

Draft Lambeth Site Allocations DPD

SA19 Knolly's Yard, Knolly's, SW16

Evidence



January 2022



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1. INTRODUCTION

- 1.1 This evidence demonstrates the approach taken to understanding the design-led optimisation of the site to inform the content of the draft site allocation policy for this site.
- 1.2 This evidence is in several parts. Part 2 contains an assessment of the site and its context and analysis of the opportunities and constraints these present. That assessment has informed the key design principles for approaching development on the site as set out in Part 3. The detailed analysis has allowed an indicative approach to massing and height to be developed which is set out in Part 4. The indicative approach has been tested to ensure it meets the key design principles and this testing is explained in Part 5. Part 6 concludes the evidence with the identification of key design considerations to be included within the SADPD Policy itself.
- 1.3 The indicative approach included in this evidence is one way to achieve design-led optimisation of the site, assuming it is comprehensively redeveloped. The indicative approach is for testing purposes only and does not have the status of planning policy or guidance. It is not intended to be prescriptive. Applicants and their architects are expected to develop their own approaches to optimisation of capacity within the context of the parameters, constraints and opportunities set out in the site allocation policy.
- 1.4 The indicative approach massing, in combination with land use analysis, has informed the approximate land use quantum included within the draft site allocation policy. As the indicative approach does not include detailed floor plan designs, a number of standard assumptions have been used to approximate the potential number of residential units, including London Plan space internal standards, London Plan and Local Plan external amenity space standards, Local Plan requirements for dual aspect residential units, Local Plan policy for dwelling size mix, and best practice separation distances for that context. For this reason, the indicative quantum included in the draft allocation is approximate and should not be read as absolute minima or maxima. Applicants and their architects may be able to demonstrate a different figure based on alternative design solutions to the site. Detailed planning assessment of design proposals at pre-application and planning application stage may also result in a variation on the indicative figures included in the draft site allocation policy.
- 1.5 References to building heights should be read in the context of the definitions in Local Plan Policy Q26. As storey heights vary according to the building use, they are not an accurate means to gauge height. For that reason, building heights are expressed in metres rather than storeys. Additionally, above Ordnance Datum (AOD) height is used to aid understanding of site and context topography in those circumstances where the topography is varied.
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2. SITE APPRAISAL / ANALYSIS

Site Overview

2.1 Principal details of the site are outlined below:

Site Address Knolly's Yard, Knolly's Road London, SW16

Site Area (approx.) 16,629m², 1.66ha



Figure 1 – Site boundary map

Site Photographs

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



Figure 2-- Viewing Location: York Hill overbridge close to the junction with Knolly's Road looking north towards the site. The site can be seen in the space between the diverging railway lines.



Figure 3 - Viewing Location: Cameron Place looking northeast towards the site. The underbridge provides sole access into the site for both pedestrians and vehicles.



Figure 4- Viewing Location: Knolly's Yard, within the site looking southwest towards Cameron Place underbridge. The properties beyond are those to Cameron Place.



Figure 5 - Viewing Location: Knolly's Yard, within the site looking northeast along the roadway. The visible block in the distance is IRA Court, Norwood Road.

Current Site Character and Brief History

- 2.3 The site is formed by the convergence of railway lines approaching from the W, NE, and S. These lines were laid in the 1860s and the triangular shape results entirely from this railway line configuration. For three decades the site remained empty but by the 1910s a coal depot had been established. That use appears to have continued until the post-war decades. Since that time the site has been used as industrial space, most recently as scaffolding yard.
- 2.4 The site is accessed from its Western side by an underbridge via Cameron Close. The restricted height of the underbridge limits the height of vehicles that can enter the site and restricts the types of industrial uses on site.
- 2.5 Within the site an access road serves a number of yards. Within some of the yards are sheds, outbuildings and temporary buildings serving as stores and offices
- 2.6 Around the perimeter edge of the site mature trees line the railway edges and are subject to a group Tree Preservation Order (TPO no. 205).

Historical Maps

2.7 The historic maps below show key phases in the development of the site.

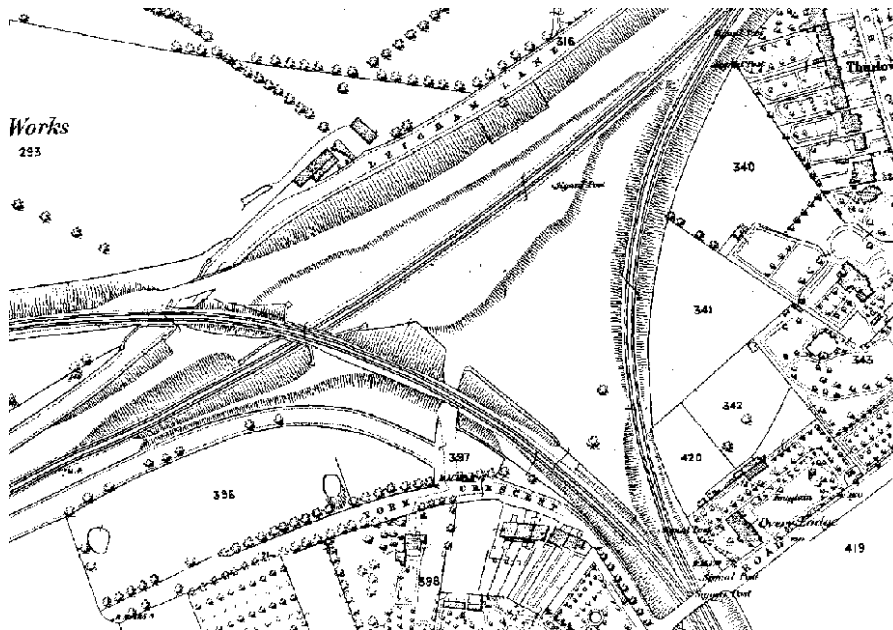


Figure 6 - 1867 – 1895 OS map – The railways define the site and it is accessed by the current underbridge. However, it appears unused.

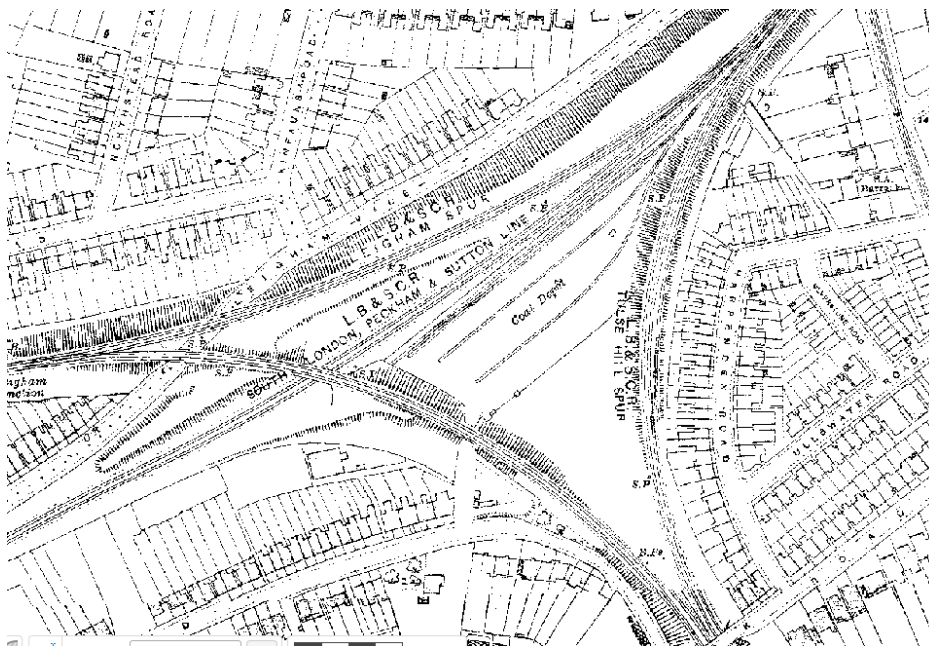


Figure 7 - 1912-16 OS Map – The coal depot occupies the north of the site and is served by spur lines coming off the railway from the north-eastern corner of the site.

Site Context

Local Character

- 2.8 The Tulse Hill neighbourhood, like West Norwood to its south, has a hilly topography which lends much to the character of the locality. The district urbanised in the later decades of the 19th Century following the opening of Tulse Hill Railway Station in 1869. The 19th Century housing that characterises Tulse Hill was built for the expanding middle classes and is generally attractive but undistinguished housing in brick with slate roofs.
- 2.9 Leigham Vale runs parallel to the northern side of the site. The railway embankment forms its southern side. The topography falls from west to east. The houses on the northern side, looking south towards the site, are semi-detached two storey houses dating from c1890.
- 2.10 Knolly's Road adjoins the western side of the site and bends southward along the railway to connect to York Hill. The housing along Knolly's Road is varied and reflects the fact that the plots here were developed in a piecemeal fashion over many decades. The houses on the southern side were generally built first. The majority of the houses on the northern side date from c1900. Whilst most of the buildings are Victorian there are inter-war houses and post-war blocks of flats. Knolly's Road has an elevated position in relation to the site. Nos. 177 and 179 are the only Knolly's Road properties that back directly onto the railway line that bounds the western side of site. These are 1990s blocks of flats.
- 2.11 Cameron Place is a cul-de-sac of modern suburban houses built to the rear of nos. 127 – 175 Knolly's Road and immediately south of the railway lines which define the site's western extreme. A mature belt of trees separates the houses here from the railway line.
- 2.12 Harpenden Road backs onto the railway line which forms the eastern side of the site and its road alignment follows the sweep of the railway line. The highest level on Harpenden Road is its southern end (where it meets York Road) with the ground levels falling as the road progresses northwards. Harpenden Road has a sharp turn at its northern end which connects it to Norwood Road. As the ground level falls the properties here sit at a lower level than the site and where these back onto the railway, there is an embankment.
- 2.13 Penrith Place is a cul-de-sac of modest houses accessed off the northern side of Harpenden Road. The houses on Penrith Place sit in close proximity to the railway lines which define the north-eastern corner of the site.

Building Heights

- 2.14 The vast majority of the properties in the locality of the site are purpose-built houses of two and three storeys in height. The locality is not characterised by tall buildings which, given the site is located South of the South Circular Road, are those exceeding 25m in height.

Building Uses

- 2.15 The locality is largely residential in character.

Heritage Assets

- 2.16 There are no heritage assets on the site.

Designated Heritage Assets (DHA)

- 2.17 The following designated heritage assets are within the wider locality of the site

Asset	Description
242 – 244 Norwood Road (grade II)	This modest 19 th Century villa stands on the western side of Norwood Road some distance from the site boundary.
St Luke's Church, Knights Hill	Grade II* listed regency church. Important local landmark, especially in views from West Norwood Conservation Area.
Trinity Church, trinity Rise (grade II listed church on edge of Brockwell Park)	Gothic revival church with tower and spire which is an important landmark in views from Brockwell Park.
Brockwell Park Registered Landscape	The historic parkland to Brockwell Hall was converted into a public park in the late 19 th Century. It has landscape and built features from both phases of its history.
Brockwell Park Conservation Area	The Brockwell Park Conservation Area is located some distance to the north of the site. It comprises the historic parkland of Brockwell Park, the grade II* listed Brockwell Hall and 19 th Century development around the park perimeter.
Lancaster Avenue Conservation Area	The conservation area lies some distance to east of site. The conservation area extends from Norwood Road (east) to Thurlow Park Road, is residential in character, and contains a number of locally listed buildings.
Leigham Court Estate Conservation Area	This conservation area lies some distance to the west of the conservation area with its principal roads – Amesbury Avenue and Barcombe Avenue aligned towards the site. The area is characterised by high quality Edwardian housing.
West Norwood Cemetery Registered landscape	The Cemetery is a Grade II* registered landscape containing many statutory listed monuments. It is on the Heritage at Risk Register and is the subject of a major HLF funded restoration initiative being led by the Council and the Friends of West Norwood Cemetery. The landscape is expansive and sits to the south-east of the site. The low-rise setting of the Cemetery contributes to its significance by reinforcing its landscape character – at present no development dominates the views out. The Cemetery is low-lying land at its western end which is at the foot of Knights Hill and then the ground rises up Pilgrim Hill to the east and south-east. The

	topography is one of the Cemetery's defining features as the north facing slopes and the emphasis of all the main paths towards the entrance in the north-western corner means that many of the views from the Cemetery area towards the site.
West Norwood Conservation Area	This conservation area lies to the south-east of the site. The conservation area comprises of West Norwood Cemetery and some mostly Victorian development around its perimeter.

Non-Designated Heritage Assets (NDHA)

2.18 There are no non-designed heritage assets within the immediate vicinity of the site. In the wider vicinity there are two locally listed buildings:

- 270 Norwood Road – a late 19th Century bank.
- Hitherfield Primary School, Leigham Vale – a late 19th Century school

Designated Views

Strategic Views

2.19 The does not fall within any strategic views.

Local Views

2.20 Policy Q25 of the Lambeth Local Plan identifies views of local importance. The site falls within the following Lambeth views:

(c) Landmark Silhouette Views iii) - View N from Chapel Road along Weaver Walk of St Luke's Church tower

Access and Servicing

2.21 The site is accessed from Cameron Place which has a sloping roadway off the western end of Knolly's Road. An underbridge with limited head height provides sole vehicular and pedestrian access into the site. See Image 2.

Planning and Emerging Context

- 2.22 This site was designated a Key Industrial and Business Area through the adoption of the Lambeth Local Plan 2021. It is identified as having potential for industrial intensification and co-location with other uses such as residential – see Lambeth Local Plan policy ED3C and associated supporting text, particularly paragraph 6.29. This policy and supporting text allow for a site-specific approach to industrial intensification in KIBAs of this type where specified through a site-specific policy in the Site Allocations DPD. The requirements of London Plan policy E7D will apply to this site in addition to the site allocation policy, once adopted.
- 2.23 In recent years, the industrial activity on the site has been very low in both employment density and building density, occupied primarily by firms in the construction sector (e.g., scaffolders and welders) using open yards with a limited number of buildings. The single-lane, low-headroom access to the site under one of the railway lines constrains the amount and type of industrial activity that can take place at present. Assuming significant improvements to the access can be achieved (for vehicles and other road users including pedestrians and cyclists), there is scope to intensify the industrial activity on the site by providing more floorspace, resulting in greater levels of employment density in industrial sectors.
- 2.24 The very significant costs likely to be associated with providing adequate access to the site will have a bearing on the deliverability of new development. This helped to justify the identification of the site/KIBA for the co-location approach through the examination of the Local Plan. Residential development is going to be necessary alongside industrial to enable the benefits associated with new industrial floorspace as well as the wider planning benefits that can be achieved through redevelopment of the site.
- 2.25 The shape and configuration of the site and various constraints (including the requirement to retain an electricity sub-station and to allow on-going access to the railway lines for servicing and repairs) also limit the design options in terms of how industrial and residential can be co-located in this case. This, in addition to the nature of demand in the local area, will affect the type of industrial space provided. Light industrial workspace is likely to be most compatible with residential in this instance. Other KIBAs in West Norwood (particularly the existing, large commercial area KIBA) provide a good alternative for heavier, more bad neighbour uses. In combination this will help to ensure a good mix of types of industrial space in the West Norwood/Tulse Hill neighbourhood.
- 2.26 The eventual proportions of industrial and residential will have to be independently tested through a financial viability assessment submitted with a planning application to ensure that the optimum mix of uses is achieved, taking account of all relevant planning considerations and policy requirements. Given the specific deliverability challenges associated with this site, the draft site allocation policy specifies a minimum requirement of 1,500 sqm (GIA) new industrial floorspace. It also sets out that the space should be flexible but acknowledges the particular scope for light industrial space given anticipated local demand from creative sector firms and the green technology/low carbon sector.

Site Constraints and Opportunities

Constraints

2.27 The following constraints affect the site:

Trees	The trees immediately around and adjoining the perimeter of the site are covered by TPO no. 205 which is an area designation.
Sites of Borough Nature Conservation Importance (SINC)	There are two SINCS that affect the site; one around its perimeter (SINC 16) and one that is located at the centre and eastern portion of the site (SINC 24)
Railway	The railway line presents constraints to site access as well as noise and vibration issues for future occupiers of the site.
Views	A 3m easement is normally required along railway lines to ensure space for infrastructure maintenance. Views from West Norwood Cemetery and Brockwell Park present height constraints
Access	The current access is inadequate.
Topography	The lower levels of the ground to the eastern side of the site present constraints in terms of townscape and visual amenity
Site	The triangular shape of the site can limit potential development layout.
Electricity Substation	Access to the substation is required

Opportunities

2.28 The following opportunities affect the site:

Trees	The trees lining the railway lines along the perimeter of the site have amenity, environmental, and habitat value.
Railway	The railway - The site's triangular shape and unusual characteristics created by the railway line give it a unique character
Access	The elevated topography to the western side of the site presents opportunities for an overbridge to improve vehicular access.
Topography	The site's topography presents opportunities to optimise views out to the wider city

3. Design Approach

Key Principles

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

- | | |
|----------|---|
| A | Respect Heritage Assets
Cause no harm to the significance or setting of designated or non-designated assets. In particular, preserve the settings of the Brockwell Park (CA and registered landscape), West Norwood Cemetery (CA and registered landscape), Lancaster Avenue CA, and Leigham Court Estate CA. |
| B | Protect trees /Site of Nature Conservation (SINC) <ul style="list-style-type: none">• Retain trees of value protected under the Tree Preservation Order no. 205 and ensure that the SINC is sustained. |
| C | Bulk / Scale and Mass <ul style="list-style-type: none">• Create a place that has coherence in its own right and integrates comfortably with its townscape context. |
| D | Transport <ul style="list-style-type: none">• Improved pedestrian and vehicular accessibility• Integration of routes with wider area |
| G | Neighbour and future occupier amenity <ul style="list-style-type: none">• Cause no unacceptable effects on neighbour amenity |
| H | Infrastructure <ul style="list-style-type: none">• Maintain the electricity substation and access to it. |

4. Indicative Approach

Indicative Approach

- 4.1 The indicative approach clears all existing buildings and structures except for the electricity substation in the north-eastern corner of the site.

Indicative Approach –Site Layout and Access

- 4.2 Whilst the railway lines and existing development around the perimeter of the site severely limit the scope for improved access, the indicative approach improves access into the site, connects the site better to the existing road network, and increases pedestrian permeability. To achieve this, it retains the existing Cameron Place underbridge route and provides two new overbridges: a vehicular and pedestrian overbridge from the southern part of Knolly's Road (crossing the railway at the SW corner of the site), and a solely pedestrian/cycle overbridge from Leigham Vale. These new connections will allow a pedestrian and cyclist to pass through the site using the overbridge at Knolly's Road, an elevated traffic-free podium deck and pedestrian overbridge at Leigham Vale.
- 4.3 To take account of differing land levels across and around the site the indicative approach creates a two storey podium that occupies most of the buildable area of the site. The podium roof level would act as a pedestrian deck level with most servicing and vehicular access being accommodated in the levels below. Pedestrians and servicing movements would be largely segregated.
- 4.4 The triangular shape of the site with its three tapering corners restricts development layout options. The retention of the electricity substation in the north-eastern corner, separation distance between blocks on the site, and in relation to nearby existing buildings have been considered. The indicative approach locates development along the three long sides of the podium leaving breaks and gaps between development blocks and creating a central, pedestrian space at deck level.

Uses

- 4.5 Light industrial uses and servicing are accommodated largely within the podium and the first level of accommodation on the deck. Upper floors are residential with principal entrances at podium deck level.

General Height and Massing

- 4.4 The indicative approach has sought to integrate the massing with the wider townscape in a manner which is clearly a change but not a harmful one. Massing along the eastern part of the site seeks to protect the amenity of adjoining neighbours on the other side of the railway and has been developed with the consideration to the townscape particularly in relation to views along Harpenden Road which sits lower than the site. This is achieved by (i) restricting the height of development to c68m AOD directly behind Harpenden Road properties and 71m (AOD) in the north-eastern apex of the site, (ii) setting development away from the site boundary; and (iii) avoiding a long, single built mass.
- 4.5 A similar approach has been taken in relation to development along the south-western side of the site which shares similar residential and townscape sensitivities. Here the site adjoins

Cameron Close and Knolly's Road which stand on higher ground. Development on the site will terminate vistas along Knolly's Road from the west and the visual effect in this view has been given consideration. The indicative approach avoids the creation a continuous wall of development of consistent height by ensuring there are gaps between blocks which are varied in height, stepping the height up towards the southern apex from 75m to 87m AOD. Massing is also set back from the sites boundary to provide good separation distances from existing neighbours.

- 4.6 To the northern side of the site the indicative approach seeks to optimise development as the separation distances to existing residential development are at their greatest. Height here is the greatest within the site and rises from 81m and 115m AOD. These heights have been carefully modelled to ensure no harm results to the settings of sensitive designated heritage assets including West Norwood Cemetery and Brockwell Park. Height steps up towards the western corner. Amongst other things, this ensures that the greatest on the site is located as far as possible from sensitive residential properties along Harpenden Road to the east.



Figure 9 - Aerial view of indicative layout showing the arrangement of blocks and the central deck at podium roof level.



Figure 10 – Bird’s eye view looking from the northeast. The lowest block is on the eastern side of the site and the tallest massing in the western corner.

Daylight and Sunlight

- 4.7 In testing optimum development capacity, The objective has been to ensure that the indicative approach is consistent with the generally accepted parameters for daylight and sunlight best practice as set out by the BRE guidance and Mayoral guidance for inner urban locations and for the immediate context of the site, having regard in particular to sensitive residential neighbours (the locations of which are identified in the draft site allocation policy) and to the quality of new residential accommodation to be provided Any scheme that comes forward would be required to demonstrate an acceptable response to daylight and sunlight constraints and overshadowing and will be independently tested at planning application stage.

5. Appraisal of the Indicative Approach

Townscape and Visual Impact Assessment

5.1 A townscape and visual impact assessment has been undertaken with three principal objectives:

- firstly, to ensure that the impact on Strategic and Local views is acceptable in relation to view composition and appreciation.
- secondly, to ensure that the townscape effects of the development are acceptable; in this regard the starting point has been that a degree of noticeable townscape change is inevitable but it should not be discordant or unduly dominant in its context; and
- thirdly, to ensure no harm to the significance (including setting) of heritage assets.

5.2 In accordance with best practice there has been no presumption that change within the setting of heritage assets is automatically harmful. Instead, the contribution of setting to the significance of the asset has been at the forefront of assessments and thus how that significance might be influenced by changes to the context.

5.3 This height and massing exercise has informed conclusions about whether the site is an appropriate location for a tall building(s) as defined by Policy Q26 of the Lambeth Local Plan. The indicative approach is considered to constitute the optimum level of development capacity for the site. This does not preclude other possible approaches to optimisation coming forward, in different forms, through the planning process.

5.4 The twelve test views can be found in Appendix 1. They are summarised below:

View 1 – West Norwood Cemetery western side looking north	The highest element of the indicative approach will punctuate the tree capped hillside. Care has been taken with its height and massing to ensure that St Luke’s Church tower retains its primacy in this view. The setting clearly changes but the effect on the significance (including settings) of the assets is neutral. No harm.
View 2 – West Norwood Cemetery near main entrance looking north	The highest element of the indicative approach will be glimpsed beyond the cemetery in the distance. It is small and will largely be screened by trees. The effect on the significance (including settings) of the assets is neutral. No harm.
View 3 – Brockwell Park southern landscape	The highest element of the indicative approach can be seen to the left of the church tower. It is of a scale in this view which is comparable to the church tower and is clearly subordinate to the church spire. Trinity Church retains its landmark status and the Indicative approach will be largely screened by trees. The effect on the significance (including settings) of the assets is neutral. No harm.
TVIA View 4 – Knolly’s Road (midway)	The buildings of the Indicative approach lining the western side of the site can be seen terminating the vista down the street. The highest element of the indicative approach terminates is to the left behind the middle ground houses.

	The distant townscape clearly changes but the general character of the road is largely undisturbed. The tallest element of indicative approach is eye catching but with high quality design and careful material selection the effect will not be harmful.
TVIA View 5 – Knolly’s Road at no. 135	The southmost block on the western side of the indicative approach terminates the building line of the street. It forms a termination point on the corner. The townscape effect is beneficial.
TVIA View 6 – Harpenden Road (south end)	The buildings of the Indicative approach lining the eastern side of the site can be seen terminating the vista down the street with the top of building at the southern end of the site glimpsed over the flat roofs of the foreground houses.
	The indicative approach is clearly visible in the townscape but is not unduly dominant or discordant. The effect is neutral.
TVIA View 7 – Cameron Place	The uppermost part of highest element of the indicative approach rises up behind the tree canopy at the end of the street. It will increase the sense of intimacy. Townscape effect is beneficial.
TVIA View 8 – Tulse Hill at Hardel Rise	The highest element of the indicative approach can be seen in the centre of the view in the distance. It terminates the view along Hardel Rise but is neither dominant nor distracting. Townscape effect is neutral.
TVIA View 9 – Leigham Vale at western end	The highest element of the indicative approach will be glimpsed through the trees. Effect is negligible. Effect is neutral.
TVIA View 10 – Norwood Road at no. 242-244	The massing of the indicative approach can be viewed in the backdrop. It adds a contemporary layer to an already varied architectural environment. The indicative approach does not dominate or compete unduly with the listed building and is some distance away to the west. The effect on significance is neutral.
TVIA View 11 – Elmcourt Road	The Indicative approach will be visible beyond the trees at the end of the street. The highest element of the indicative will provide an architectural termination to the currently undistinguished the vista. Beneficial effect.
TVIA View 12 – Knights Hill railway bridge	The highest element of the indicative approach terminates the distant view but will be largely screened by middle ground trees. Neutral townscape and heritage effect.

Effect on Heritage Assets

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

Asset	Description
242 – 244 Norwood Road (grade II)	This modest 19 th Century villa stands on the western side of Norwood Road some distance from the site boundary. The building largely pre-dates all the urban development around it and does not rely on its context for significance. The effect is assessed in TVIA View 10. No harm to significance including setting.
St Luke's Church, Knights Hill	Grade II* listed regency church. Important local landmark, especially in views from West Norwood Conservation Area. The only place that the Indicative Approach and the church are appreciable together is from West Norwood Cemetery. See TVIA View 10. The presence of the Indicative Approach clearly changes the setting of the church but the subordinate appearance of the indicative Approach's height and scale in the view are such that the church retains its primacy in the townscape. No harm to significance including setting.
Trinity Church, Trinity Rise (grade II listed church on edge of Brockwell Park)	Gothic revival church with tower and spire which is an important landmark in views from Brockwell Park. In TVIA view 3 from Brockwell Park the Indicative Approach is present in the backdrop of the church spire. The Indicative Approach remains subordinate to the church spire in this view. No harm to significance including setting
Brockwell Park Registered Landscape	The historic parkland to Brockwell Hall was reconfigured into a public park in the late 19 th Century. It has landscape and built features from both phases of its history. The Indicative Approach will be a glimpsed, distant, form and visible from only limited places within the extensive landscape. See TVIA View 3. No harm to significance including setting
Brockwell Park Conservation Area	The Brockwell Park Conservation Area is located some distance to the north of the site. It comprises the historic parkland of Brockwell Park, the grade II* listed Brockwell Hall and 19 th Century development around the park perimeter. The Indicative Approach will be a glimpsed, distant, form and visible from only limited places within the extensive landscape. See TVIA View 3. No harm to significance including setting
Lancaster Avenue Conservation Area	The conservation area lies some distance to east of site. The conservation area extends from Norwood Road (east) to Thurlow Park Road, is residential in character, and contains a number of locally listed buildings. The alignment of Lancaster Avenue in relation to the site means that the Indicative Approach will not be visible in views along Lancaster Avenue. No harm to significance including setting.
Leigham Court Estate Conservation Area	This conservation area lies some distance to the west of the conservation area with its principal roads –

	Amesbury Avenue and Barcombe Avenue aligned towards the site. The area is characterised by high quality Edwardian housing. At the eastern end of the conservation area where Amesbury Avenue and Barcombe Avenue meet Hillside Road the Indicative Approach will be glimpsed as a distant form. However, it will neither be dominant nor distracting and the screening of the mature trees on the foreground (Hillside Gardens Park in particular) will mean the visibility from the conservation area will be negligible. No harm to significance including setting.
West Norwood Cemetery Registered landscape	The Cemetery is a Grade II* registered landscape containing many statutory listed monuments. It is on the Heritage at Risk Register and is the subject of a major HLF funded restoration initiative being led by the Council and the Friends of West Norwood Cemetery. The landscape is expansive and sits to the south-east of the site. The low-rise setting of the Cemetery contributes to its significance by reinforcing its landscape character – at present no development dominates the views out. The Cemetery is low-lying land at its western end which is at the foot of Knights Hill and then the ground rises up Pilgrim Hill to the east and south-east. The topography is one of the Cemetery's defining features as the north facing slopes and the emphasis of all the main paths towards the entrance in the north-western corner means that many of the views from the Cemetery area towards the site. TVIA Views 1 and 2 give a good indication of the relationship the Indicative Approach has with the Cemetery. In some limited elevated places, the Indicative Approach is clearly a new addition to the wider setting (TVIA View 1) but generally the presence of significant mature tree screening, and the extensive nature of the landscape, means that the degree of change will be negligible. No harm to significance including setting.
West Norwood Conservation Area	This conservation area lies to the south-east of the site. The conservation area comprises of West Norwood Cemetery and some mostly Victorian development around its perimeter. TVIA Views 1 and 2 give a good indication of the relationship the Indicative Approach has with the Conservation Area. In some limited elevated places within the Cemetery the Indicative Approach is clearly a new addition to the wider setting (TVIA View 1) but generally the presence of significant mature tree planting, and the extensive nature of the cemetery landscape and wider conservation area, means that the degree of change will be negligible. No harm to significance including setting.

270 Norwood Road	This is a locally listed former bank on the corner of Norwood Road and Ullswater Road. The Indicative Approach will be visible in the townscape backdrop of the bank. However, the building is not reliant on its wider townscape setting for its significance. No harm to significance including setting.
Hitherfield Primary School, Leigham Vale	This building is on the north side of Leigham Vale set behind the frontage building. It is separated from the site by the frontage buildings, Leigham Vale road and the railway embankment and tracks. The Indicative Approach is some distance to the south and can't be appreciated in conjunction with the school. No effect.

6.0 Conclusion

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

Topic	Recommendation
Heritage Assets	Development should not harm the setting of any designated heritage assets with particular regard to the registered landscapes at West Norwood Cemetery and Brockwell Park; St Luke's Church West Norwood, Holy Trinity Church, Trinity Rise; and 242- 244 Norwood Road.
Views	Development should not harm the composition of local views
Height and massing	Heritage assets, local views and residential amenity constraints restrict development height in parts of the site. In the east (including the northeast corner) development up to 65m AOD is likely to be acceptable to protect residential amenity and townscape views along Harpenden Road. There is potential for increased height of up to 100m AOD in the west corner which is likely to be the maximum acceptable to prevent harm to the setting the registered landscapes of West Norwood Cemetery and Brockwell Park and local views. Development to the north of up to 77m AOD would mediate between the taller height in the west corner and the lower height in the northeast. To the southeast corner, the height should not exceed 83m AOD and step down in height to the south to 71m AOD
Building Design	Given the scale and visibility of development buildings should be of high-quality design with a material palette that harmonises and integrates well with the context. Taller buildings should have a pale recessive material palette.
Public realm	Publicly accessible courtyards and/or podiums should be designed with the priority given to creating a space with high amenity value

	for residents. Soft landscaping and trees are integral to achieving this.
Uses	Residential and commercial/employment uses should be clearly separated within the site with the latter being limited to the ground and first floor.
Access/Serviceing	The existing vehicular and pedestrian access from Cameron Place should be retained and the public realm improved. A new vehicular and pedestrian overbridge is necessary from the eastern end of Knolly's Road that will serve as primary vehicular access into the site. Servicing should take place via the overbridge. A new safe and fully accessible pedestrian link that connects the site to Leigham Vale is necessary.
Residential Amenity	Cause no unacceptable effects on the amenity of neighbours.

TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

TVIA View 1 – West Norwood Cemetery western side looking north

The viewing location is within West Norwood Cemetery (Grade II* registered landscape) and West Norwood Conservation Area. There is high heritage sensitivity.



The viewer is on the elevated path on the western side of the cemetery. This is one of the more exposed parts of the cemetery with less tree cover than the rest. The view looks beyond the cemetery to the rolling tree-capped hillside beyond where St Luke's Church tower is a landmark. The tree-topped hill and church contribute positively to the setting of the asset.



The highest element of the indicative approach will punctuate the tree-capped hillside. Care has been taken with its height and massing to ensure that St Luke's Church tower retains its primacy in this view. The setting clearly changes but the effect on the significance (including settings) of the assets is neutral. No harm.

TVIA View 2 – West Norwood Cemetery near main entrance looking north



The viewing location is within West Norwood Cemetery Grade II* registered landscape and West Norwood Conservation Area. There is high heritage sensitivity.



The cemetery is extensive in area and has an attractive landscape character which is a combination of its topography and planting. It is this landscape framework that provides a setting for the numerous monuments and which is why it has value as a Registered Landscape.

The viewer is facing north and approaching a fork in the road. The left sweep leads to the main entrance. The two middle ground monuments are grade II listed buildings.



The highest element of the indicative approach will be glimpsed beyond the cemetery in the distance. It is small and will largely be screened by trees. The effect on the significance (including settings) of the assets is neutral. No harm.

TVIA View 3 – Brockwell Park southern landscape



The viewing location is within Brockwell Park Grade II registered landscape and the principal component of Brockwell Park Conservation Area. There is high heritage sensitivity.



The rolling landscape of the park here has a semi-rural character and is crossed by pedestrian tracks. It is a popular and well-used space away from traffic. The perimeter trees create a sylvan backdrop. The spire of Trinity Church, Trinity Rise (grade II listed) punctuates the sky and has landmark status in the landscape, and positively contributes to the setting of the park.



The highest element of the indicative approach can be seen to the left of the church tower. It is of a scale in this view which is comparable to the church tower and is clearly subordinate to the church spire. Trinity Church retains its landmark status and the Indicative approach will be largely screened by trees. The effect on the significance (including settings) of the assets is neutral. No harm.

TVIA View 4 – Knolly's Road (midway)



The viewing location is mid-point along Knolly's Road. There is no heritage sensitivity.



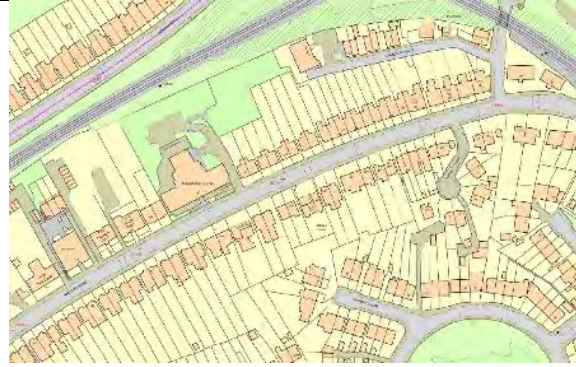
The architectural quality here is varied with pleasant Victorian housing and modern flats. The townscape quality is moderate/low.



The buildings of the Indicative approach lining the western side of the site can be seen terminating the vista down the street. The highest element of the indicative approach terminates is to the left behind the middle ground houses.

The distant townscape clearly changes but the general character of the road is largely undisturbed. The tallest element of indicative approach is eye catching but with high quality design and careful material selection the effect will not be harmful.

TVIA View 5 – Knolly's Road at no. 135



The viewing location is at no.135 Knolly's Road.
There is no heritage sensitivity.



The Victorian houses here are of pleasant character and the general effect is spacious. The road curves right (south) in the distance. The townscape quality is moderate.



The southmost block on the western side of the indicative approach terminates the building line of the street. It forms a termination point on the corner. The townscape effect is beneficial.

TVIA View 6 – Harpenden Road (south end)



The viewing location is at the southern end of Harpenden Road at the junction with York Hill. There is no heritage sensitivity.



The architectural quality here is varied with pleasant Victorian housing and modern flats. The road has a relatively intimate character. The townscape quality is moderate.



The buildings of the Indicative approach lining the eastern side of the site can be seen terminating the vista down the street with the top of building at the southern end of the site glimpsed over the flat roofs of the foreground houses.

The indicative approach is clearly visible in the townscape but is not unduly dominant or discordant. The effect is neutral.

TVIA View 7 – Cameron Place



The viewing location is at the southern end of Cameron Place at the junction with Knolly's Road. There is no heritage sensitivity.



The architectural quality isn't particularly high but the arrangement of buildings, the slope and the trees have an informal and intimate character. The townscape quality is moderate.



The uppermost part of highest element of the indicative approach rises up behind the tree canopy at the end of the street. It will increase the sense of intimacy. Townscape effect is beneficial.

TVIA View 8 – Tulse Hill at Hardel Rise



View location is on Tulse Hill looking South along Hardel Rise. There is some heritage sensitivity.



The villa to the right of the view is grade II listed. It adds some interest to an otherwise undistinguished townscape. Townscape value is moderate.



The highest element of the indicative approach can be seen in the centre of the view in the distance. It terminates the view along Hardel Rise but is neither dominant nor distracting. Townscape effect is neutral.

TVIA View 9 – Leigham Vale at western end



The view location is at the western end of Leigham Vale to the west of the site. There is no heritage sensitivity.



There is development only to the northern (left) side of Leigham Vale with the tree-lined railway line occupying the southern (right side). The Victorian houses are pleasant and the general character leafy. Townscape value is moderate.



The highest element of the indicative approach will be glimpsed through the trees. Effect is negligible. Effect is neutral.

TVIA View 10 – Norwood Road at no. 242-244



View location is on east side of Norwood Road. The villa is grade II listed. There is heritage sensitivity.



No 242 – 424 Norwood Road is a grade II listed regency villa. It has a compact form and shallow roof. Its context is much changed from when it was erected with modern, urban buildings on either side. Whilst it is not reliant on its setting for its significance, it enriches the townscape and has heritage significance.



The massing of the indicative approach can be viewed in the backdrop. It adds a contemporary layer to an already varied architectural environment. The indicative approach does not dominant or compete unduly with the listed building and is some distance away to the west. The effect on significance is neutral.

TVIA View 11 – Elmcourt Road



On Elmcourt Road to the west of Elmcourt School. There is no heritage sensitivity.



Straight road with Victorian houses and mature trees. Moderate townscape value.



The Indicative approach will be visible beyond the trees at the end of the street. The highest element of the indicative will provide an architectural termination to the currently undistinguished the vista. Beneficial effect.

TVIA View 12 – Knights Hill railway bridge



On the railway bridge by the Horns Tavern. Some heritage sensitivity as the view location is proposed for inclusion in the West Norwood Conservation area.



The curve of the railway line draws the eye to the leisure centre. The tree lined cutting adds landscape quality. Moderate / high townscape value.



The highest element of the indicative approach terminates the distant view but will be largely screened by middle ground trees. Neutral townscape and heritage effect.