16 - To provide everyone with the opportunity to live in a decent home.

6.10 Building height and tall building guidance

From the assessment of building heights and tall buildings there is a need for guidance which will ensure that while there is the capacity for new tall and very tall building development, that this change needs to be carefully managed to ensure that the benefits of tall buildings are not outweighed by the potential adverse impacts of such development.

Therefore there is a need for clear principles that establish the sensitivities in the area that should be addressed when considering a proposal for a tall building. In the character area sections of the SPD, there is the opportunity to provide more specific detail about particular assets that are likely to be sensitive to tall buildings, as determined through the views assessment work in this study.

In understanding the context for tall buildings we have identified potential opportunities for enhancing gateway opportunities into the Central area by creating new focal points at these locations. In turn this has helped establish principles for where tall buildings would be appropriate, in line with our vision for the area.

To ensure flexibility in the guidance our preferred approach would be to not specify a range of heights, profile of the skyline or identify specific locations for landmark tall buildings as was previously established in the Elephant and Castle frameworks. Our preferred approach to guidance is to establish clear guidelines for assessing the potential impact of tall buildings and set out additional detailed design guidance to ensure that proposals will provide a response specific to the local character and historic context of the opportunity area. The detailed analysis produced through the characterisation study and this urban design study paper have ensured that we have based these principles on both analysis and testing to ensure that they are robust and accurate requirements.

It is important that sufficient information is provided with planning applications to enable us to assess compliance with Southwark Plan policy 3.20 and any proposed building height guidance. While detailed planning applications for tall buildings are preferred, as a minimum the information set out in the proposed building height guidance should be supplied. As part of the application, the submission of a three dimensional computer model of the proposal would aid assessment of the application as well as allowing us to monitor the form of the emerging cluster of tall and very tall buildings.

Appendix 1 :

Reference List

Appendix 1 : Reference List

- CDN1. Planning Policy Statement 1: Delivering Sustainable Development, January 2005
- CDN103. Planning Policy Statement 5: Planning and the Historic Environment, Communities and Local Government, March 2010
- CDN8. Planning Policy Statement 12: Local Spatial Planning, Communities and Local Government, June 2008
- CDN124. Draft National Planning Policy Framework, July 2011
- CDN89. The Town and Country Planning (Environmental Impact Assessment) Regulations, No. 1824, 2011
- CDN25. Guidance on Tall Buildings, CABE & English Heritage, July 2007
- CDN126. London Squares Preservation Act, 1931
- CDR97. The London Plan, Mayor of London, July 2011
- CDR94. Revised Supplementary Planning Guidance, London View Management Framework, Mayor of London, July 2010
- CDR100. Draft Supplementary Planning Guidance, London View Management Framework, Mayor of London, July 2011
- CDR101. Draft Supplementary Planning Guidance, London World Heritage Sites – Guidance on Settings, Mayor of London, October 2011
- CDCS3. Core Strategy, Southwark Council, April 2011
- CDL21. Saved Southwark Plan, Southwark Council, July 2010
- CDB11. Policy 12: Design and Conservation Tall Building Background Paper, Southwark Council, June 2010
- CDD1. Core Strategy: Core Strategy: Borough-wide Strategic Tall Building Study, July 2010
- CDSPD10. Elephant and Castle Development Framework Supplementary Planning Guidance, 2004
- CDSPD11. Elephant and Castle Enterprise Quarter Supplementary Planning Document, 2008
- CDSPD12. Walworth Road Supplementary Planning Document, 2008
- CDD63. Elephant and Castle Characterisation Study, NLP, November 2011
- CDD79. St George's Circus, London Urban Design Framework, Alan Baxter and Associates and Urban Practitioners, July 2004
- CDEC1. Draft Elephant and Castle SPD / OAPF Equalities Impact Assessment, Southwark Council, November 2011
- CDEC2. Draft Elephant and Castle SPD / OAPF Sustainability Appraisal, Southwark Council, November 2011

- CDD15 St George's Circus, Conservation Area Appraisal, Southwark Council, 2005
- CDD20 Pullens Estate Conservation Area Appraisal, Southwark Council, February 2006
- CDD64 Draft Elliott's Row Conservation Area Appraisal, Southwark Council, 2011
- CDD65 Draft Larcom Street Conservation Area Appraisal, Southwark Council, 2011
- CDD66 Kennington Park (Grade II) – Park Description, Lambeth Council
- CDD67 Lambeth Palace (Grade II*) – Park Description, Lambeth Council
- CDD68 Guidance on Heritage Impact Assessments for Cultural World Heritage Properties, ICOMOS, 2010
- CDD69 World Heritage Impact Assessment: experience from the UK, IAIA11 Conference Proceedings, 2011
- CDNB14 Metropolitan Views Draft Supplementary Planning Guidance, City of Westminster, October 2007
- CDNB24 Tower of London World Heritage Site Management Plan, Historic Royal Palaces, 2007
- CDNB25 Tower of London Local Setting Study, Tower of London World Heritage Site Consultative Committee, August 2010
- CDNB26 Westminster World Heritage Site Management Plan, May 2007
- CDD70. Conservation Bulletin 47: Characterisation, English Heritage, March 2005
- CDD71. Understanding Place: Historic Area Assessments in a Planning and Development Context, English Heritage, June 2010
- CDD72. Understanding Place Historic Area Assessments: Principles and Practice, English Heritage, June 2010
- CDD73. Valuing Places: Good Practice in Conservation Areas, English Heritage, January 2011
- CDD74. The Setting of Heritage Assets, English Heritage, October 2011
- CDD75. Seeing The History In The View: A Method For Assessing Heritage Significance Within Views, English Heritage, June 2011
- CDD76. Understanding Place: Character and context in local planning, English Heritage, November 2011
- CDD77. Understanding Place: Conservation Area Designation, Appraisal and Management, English Heritage, March 2011
- CDD78. Good Practice for Local Listing Consultation Draft, English Heritage, February 2011

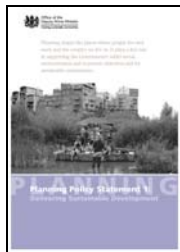
Appendix 2 :

Policy background

Appendix 2 : Policy background

A2.1 National policy

Planning Policy Statements (PPS) and associated guidance, set out that when preparing our development plans that local authorities should:



Planning Policy Statement (PPS) 1 : Delivering Sustainable Development

Sets out principles that development plans should consider in order to deliver sustainable development. This includes:

- Emphasis on design that takes the opportunity for improving the character and quality of an area (para. 13 iv, 33 to 39)
- Planning policies should seek to protect and enhance the quality, character and amenity of urban areas (para. 17).
- Promote more efficient use of land through higher density, mixed use development (para. 27 viii)
- Enhance and protect the historic environment and townscape character (para. 27 ix)
- Demonstrate how plans integrate various elements of sustainable development and achieve outcomes which enable social, environmental and economic objectives to be achieved together (para. 28)
- That good design is integrated into the existing urban form and the natural and built environment (para. 35)



- Ensure that developments optimise potential of a site to accommodate development; incorporating green and other public space as part of developments (para. 36)
- Ensure that developments respond to local context and create or reinforce local distinctiveness (para. 36)
- Ensure that design policies avoid unnecessary prescription detail and provide more general guidance detail. Local authorities should not attempt to impose architectural styles or particular tastes or stifle innovation (para. 38)

PPS 5 : Planning and the Historic Environment and supporting Practice Guide

Sets out that local planning authorities should:

- Ensure that they have evidence about the historic environment and heritage assets in their area which is publicly documented. The level of detail of the evidence should be proportionate to inform adequately the plan-making process (Policy HE2.1)
- Consider the desirability of new development to make a positive contribution to the character and local distinctiveness of the historic environment, including consideration of high quality design, scale, height, massing, alignment, materials and use. (Policy HE7.5)





PPS 12 : Local Spatial Planning

Sets out that when preparing local development frameworks local authorities should:

- Prepare a robust evidence base that should be proportionate to the task, should be relevant to the place and up to date as practical (para. 4.37)



Draft National Planning Policy Framework (NPPF) – Design Chapter

The Government's objective for the planning system is to promote good design that ensures attractive, usable and durable places. The draft document advises that planning policies and decisions should aim to ensure that developments:

- Ensure that a place will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development
- Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks
- Respond to local character and reflect the identity of local surroundings, while not preventing or discouraging appropriate innovation
- Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and

- Are visually attractive as a result of good architecture and appropriate landscaping.

London Squares Preservation Act 1931

Sets out xxxxx

A2.2 Regional policy

The London Plan and associated supplementary planning guidance (SPG), establishes the planning framework for London and the policies and guidance which need to consider when preparing the local development framework.



London Plan 2011

Sets out that :

- Boroughs should enhance and promote the unique international, national and London wide role of the Central Activity Zone (CAZ)
- Boroughs should sustain and enhance the distinctiveness of the Central Activity Zone (CAZ), particularly World Heritage Sites, designated views and local features, such as historic heritage, open spaces and distinctive buildings (Policy 2.10)
- The Elephant and Castle is identified as an opportunity area with significant capacity to accommodate new development (Policy 2.13)
- The Mayor will work with boroughs to prepare opportunity area Planning Frameworks (Policy 2.13)
- Local character, legibility and permeability can reinforce or enhanced by the design of new buildings and spaces. (Policy 7.1)

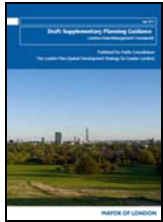
- That new development should consider historic context and local character when producing an architectural design and that boroughs should consider the different characters of their areas to identify landscapes, buildings and places where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process. (Policy 7.4)
- Development should make the public realm comprehensible at a human scale, using gateways, focal points and landmarks as appropriate to help people find their way (Policy 7.5)
- Architecture should make a positive contribution to coherent public realm, streetscape and wider cityscape and that it should design appropriate to context (Policy 7.6)
- That tall and large buildings are generally limited to sites in the CAZ, opportunity areas and they should relate well to the local character and context. They must also not impact negatively on the amenity of surroundings and on strategic views. Tall buildings are likely to be sensitive in areas such as in the vicinity of heritage assets and their settings or other areas identified by local boroughs (Policy 7.7)
- Tall and large building developments should aim to meet a series of design requirements to ensure that they are positive and successful contributions. (Policy 7.7)



- That the Mayor will work with boroughs to identify appropriate, inappropriate and sensitive locations for tall buildings, and that opportunity area planning frameworks can provide useful opportunities for carrying out such joint work. (Policy 7.7, para 7.28)
- The importance of conserving and enhancing the Outstanding Universal Value of World Heritage Sites (Policy 7.10)
- Designates strategic views important to London with additional guidance set out in the London View Management Supplementary Planning Guidance (LVMF SPG) (Policy 7.11)
- Sets out the principles for management of development in the strategic views (Policy 7.12)

Revised Supplementary Planning Guidance London View Management Framework (LVMF) 2010

- Identifies and maps the strategic views identified in the London Plan and sets out how they will be protected and how the impacts of new development will be tested.
- Sets out guidance for the management of **LVMF 23A.1: Bridge over Serpentine to Westminster** including:
 - Establishes how development in the background of the view will be assessed
 - Establishes a threshold height for wider setting consultation area



Draft Supplementary Planning Guidance London View Management Framework, published for consultation 2011

- During autumn 2011 the GLA consulted on a draft version of the LVMF, which has been updated to reflect the changes in the adopted London Plan.
- The consultation also included proposed guidance for the management of a new strategic view **LVMF 27A.1: Parliament Square to Palace of Westminster**



Draft Supplementary Planning Guidance, London World Heritage Sites – Guidance on Settings, published for consultation October 2011

- During autumn 2011 the GLA consulted on a draft version of this document which sets out guidance for how the dynamic relationship between protecting heritage and encouraging change can be managed so that the value of the World Heritage Sites can be protected while the city around it continues to develop.

A2.3 Local policy

Which collectively is known as the Local Development Framework including the Core Strategy, Southwark Plan and other area action plans (AAPs), supplementary planning documents (SPDs) and guidance (SPGs), set out the strategy and guidance for development in Southwark.



Core Strategy

Sets out the strategy for development in Southwark. This includes:

Vision for Elephant and Castle Opportunity Area

The vision for Elephant and Castle Opportunity Area.

The vision sets out a supplementary planning document / opportunity area planning framework will provide more detail on where tall buildings will be appropriate, inappropriate and sensitive.

Strategic Policy 5 – Providing new homes

Sets out the different density areas in the borough.

Elephant and Castle Opportunity Area is covered by:

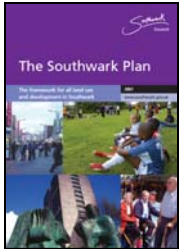
- Central Activity Zone (CAZ) - 650 to 1,100 habitable rooms per hectare
- Urban Density Zone - 200 to 700 habitable rooms per hectare

In opportunity areas the maximum densities may be exceeded where developments are of exemplary design.

Strategic Policy 12 – Design and conservation

Sets out our design and conservation policies

and that tall buildings could go in the Elephant and Castle Opportunity Area.



Southwark Plan (saved policies)

Sets out more detailed development management policies by which planning applications in the borough will be assessed. These design policies have been saved through the Core Strategy:

Policy 3.11 Efficient use of land

Sets out that new developments should maximise efficient use of land whilst responding to local context and design policies as well as protecting local amenity.

Policy 3.12 Quality in design

- New developments / alterations should achieve a high quality of architecture for new buildings and urban design.
- Consider existing context and preserve or enhance historic environment.
- Design Statement must be submitted with application.

Policy 3.13 Urban design

Advises that new developments should incorporate good urban design principles to ensure that new development relates well to the existing context, and in particular consider:

- Height, Scale & Massing
- Scale
- Urban structure

- Movement
- Local character
- Site layout
- Streetscape
- Landscaping
- Inclusive design

Policy 3.15 Conservation of the historic environment

Preserve and enhance the special interest / historic character or appearance of buildings / areas of historic significance. Relates to local character.

Policy 3.16 Conservation Areas

Sets out policies for new development / alterations / demolition in a conservation area.

Policy 3.17 Listed Buildings

Sets out policies for alterations / demolition of a listed building.

Policy 3.18 Setting of listed buildings, conservation areas and world heritage sites

Sets out policy for new development within an APZ and requirement for an archaeological assessment of the site.

Policy 3.19 Archaeology Policy

Sets out policy for new development within an APZ and requirement for an archaeological assessment of the site.

Policy 3.20 Tall buildings

Defines a tall building

- Sets out that they are located in CAZ (particularly OA's) outside landmark viewing corridor
- Sets out criteria for tall buildings:
 - Links to public transport
 - Positive contribution to landscape
 - Located at point of landmark significance
 - Highest architectural quality
 - Relates well to surroundings, particularly at street level
 - Contributes positively to skyline as a cluster or key focus within views

Policy 3.22 Important local views

Sets out that the borough will seek to protect and enhance identified views, panoramas, prospects and their settings that contribute to the image and built environment of the borough and wider London.



Elephant and Castle Development Framework SPG

The Elephant and Castle SPG sets out broad principles for the regeneration of the Elephant and Castle town centre, and sets out an illustrative masterplan proposal for the Elephant and Castle Core Area (Southwark Plan Site 39P). This site covers the Elephant and Castle Shopping Centre and northern roundabout, Heygate Estate, London Park Hotel, Leisure Centre and north end of the Walworth Road.

The built form and building height strategy, is shown in Figure 45, 46 and 47 below, sets out the principles for tall buildings across the site.

- | | |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Core cluster | <ul style="list-style-type: none">• Tallest point +135m in height• 2 mixed use city scale towers along Walworth Road• Focal point of views |
| Secondary cluster | <ul style="list-style-type: none">• Surrounding core• Lower in scale and height |
| Local tall building | <ul style="list-style-type: none">• Adjacent St. Mary's Churchyard• Gateway location when approaching from South West |
| Rest of area | <ul style="list-style-type: none">• Heights relative to context |

The document also sets criteria that tall buildings should meet in accordance with the London Plan policies at that time.

Figure 45. Elephant and Castle SPG – Indicative Approach to Building Heights

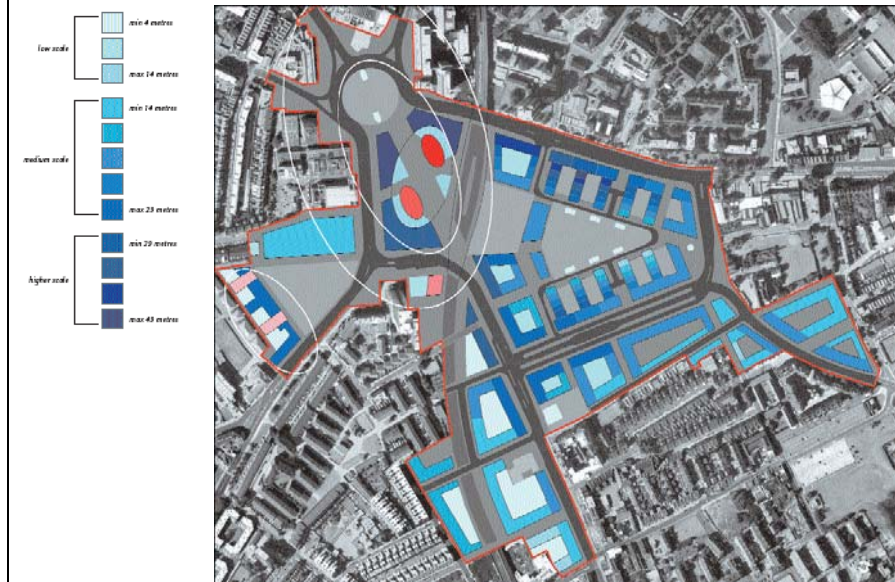


Figure 46. Elephant and Castle SPG – Building height guidance

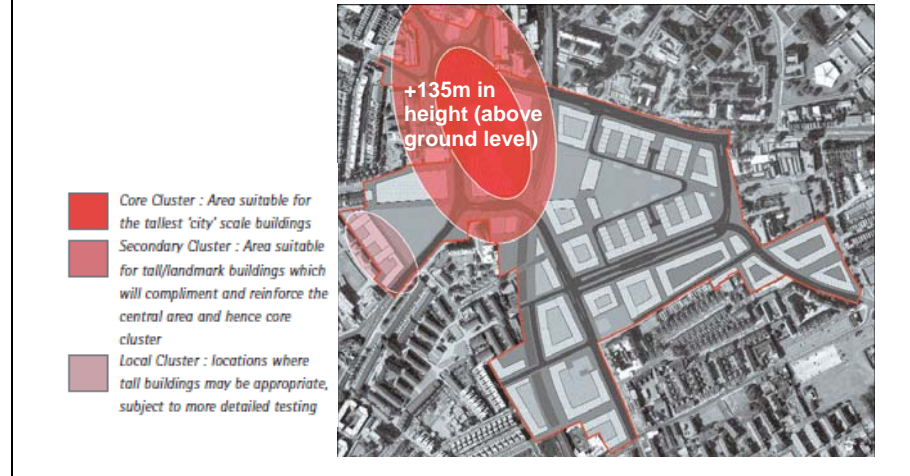
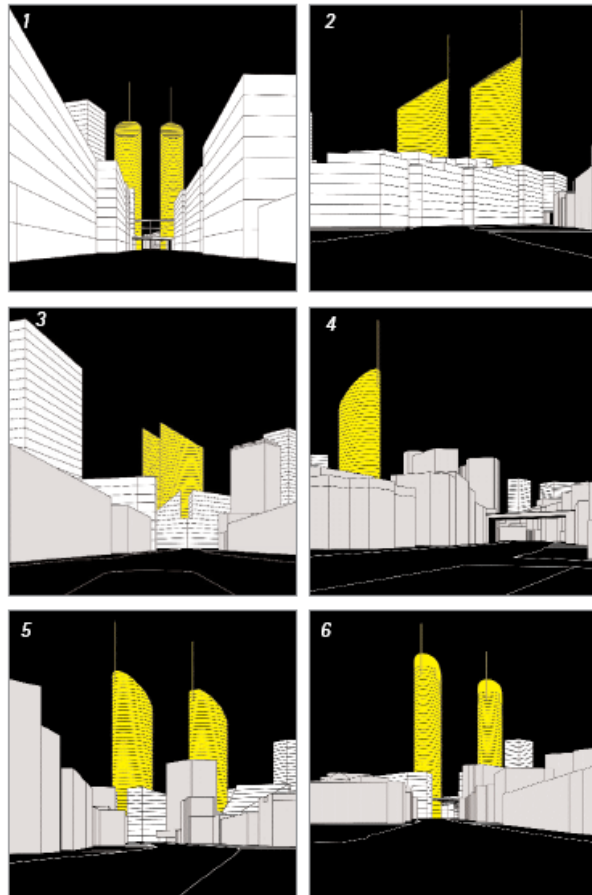


Figure 47. Elephant and Castle SPG – Tall buildings create landmarks and focal points at town centre



Elephant and Castle Enterprise Quarter SPD

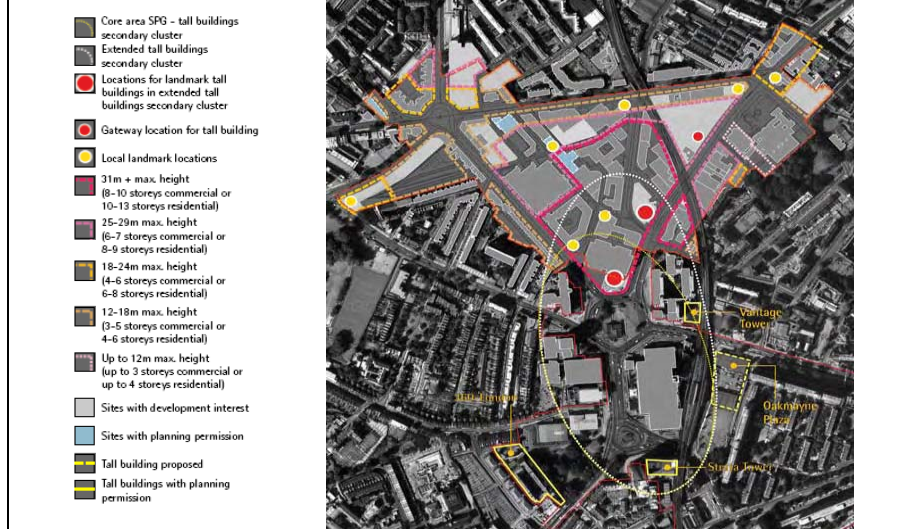
The Elephant and Castle Enterprise Quarter SPD sets out broad principles for the area at the north of the Elephant and Castle Opportunity Area, known as the Enterprise Quarter. This area includes London Southbank University, St George's Conservation Area and buildings along Newington Causeway.

The built form and building height framework, is shown in Figure 48 and 49 below, sets out the following principles:

- Core cluster**
 - Appropriate area for tallest buildings from SPD extended to north into Enterprise Quarter
 - Location for landmark tall buildings
- Secondary cluster**
 - Extends north to define zone for city scale tall buildings
 - Landmark buildings may be located here subject to further impact assessment
- Landmark tall buildings**
 - Appropriate locations at points of landmark significance
 - Cluster to the north of Core
 - Guidance for design of tall buildings
 - Sensitivities of historic environment

The document also sets out guidance for buildings identified as having townscape value, as well for existing and new active building frontages

Figure 48. Development framework - building heights, towers and landmarks



Walworth Road SPD

The Walworth Road SPD sets out guidance for an area at the north end of Walworth Road, adjacent to the Heygate Estate. The area included the following sites:

- 120 to 138 Walworth Road (under construction)
- 140-152 Walworth Road
- Vacant site on the corner of Amelia Street and Robert Dashwood Way (since developed)

The SPD provides guidance on the following:

- Urban design
- Appropriate land uses
- Movement and Access
- Heights and massing
- Building lines
- Response to listed buildings
- Character and quality
- Section 106 planning contributions

Figure 49. Existing buildings with townscape value



A2.4 Evidence base documents

These documents establish the evidence and analysis that has informed the production of our design and conservation policies in the Core Strategy document.



Policy 12 Tall building background paper

Sets out the background and research that has informed the suitable locations for tall buildings as established in Policy 12 and supporting text contained within our core strategy. It summarises our evidence base, describes our strategy and our reasons for selecting the approach we have taken.

Identifies that the strategy for building heights in the Elephant and Castle Opportunity area is set out in the Elephant and Castle Development Framework Supplementary Planning Guidance and Enterprise Quarter Supplementary Planning Document.

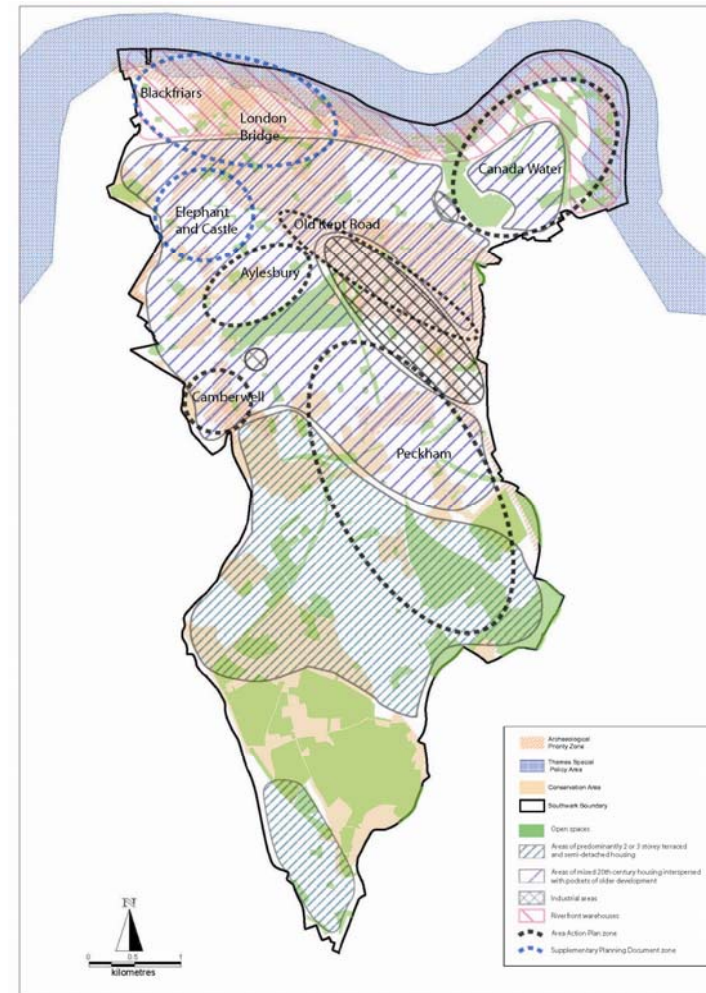


Borough-wide Strategic Tall Building Study

Sets out the approach and analysis to establish where tall buildings could be accommodated in Southwark, where they could not be accommodated and where they could be sensitive.

Sets out an overview for the character of the borough as shown in Figure 50.

Figure 50. Scale of development in Southwark



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A2.5 Other guidance

Best practice guidance produced by CABE and English Heritage which should inform plan making and development management.



CABE / EH Guidance on Tall Buildings

Sets out that when local authorities are preparing an evidence base to identify appropriate, inappropriate and sensitive locations for tall buildings that as a matter of good practice a detailed urban design study should be conducted. This includes analysis of the historic context of the wider area, local character, opportunities and identification of mistakes of the past.



Conservation Bulletin 47 : Characterisation

A bulletin that explores the subject of characterisation and sets out some examples of studies of local character.



Understanding Place: Historic Area Assessments In a Planning and Development Context

Sets out guidance for undertaking Historic Area Assessments to inform plan making and development management.



Understanding Place: Conservation Area Designation, Appraisal and Management

Sets out guidance for managing change in a way that conserves and enhances historic areas through conservation area designation, appraisal and management.



Understanding Place Historic Area Assessments: Principles and Practice

Sets out guidance for how to undertake assessments for historic areas in order to produce a Historic Area Assessment.



The Setting Of Heritage Assets

Sets out guidance for managing change within the settings of heritage assets.



Seeing The History In The View: A Method For Assessing Heritage Significance Within Views

Sets out a method for understanding and assessing heritage significance of views.



Understanding Place: Character and context in local planning

Sets out case studies for how historic characterisation can be used to inform plan making and development management decisions.



Good Practice for Local Listing Consultation Draft

Sets out best practice guidance for identifying buildings and structures suitable for local listing and for managing the list.

A2.6 World Heritage Site Management Plans and other associated guidance

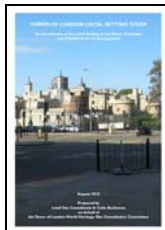
Documents that establish the setting of the World Heritage Sites, define their Outstanding Universal Values and propose principles for the management of these sites.

These management plan documents may identify views of or from the World Heritage Sites which should be considered when assessing the impact of development on the appreciation of Outstanding Universal Value of the sites.



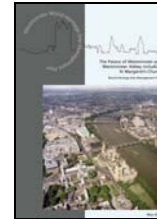
Tower of London World Heritage Site Management Plan

Sets out a description of the Tower of London World Heritage Site and its setting, and establishes a vision and management objectives the site.



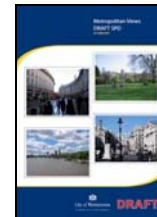
Tower of London Local Setting Study

Describes the current character and condition of the Tower of London World Heritage Site local setting and sets out aims and objectives for conserving and enhancing the appreciation of the Outstanding Universal Value of the site.



Westminster World Heritage Site Management Plan

Sets out an understanding of the setting of the World Heritage Site within its historical and contemporary context, defines the Outstanding Universal Value of the World Heritage Site and establishes principles for the management of the site.



City of Westminster Views Draft Supplementary Planning Document

Identifies important local views in or from the City of Westminster including views of the Westminster World Heritage Site.



Guidance on Heritage Impact Assessments for Cultural World Heritage Properties

Sets out guidance for producing Heritage Impact Assessments for World Heritage Sites in order to evaluate the impact of potential development on the Outstanding Universal Value. This may also provide a guide for assessing general impact of development on heritage assets and their settings.

Appendix 3 :

Study of contextual heights

Appendix 3 : Study of contextual tall building heights

A3.1 Study of contextual heights

The following are the heights of existing development and consented tall building proposals in the Elephant and Castle Opportunity Area. This includes:

- Strategic view – Protected Vista threshold heights
- Existing tall buildings
- Consented tall buildings
- Applications for tall buildings not consented

3.1.1 Strategic View – Protected viewing corridor threshold heights

LVMF Strategic View 1A.2

Alexandra Palace: the viewing terrace

Threshold height of the Wider Setting
Consultation Area 52.1m AOD

LVMF Strategic View 23A.1

Bridge over Serpentine to Westminster

Threshold height of the Wider Setting
Consultation Area across Elephant
and Castle Opportunity Area from 60m to 65m[^] AOD

[^] Approximate average height as plane is on an incline across the opportunity area

* Approximate heights

3.1.2 Existing tall buildings

<i>Name of building</i>	<i>Height (m AOD)</i>	<i>Storeys (above ground)</i>
Strata Tower	147.85m	43 storeys
Draper Estate Building	75m	25 storeys
Metro Central Heights (inc Vantage Tower)	55.17m	16 storeys
Albert Barnes House	52m	18 storeys
Hannibal House	52m	16 storeys
University of the Arts	51.2m	15* storeys
99-101 Newington Causeway	42.8m	12* storeys
H10 Hotel	40.27m	13 storeys
Southbank University 21 Keyworth Street	37.8m	12* storeys
Heygate Estate Buildings	35m	11 storeys
South Central	32.65m	10* storeys
Perronet House	30* m	10* storeys
Prospect House	30* m	10* storeys
Erlang House	30* m	10* storeys
Skipton House	30* m	9* storeys

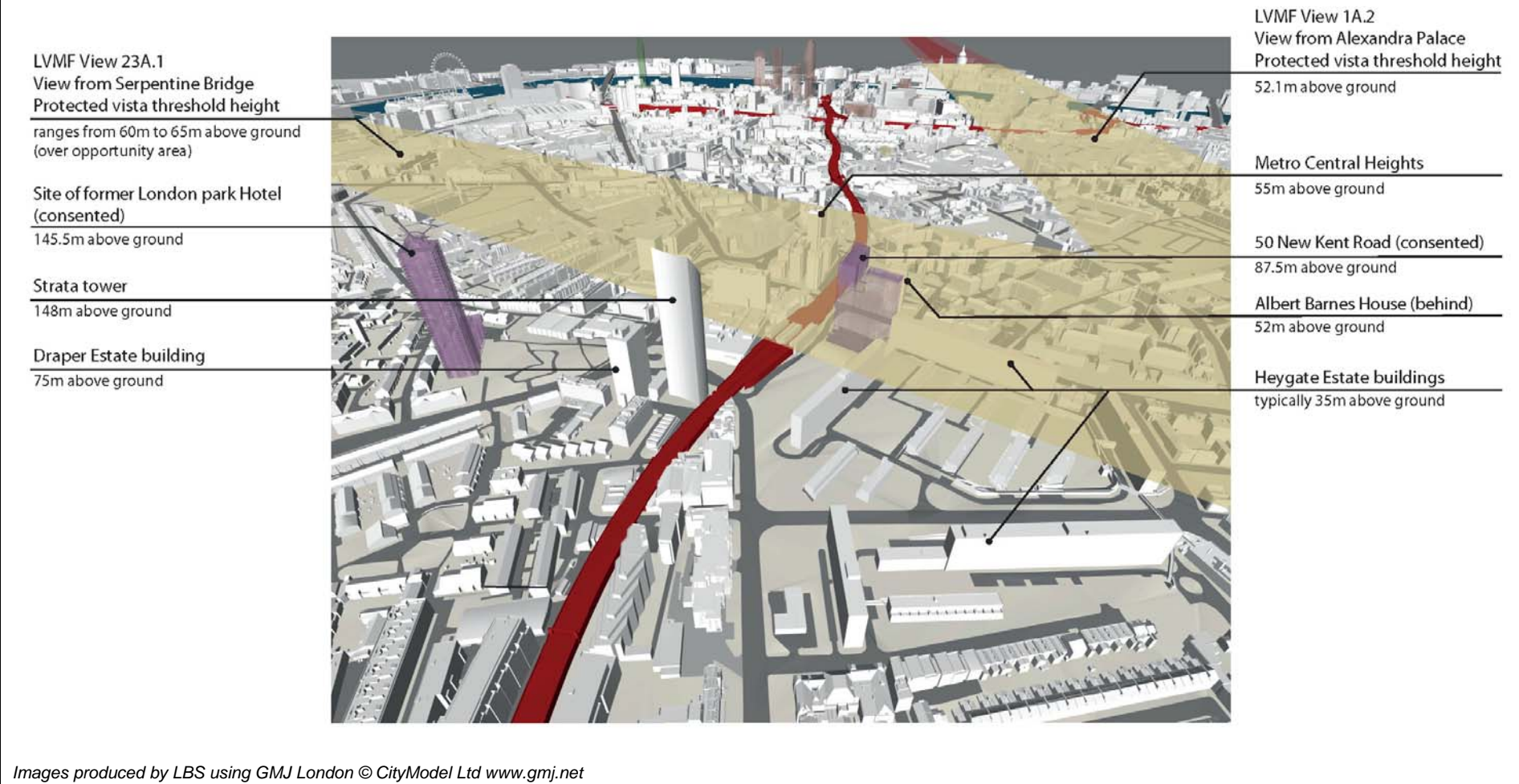
3.1.3 Consented tall buildings

Former London Park Hotel	145.5m	44 storeys
50 New Kent Road	87.5m	23 storeys
89-93 Newington Causeway	69.82m	22 storeys

3.1.4 Applications for tall buildings not consented

Eileen House	128.7m	41 storeys
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Figure 51. Contextual heights in the Elephant and Castle



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Appendix 4 :

Assessment of potential conservation area designation

Appendix 4 : Assessment of potential conservation area designation

A4.1 Assessment of potential designation of new conservation areas

The potential designation of the Larcom Street and Walworth Road areas as new conservation areas is informed by English Heritage guidance *Understanding Place: Conservation Area Designation, Appraisal and Management* (2011), which sets out the best practice guidance for identifying special architectural and historic interest which can lead to designation. As there are no specific local criteria for designating conservation areas, we have applied the following criteria:

- An area (not just individual buildings) that is of special (architectural or historic) interest

Special Architectural interest

- Good surviving architecture of a significant period or style that is substantially unaltered; or
- Architecture that is unique/designed by notable architects or contributes to local distinctiveness; or
- Townscape significance of the area such as: character and hierarchy of spaces; interesting views, vistas or topography; landscape quality; or, good quality public realm (street furniture, hard landscaping)

Special Historic Interest

- It illustrates a significant phase of the borough's history or development that may have been well-documented
- It has associations with historic event/s, uses, movements or people of local or national significance.

- Its layout of property boundaries, roads and pathways contribute to the character of the area.
- It is desirable to preserve features in the area; or
- It is desirable to enhance features in the area

The details of the assessment are set out in A4.3 of this appendix.

In conclusion:

Larcom Street area would be suitable for designation status, due to consistent examples of three storey London stock brick terraces set within a road layout that retains the original 19th Century structure contributing to the character of the area. Many of the original features are visible across the buildings in the area. Significant townscape interest is derived from interesting road configuration as well as key buildings of townscape interest such as St. John's Church and St. John's Walworth C of E Primary School.

Walworth Road area is not a clear example of a designated area. Whilst it does have some early 19th Century buildings, these are generally of limited quality and interest and largely altered or in poor condition. Later Victorian/Edwardian buildings feature that are more ornate and are architecturally pleasing. Its key interest lies in its association with the growth of the London suburbs and the change in living/working patterns. On balance, due to the lack of consistency of buildings in terms of quality and architectural interest it was concluded that the area is not worthy of designation status.

A4.2 Potential extension of West Square Conservation Area

When considering extensions to existing conservation area boundaries, the key starting point is whether the proposed area to include shares many of the qualities and characteristics of the designated area. The criteria are slightly different to designation of a new area (although issues are obviously similar).

We have used the following criteria (adapted from the now replaced English Heritage advice, Conservation Area Practice 1995) to assess the potential extension of the West Square conservation area:

- Is there a clearly defined edge to the existing boundary (i.e. a definite change in character and quality between the two areas)?
- Is the area part of the setting of the conservation area?
- Is the area clearly beyond the defined edge of the conservation area?
- Does the area reflect the architectural style and details present with substantial parts of the conservation area?
- Does the development date from a similar period to substantial parts of the conservation area?
- Is the development the work of the same architect/developer?
- Is the development of similar massing, bulk, height and scale to significant proportions of the conservation area?
- Is the development of notable architectural and historic interest in its own right?

The details of the assessment are set out in A4.4 of this appendix.

In conclusion, **Elliott's Row** area was considered worthy of designation as a separate conservation area as while many of the buildings have a similar style and layout to the existing conservation area they were constructed at later time than the West Square

buildings and likely by different architects. The area also does not form part of the setting of the West Square Conservation Area. However the historic interest of the area would deem it suitable of designation in its own right.

A4.3 Assessment of potential designation of new conservation areas

The following table sets out an assessment of the Larcom Street and Walworth Road area to see if these areas have special architectural or historic interest that should be conserved or enhanced by designating these areas as conservation areas.

Criteria	Larcom Street	Walworth Road
An area (not just individual buildings) that is of special (architectural or historic) interest	A defined group of streets with a large number of buildings of special interest. Minimal recent interventions.	A linear area which has a balance of historic buildings (generally with substantial alterations) and more recent interventions of no architectural or historic interest.
Special Architectural interest		
Good surviving architecture of a significant period or style that is substantially unaltered; or	<p>Buildings are consistent examples of three storey London stock brick terraces dating from 1870-1914. They have rendered bay windows at ground floor with rendered door surrounds. They have vermiculated key stones above the door and upper floor windows. Alternate red brick headers are also evident above the upper floor windows. Brackets are a feature at eaves level. Roofs are slate with brick stacks. Small front gardens with a consistent (albeit replacement) black metal railing are a feature. Two-light sash windows are characteristic that have predominantly been retained.</p> <p>St. John's Church is listed (grade II) Anglican church. 1859-60. Built of stone. By Henry Jarvis, District Surveyor. Vestry of 1912 by Greenaway and Newberry.</p>	<p>The John Roque map of 1766 shows the original villages and the principal north south road (Walworth Road) along with other routes passing through, and surrounded, by fields and isolated development in the vicinity of the character area. The earliest buildings within the character area date from 1790 (The listed terrace at the northern end of potential conservation area). By 1830 historic mapping shows that linear development had appeared along almost the whole length of the Walworth Road and there is also additional subsidiary development on several side streets including Amelia Street, Manor Place, Carter Street and East and West Street as former agricultural land is subdivided and parcelled off for development along newly laid out streets.</p> <p>Today the remainder of the street is a mixture of early-mid 19th Century terraces and late Victorian/Edwardian</p>

Criteria	Larcom Street	Walworth Road
		<p>shopping parades (with flats above), 20th Century buildings are also a feature on the western side.</p> <p>East Street (south side) comprises a very standard late 20th Century, 3 storey terraced block with shops at ground level of no interest and one c.1930s pub. A 1934 mansion block with 1930s pub fronts the northern side.</p> <p>Replacement shop fronts along the Walworth Road detract from the architectural interest of the buildings. Only one interesting shopfront remains dating to 1923 - Kennedys Sausage shop (grade II listed).</p> <p>Generally the Late Victorian/Edwardian parades remain unaltered at upper levels. The late Victorian buildings are fairly ornate and of architectural interest.</p> <p>Very few of the upper levels of the earlier 19th Century terraces remain unaltered and have lost much of their detailing and interest including sash windows. No overall consistency to area in terms of quality of surviving architecture.</p>
<p>Architecture that is unique/designed by notable architects or contributes to local distinctiveness; or</p>	<p>Larcom Street and Ethel Street were laid out between 1873 and 1893 as an infill development between the Walworth New Town to the north and Charleston Street, Cotham Street and York Street to the south. Turquand Street and Walcorde Avenue were built during the same period.</p>	<p>At this stage specific architects of buildings have not been identified/researched. We anticipate this information may be difficult to establish.</p> <p>Whether designed by notable architects or not the buildings do contribute to how this part of London developed.</p>

Criteria	Larcom Street	Walworth Road
	<p>The interesting road configuration arose from the need to accommodate the dense urban form within an area constrained by pre-existing development including terraced housing, St John's Church, the public library on Walworth Road and the timber yard and cooperage on Brandon Street.</p>	
<p>Townscape significance of the area such as: character and hierarchy of spaces; interesting views, vistas or topography; landscape quality; or, good quality public realm (street furniture, hard landscaping)</p>	<p>Significant townscape interest deriving from layout - well enclosed streets, dog-leg layouts are a feature with buildings terminating views along streets. St. John's Church and St. John's Walworth C of E Primary School are key buildings of townscape interest. These buildings form a substantial part of their respective plots with little surrounding land, creating a very tight-knit built environment. The Church, School and Vicarage form a group that adds interest to the area.</p>	<p>Linear street that provides sequential views of the immediate townscape. Views towards both the Strata tower (from the northern end) and the shard (from the southern end) are available.</p> <p>Other townscape views available are eastwards along Liverpool Grove to St. Peter's Church and westward into along McLeod Street to Sunderland Square Conservation Area.</p> <p>The public realm is inconsistent. The middle section of the street has been recently relandscaped and modern street furniture and paving has been introduced to rationalise the townscape. However, at the northern and southern end of Walworth Road, the quality of the public realm is poor.</p>
<p>Special Historic Interest</p>		
<p>It illustrates a significant phase of the borough's history or development that may have been well-documented</p>	<p>Tight urban form/infilling of an established built-up area indicates that Larcom Street was built to respond to the urgent need for terraced housing, reflecting the continued urbanisation of the area in response to</p>	<p>The development of the London suburbs has been well-documented. During the 18th and 19th Centuries new bridges over the Thames and improved roads made it easier for wealthier Londoner's to live in</p>

Criteria	Larcom Street	Walworth Road
	commercialisation and industrialisation.	greener villages outside the City and commute in. Walworth was originally a village. Towards the end of the 19 th Century (as factories/railways etc. displaced Londoners from the centre) the population grew and Walworth became fully urbanised. The architecture from this period features heavily along Walworth Road.
It has associations with historic event/s, uses, movements or people of local or national significance.	It exemplifies the intensification of the London suburbs and changes to commuting/movement patterns.	As above it exemplifies the changing living and movement patterns of Londoners in the 18 th and 19 th Centuries.
Its layout of property boundaries, roads and pathways contribute to the character of the area.	Layout of roads, footpaths and buildings retains its original 19 th century structure which contributes to the character of the area.	Property alignment retains its 19 th Century structure with shop fronts built out over what would have been front gardens at ground level.
It is desirable to preserve features in the area; or	Yes, preservation of sash windows, uniform render, architectural detailing, front property boundaries, lack of roofline alterations (dormers etc,) and general upkeep.	Shop fronts have been lost, many of the original features of the 19 th Century terraces have also been lost/altered which means the properties retain little of their architectural and historic significance.
It is desirable to enhance features in the area	Generally well preserved therefore preservation would take precedence over enhancement. Opportunities to encourage consistency e.g. door types, boundary treatments in keeping with the character of the properties.	The area would benefit greatly from enhancement - with more characteristic shop fronts being introduced, better managed public realm, improvements to remaining 19 th Century terraces. The Council would have greater control over this if designated as a conservation area. However, the lack of quality/early buildings and consistency in quality on balance indicates the area is not worthy of designation.

A4.4 Assessment of potential extension of West Square Conservation Area

The following table sets out an assessment of the Elliott's Row area to see if the qualities and characteristics of the area meet those of the West Square Conservation Area and suit extending the designation to include Elliott's Row.

Criteria	Elliott's Row Area
Is there a clearly defined edge to the existing boundary (i.e. a definite change in character and quality between the two areas)?	The current eastern edge of the conservation area appears to cut through buildings of similar ages and types to those within the conservation area (Brook Street and Austral Street)
Is the area part of the setting of the conservation area?	The area does form part of the setting of the conservation area. However, conservation of the townscape would ensure protection of the existing conservation area.
Is the area clearly beyond the defined edge of the conservation area?	It is not clearly beyond the define edge, but could be considered to form part of the conservation area.
<p>Does the area reflect the architectural style and details present with substantial parts of the conservation area?</p> <p>Does the development date from a similar period to substantial parts of the conservation area?</p>	<p>The terraced housing within the conservation area dates from late 1790-1800 (West Square), Colnbrook Street and Gladstone Street (1850s) and Brook Drive/Austral Street are later 19th Century. Buildings on Hayles Street within the conservation area date from the 1850s and 1894. The building styles and details are typical of their respective periods.</p> <p>Buildings within the potential extended area generally date from the later 19th Century and turn of the 20th Century. The buildings fronting the eastern side of Hayles Street are a mixture of two and three storey. The two storey buildings share many of the characteristics of the western side (within the conservation area) however, the three storey buildings are later red brick buildings with red brick bays and terracotta detailing. The massing, scale, heights, alignment and sense of enclosure to the street complements the conservation area. The buildings on Brook Drive are slightly plainer three storey buildings than further west on Brook Drive with bay windows at ground floor and brick headers above windows on upper levels, but the form of the</p>

Criteria	Elliott's Row Area
	<p>terrace is otherwise similar.</p> <p>The Lambeth Hayles Estate fronting the eastern side of Elliott's Row appears to have been built in three sections (1890, 1896 and 1902). These are five storey mansion-style blocks. They are yellow stock brick with red brick detailing and some terracotta door surrounds and cornicing. Whilst these buildings are of different dates, form and detailing they positively contribute to the character of the area. They are good quality surviving examples of their building type. They create good enclosure to the street and complement the development opposite. A Lambeth Hayles Estate building already falls within the conservation area, on Hayles Street, providing a link between the existing and potential conservation area.</p> <p>Buildings on Gaywood Street date from the and c.late 19th Century (detailed check of historic mapping) they are four storeys including basements. They are constructed of London stock brick and have rendered door surrounds and headers. They are otherwise fairly plain in terms of detailing. They have iron railings and small front gardens. Again, they complement the buildings in the wider conservation area in terms of building form, scale, alignment, materials and detailing.</p>
<p>Is the development the work of the same architect/developer?</p>	<p>At this stage, we are only aware of the architects of Colnbrook and Gladstone Street within the designated conservation area. Initial research suggests the Lambeth Hayles Estate buildings in the potential extension were designed by Waring and Nicholson. One of their buildings may also be located in the designated area. We would need to undertake more research on other architects/developers.</p>
<p>Is the development of similar massing, bulk, height and scale to significant proportions of the conservation area?</p>	<p>Generally yes. Buildings are predominantly 2-5 storeys across the whole area with the five storey buildings fronting West Square (already designated) and Elliott's Row (potential designation). The massing and scale together with alignment and width of streets creates a tight-knit urban grain which is a feature across the area (the only open space being West Square Garden).</p>
<p>Is the development of notable architectural and historic interest in its own right?</p>	<p>Whilst further research is required on the development of the area and on the Lambeth Hayles Estate buildings the quality of architecture which survives largely intact is of interest in its own right.</p>

Appendix 5 :

Views assessment

Appendix 5 : Views Assessment

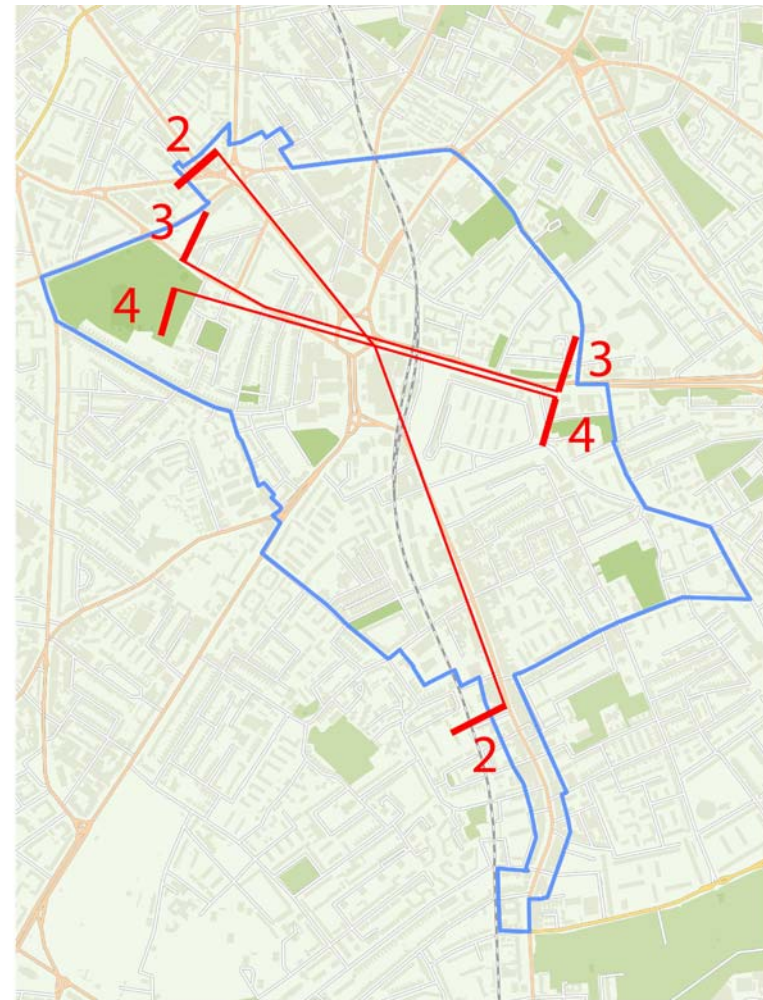
A5.1 Testing options

The following pages set out the different strategic testing options that we have tested in our three dimensional model.

Section A5.1.1 shows the different heights tested in the options in a series of diagrammatic cross sections of the opportunity area. Figure 52 sets out the locations for the sections shown.

Section A5.3.2 sets out an assessment of the potential impact of the different options when seen in testing views.

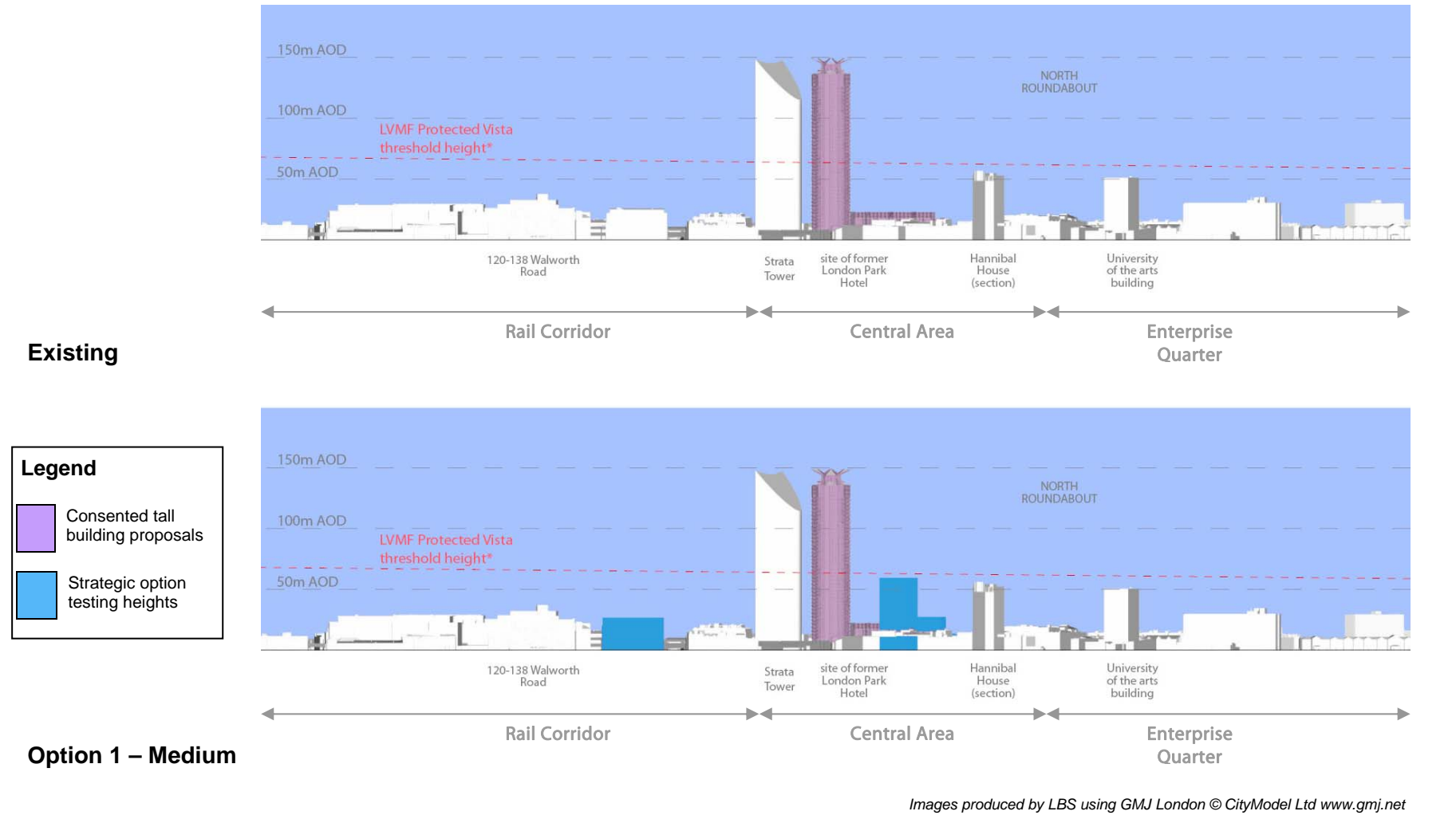
Figure 52. Indicative locations of diagrammatic cross sections



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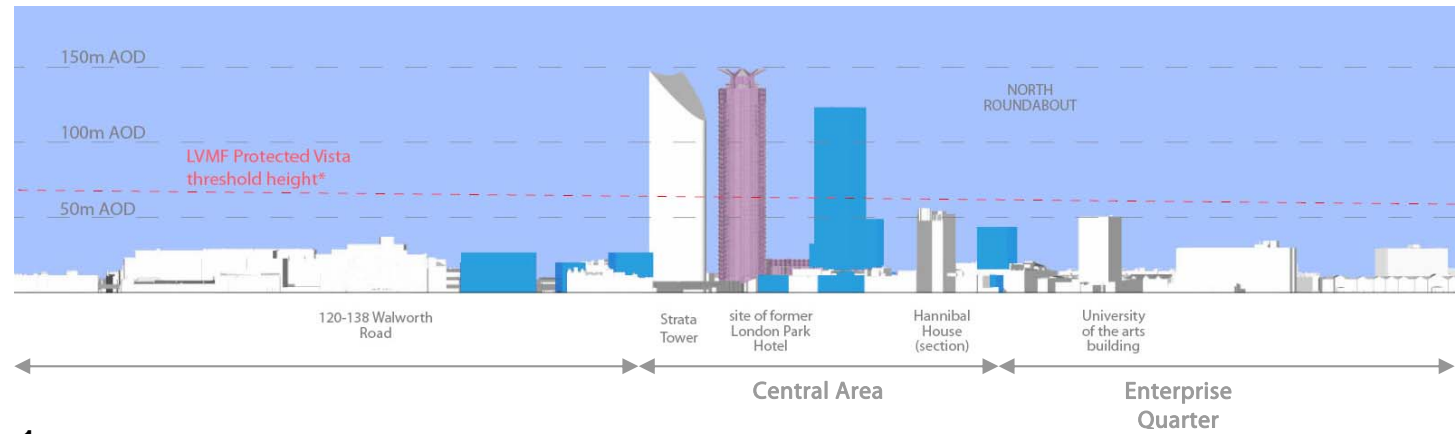
A5.1.1 Diagrammatic cross sections

Figure 53. Tall building strategic options - Diagrammatic cross section 2

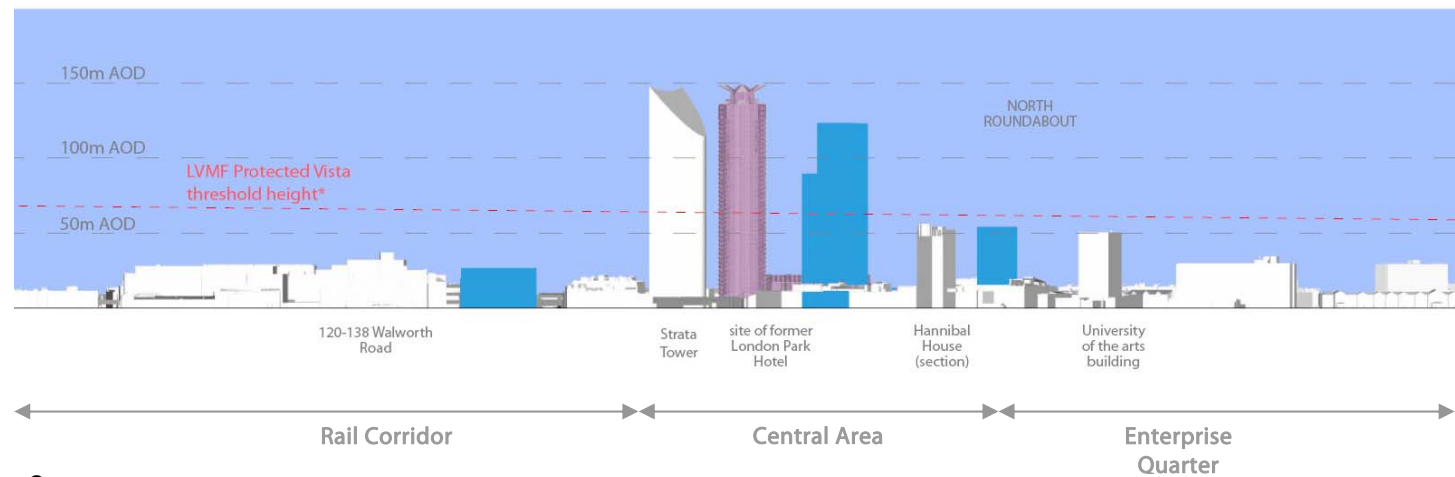


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* Protected vista height range shown is indicative only. Buildings shown in section may sit outside of the extent of the protected vista.



Option 2 – High option 1



Option 3 – High option 2

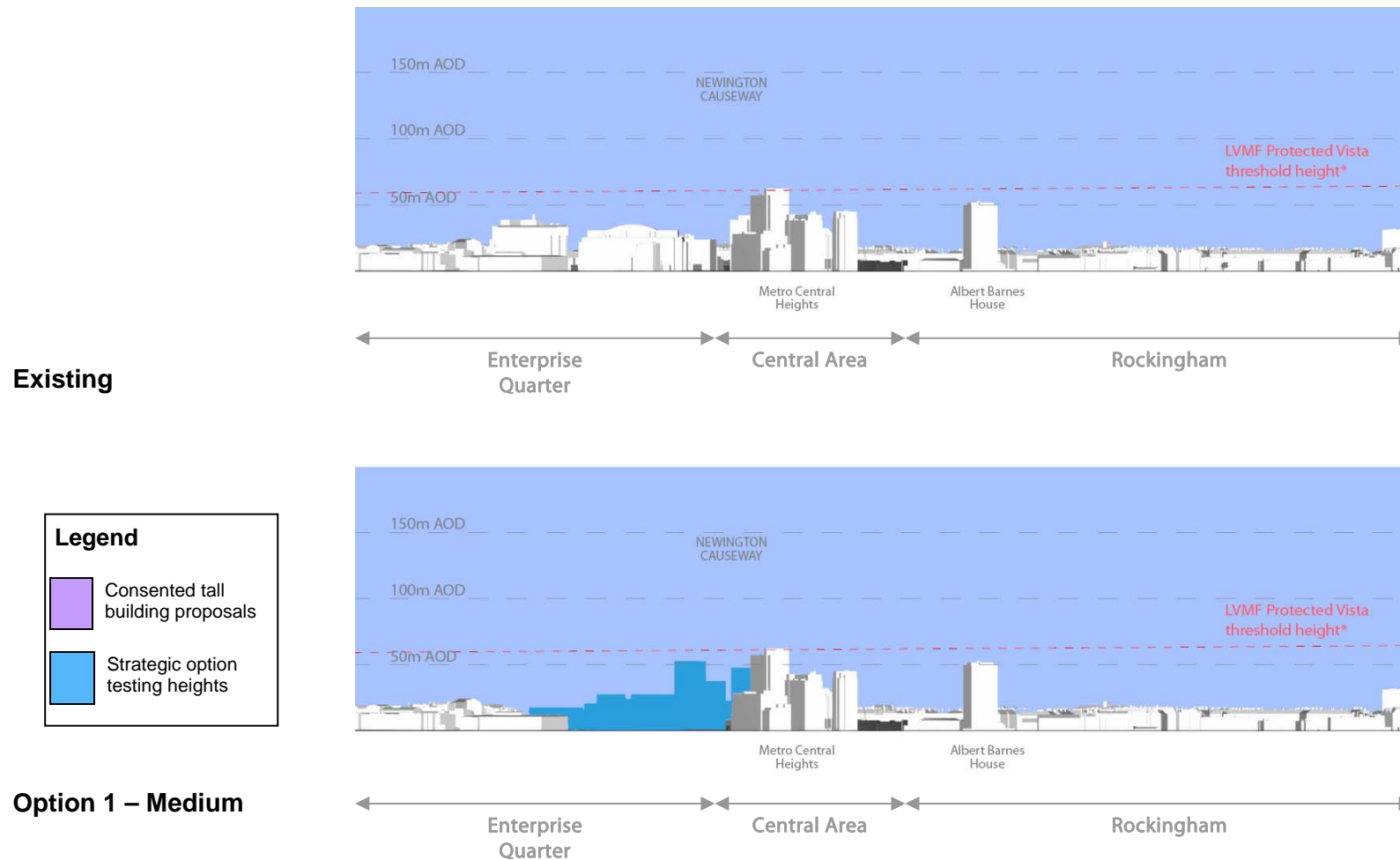
Legend

- Consented tall building proposals
- Strategic option testing heights

Images produced by LBS using GMJ London © CityModel Ltd www.gmj.net

* Protected vista height range shown is indicative only. Buildings shown in section may sit outside of the extent of the protected vista.

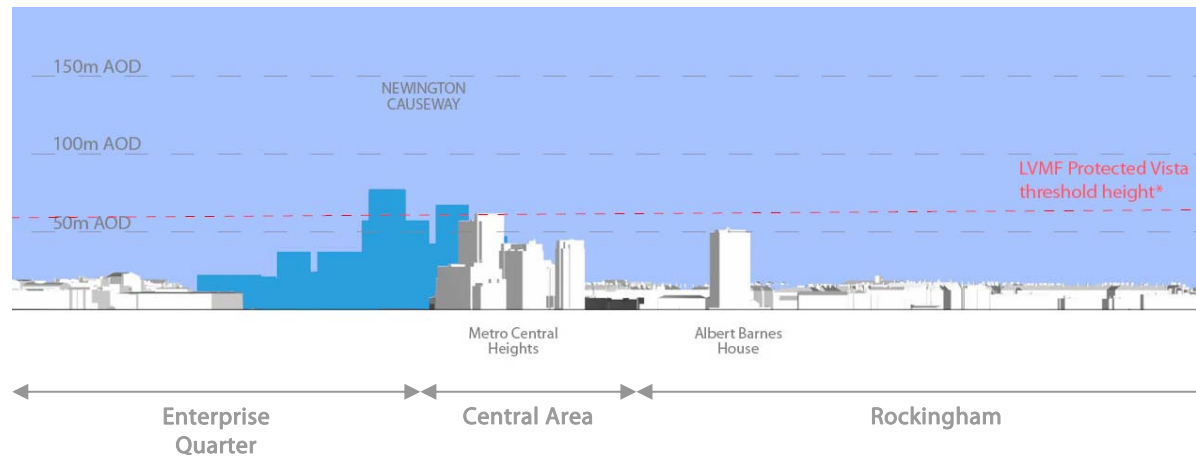
Figure 54. Tall building strategic options - Diagrammatic cross section 3



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* Protected vista height range shown is indicative only. Buildings shown in section may sit outside of the extent of the protected vista.

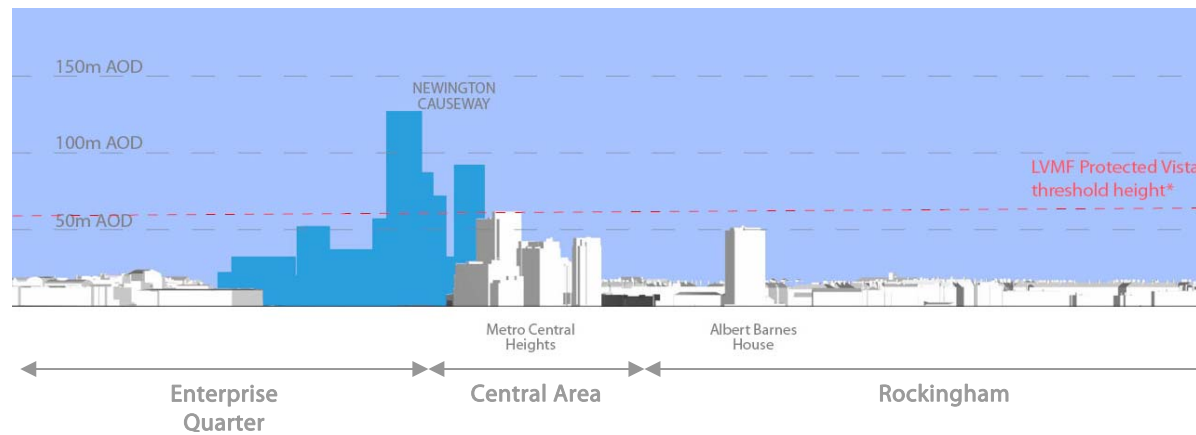
Option 2 – High option 1



Legend

- Consented tall building proposals
- Strategic option testing heights

Option 3 – High option 2



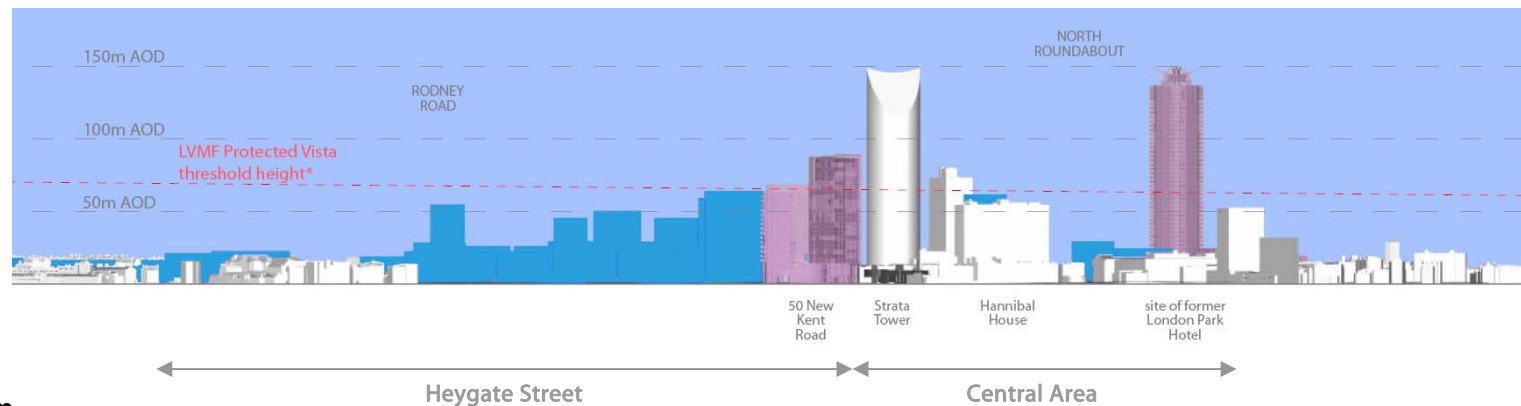
Images produced by LBS using GMJ London © CityModel Ltd www.gmj.net

* Protected vista height range shown is indicative only. Buildings shown in section may sit outside of the extent of the protected vista.

Figure 55. Tall building strategic options - Diagrammatic cross section 4



Existing



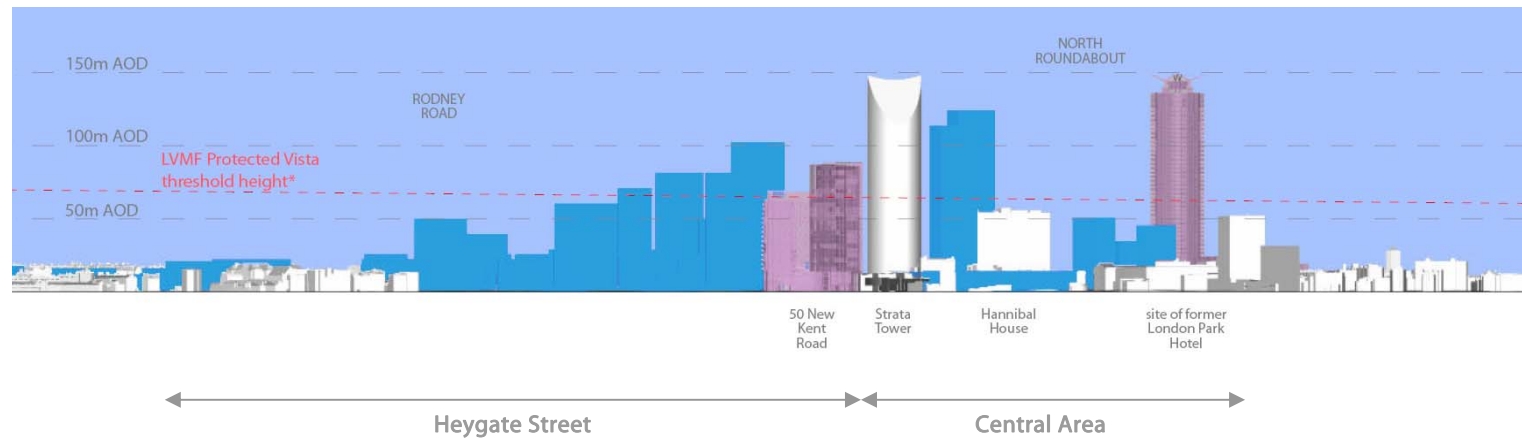
Legend

- Consented tall building proposals
- Strategic option testing heights

Option 1 – Medium

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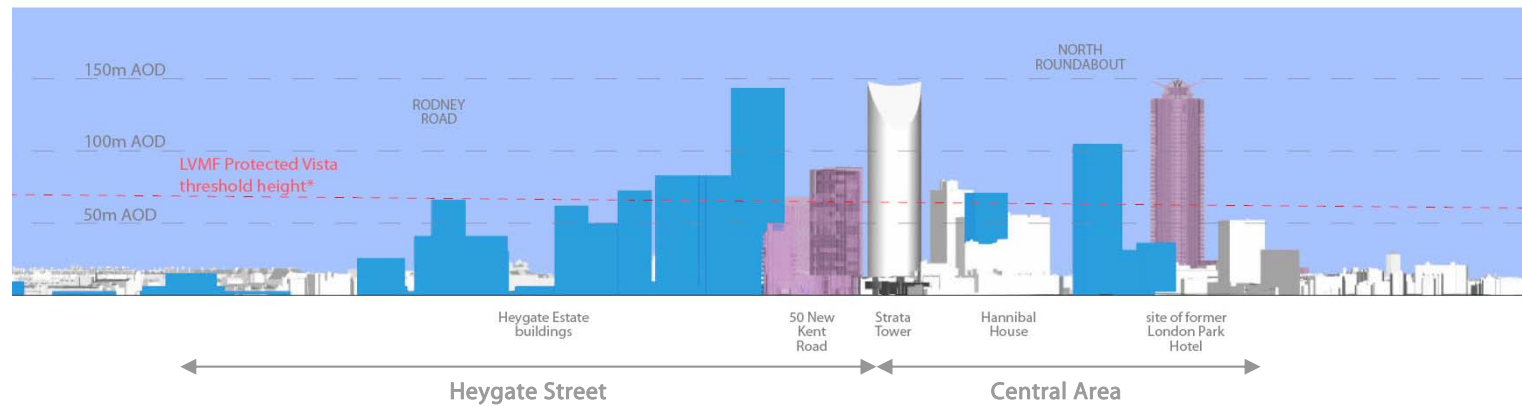
* Protected vista height range shown is indicative only. Buildings shown in section may sit outside of the extent of the protected vista.



Option 2 – High option 1

Legend

- Consented tall building proposals
- Strategic option testing heights



Option 2 – High option 2

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* Protected vista height range shown is indicative only. Buildings shown in section may sit outside of the extent of the protected vista.

A5.2 Identification of testing views

We have identified a number of views for testing and assessing the potential impact of tall buildings. These have been identified from the following sources:

- Strategic views identified in the London Plan
- Views identified in other planning policy documents, such as other borough designated views or
- Views identified in characterisation studies or conservation area appraisals
- Views identified through site analysis or from site visits
- Views identified through public consultation
- Views identified during the planning application process for testing of tall building application proposals

The assessment set out in the following sections covers the following views:

- Strategic views
- Views to or from a World Heritage Site
- Testing views from the local and wider area

Figure 56 sets out the strategic views and local views identified for this tall building study.

More information on identification of testing views is set out in section 6.5 of this report.

A5.2.1 Strategic Views

London Panorama View

LVMF 1A.2	Alexandra Palace: the viewing terrace view to St. Paul's Cathedral
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Townscape view

LVMF 23A.1	Bridge over Serpentine to Westminster
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Draft Townscape view – as set out in the Draft LVMF SPG July 2011

LVMF 27B	Parliament Square: North Pavement (Westminster View 37)
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A5.2.2 Views to or from a World Heritage Site

Houses of Parliament

WV 1	Westminster View 38 - Westminster Abbey from Tothill Street/Victoria street and Broad Sanctuary
-------------	-------------------------------------------------------------------------------------------------

Tower of London

TL 1	View from Inner Ward to London Bridge
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A5.2.3 Testing views of the local and wider area

TV1	From Kennington Park Road, outside St Marys Newington Causeway (junction with Suffolk Street)
TV2	West Square (junction with Geraldine Street)
TV3	Approach from Brook Drive (south of Imperial War Museum) and Sullivan Road
TV4	View from Walcot Square
TV5	View from north-west of Trinity Church Square (junction with Trinity Street)
TV6	Approach from Walworth Road (junction with Browning Street)
TV7	Approach along New Kent Road
TV8	Approach along Newington Causeway
TV9	View of St George's Circus
TV10	View from setting of Imperial War Museum (view from in Geraldine Mary Harmsworth Park)
TV11	Approach from London Bridge looking south
TV12	Approach from Borough High Street
TV13	View from Camberwell Road view towards St Pauls Cathedral

TV14	View from Victoria Tower Gardens towards the River Thames
TV15	View from Kennington Park looking towards the north
TV16	View from Nursery Row Park
TV17	View along Brook Drive from corner Oswin Street
TV18	View from Pasley Park

A5.2.4 Other views analysed

A number of other views have been identified and tested as part of this study. The heights tested have either negligible or minimal impact when seen in these views. While detailed testing is not shown for these views this information has informed our study and been incorporated into the conclusions of this assessment.

These views include:

Strategic Views - River Prospect Views

- LVMF 15B.1** Waterloo Bridge - The Downstream Pavement
- LVMF 15B.2** Waterloo Bridge - The Downstream Pavement
- LVMF 17B.1** Golden Jubilee / Hungerford Footbridges - Downstream
- LVMF 17B.2** Golden Jubilee / Hungerford Footbridges - Downstream
- LVMF 18B.1** Westminster Bridge - Upstream
- LVMF 19A.1** Lambeth Bridge - The Downstream Pavement
- LVMF 20A.1** Victoria Embankment between Waterloo and Westminster Bridges - Opposite County Hall

LVMF 20B.1 Victoria Embankment between Waterloo and
Westminster Bridges - At Cleopatras Needle

World Heritage Site Views - Houses of Parliament

WV2 Foreign Office from St James's Park (Westminster
View 6)

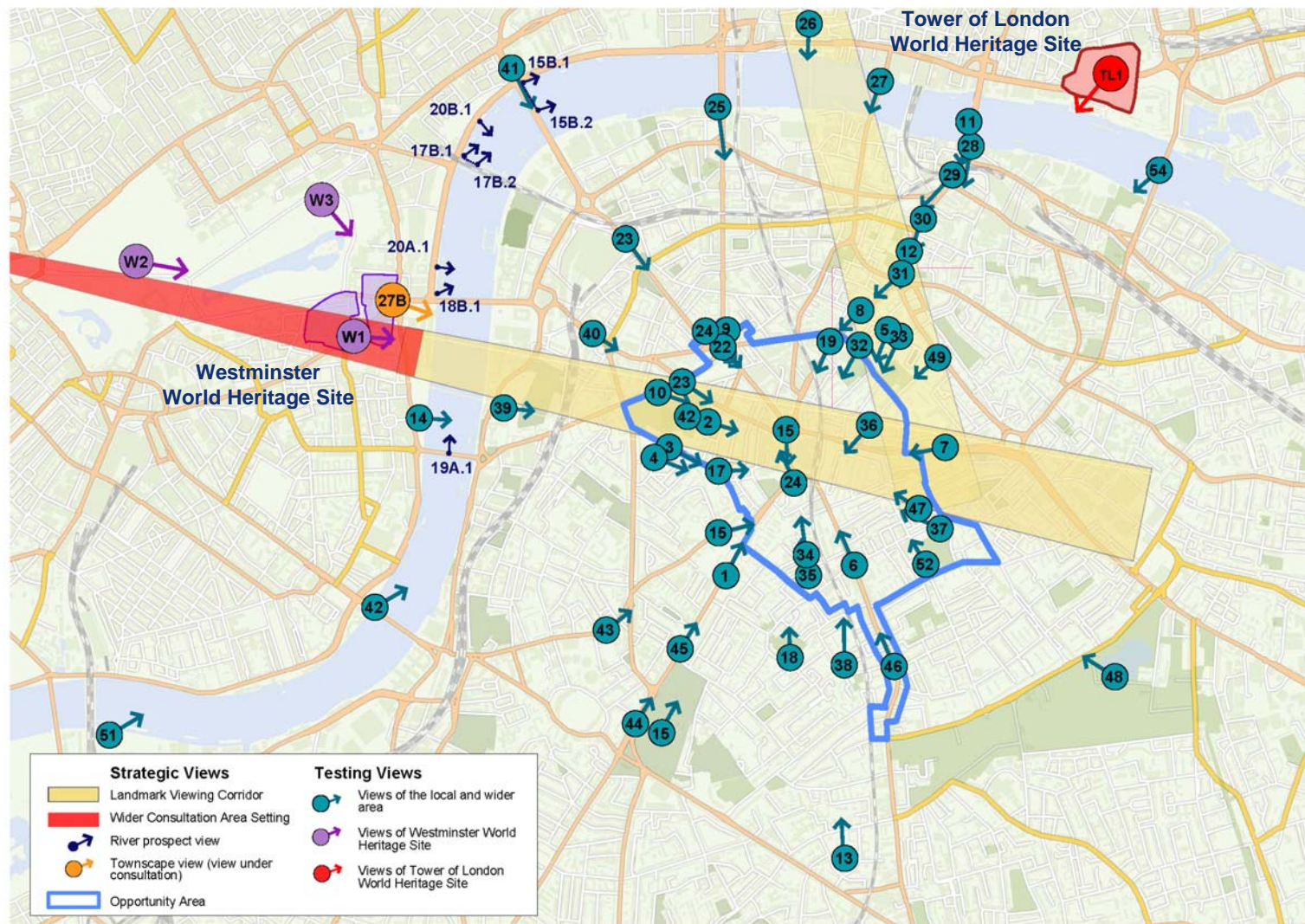
WV3 Big Ben Clock Tower from the bottom of
Constitution Hill (Westminster View 40)

Testing views of the local and wider area

TV19 Approach from Newington Causeway
TV20 From corner of Renfrew Road and Dugard Way
TV21 Approach from St Georges Road
TV22 Approach from London Road
TV23 Approach along Waterloo Road
TV24 View to from E&C south intersection looking north
TV25 View from Blackfriars Bridge
TV26 View from north bank of Thames looking south to
Millennium Bridge
TV27 View from Southwark Bridge
TV28 View from London Bridge
TV29 to 31 Other approaches from Borough High St
TV32 Approach from Newington Gardens
TV33 Approach from Trinity St
TV34 & 35 Views from Pullens Estate
TV36 View from outside Star and Cross Church, Falmouth
Road
TV37 View across Stead Street Carpark
TV38 View from Sutherland Square
TV39 View from Archbishop's Park
TV40 View from Westminster Bridge Road
TV41 View from Somerset House River Terrace
TV42 View from Geraldine Street
TV43 View from Courtney Street & Kennington Lane

TV44 & 45 Views from Kennington Park Road
TV46 Approach from Camberwell Road
TV47 Approach from Rodney Road
TV48 View from Burgess Park across lake
TV49 Approach from Falmouth Road and Trinity Street
TV50 Vauxhall Bridge looking north east
TV51 View from Battersea Power Station
TV52 View from Brandon Street
TV53 View to from E&C north roundabout looking south
TV54 View from Tower Bridge

Figure 56. Strategic and testing views



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A5.3 Views Assessment and options testing

The following sections set out an assessment of the testing views and identifies:

- What is important in the view or why is the view of importance
- What type of view is it and what is visible in the view
- What is the management guidance for the view, if relevant
- How have consented schemes changed or likely to change the view
- What is the potential impact of new development in the view

The following pages set out our assessment for a number of views where the potential impacts of tall buildings can be assessed.

The views which are included in this section are of the following:

- Strategic views
- Views of or from the World Heritage Sites
- Views along main routes into the opportunity area
- Views of or from the setting of heritage assets including conservation areas and listed buildings
- Views from protected open spaces

We have also tested each of the three strategic building height options (as identified in section 6 of this paper) in each of the views. Each testing is shown with an assessment of the potential impact.

This assessment has informed our approach to building height and tall building guidance and a summary of the findings set out in section 6 of this paper.

A5.3.1 Strategic Views

The following assessment for strategic views is informed by the guidance for managing views as set out in the London View Management Framework SPG:

London Panorama View

LVMF 1A.2 Alexandra Palace: the viewing terrace view to St. Paul's Cathedral

- The view is important as it is a wide panorama view of London from Alexandra Palace and provides good views of St. Paul's Cathedral and other London landmarks such as the London Eye and BT tower.
- Development in the background of the view should reinforce the existing composition of the view and should preserve or enhance the viewer's ability to recognise and appreciate the visible elements of St. Paul's Cathedral.
- No tall building proposals have been consented in the background assessment of the view.
- New development in the wider consultation assessment area which is taller than the threshold height will need to consider the potential impact on the appreciation of the setting of St. Paul's Cathedral.

Figure 57.

LVMF SPG Photograph of the view

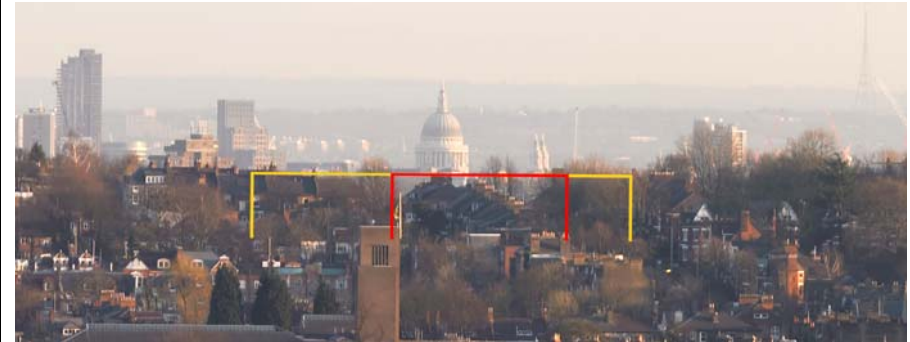


Image sourced from Revised London View Management Framework SPG, Mayor of London, July 2010

Indicative view (including consented schemes)

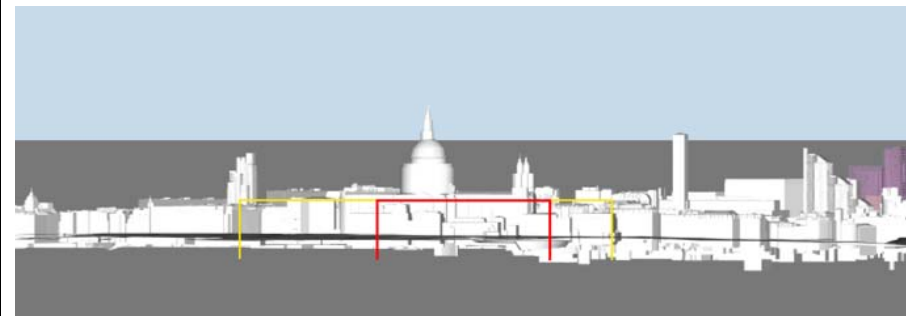


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

Indicative view: Option 1

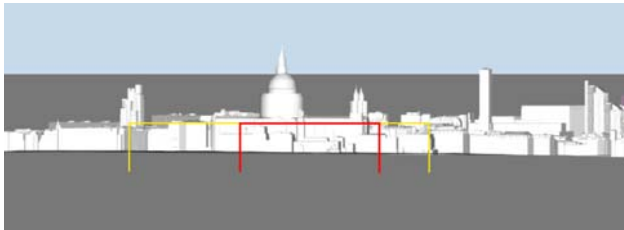


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

While visible in the background the heights tested will not impact on the appreciation of the view of St. Paul's Cathedral. These heights will have negligible impact on the skyline.

Indicative view: Option 2

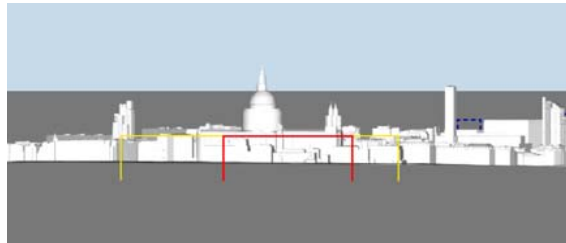
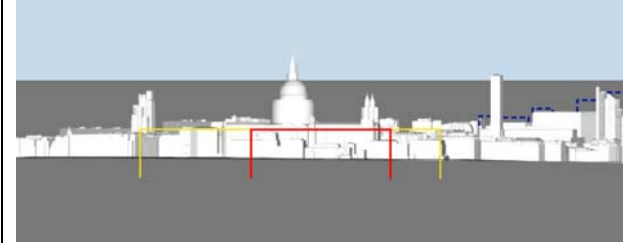


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

While visible in the background the heights tested will not impact on the appreciation of the view of St. Paul's Cathedral. Heights in the Central area will become visible on the skyline, though have only a minor impact.

Indicative view: Option 3



While visible in the background the heights tested will not impact on the appreciation of the view of St. Paul's Cathedral. Heights in the Central area will become visible on the skyline, though have only a minor impact.

Townscape view

LVMF 23A.1 Bridge over Serpentine to Westminster

- The view is important as it is a view of the Grade I Historic Park and elements of the Westminster World Heritage Site visible above the treescape at the end of the lake, particularly the towers of Westminster Abbey and the Victoria and Central Lobby Towers of Houses of Parliament.
- This is a townscape view from a single point located at the centre of the bridge in the grade I Historic Registered Hyde Park looking towards the lake and townscape beyond.
- Development in the background of the view must be subordinate to the WHS. Buildings that exceed the threshold plane of the wider setting consultation area should preserve or enhance the viewer's ability to recognise and appreciate the Palace of Westminster.
- The consented proposal at 50 New Kent Road, currently under construction, will become visible in the background of the view adjacent to the towers of Westminster Abbey.
- Tall building development above the threshold height of the wider setting consultation area (60 to 65mAOD) is likely to be visible in the gaps between the towers of the Houses of Parliament and Westminster Abbey and not be acceptable.
- Tall buildings in the wider setting consultation area which are taller than the threshold height will need to consider the potential impact on the appreciation of WHS particularly if they are located in the background of the protected vista of the view and in close proximity to the Tower.

- Tall buildings to north and south of the viewing corridor which are visible above the tree canopy will need to consider the potential impact on the composition of buildings and landscape in the view.

Figure 58.

LVMF SPG Photograph of the view



Image sourced from Revised London View Management Framework SPG, Mayor of London, July 2010

Indicative view (including consented schemes)

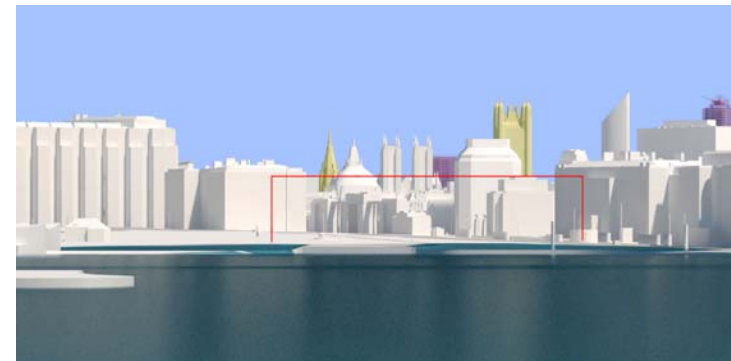
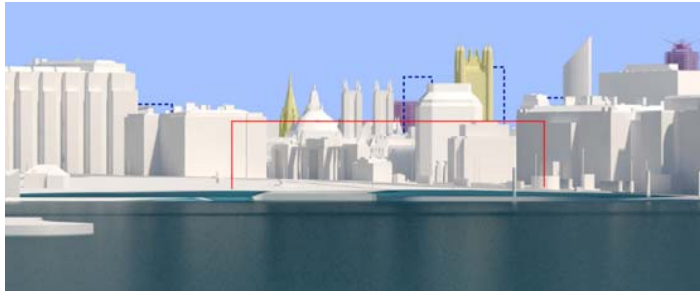
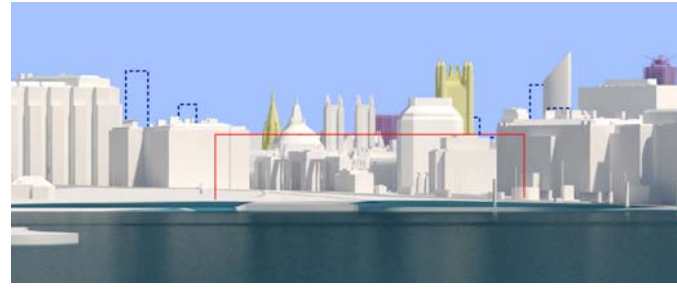


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
<p>The tall buildings in Option 1 will not be visible in this view and therefore have a negligible impact. There is no change from the existing view.</p>	 <p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p>The tall buildings in this option are visible in the background of the view of the Westminster World Heritage Site and due to their close proximity to Victoria Tower will have a major impact on the viewer's ability to recognise and appreciate the World Heritage Site.</p>	 <p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p>The tall buildings in this option are visible in the background of the view, with minor impact to the setting of the World Heritage Site. Other tall buildings outside of the protected vista are visible above the skyline and may impact on the composition of the view and skyline in general, particularly in relation to Strata.</p>

Draft Townscape view – as set out in the Draft LVMF SPG July 2011

LVMF 27B Parliament Square: North Pavement

- This view is important as it is the best overall views of Westminster WHS, the dominance of St. Stephen's Tower and Victoria Tower with main buildings of the Houses of Parliament visible against clear sky. The view identifies two assessment points between which a protected silhouette is established.
- The view establishes a protected silhouette of Houses of Parliament which will restrict development that may impact on preservation of the silhouette.
- Development in the background of St. Stephens tower will need to consider impact on appreciation of the WHS and strong vertical emphasis of the towers.
- No tall building proposals have been consented in the background assessment of the view
- While development in Elephant and Castle is likely to have a negligible impact on the setting of the World Heritage Site, where development is visible in the background of the view, consideration should be given to the appreciation of the setting of the World Heritage Site and the prominence of the towers.

Figure 59.

LVMF SPG Photograph of the view



Image sourced from Draft London View Management Framework SPG, Mayor of London, July 2011

Indicative view (including consented schemes)



Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

A5.3.2 Views from around or from within the World Heritage Site

Views identified in World Heritage Site Management Plans or other borough specific guidance which identifies views, such as the Westminster Metropolitan Views Draft Supplementary Planning Document.

Views of the Palace of Westminster and Westminster Abbey

City of Westminster have identified in their Metropolitan Views Draft Supplementary Planning Document, a number of local views which are of strategic importance to their borough and the setting of the World Heritage Site and other listed buildings. The assessment of this view is therefore informed by the guidance set out in the SPD document:

WV1 Westminster View 38 - Westminster Abbey from Tothill Street

- This view is important as it provides a view of the entrance to Westminster Abbey, with the silhouette and towers clearly read against the sky, when approaching Tothill Street.
- View of the west front of Westminster Abbey from Tothill Street with the twin towers of the Abbey dominating the view, with the silhouette of the Abbey clear against the sky.
- Westminster Hall and the Clock Tower are visible to the left of the Abbey, but obscured by trees.
- The outline of the Palace of Westminster is clearly visible against the sky.
-

- New tall building development in Elephant and Castle should aim to preserve or enhance the viewer's appreciation of Westminster Abbey and the Palace of Westminster in the background.

Figure 60.

Indicative photo of the view (including consented schemes)



Image sourced from Metropolitan Views Draft SPG, City of Westminster, Oct 2007

Indicative view (including consented schemes)

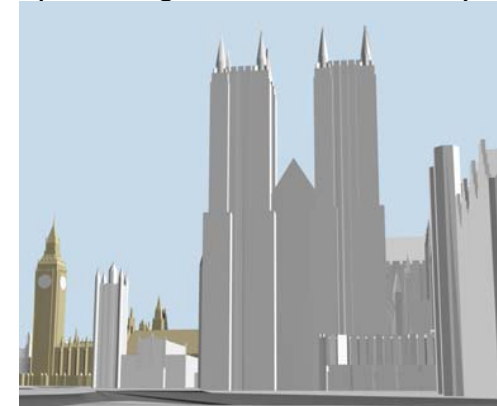


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
Heights tested will not be visible in the view.	Heights tested will not be visible in the view.	Heights tested will not be visible in the view.

Views from the Tower of London

City of Westminster have identified in their Metropolitan Views Draft Supplementary Planning Guidance, a number of local views which are of strategic importance to their borough and the setting of the World Heritage Site and other listed buildings. The assessment of this view is therefore informed by the guidance set out in the SPG document:

TL1 View from Inner Ward

- This view is important as it is a view of the Inner Ward of the Tower of London looking towards the Queens House and Tower Green. This view would be commonly be experienced by visitors to the Tower of London when walking through the Inner Ward.
- There are buildings from Southwark and the south bank visible in the distant background of the view including City Hall and Guys Hospital Tower.
- The trees in the foreground are an important element in the view.
- As this view is experienced while walking into the space as the viewer moves closer towards the Queens House, the development on the south bank disappears from view behind the walls of the surrounding buildings.
- The Queens House is the prominent element in the view and development in the background should not dominate the landmark.
- The Shard will also form a new element in the view

- New tall building development at Elephant and Castle will have a negligible impact in the view.

Figure 61.

Indicative photograph of the view



Indicative view (including consented schemes)

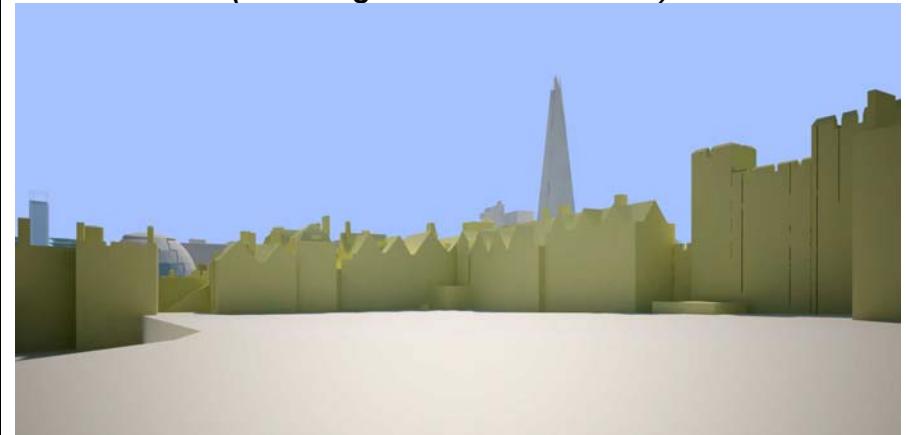


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

<i>Indicative view: Option 1</i>	<i>Indicative view: Option 2</i>	<i>Indicative view: Option 3</i>
Heights tested will not be visible in the view.	Heights tested will not be visible in the view.	Heights tested will not be visible in the view.

A5.3.3 Testing views of the local and wider area

Views of the local and wider area which inform our understanding of the local character and historic context of the area and which we can use to assess the potential impact of development. These views can also be from the wider area so that we can understand the potential impact of tall buildings when seen from the surrounding area.

TV 1 From Kennington Park Road, outside St Mary's Newington Causeway (junction with Suffolk Street)

- This is a view from the end of the Kennington Park Road Conservation Area, with a grade II listed building visible in the left side view.
- This is an axial view down the main axis of Kennington Park Road heading towards Newington Butts and Elephant and Castle shopping centre and rail station. There is no consistency to the streetscape in this view. Hannibal House is visible in the background
- The Elephant and Castle former London Park Hotel (on the site of London Park Hotel) is prominent in the view and is dominant over the lower height development along Newington Butts
- Tall building development at the end of Newington Butts can form focal points and a gateway opportunity into the Elephant and Castle Central area.
- New tall building development on the shopping centre should consider how it can enhance this gateway opportunity when viewed from Newington Park Road.

Figure 62.

Indicative photograph of the view



Indicative view (including consented schemes)



Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

Indicative view: Option 1



Image produced by LBS using GMJ London © CityModel Ltd
www.gmj.net

Heights tested in the Central area will be visible in the background of the view at the end of Newington Butts. These heights will have a minor impact on the view and can be beneficial by creating a new focal point in the view.

Indicative view: Option 2



Image produced by LBS using GMJ London © CityModel Ltd
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Heights tested in the Central area will be visible in the background of the view at the end of Newington Butts.

Very tall buildings on the shopping centre site will have a moderate impact on the skyline. This can be beneficial by creating a focal point in the view which can provide a visual transition from the heights of Strata tower and the consented scheme on London Park Hotel site to lower height buildings.

Focus is maintained on the scheme on the former London Park Hotel site as the tallest building in the view.

Indicative view: Option 3



Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Heights tested in the Central area will be visible in the background of the view at the end of Newington Butts.

Very tall buildings located along Newington Butts will have a moderate impact on the skyline and in the view. This can be beneficial by creating a visual transition from the height the consented scheme on London Park Hotel site to lower height buildings.

Focus is maintained on the scheme on the former London Park Hotel site as the tallest building in the view.

TV 2 West Square (junction with Geraldine Street)

- This is a view which is seen when entering the West Square Conservation Area and establishes the character of that area, including views towards Grade II listed terraces.
- This is a townscape view of West Square when viewed from in the square looking towards the Elephant and Castle town centre.
- The Square is dominated by large mature trees which obscure the view of the town centre.
- The Strata tower is slightly visible above the roofline of listed terraces.
- The former London Park Hotel is prominent over the roofline of listed terraces.
- New tall building development in the Central area will need to consider the impact on the setting of the conservation area and listed buildings when they appear above the treescape and roofline of terraces in the square.

Figure 63.

Indicative photograph of the view



Indicative view (including consented schemes)

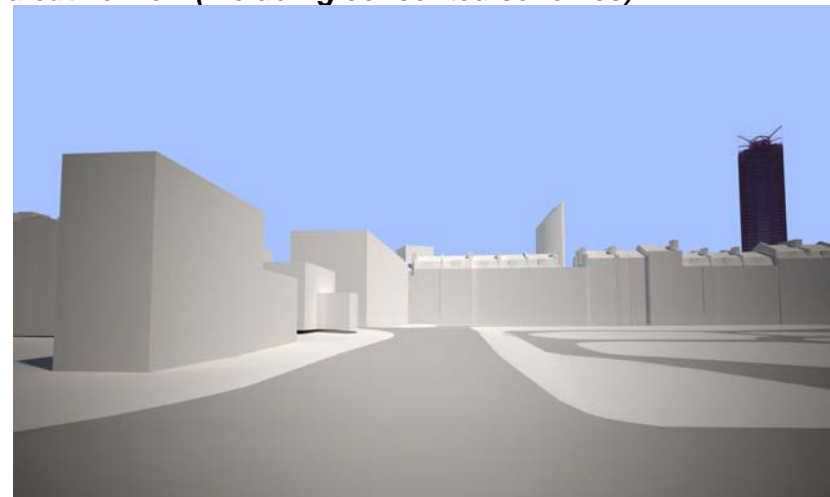
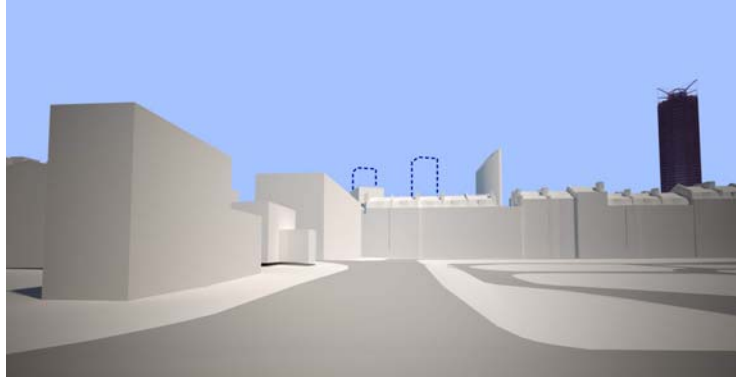
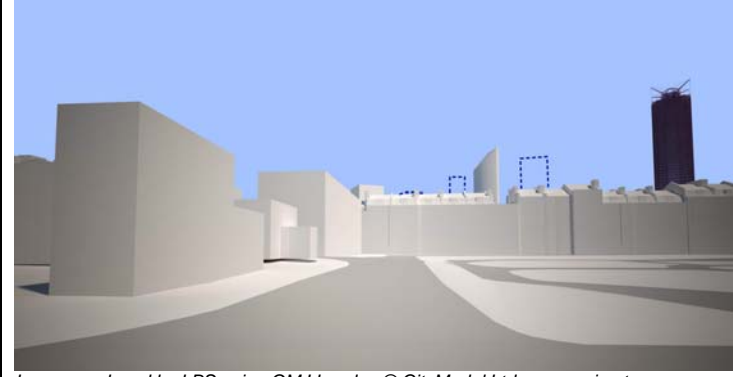


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

**Assessment of testing
options**

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
<p>Heights tested will not be visible in the view.</p>	 <p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p>Heights tested will be slightly visible above the roofline of listed terraces in the background of the view. Very tall buildings in the Central area will have a minor adverse impact on the setting of the conservation area and listed buildings should they be highly visible above the rooflines as they can affect the appreciation of this setting.</p>	 <p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p>Heights tested will be slightly visible above the roofline of listed terraces in the background of the view. Very tall buildings in the Central area will have a minor adverse impact on the setting of the conservation area and listed buildings should they be highly visible above the rooflines as they can affect the appreciation of this setting.</p>

TV 3 Brook Drive (south of Imperial War Museum) and Sullivan Road

- This view is on the border between the West Square (Southwark) and Walcot Square (Lambeth) Conservation Areas. The view establishes the character of the conservation areas and comprises of identical terraced houses which provide a consistent roofline.
- This is a townscape view along Brook Drive looking towards the central area. The street is lined on both sides by terraced houses.
- Strata tower is slightly visible above the roofline.
- The former London Park Hotel is prominent at the end of the view creating a focal point in the Central area when seen along this axis.
- New tall building development will need to consider the impact on the setting of the conservation area when visible in the background of the view over the consistent roof lines.
- When located in close proximity to the consented scheme on the former London Park Hotel site, tall buildings will need to consider the relationship with the consented tall building, as well as in the cluster.

Figure 64.

Indicative photograph of the view




Indicative view (including consented schemes)



Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

<p>Indicative view: Option 1</p> <p>Heights tested will not be visible in the view.</p>	<p>Indicative view: Option 2</p> <p>Heights tested will not be visible in the view.</p>	<p>Indicative view: Option 3</p>  <p><small>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</small></p> <p>Heights tested will be slightly visible above the roofline of listed terraces in the background of the view. Very tall buildings in the Central area will have a minor impact on the setting of the conservation area and listed buildings should they be visible above the roofline.</p> <p>Focus is maintained on the scheme on the former London Park Hotel site as the tallest building in the view.</p>
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TV 4 Walcot Square

- This view is from inside the Walcot Square CA (Lambeth). It establishes the character of the conservation area and comprises identical Grade II listed terraced houses which provide a consistent roofline.
- This is a townscape view along in Walcot Square looking towards the Elephant and Castle central area. The terraced houses converge together in the focus of the view. There are a number of trees in the green space in the square which obscure the view over the roofline
- Strata tower may be visible above the roofline and trees in the square.
- The former London Park Hotel will be prominent at above the roof and tree line in the focus of the view.
- New tall building development in the background of the view will need to consider the potential impact on the setting of the listed buildings and the conservation area if tall buildings appear prominent over the roofline of buildings in the square.

Figure 65.

Indicative photograph of the view



Indicative view (including consented schemes)

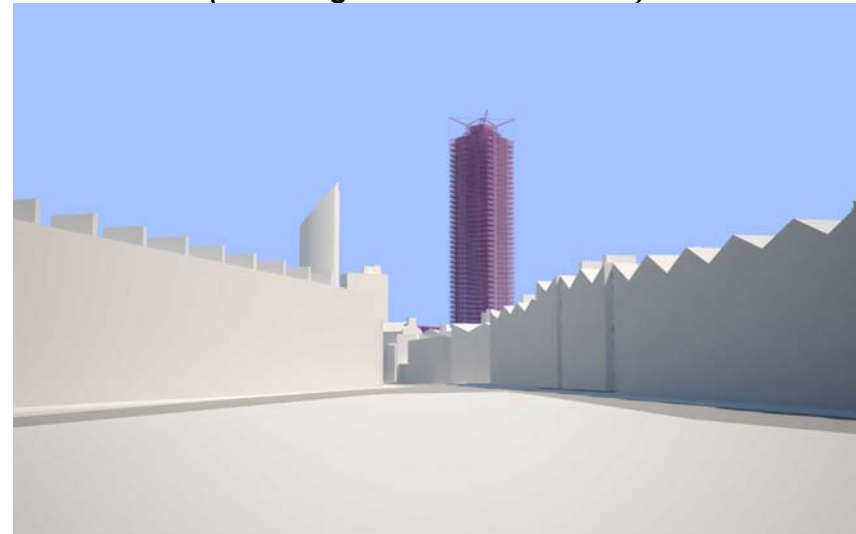
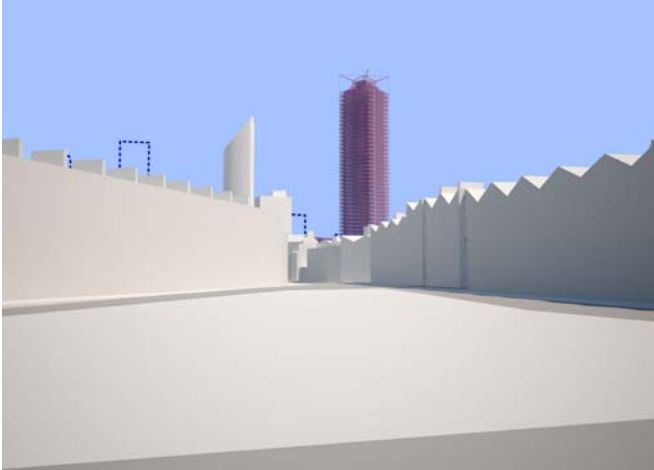
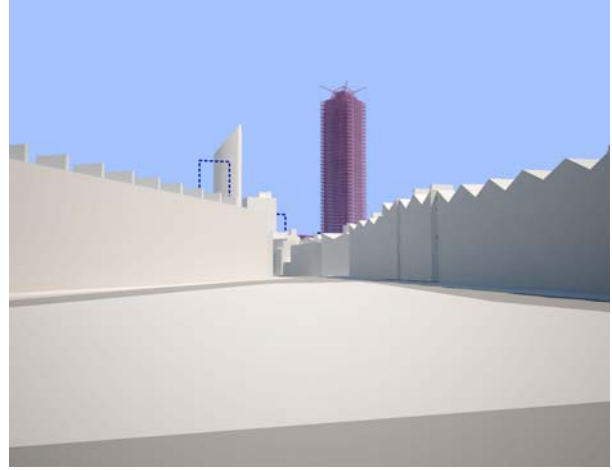


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
<p>Heights tested will not be visible in the view.</p>	 <p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p>Heights tested will be visible above the roofline of listed terraces in the background of the view. Very tall buildings in the Central area will have a minor impact on the setting of the conservation area and listed buildings should they be visible above the roofline.</p> <p>Focus is maintained on the scheme on the former London Park Hotel site as the tallest building in the view.</p>	 <p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p>Heights tested will be visible above the roofline of listed terraces in the background of the view. Very tall buildings in the Central area will have a minor impact on the setting of the conservation area and listed buildings should they be visible above the roofline.</p> <p>Focus is maintained on the scheme on the former London Park Hotel site as the tallest building in the view.</p>

TV 5 North-west of Trinity Church Square (junction with Trinity Street)

- This view is from inside the Trinity Square Conservation Area and establishes the character of the conservation area and historic square which is framed by grade II terraced houses which provide a consistent roofline. The grade II Henry Wood Hall is in the centre of the square.
- This is a townscape view along in Trinity Square looking towards the Elephant and Castle central area. The view is framed by terraced houses and view of the Henry Wood Hall.
- The former London Park Hotel and the 50 New Kent Road are slightly visible above the roofline.
- New tall building development in the background of the view which is visible over the roof line of terraces will need to consider the potential impact on the setting of the listed buildings and the conservation area.

Figure 66.

Indicative photograph of the view



Indicative view (including consented schemes)

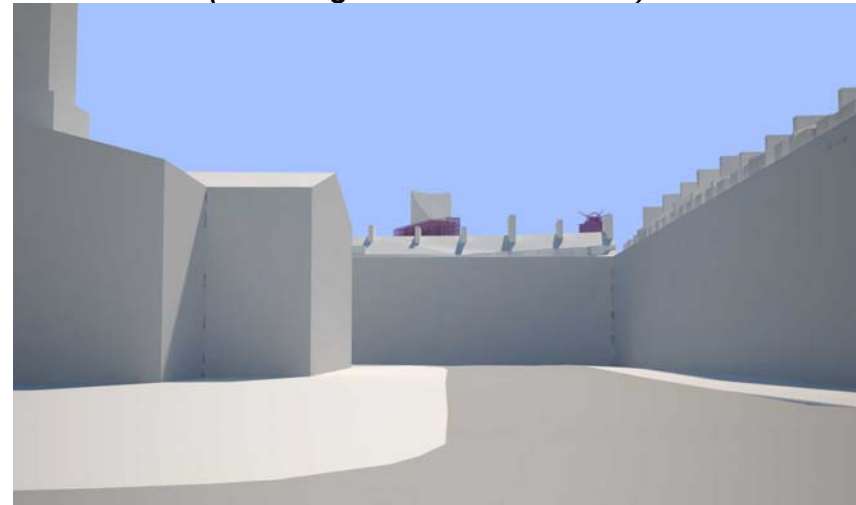
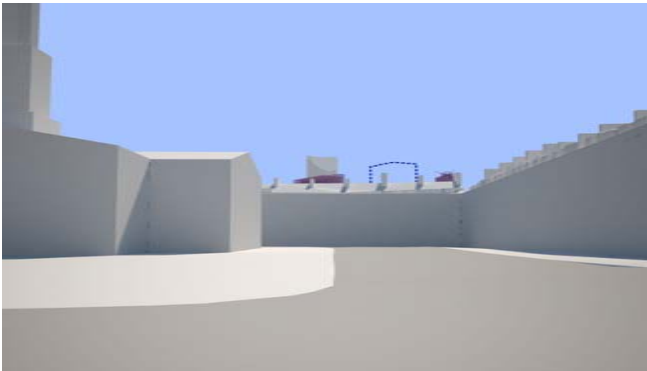


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
<p>Heights tested will not be visible in the view.</p>	 <p><small>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</small></p> <p>Heights tested will be visible above the roofline of listed terraces in the background of the view.</p> <p>Very tall buildings in the Central area will have a moderate adverse impact on the setting of the conservation area and listed buildings should they be highly visible above the rooflines as they can affect the appreciation of this setting.</p>	<p>Heights tested will not be visible in the view.</p>

TV 6 Approach from Walworth Road (junction with Browning Street)

- This view establishes the character of the existing Walworth Road area, which is generally low height in scale.
- Strata forms a focal point at the gateway and as an identifier of the location of the central area.
- This is an axial view along Walworth Road experienced when heading towards Elephant and Castle shopping centre. Strata tower is a focus in the view at the end of the Walworth Road at the central area. The shopping centre and Hannibal House is visible at the end of the street.
- New tall building development at the end of Walworth Road offers an opportunity to enhance the gateway opportunity to the Central area at the end of Walworth Road. Any tall building in this location will need to consider the relationship with Strata tower as well as how this will relate in a cluster of tall buildings.
- Any new development which is proposed along the Walworth Road frontage on the Heygate site will need to consider how the streetfront development manages the transition from the low height of Walworth Road up to taller heights.

Figure 67.

Indicative photograph of the view



Indicative view (including consented schemes)

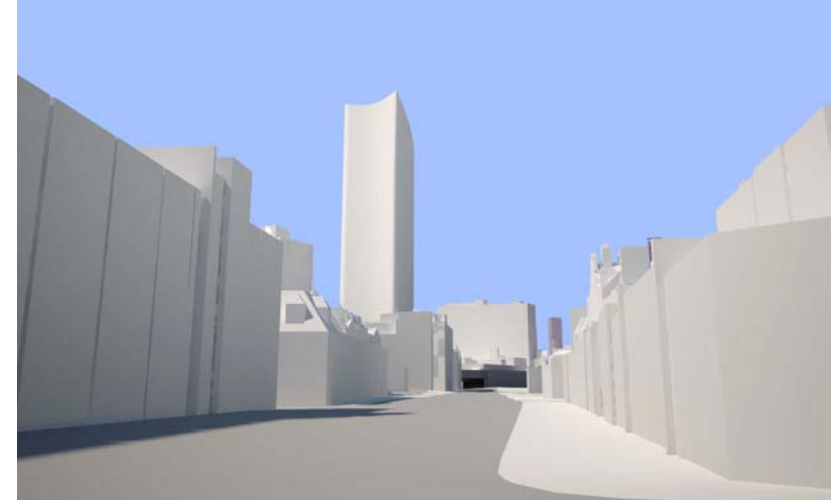


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

Indicative view: Option 1

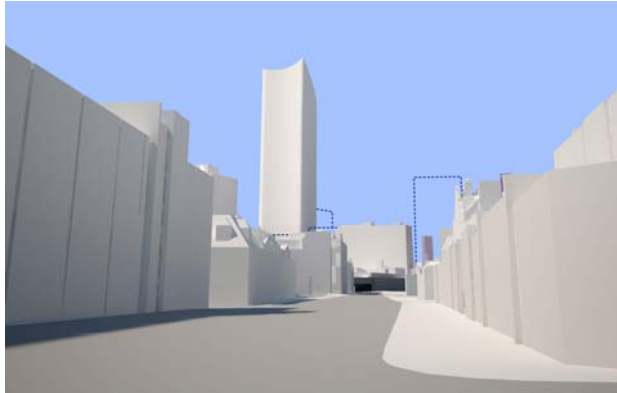


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Heights tested in the Central area are visible in the background of the view, above the line of frontages along Walworth Road and provide a minor change in the view.

At this height tall buildings can accentuate the gateway opportunity on Walworth Road while maintaining a focus on Strata tower as the tallest building in the view.

Indicative view: Option 2

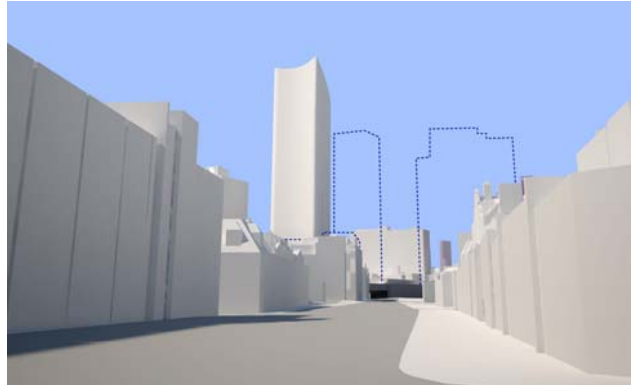


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Heights tested in the Central area are visible in the background of the view, above the line of frontages along Walworth Road as well as in the backdrop of views of Strata. While these tall buildings can provide a moderate change in the view and accentuate the gateway opportunity along the Walworth Road, new tall buildings will need to consider their relationship to Strata and also to other tall buildings in a cluster.

Tall building proposals along Walworth Road will also need to consider the relationship to the existing lower height buildings and the transition in heights.

Indicative view: Option 3

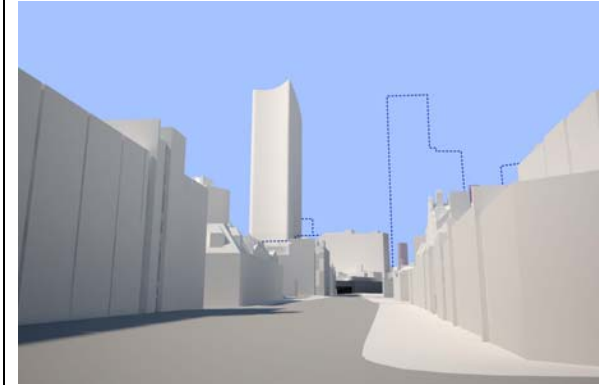


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Similar impacts as option 2, though where height tested appear at similar height to Strata further consideration will need to be given to how the design of a new tall structure of a similar height to Strata will relate to this prominent building, as well as to a cluster of tall buildings.

Particular consideration will need to be given to how a tall building of this height will relate to the lower height buildings along Walworth Road.

TV 7 Approach along New Kent Road

- This view is from outside the opportunity area as you enter from the east and highlights the changes in the area visible in the central area.
- Strata forms a focal point in the view and signals the central Elephant and Castle area.
- There are a number of mature trees along New Kent Road in the background of the view.
- This is an axial view along New Kent Road experienced when heading towards the central area. The large Heygate blocks are visible in the view. Strata tower is prominent when visible over rooflines in the view.
- The consented proposal at 50 New Kent Road will become visible above the roofline of the existing Heygate estate.
- New development on the Heygate site when viewed along main axis from South and East will need to consider the existing scale and height of development surrounding the estate.
- New tall building development on the Heygate site will need to consider how it relates to the surrounding lower height development. Any tall buildings will need to consider how they relate to Strata tower as well as in a cluster.

Figure 68.

Indicative photograph of the view



Indicative view (including consented schemes)

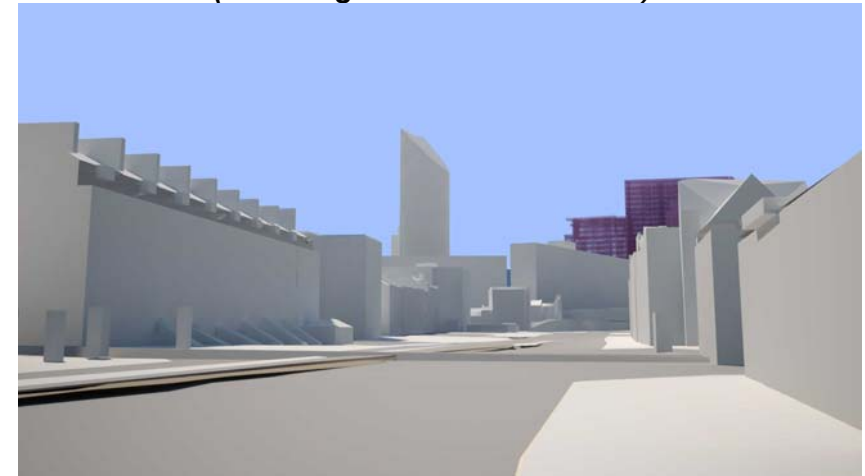
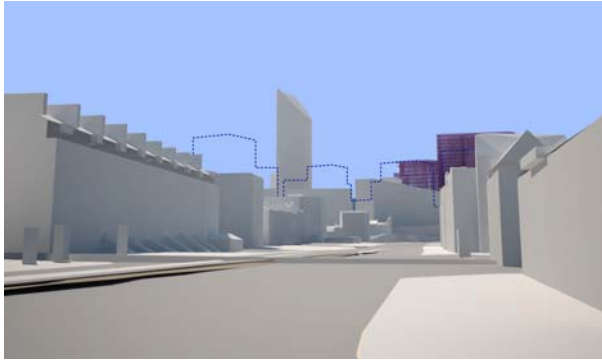


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Assessment of testing options

**Indicative view:
Option 1**

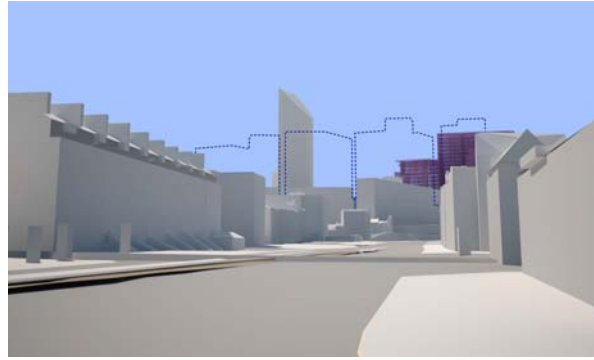


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Heights tested in the Heygate Street area will be visible in the background of the view.

These heights will have a minor impact in the view and can be beneficial by providing a visual transition from the height of Strata tower down to lower heights on New Kent Road.

**Indicative view:
Option 2**



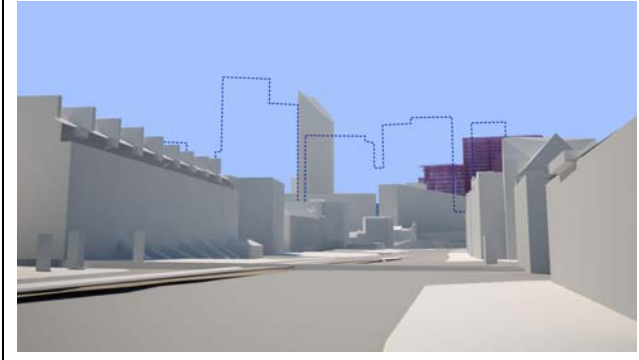
*Image produced by LBS using GMJ London © CityModel Ltd
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Heights tested in the Heygate Street area will be visible in the background of the view.

These heights will have a minor impact, this can be beneficial by providing a focal point to emphasise the gateway into the Elephant and Castle area.

However when a number of taller elements of similar heights are visible in the background the view, the potential impact of these tall buildings on the skyline will need to be considered as well as the relationship to existing lower height buildings.

**Indicative view:
Option 3**



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Similar impacts as option 2.

TV 8 Approach along Newington Causeway

- This view establishes the character of the Enterprise Quarter area along Newington Causeway.
- This is an axial view along Newington Causeway experienced when heading towards the Central area. The railway viaduct crosses over the road and is a barrier in the view.
- Existing mature trees along Newington Causeway are prominent in the view
- Development in the Enterprise Quarter should consider how it can enhance the existing streetscape along Newington Causeway and enhance the gateway opportunity from the Enterprise Quarter into the Central area.
- New tall or large building development will need to consider the cumulative impact of a number of new tall buildings in the emerging cluster particularly and how these change the streetscape when viewed along Newington Causeway.

Figure 69.

Indicative photograph of the view



Indicative view (including consented schemes)

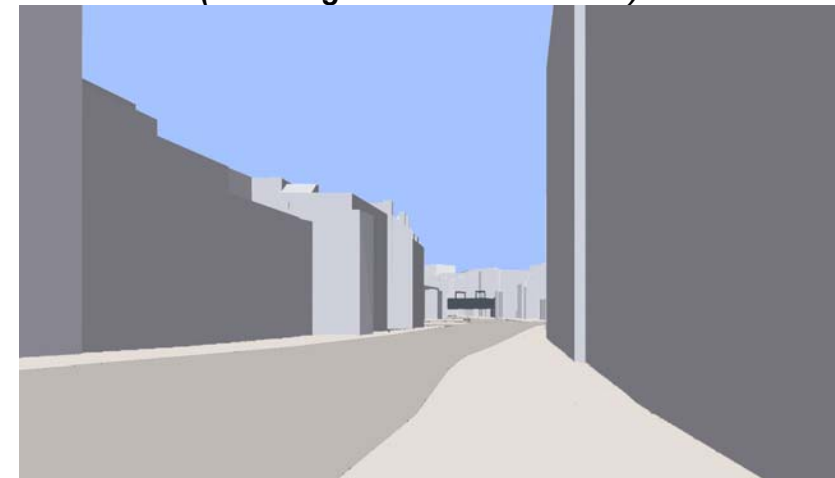
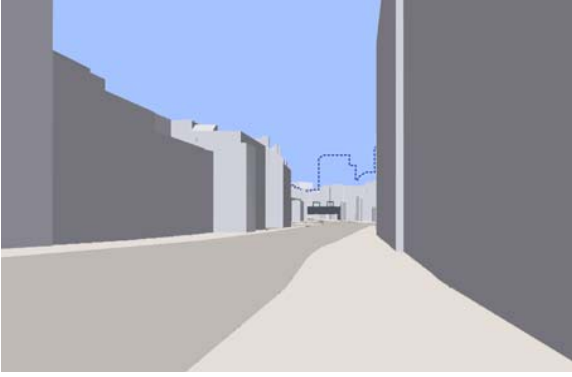
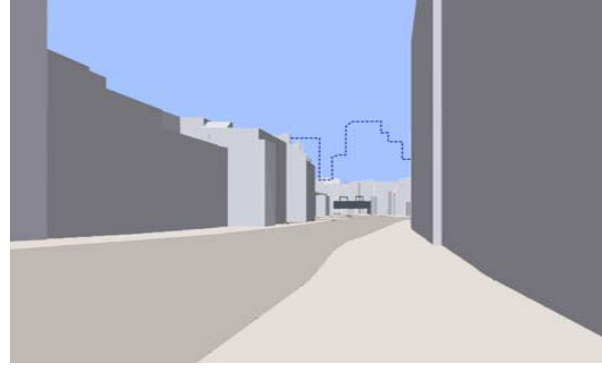
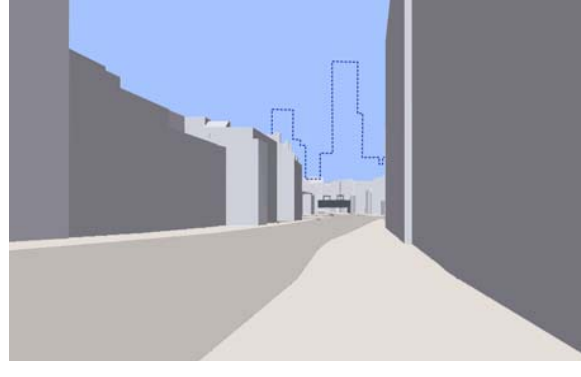


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Assessment of testing options

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
		
<p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p>	<p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p>	<p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p>
<p>Heights tested in the Enterprise Quarter area will be visible in the background of the view</p> <p>These heights will have a minor impact in the view and can be beneficial by providing a focal point to emphasise the gateway into the Elephant and Castle area.</p>	<p>Heights tested in the Enterprise Quarter area will be visible in the background of the view.</p> <p>These heights will have a minor impact in the view and can be beneficial by providing a focal point to emphasise the gateway into the Elephant and Castle area.</p> <p>However when a number of taller elements are visible in the background the view, the potential impact of these tall buildings on the skyline will need to be considered.</p>	<p>Heights tested in the Enterprise Quarter area will be visible in the background of the view.</p> <p>These heights will have a moderate impact in the view and can be beneficial by providing a focal point to emphasise the gateway into the Elephant and Castle area.</p> <p>However when a number of very tall buildings are visible in the background the view, the potential impact of these tall buildings on the skyline, as well as the relationship to existing lower height buildings. will need to be considered</p>

TV 9 St George's Circus view to south

- The view is a planned view in the St George's Conservation Area to the grade II* St George's Obelisk and the grade II listed and possible locally listed frontages along London Road.
- This is the only real example of planned views within the opportunity area arises from St. George's Circus where the views from the radiating streets towards the obelisk were an integral element of the Georgian street plan.
- This is an axial view from the north side of St George's Circus looking towards St George's Obelisk and down London Road towards Elephant and Castle central area with Hannibal House visible in the background.
- There are a number of mature trees that line London Road.
- Once completed the consented 50 New Kent Road scheme will become slightly visible above the roofline of the buildings further down London Road.
- The consented development on the former London Park Hotel site will be visible above the roofline of buildings on the southwest of the circus.
- New tall buildings in the Enterprise Quarter when visible in the background above the roof line of buildings will need to consider the potential impact on the appreciation of the setting of the listed buildings along London Road and Borough Road and the St George's Conservation Area.
- New tall buildings in the Central area can enhance the gateway opportunities and create new focal points when viewed along major axis when approaching the Central area.

Figure 70.

Indicative photograph of the view



Indicative view (including consented schemes)

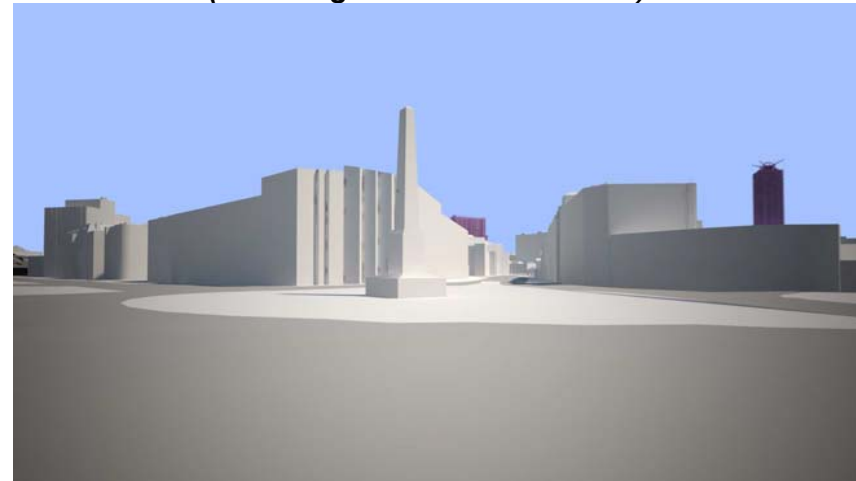


Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net

Assessment of testing options

**Indicative view:
Option 1**

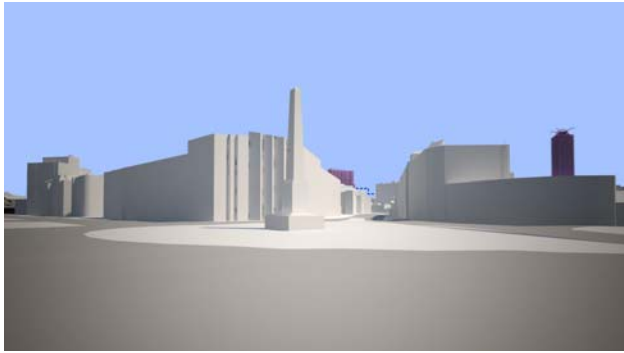


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Heights tested will be slightly visible in the background of the view but have a negligible impact.

**Indicative view:
Option 2**

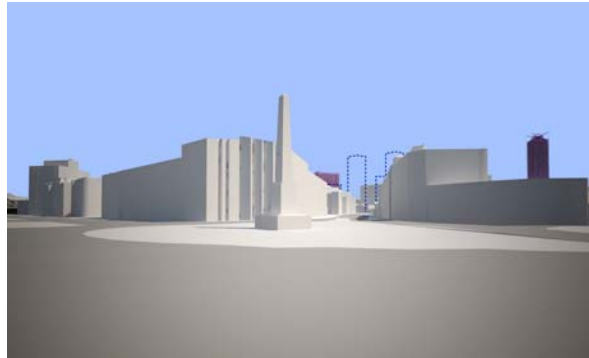


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Heights tested will be visible in the background of the view in the Central area.

These heights will have a minor impact in the view and can be beneficial by providing a focal point to emphasise the gateway into the Elephant and Castle area.

**Indicative view:
Option 3**

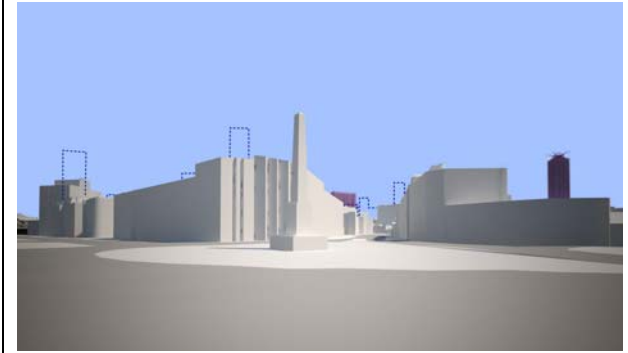


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Heights tested will be visible in the background of the view in the Central area and over the roofline of listed buildings, when located in the Enterprise Quarter area.

These heights will have a minor impact in the view. However when very tall buildings in the Enterprise Quarter area are highly visible over the roofline of listed buildings, the potential impact on the appreciation of the setting of listed buildings and the conservation area will need to be considered.

TV 10 Imperial War Museum (view from Geraldine Mary Harmsworth Park)

- The view is within the West Square Conservation Area with a view towards the Grade II listed buildings surrounding West Square including Charlotte Sharman school buildings.
- This is a townscape view across the Geraldine Mary Harmsworth Park Metropolitan Open Land looking towards the West Square and the Elephant and Castle central area.
- Strata tower is highly visible over the roof line of the grade II listed buildings in Trinity Church square.
- There are a number of mature trees in the view.
- New tall building development in the Enterprise Quarter and Central area when visible above the roofline of buildings in the background of the view will need to consider their potential impact on the setting of the conservation area, listed Imperial War Museum and park.

Figure 71.

Indicative photograph of the view



Indicative view (including consented schemes)

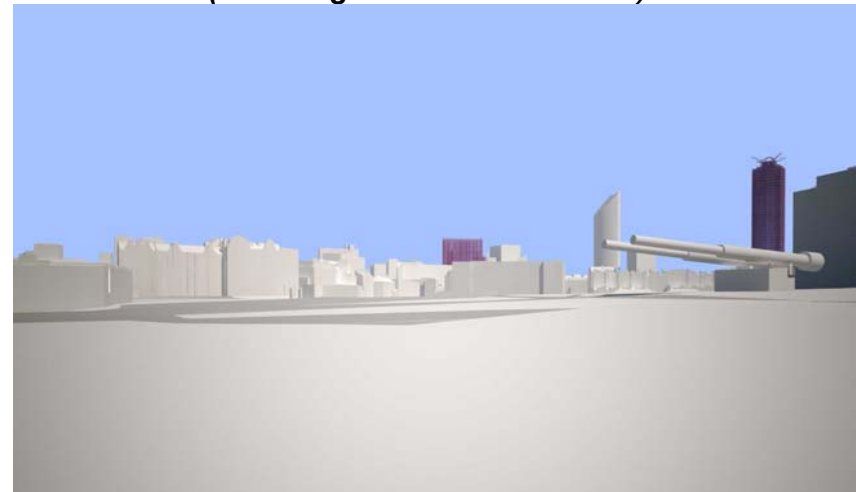


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Assessment of testing options

Indicative view: Option 1

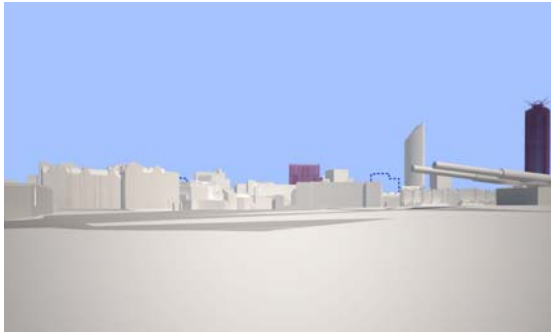


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Heights tested will be slightly visible on the skyline of the view but have a negligible impact.

Indicative view: Option 2

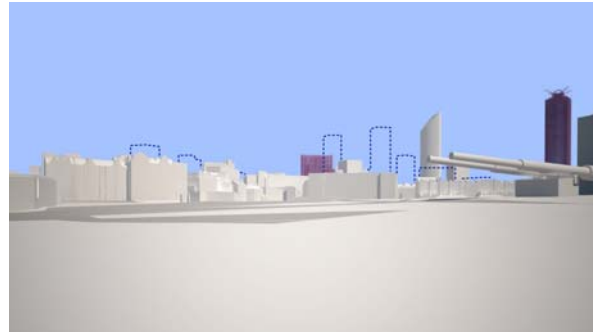


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Heights tested in the Central area will be visible on the skyline of the view.

These heights will have a minor impact in the view and where a number of very tall buildings appear on the skyline, proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal point of Strata tower.

Indicative view: Option 3



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Heights tested in the Central and Enterprise Quarter areas will be visible on the skyline of the view.

These heights will have a minor impact in the view and where a number of very tall buildings appear on the skyline, proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal point of Strata tower.

Where very tall buildings in the Enterprise Quarter sit above the roofline of listed buildings, the potential impact on the appreciation of the setting of the listed buildings will need to be considered.

TV 11 From London Bridge looking south

- This is a view across London Bridge and the River Thames with the towers of Southwark Cathedral a focus in the background of the view.
- This is a river prospect view along a main route into Southwark from the north bank.
- Strata is slightly visible in the background of the view behind the tower of Southwark Cathedral.
- New tall building development which appears in the background of the view of Southwark Cathedral will need to consider the potential impact on the setting of the listed building and its relationship with other buildings in the cluster of tall buildings in Elephant and Castle, particularly with Strata tower, when viewed from the north.

Figure 72.

Indicative photograph of the view



Indicative view (including consented schemes)



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Assessment of testing options

**Indicative view:
Option 1**



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Heights tested will not be visible in the view.

**Indicative view:
Option 2**



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Heights tested in the Central area will be visible on the skyline of the view.

These heights will have a minor impact in the view and proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal point of Strata tower and how this relates to appreciation of the tower of Southwark Cathedral.

**Indicative view:
Option 3**



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Similar impacts as option 2.

TV 12 From Borough High Street looking south

- This is a view from the Borough High Street Conservation Area towards the grade II* listed St. George the Martyr which is a focus in the background of the view.
- This is an axial view along the main route leading from London Bridge towards Elephant and Castle.
- Strata is slightly visible in the background of the view over the roof line of buildings in the background.
- The proposal on the former London Park Hotel site is also visible above the roof line in the background of the view.
- New tall building development which appears in the background of the view should consider how the emerging cluster appears on the skyline when viewed from the main approach from the north of the borough.

Figure 73.

Indicative photograph of the view




Indicative view (including consented schemes)



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Assessment of testing options

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
<p>Heights tested will not be visible in the view.</p>	 <p><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p>Heights tested will be slightly visible above the roofline of existing buildings along Borough High Street.</p> <p>These heights will have a minor impact in the view and proposals will need to consider the relationship of tall buildings within the cluster when seen from the north.</p>	<p>Heights tested will not be visible in the view.</p>

TV 13 Camberwell Road view towards St Paul's Cathedral

- The grade I St Paul's Cathedral is visible in the background of the view along the axis of Camberwell Road. This is one of Southwark's clear views towards the Cathedral.
- This is an axial view looking down Camberwell Road towards Elephant and Castle central area. St Paul's Cathedral is visible in the background of the view along the street axis.
- A number of mature trees line the street.
- New development in the Heygate Street area should consider the potential impact on the view of St Paul's Cathedral when viewed from Camberwell Road.

Figure 74.

Indicative photograph of the view

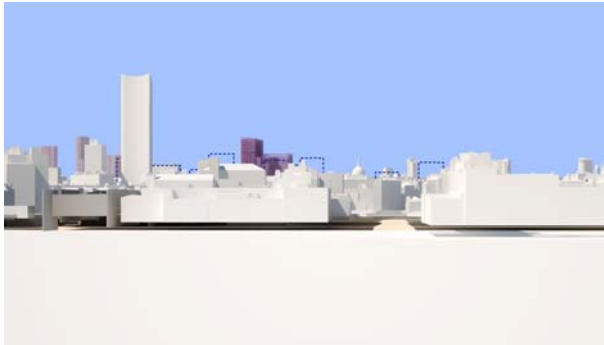




Indicative view (including consented schemes)



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Assessment of testing options

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
 <p data-bbox="185 751 786 794"><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p data-bbox="185 834 786 898">Heights tested will be slightly visible above the roofline of existing buildings.</p> <p data-bbox="185 938 786 1002">These will have a negligible impact in the view.</p>	 <p data-bbox="813 751 1435 794"><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p data-bbox="813 834 1435 898">Heights tested will be slightly visible above the roofline of existing buildings.</p> <p data-bbox="813 938 1435 1066">These heights will have a moderate impact in the view and will need to consider the potential impact on the view of the dome of St. Paul's Cathedral.</p> <p data-bbox="813 1106 1435 1201">When a number of very tall buildings are visible proposals will need to consider the relationship of tall buildings within the cluster.</p>	 <p data-bbox="1462 751 2087 794"><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p data-bbox="1462 834 2087 1098">Similar impacts to option 2, though these heights will have a moderate impact in the view and will need to consider the potential impact on the view of the dome of St. Paul's Cathedral. Proposals which block this view of St. Paul's Cathedral would have an adverse impact on the appreciation of the Cathedral when seen from this view.</p>

TV 14 From Victoria Tower Gardens towards the River Thames

- The view is of grade I Lambeth Palace and grade II St Thomas's Hospital and Medical School buildings.
- This is a river prospect view over the River Thames looking from Victoria Tower Gardens towards the east side of the river bank.
- Strata is visible above the roofline of the Medical School.
- The consented proposal on the former London Park Hotel will be visible above the roofline.
- New tall buildings in the Enterprise Quarter should consider how the cluster of new tall buildings in Elephant and Castle will appear on the skyline when viewed over the roof line of Lambeth Palace and St Thomas Hospital when viewed from the west side of the River Thames embankment.

Figure 75.

Indicative photograph of the view



Indicative view (including consented schemes)

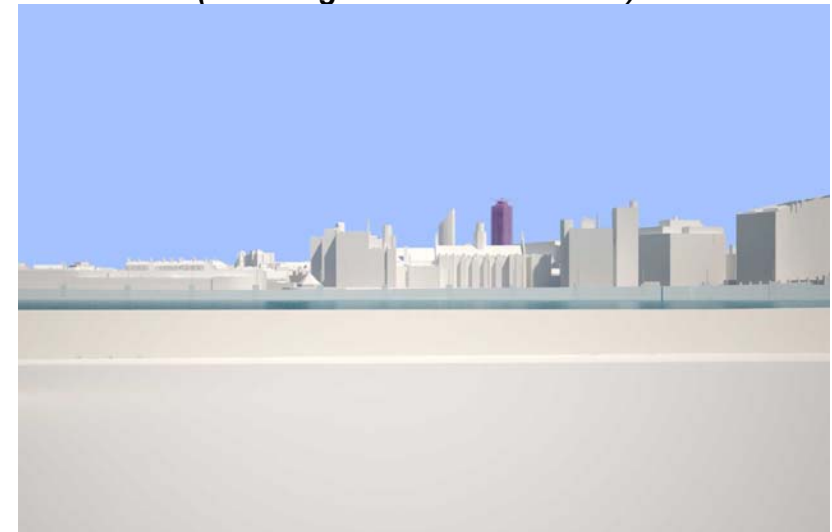


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Assessment of testing options

Indicative view: Option 1

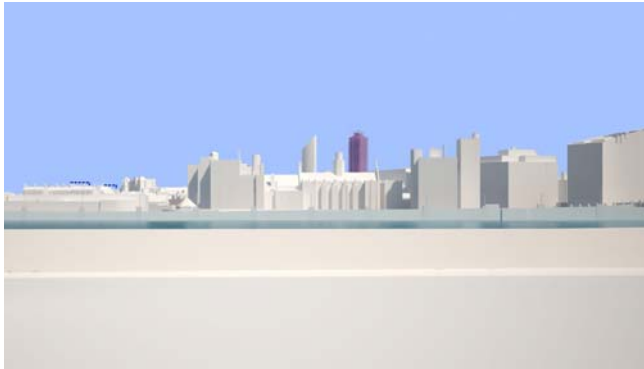


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Heights tested will be slightly visible on the skyline above the roofline of existing buildings.

These will have a negligible impact in the view.

Indicative view: Option 2

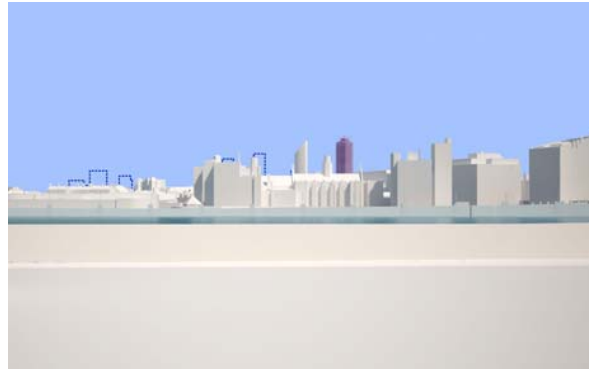


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Heights tested will be slightly visible on the skyline above the roofline of existing buildings.

These heights will have a minor impact in the view. When a number of very tall buildings are visible proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal points of Strata tower and the consented scheme on the former London Park Hotel site.

Indicative view: Option 3

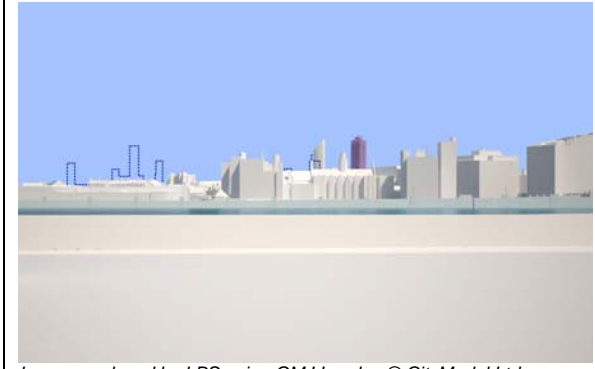


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Heights tested will be visible on the skyline above the roofline of existing buildings. This applies particularly to heights tested in the Enterprise Quarter area.

These heights will have a minor impact in the view. When a number of very tall buildings are visible proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal points of Strata tower and the consented scheme on the former London Park Hotel site.

TV 15 Kennington Park looking towards the north

- The view from within the Historic Registered Kennington Park looking to the north.
- Mature trees are visible in the foreground and backdrop of the view.
- This is a townscape view from Kennington Park looking towards the Elephant and Castle central area.
- Strata tower and the Shard are visible in the backdrop of the view.
- The consented proposal on the former London Park Hotel will also be a prominent feature and establish the cluster of tall buildings at Elephant and Castle.
- New tall buildings on the Heygate development site will need to consider how they relate in a cluster of tall buildings in the Elephant and Castle and particularly in relation to Strata and consented former London Park Hotel scheme when viewed from the south.

Figure 76.

Indicative photograph of the view



Indicative view (including consented schemes)

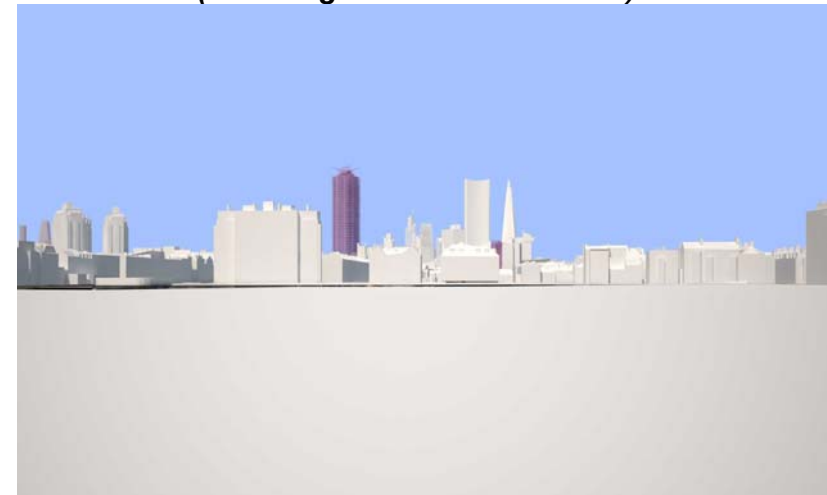
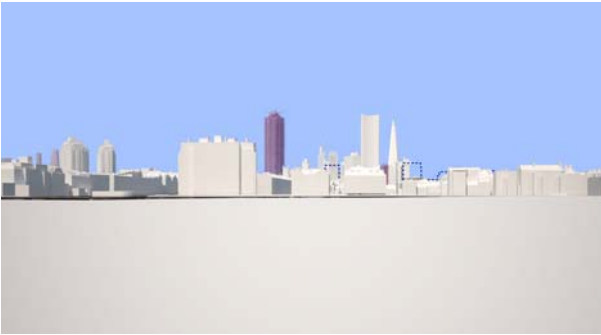
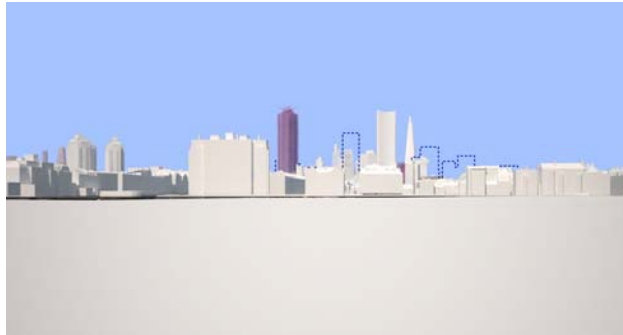



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Assessment of testing options

Indicative view: Option 1	Indicative view: Option 2	Indicative view: Option 3
 <p data-bbox="188 735 786 783"><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p data-bbox="188 823 786 922">Heights tested will be slightly visible on the skyline above the roofline of existing buildings.</p> <p data-bbox="188 959 786 1023">These will have a negligible impact in the view.</p>	 <p data-bbox="810 735 1431 783"><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p data-bbox="810 823 1431 887">Heights tested will be slightly visible on the skyline above the roofline of existing buildings.</p> <p data-bbox="810 924 1431 1158">These heights will have a minor impact in the view. When a number of very tall buildings are visible proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal points of the Shard, Strata tower and the consented scheme on the former London Park Hotel site.</p>	 <p data-bbox="1449 735 2060 783"><i>Image produced by LBS using GMJ London © CityModel Ltd www.gmj.net</i></p> <p data-bbox="1449 823 2060 922">Heights tested will be slightly visible on the skyline above the roofline of existing buildings.</p> <p data-bbox="1449 959 2060 1225">These heights will have a minor impact in the view. When a number of very tall buildings are visible proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal points of the Shard, Strata tower and the consented scheme on the former London Park Hotel site.</p>

TV 16 View from Nursery Row Park

- This view helps establish the existing character of the Brandon Street character area and provides a clear view of the regeneration of the area. The potentially local listed Peabody estate buildings are visible in the background of the view.
- This is a view across the protected open space of Nursery Row Park looking towards the Elephant and Castle central area.
- Strata is prominent in the view over the Heygate estate blocks with Draper House also visible in the view.
- The consented proposal on the former London Park Hotel will also be a prominent feature and establish the cluster of tall buildings at Elephant and Castle.
- New development in the Heygate Street area will need to consider how the composition of this development will impact on the skyline, particularly with consideration to the existing low height development in the surrounding area.
- New tall buildings should consider how a cluster of tall buildings will impact on the skyline when visible from the south and particularly from higher points in the area.

Figure 77.

Indicative photograph of the view



Indicative view (including consented schemes)

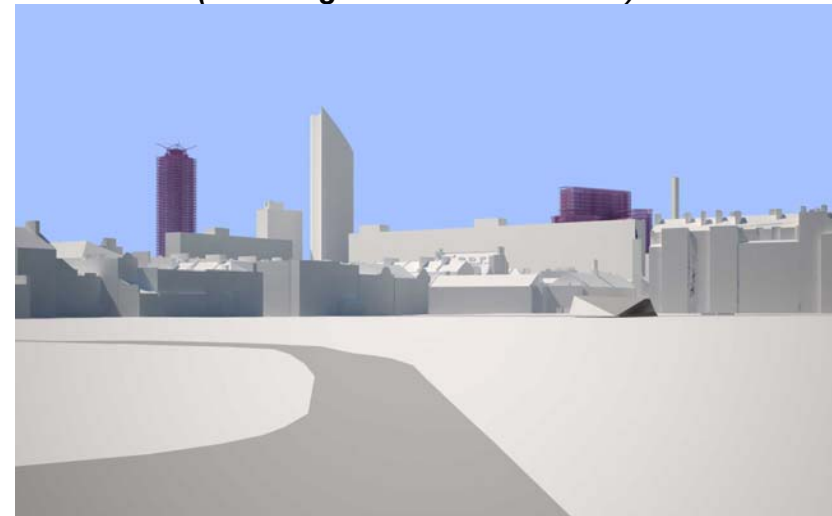


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Assessment of testing options

Indicative view: Option 1

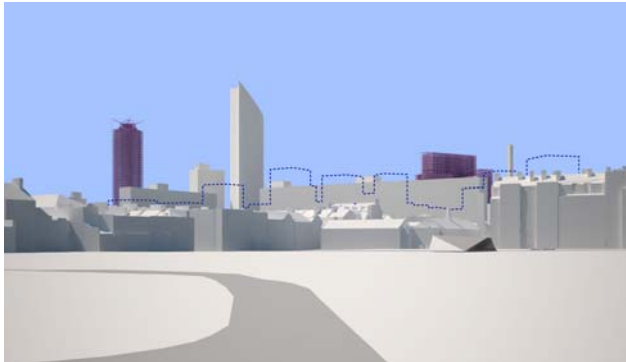


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Heights tested in the Heygate Street area will be visible in the background of the view.

These heights will have a minor impact in the view and can be beneficial by providing a visual transition from the height of Strata tower down to lower heights of existing buildings.

However when a number of taller elements of similar heights are visible in the background the view, the potential impact of these tall buildings on the skyline, as well as the relationship to existing lower height buildings. will need to be considered

Indicative view: Option 2

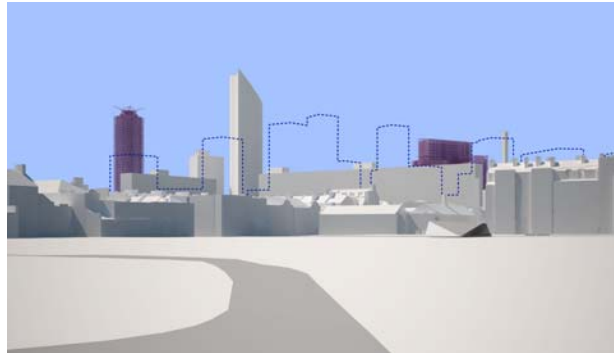


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Heights tested in the Heygate Street area will be visible in the background of the view.

These heights will have a moderate impact in the view. When a number of very tall elements are visible in the background the view, the potential impact of these tall buildings on the skyline will need to be considered, particularly the relationship to the cluster of tall buildings, including the existing focal points of Strata tower and the consented scheme on the former London Park Hotel site. Proposals will also need to consider the relationship to existing lower height buildings.

Indicative view: Option 3

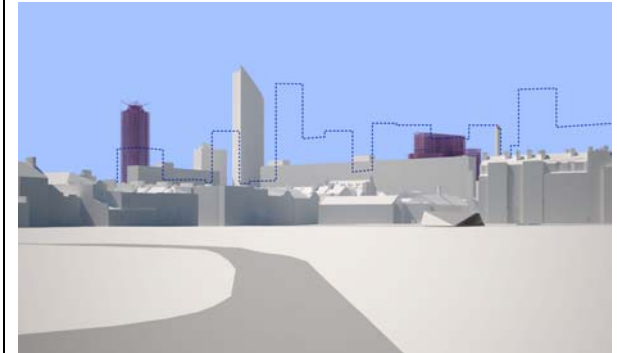


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Similar impacts as option 2.

Consideration should also be given to the setting of the Peabody estate buildings, which have been identified as having the potential for local listing.

TV 17 View along Brook Drive from corner Oswin Street

- This view helps establish the existing character of the West Square character area and New Elliott's Row Conservation Area.
- This view establishes the cluster of towers at Elephant and Castle with a clear view of Strata and Draper House.
- This is a view from the edge of the Elliott's Row Conservation Area looking towards the Elephant and Castle central area.
- Strata is prominent in the view above the rooflines of houses in the foreground adjacent to Draper House.
- There are a number of mature trees in the view.
- The consented proposal at 50 New Kent Road will be visible in the background of the view.
- New tall building development in the Central area will should consider the relationship in a cluster of tall buildings and particularly the relationship to Strata tower when viewed from the west.

Figure 78.

Indicative photograph of the view



Indicative view (including consented schemes)

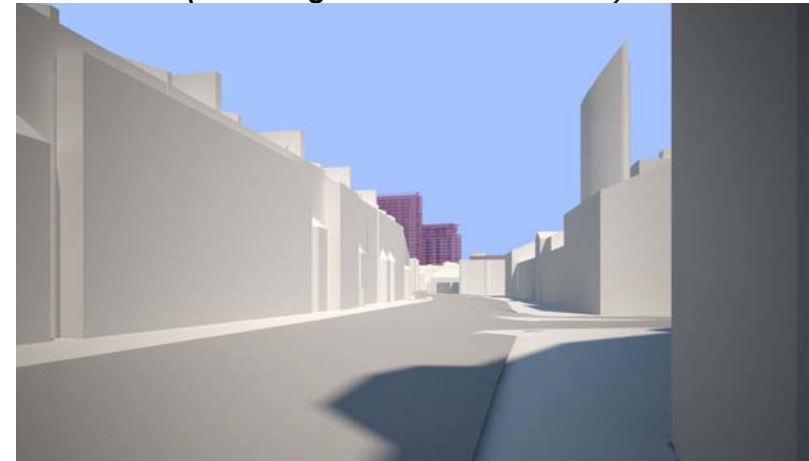


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Assessment of testing options

Indicative view: Option 1

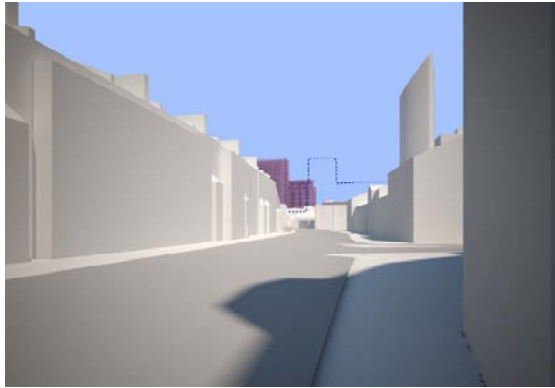


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Heights tested in the Central area will be visible in the background of the view.

These heights will have a minor impact on the view and can be beneficial by creating a new focal point in the view.

Indicative view: Option 2

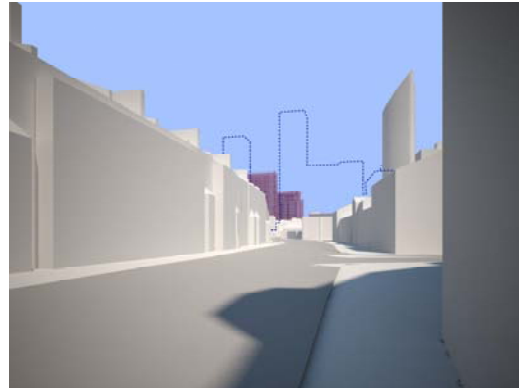


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Heights tested in the Central area will be visible in the background of the view.

These heights will have a minor impact on the view and can be beneficial by creating new focal points in and a visual transition from the height of Strata tower down to lower heights of existing buildings. However when a number of tall elements are visible on the skyline these heights will have a moderate impact in the view and proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal point of Strata tower. Proposals will also need to consider the relationship to existing lower height buildings and in particular the potential impact on the setting of the conservation area.

Indicative view: Option 3



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Similar impacts as option 2.

Where very tall buildings are closely located to Strata the relationship between these two tall buildings will need consideration during the design process.

TV 18 View from Pasley Park

- This is a view across the protected open space of Pasley Park looking towards Elephant and Castle to the north.
- This is a panorama view of the Elephant and Castle area when seen from the open space of Pasley Park in the south.
- Strata is a prominent feature on the skyline in the background of the view.
- The consented proposal on the former London Park Hotel site will also become a prominent feature in the background of the view.
- New tall building development in the Central area will should consider the relationship in a cluster of tall buildings and particularly the relationship to Strata tower when viewed from the west.

Figure 79.

Indicative photograph of the view



Indicative view (including consented schemes)

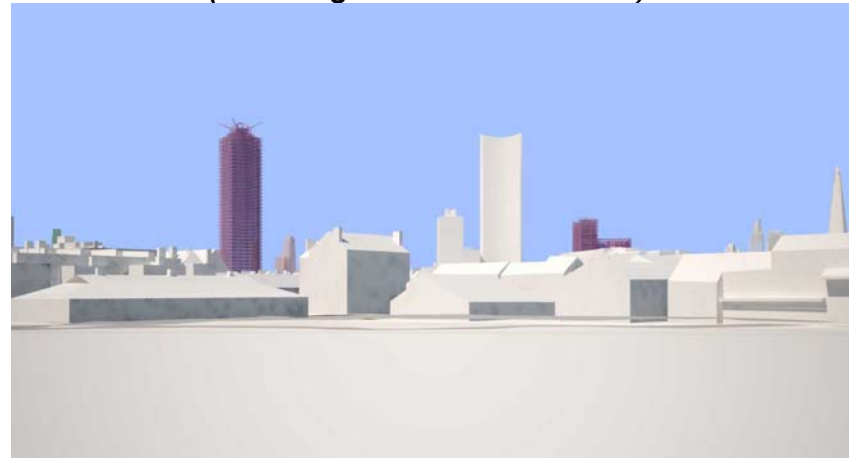


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Assessment of testing options

**Indicative view:
Option 1**

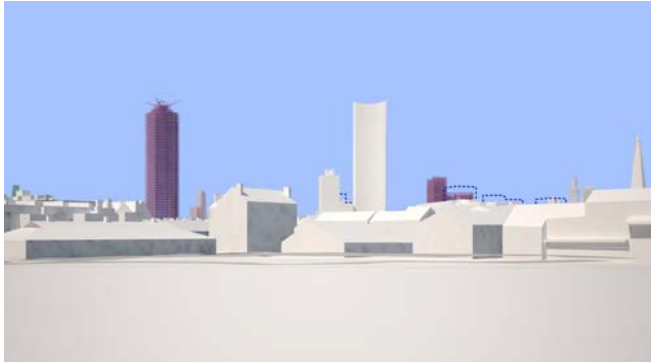


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Heights tested will be slightly visible on the skyline above the roofline of existing buildings.

These will have a negligible impact in the view.

**Indicative view:
Option 2**

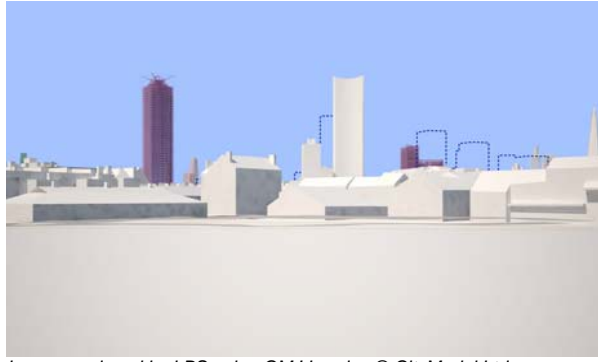


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Heights tested will be slightly visible on the skyline above the roofline of existing buildings.

These heights will have a minor impact in the view. When a number of very tall buildings are visible proposals will need to consider the relationship of tall buildings within the cluster as well as to the existing focal points of the Shard, Strata tower and the consented scheme on the former London Park Hotel site. These heights can be beneficial by creating a focal point in the view and providing a visual transition from the heights of Strata tower and the consented scheme on London Park Hotel site to lower height buildings.

**Indicative view:
Option 3**

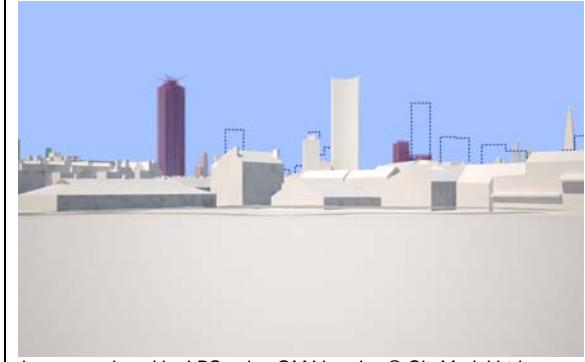


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Similar impacts to option 2.