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**Town and Country Planning Act 1990: Section
78 Appeal**

21/57 Willow Way, London, SE26 4AR

**Proposed Demolition and Redevelopment to
provide employment floorspace and residential
units**

**Planning Inspectorate Ref:
APP/C5690/W/23/3321935**

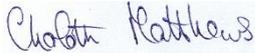
Core Document CD 5.10

**Proof of Evidence of Andy Shelley MA MCIfA
AIEMA of PCA Heritage**

Date: 03 October 2023

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1. STATEMENT OF QUALIFICATIONS AND EXPERIENCE

- 1.1.1. This Proof has been prepared by Andy Shelley, a Director of PCA Heritage (company registration number 10268563). For 21/57 Willow Way, London, SE26 4AR, PCA Heritage provides heritage sub-consultancy services to Pre-Construct Archaeology (company registration number 03534122), whose client is Kitewood Estates Ltd.
- 1.1.2. I hold a BA (Distinction) in Audio Visual Communication from the University of Manchester and an MA (Distinction) in Medieval Archaeology from the University of York. I am a Member of the Chartered Institute for Archaeologists (MCIfA) and an Associate Member of the Institute for Environmental Management and Assessment (AIEMA).
- 1.1.3. I have 38 years' experience in the historic environment contracting and consultancy sectors. Prior to becoming a Director at PCA Heritage I was Principal Archaeologist in Ramboll UK's London office, and before that Senior Project Manager at Norfolk County Council's Norfolk Archaeological Unit.
- 1.1.4. My recent projects include preparing Cultural Heritage environmental statement chapters for Custom House Masterplan (for London Borough of Newham) and West of Ifield (for Homes England). The former relied in part on the Heritage Statement which I prepared for the project. Both Cultural Heritage chapters assessed the historic environment in its widest sense, which includes historic buildings, conservation areas, landscapes and below-ground archaeological remains.
- 1.1.5. The Custom House Masterplan envisages the demolition of existing buildings and the erection of a phased development of up to 650 new, replacement or retrofitted homes, commercial, business and service floor space, a health hub and associated open space, public realm, landscaping, servicing facilities, plant space, parking, access and highways work.
- 1.1.6. West of Ifield is being promoted for mixed-use development as part of the current Horsham Local Plan review. The proposed development is anticipated to include up to 3,000 new homes, an 80-bed hotel, new roads, gypsy and traveller pitches, up to 36,350m² of commercial, business and services space, a mix of social and physical infrastructure, including local shops and services, three primary schools and a secondary school.
- 1.1.7. Between 2017 and 2020 I was HS2's Historic Environment Technical Lead Author and joint Topic Lead for the Bolsover to Leeds and ECML section of the draft Environmental Statement prepared to support the passage through Parliament of the HS2 Phase 2b hybrid bill. This section comprised a 110km section of new railway between Bolsover, Derbyshire and the East Coast Main Line in North Yorkshire. It included a branch to Leeds and the section of Midland Mainline railway between Clay Cross and Sheffield.
- 1.1.8. My published work includes *From Brunel to British Rail: The Railway Heritage of the Crossrail Route* (Shelley 2016), a chapter in *The Changing Face of London: Historic Buildings and the Crossrail Route* (Brown *et al* 2016) and *Recent Conservation Management Plans for Errigal Truagh and Magheross* (Shelley 2009). I have prepared many heritage statements, most recently to support major developments in Essex, Buckinghamshire and London.

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- 1.1.9. The evidence which I have prepared and provided for this appeal in this Proof is true and has been prepared and given in accordance with the guidance of my professional institutions. I confirm that the opinions expressed are my true professional opinions.

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2. INTRODUCTION

- 2.1.1. This Heritage Proof of Evidence (hereafter 'Proof') has been prepared on behalf of Kitewood Estates Ltd (hereafter 'Kitewood'), the Appellant, to support an appeal of the London Borough of Lewisham's (hereafter 'the Council') decision to refuse permission for a development at 21-57 Willow Way, SE26 4AR (hereafter the 'site', Fig 1). The planning application number is DC/22/129789.
- 2.1.2. The planning application was supported by a Heritage Statement¹ (PCA Heritage 2022; see Core Document CD 1.12) and an Archaeological Desk-based Assessment² (PCA Heritage 2022a; see Core Document CD 1.24). The Heritage Statement considered matters relating to buildings, conservation areas and parks and gardens; all below-ground archaeological matters were considered in the Archaeological Desk-based Assessment and do not feature in the Council's Statement of Case (LBL 2023, Core Document CD 5.4).
- 2.1.3. A Heritage Addendum³ (PCA Heritage 2023; see Core Document CD 5.3.1 Appendix 14) provided an historic environment response to the Council's comments, received on 16 March 2023, regarding impacts on built heritage assets. These comments were contained in the planning officer's report (reference DC_22_129789-OFFICERS_DELEGATED_REPORT-1178451; Core Document CD 2.2).
- 2.1.4. Reason for Refusal 4 raises heritage issues which are further set out in the Officers' Report and the Council's Statement of Case (LBL 2023; hereafter 'SoC'). These are addressed in Section 6 below but I first outline (in Section 3) the methodology used in the Heritage Statement that was submitted in support of the Application, before summarising the findings in that Statement (Section 4) and the Addendum to it (Section 5). Finally, I provide a Summary and my Conclusions in Section 7.
- 2.1.5. When considering the degree of impact (if any) from the proposed development on surrounding heritage assets, the Heritage Statement, Heritage Addendum and this Proof focus on the development proposal submitted under planning application reference DC/22/129789. This is for development at 21-57 Willow Way (known as 'Site A') comprising:
- Demolition of existing buildings and redevelopment of the site comprising a block rising to 5/6 stories accommodating 1,401 sqm of employment floorspace (Use Classes E(g)(i)(ii)(iii)) at ground and mezzanine floors and 60 residential units (Use Class C3) above, with associated landscaping, amenity areas, cycle, car parking and refuse/recycling stores at 27-57 Willow Way, London, SE26*
- 2.1.6. Site A is part of an emerging masterplan area which includes sites between Willow Way and Dartmouth Road (Sites B to D) and a site (Site E) to the south of Site A. As detailed design for these sites was not available, and they did not form part of the proposals seeking planning permission under planning application DC/22/129789 these sites were not assessed in the

¹ PCA Heritage, 2022, *Site A, Willow Way, Sydenham: Heritage Statement*

² PCA Heritage, 2022a, *Site A, Willow Way, Sydenham: Archaeological Desk-based Assessment*

³ PCA Heritage, 2023, *Site A, Willow Way, Sydenham: Heritage Addendum*

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Heritage Statement and Heritage Addendum. Where there is a possibility of cumulative effect on heritage assets from the masterplan proposal, this is referred to in this Proof.

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3. ASSESSMENT METHODOLOGY

3.1.1. This section summarises the methodology used to prepare the Heritage Statement.

3.2. Heritage value (significance)

3.2.1. The National Planning Policy Framework (NPPF) defines the term ‘heritage asset’ as a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing) (NPPF Annex 2: Glossary).

3.2.2. NPPF defines heritage significance as the value of a heritage asset to this and future generations because of its heritage interest (NPPF Annex 2: Glossary). Significance derives not only from a heritage asset’s physical presence, but also from its setting. Heritage significance can be thought of as a term which captures what is valued about the asset (IEMA 2021, 7; Core Document 4.94). It has equivalence with terms such as ‘heritage value’ (High Speed Two (HS2) Limited 2022, 185, paragraph 8.9.10⁴; Core Document 4.92) and ‘cultural heritage significance’ (IEMA 2021, 8-9). In the Heritage Statement and Heritage Addendum the term used was heritage value.

3.2.3. Heritage interest may be archaeological, architectural, artistic or historic (Historic England 2017a, 7; Core Document 4.93). In NPPF terms, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point (NPPF Annex 2: Glossary). Architectural and artistic interests relate to the design and general aesthetics of a place (PPG 2019, Paragraph 006 Reference ID: 18a-006-20190723). More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture. Heritage assets with historic interest provide a material record of a nation’s history, and also provide meaning for communities derived from their collective experience of a place. They can symbolise wider values such as faith and cultural identity (PPG 2019, paragraph 006 Reference ID: 18a-006-20190723), and can illustrate or be associated with past lives and events.

3.2.4. Setting is defined in the NPPF (Annex 2: Glossary) as the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not (Historic England 2017, 2; Core Document 4.79).

3.2.5. The importance of setting lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance (Historic England 2017, 4; Core Document 4.79).

⁴ High Speed Two (HS2) Limited 2022, 185
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1046285/M14.pdf

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It is important to recognise that analysis of setting is different from landscape assessment, and similarly, setting is different from general amenity. Views from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting (Historic England 2017, 7).

- 3.2.6. The degree of heritage value that a heritage asset possesses, in *Principles of Cultural Heritage Impact Assessment* terms⁵ (IEMA 2021, 8; Core Document 4.94) broadly its ‘cultural importance’, is dependent upon a variety of factors and characteristics and is not directly related to designation status. The Heritage Statement determined degrees of heritage value and magnitude of impact by the use of environmental assessment guidance provided by Highways England⁶ (Highways England, 2020, 13; Table 1 below).

Table 1: The characteristics that define degrees of heritage value (significance)

Degree of heritage value (significance)	Description
Very high	Very high importance and rarity, international scale and very limited potential for substitution.
High	High importance and rarity, national scale, and limited potential for substitution.
Medium	Medium or high importance and rarity, regional scale, limited potential for substitution.
Low	Low or medium importance and rarity, local scale.
Negligible	Very low importance and rarity, local scale.

3.3. The consequences of change

- 3.3.1. The significance of effect arising from change to a heritage asset, in *Principles of Cultural Heritage Impact Assessment* terminology ‘the consequences of change to cultural significance’ (IEMA 2021, 5), is determined by weighing the heritage value of that asset against the predicted level of change (in other words, the magnitude of impact, Table 2). Effects can be beneficial or adverse. This is not intended to lead to a formulaic assessment and professional judgement is used at all stages in the process.

Table 2: Magnitude of impact

Magnitude of impact		
Major	Adverse	Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements.
	Beneficial	Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.
Moderate	Adverse	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.

⁵ IEMA, 2021, *Principles of Cultural Heritage Impact Assessment*

⁶ Highways England, 2020, *Design Manual for Roads and Bridges: LA 104 Environmental assessment and monitoring* Revision 1

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	Beneficial	Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.
Minor	Adverse	Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements.
	Beneficial	Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible	Adverse	Very minor loss or detrimental alteration to one or more characteristics, features or elements.
	Beneficial	Very minor benefit to or positive addition of one or more characteristics, features or elements.
No change		No loss or alteration of characteristics, features or elements; no observable impact in either direction.

3.3.2. Research undertaken in connection with preparation of the Heritage Statement included an examination of the National Heritage List for England (NHLE), the Greater London Historic Environment Record, historic maps, relevant reports and publications. A study area comprising the site and an area extending to 500m from its boundaries was chosen. Internet archives and other online resources including the Archaeology Data Service and the Council's list of locally-listed buildings were utilised. A site visit was undertaken on 5 December 2022 to identify any further built heritage assets and determine matters of setting. Archive material held in London Metropolitan Archives was inspected on 5 December 2022.

3.3.3. The Heritage Statement was prepared in accordance with policies set out in Section 16 of the NPPF and the following standards and guidance:

- Chartered Institute for Archaeologists, 2020, *Standard and Guidance for Historic Environment Desk-based Assessment*
- Historic England, 2017, *The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning: 3*, Swindon: Historic England
- Historic England, 2017a, *Conservation Principles for the Sustainable Management of the Historic Environment (draft)*, Swindon: Historic England
- Historic England, 2019, *Statement of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12*, Swindon: Historic England
- IEMA, 2021, *Principles of Cultural Heritage Impact Assessment In The UK*
- IHBC, 2017, *Conservation Professional Practice Principles*

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4. SUMMARY OF THE HERITAGE STATEMENT AND ITS CONCLUSIONS

- 4.1.1. The objective of the Heritage Statement was to identify the built heritage resource within the site and a suitable study area surrounding it, assess its significance (and thereby its heritage value), identify any impacts from the development proposals on that resource, and recommend suitable measures to mitigate any such impacts.
- 4.1.2. There are no built heritage assets within the site. In an area extending up to 500m from the site boundary there are 20 listed buildings, of which 19 are Grade II listed and one is Grade II* listed. In addition, there are eight conservation areas either wholly or partly within the 500m study area, and 38 locally-listed buildings. There are no world heritage sites, scheduled monuments or registered parks and gardens within 500m of the site.
- 4.1.3. The site visit, supplemented by preliminary in-house viewshed analysis in QGIS⁷, allowed a broad determination of which assets might be scoped out because of a lack of intervisibility, often an indicator that heritage value will be unaffected by proposed development. It is accepted that a lack of intervisibility does not automatically lead to the exclusion of a heritage asset from assessment, but may do so if augmented by other factors such as distance from the proposed development and/or the likely extent of the asset's setting. For heritage assets scoped out in this way, no further assessment was undertaken.
- 4.1.4. Following the viewshed analysis exercise and the subsequent site visit, a total of 16 built heritage assets or groups of built heritage assets were taken forward for assessment of their significance (see PCA Heritage 2022⁸, Table 4 'Built heritage assets within the study area: their heritage value and predicted magnitude of impact to each'). All of these derive their heritage value from their architectural and historic interest.
- 4.1.5. The Heritage Statement concluded that there will be no direct impacts on built heritage assets as a result of the proposed development. Minor changes were identified to the setting of a number of the heritage assets identified, but in none of these cases will the heritage value of the asset in question be affected. The reasoning behind this conclusion is explained in the Section 6 of this Proof.

⁷ Viewshed analysis based on building heights supplied by DC Architecture and Design (draft no. KYW034-DCR-EL-300 dated 13/12/2022) and Environment Agency 1m-resolution composite DSM (2021)

⁸ PCA Heritage, 2022, *Site A, Willow Way, Sydenham: Heritage Statement*

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5. THE HERITAGE ADDENDUM AND ACCURATE VISUAL REPRESENTATIONS

- 5.1.1. The Heritage Addendum provided an historic environment response to the Council's comments, received on 16 March 2023 (repeated in the Planning Officer's report, reference DC_22_129789-OFFICERS_DELEGATED_REPORT-1178451⁹) regarding impacts on heritage assets. The Heritage Addendum was submitted with the Appellant's Statement of Case in May 2023.
- 5.1.2. The planning officer's report discussed the proposed development in relation to surrounding heritage assets under the heading 'Impact on Heritage Assets' (officer's report paragraphs 225 to 257).
- 5.1.3. Paragraphs 245 and 246 of the planning officer's report provided advice on the likely effectiveness of a number of the viewpoints proposed for use in townscape analysis. This advice was followed by the Appellant and 19 AVRs (accurate visual representations) were produced for Kitewood by Preconstruct^{10 11} (Core Documents 10.1 and 10.2).
- 5.1.4. The 19 AVRs were produced to support the assessment of degree of impact (if any) to heritage assets and to inform townscape and visual impact assessment (TVIA). The TVIA is set out in *21-57 Willow Way, London, SE26: Townscape and Visual Impact Assessment for the Appeal Scheme* (GJHP 2023; Core Document 5.3.1 Appendix 17).
- 5.1.5. The AVRs should be consulted in tandem with this Proof.

⁹ Reference DC_22_129789-OFFICERS_DELEGATED_REPORT-1178451

¹⁰ 21-57 Willow Way, Sydenham: Accurate Visual Representations, Preconstruct 2023; see Core Document 10.1; and 21-57 Willow Way, Sydenham: Accurate Visual Representations - Additional Viewpoint (Preconstruct 2023a; see Core Document 10.2)

¹¹ Preconstruct (company registration number 04713116) is an entirely unrelated company to Pre-Construct Archaeology and PCA Heritage.

6. THE APPELLANT'S CASE

6.1.1. This section responds to the heritage matters raised in Reason for Refusal 4 and in the Council's SoC (LBL 2023). The section is ordered by the sequence in which the heritage assets referred to in the Council's SoC appear (paragraphs 7.111 to 7.129).

6.1.2. In this section BHAXXX codes are gazetteer references created for the purposes of preparing the Heritage Statement.

6.2. Sydenham Park Conservation Area, including locally-listed buildings (BHA061)

6.2.1. Sydenham Park Conservation Area was designated in 1973. It includes an area of Sydenham laid out to either side of a road named 'Sydenham Park' where development in the mid and late 19th century resulted in a mix of detached, semi-detached and terraced housing. Buildings are mainly of London stock yellow brick, with stuccoed dressings, plaster decorations and slate roofs. It also includes some houses on Sydenham Park Road and houses on Albion Villas Road and the north side of Redberry Grove. According to LBL's website, the area 'has a peaceful Gothic revival character and retains a degree of original integrity'. There is also a handful of post-war buildings in the conservation area.

6.2.2. The Council's case (LBL SoC, p. 46, paragraph 7.116) is that:

The Appeal Site is in the immediate setting of Sydenham Park Conservation Area, and the layout would extend built form very close to the boundary of the conservation area. There is an abrupt change of levels which means the Proposal at five / six storeys would rise significantly higher than the existing two storey buildings of William Wood House (which was built in the former gardens of the villas on Sydenham Park Road), and also appear much higher than the predominant villa development within the conservation area. The close proximity would exacerbate the impact of the uncharacteristic height and would unduly enclose the view to the west, appearing dominating and unneighbourly.

Other development in the setting of the Sydenham Park Conservation Area is generally of similar height to buildings within the conservation area or lower. Miriam Lodge is the one building in the immediate setting of the conservation area which is notably taller at eight storeys. However, the narrow slab form of this building and its orientation minimises its visual impact on the conservation area, having a significantly less enclosing impact to the south east, and its broad side is set further away from the conservation area. By contrast, the Proposal would present a continuous linear development rising to six storeys, with no gaps in its massing that would alleviate the sense of enclosure, nor sufficient open space provided to the rear to afford tree planting which could screen the development and potentially soften the impact.

6.2.3. The conservation area's setting is greater in extent than the Council's Statement of Case might suggest. It is formed variously by the site, modern housing and the Police Section House (now

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called Miriam Lodge) to the west, a short stretch of Dartmouth Road to the north-west (where it lies opposite Sydenham School), the Forest Hill to Sydenham stretch of railway to the north-east, 1950s and later housing to the east, a post-war council estate to the south and the commercial heart of Upper Sydenham to the west. The many aspects to this setting either partially contribute to the conservation area's historical interest, detract from an appreciation of the conservation area's historical interest, or are neutral. However, the bulk of the attributes which give the conservation area its heritage value lie not in its setting but the individual quality and group value of its component buildings (its architectural interest), and their relationship they have with each other and the wide, tree-lined road on which they are situated. They provide evidence of a time during the Victorian period when Upper Sydenham was a favoured destination for the wealthy middle classes (their historical interest).

- 6.2.4. It is accepted that the site is bound on one and a half sides by Sydenham Park Conservation Area, and that the proposed development will therefore introduce new, taller buildings of greater mass close to the edge of one part of the conservation area. It is noted that the shared boundary between the site and Sydenham Park Conservation Area is approximately 110m in length, which equates to c.6% of the conservation area's perimeter. This figure gives some idea of the extent to which most of the conservation area will be unaffected by the proposed development.
- 6.2.5. In views to the west from Sydenham Park, the proposed development will be visible between the buildings which line the west side of the road. This effect is illustrated in a number of AVRs, discussed here in turn.
- 6.2.6. AVR View 10 'Sydenham Park' opposite Shrublands Close (Preconstruct 2023, 37-39) allows the viewer to look down Shrublands Close, a road developed in former back gardens in the late 1980s to provide access to William Wood House (pictured in the background). The proposed development will sit immediately behind William Wood House in this view, as illustrated by the rendered / realistic view (View 10 — Proposed — AVR3 (Rendered)). Although visible in this view, the proposed development will have no impact on the characteristics which give Sydenham Park Conservation Area its heritage value, namely the architectural interest of its buildings in the forefront of the picture, and their relationship to each other and the road on which they sit.
- 6.2.7. AVR View 11 'Carlton Terrace' (Preconstruct 2023, 41-43) provides a view north-westwards from an estate of late 20th-century brick-built houses which form the south-easternmost part of the conservation area. AVR View 11 illustrates the long distance view north-westwards to 21-23 Sydenham Park, behind which the proposed development will be situated. View 11 — Proposed — AVR3 (Rendered) shows that the upper two storeys of the proposed development will be visible behind the houses lining the west side of Sydenham Park in the few long views available. This is a change to one part of the conservation area's setting, but the change will have no impact on the ability of an observer to comprehend the historical and architectural qualities of Sydenham Park conservation area and its buildings.
- 6.2.8. The centrepiece of AVR View 12 'Sydenham Park – Park Terrace' (Preconstruct 2023, 45-47) is 'Park Terrace', a non-designated block of two semi-detached villas on the west side of

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Sydenham Park (and numbered 15-17). The rear elevation of 51-57 Willow Way (within the site) is visible in the background between 13 and 15 Sydenham Park terrace. The rendered version of the proposed development (View 12 — Proposed — AVR3 (Rendered)) shows how it will be visible in the gap between the houses on this part of Sydenham Park. This is a change to one part of the conservation area's setting, but the change will have no impact on the ability of an observer to comprehend the historical and architectural qualities of 'Park Terrace', its neighbouring buildings and the conservation area within which they sit.

- 6.2.9. AVR View 13 'Sydenham Park' opposite nos. 9 and 11 (Preconstruct 2023, 49-51) provides a similar view of the buildings on the west side of Sydenham Park as AVR View 12. The rendered version of the proposed development (View 13 — Proposed — AVR3 (Rendered)) shows how the proposed development will be visible in glimpsed views between the houses on this part of Sydenham Park. This change will have no effect on the ability of an observer to comprehend and appreciate the historical and architectural qualities of this part of Sydenham Park Conservation Area and its component buildings. An ability to appreciate the heritage value of this part of the conservation area will remain unchanged.
- 6.2.10. This change will have the effect of making the skyline in these views a uniform height, especially when the cumulative effect of the masterplan is considered, thus changing one part of the setting of the heritage asset. This change will have no effect on the architectural interest of the buildings within the conservation area, nor the legibility of its historic character. There will be no change to the ability of an observer to comprehend immediately the characteristics which give the conservation area its heritage value.
- 6.2.11. AVR View 14 'Sydenham Park by Kirkdale' (Preconstruct 2023, 53-55) shows the view northwards along Sydenham Park from immediately outside Sydenham Park Conservation Area. The rendered building on the left-hand side of the image is the former Park Chapel, now in use as a children's nursery, to the right of which is a former industrial building, now residential. The building to the right of that is a block of inter-war flats that marks the western edge of the conservation area. View 14 — Proposed — AVR1 (Wireline) shows how the proposed development will be hidden from view at this entry point into the conservation area.

6.3. Kirkdale ASLC

- 6.3.1. Kirkdale ASLC is a proposed Area of Special Local Character which lies to the west of the west of the site. The proposed ASLC has not been consulted upon or formally adopted, but its proposed boundary includes the stretch of Kirkdale between Peak Hill and Dartmouth Road, as well as Fransfield Road and the Grade II listed Former Sydenham Public Lecture Hall with entrance gates, piers and railings (NHLE 1402184) to the north. It is a non-designated heritage asset which contains a number of listed and locally-listed buildings.
- 6.3.2. Although some of the proposed ASLC's component parts, in the form of the listed buildings of 124-128, Kirkdale SE26 (NHLE 1080021; Heritage Statement reference BHA043) and High Street Buildings (NHLE 1392512; BHA056), and the locally-listed *Fox and Hounds* public house, Kirkdale (BHA019), *The Woodman* (BHA021) and 89-91 Kirkdale (BHA059), were identified and assessed in the Heritage Statement, the proposed ASLC itself was not. However, a brief

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assessment of the proposed ASLC in the Heritage Addendum (PCA Heritage 2023, 13) identified that its heritage value is derived from the architectural interest of its component buildings, and the complementary functions of those buildings (listed and otherwise) which emphasise the proposed ASLC's commercial character. Its historical interest is derived from its history as a mid-Victorian 'neighbourhood centre', and the artistic interest of its topography, namely its climb from the junction of Jews Walk, Sydenham Park and Wells Park Road to the higher ground beyond its junction with Dartmouth Road. Its setting is formed by the residential streets which meet it from both sides, from where its patrons were historically and are currently drawn.

6.3.3. The Council's case (LBL 2023, 46, paragraph 7.116) is that:

'... the proposal would have some impact on the setting of the Kirkdale ASLC due to available views down Willow Way. Particularly detrimental would be the loss of visibility of the mature large canopy trees in the Sydenham Park Conservation Area which are currently visible over the top of the existing low rise buildings on the application site. These lend the street a much more pleasant and inviting character than would be the case without them, and it was noted that the proposed development would completely obstruct views of these trees'

6.3.4. The trees referred to in the Council's case, although they may or may not be of relevance from a townscape perspective, do not contribute to the heritage value of Kirkdale ASLC. They are not a contributory factor to the heritage interests which give the proposed ASLC its heritage value, and do not assist an observer to appreciate the architectural and historical characteristics of the proposed ASLC from which its heritage value is derived.

6.3.5. The change referred to here is illustrated by AVR View 17 'Kirkdale opposite Willow Way' (Preconstruct 2023, 63-65). This shows the view of Willow Way available from the pavement on the west side of Kirkdale. In this view, Nos 51-57 Willow Way and the trees within the grounds of William Wood House are framed by the Victorian 137 Kirkdale and the recently built 139-147 Kirkdale. View 17 — Proposed — AVR3 (Rendered) shows this view with a rendered image of the proposed development in place. The effect will be to visually extend the commercial nature of Kirkdale ASLC onto a side street, in so doing mirroring the existing commercial extension on Dartmouth Road. By visually emphasising the commercial aspects of Kirkdale ASLC, the proposed development will have a beneficial effect on the heritage value of the proposed ASLC.

6.3.6. In addition to View 17 'Kirkdale opposite Willow Way', the Council requested (in paragraph 7.118 of their SoC) the preparation of one further AVR (View 19). This was to be taken from a position on the pavement on the western side of Kirkdale, opposite the junction with Peak Hill, looking north-west along Kirkdale. The purpose of the view was to allow an assessment of the visibility of the development in longer views looking north towards Kirkdale ASLC, in the setting of the listed buildings at 134-146 Kirkdale, and from the immediate setting of the Cobbs Corner Conservation Area.

6.3.7. View 19 'Kirkdale, junction with Peak Hill' (Preconstruct 2023a, 6-9) demonstrates that the proposed development, shown as a blue dashed wireline, will be hidden from view by a four-storey development along the eastern edge of Kirkdale. It will have no bearing on the

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observer's ability to appreciate the heritage value of Kirkdale ASLC. View 19 'Proposed — AVR1 (Wireline) + Masterplan' shows how the view north-westwards along Kirkdale would appear were the masterplan development to be added. The only difference to note is the smoothing of the built environment's skyline: this would no effect on the ability of an observer to appreciate the characteristics which give the proposed Kirkdale ASLC its heritage value.

6.4. Sydenham Hill / Kirkdale Conservation Area (HA062)

6.4.1. During preparation of the Heritage Statement a lack of intervisibility between Sydenham Hill/Kirkdale Conservation Area and the proposed development was considered sufficient reason to allow this Conservation Area to be scoped out of further assessment. In a meeting between the Council and the Appellant on 13 July 2023 the Council's conservation officer requested that it be included for consideration (Pre-Application Meeting 1: Meeting Minutes 13 July 2023; see Core Document 5.5).

6.4.2. Although there is no appraisal of the conservation area available, there is a summary description on the Council's website¹². This describes the area thus (my additions are in square brackets):

Designated in 1976, this area contains a mix of 19th [-century] buildings and a 20th century housing estate, all of distinctive form and style and good quality. Three different character areas can be distinguished: Mount Gardens, Mount Ash Road and Lammas Green. Mount Gardens is on the site of the original Sydenham Common which was enclosed some time between 1810 and 1820. The first houses in Mount Gardens appear to have been developed from about 1833. The area covers a nearly rectangular site with unmade roads on three sides. It is covered with dense vegetation and many good trees which give Mount Gardens an almost rural atmosphere.

The detached properties are of varied design but each posses [sic] interesting architectural character and quality and many of them on our list of buildings [are] of local interest. Also included are several Victorian mansions along Sydenham Hill which are notable for their rather ostentatious style.

Mount Ash Road to the south is a unique example of Victorian 'byelaw' housing designed as a set piece of identical three-storey terraces enclosing the road to both sides.

To the north, the conservation area includes Lammas Green, a 1950s housing scheme of the City of London comprising three terraces set round a village green, with views of the North Downs, and two blocks of flats behind, which serve as a buffer to the road. In 1998, the estate was listed Grade II as being of special architectural and historic interest in its own right.

6.4.3. The heritage value of Sydenham Hill/Kirkdale Conservation Area derives from its architectural and historical interest, in particular from Lammas Green's special interest. This development represents the smallest but finest of four housing schemes by Donald McMorran of

¹² <https://lewisham.gov.uk/myservices/planning/conservation/conservation-areas/sydenham-hill-conservation-area>

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Farquharson and McMorran, with Peter Nuttall as assistant, for the Corporation of the City of London (taken from Historic England NHLE 1246890 listing description). Their composition of three terraces (each of them a Grade II listed building) set round a village green, with views of the North Downs is, according to Historic England's listing description, 'made the more idyllic by the position of the two blocks of flats as a buffer to the road behind'. The contrast of the flats, notable for their fine brickwork and traditional proportions, with colourwashed cottages is particularly distinguished. The form of the colourwashed terraces set in pairs owes something to the work of Tayler and Green'. Herbert Tayler and David Green built 739 houses in estates for Loddon Rural District Council in Norfolk between 1945 and 1976 (Pevsner and Wilson 1999, 165). Their estates are typically found on the periphery of rural villages in South Norfolk.

6.4.4. The Council's case (LBL 2023, 46, paragraph 7.121) is that:

the visual impact of the Proposal in the setting of the conservation area would cause a low degree of harm (less than substantial in NPPF terms) to its significance as a designated heritage asset.

6.4.5. At their closest, the conservation area and proposed development lie c.275m from each other, with the residential areas of Sandown Court, Brickwood Close and Forest Hill Court acting as a visual buffer between the two. This separation is illustrated by AVR View 5 'Kirkdale, north of junction with Panmure Road' (Preconstruct 2023, 20-22), which was taken from the south-eastern corner of the conservation area. View 5 — Proposed — AVR1 (Wireline) illustrates the extent to which the proposed development would be screened from view by intervening buildings. It also illustrates that in the small area where it will be visible the proposed development in its operation phase will sit below the horizon, on the far distance of which is the high ground of north Kent.

6.4.6. Where views from Sydenham Hill/Kirkdale Conservation Area contribute to its historical interest, they are primarily to the west and south-west, where a link between Lammas Green and Sydenham Hill Wood and the green areas around Dulwich College (and the distant North Downs) establishes Lammas Green estate's credentials as an urban counterpart to Tayler and Green's estates. The view south-eastwards from Sydenham Hill/Kirkdale Conservation Area towards Kirkdale ASLC also has value for the contribution it makes to an understanding of the historic link between Upper Sydenham and the oldest parts of Sydenham Hill/Kirkdale Conservation Area, which are situated in Mount Gardens. The proposed development will have no impact on these visual connections, nor the ability of the observer to comprehend the historical interest which these visual links lend to the conservation area and thus to its heritage value.

6.5. 124-128, Kirkdale SE26 (BHA043)

6.5.1. The Grade II listed 124-128, Kirkdale SE26 (NHLE 1080021; Plate 1, termed '124-128 Kirkdale' in the Council's SoC) is an early to mid-19th century part of a symmetrical stucco composition made up of two pairs with a single house between. The buildings line the western side of Kirkdale, to the north of the Grade II listed High Street Buildings (BHA056). Historic England's

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listing describes the outer houses of each pair as being marred by alterations and projecting modern shop fronts, and:

Of two storeys and a basement, 'five windows, round arched except for outer 1st floor windows. All sashes, with either glazing bars or margin lights. 1st floor centre window a later, canted oriel bay with pilasters and entablature. Roughly rendered walls and moulded door and window architraves to No 126. Radial fanlights to doors of Nos 126 and 128. Projecting from front of No 124 and right bay of No 126 mid C19 shop front with rounded composite pilasters, moulded architrave and fascia with dentil cornice. Glazing bars to windows' (Historic England NHLE description).

- 6.5.2. The heritage value of 124-128, Kirkdale SE26 is derived from its architectural and historic interest, and the contribution it makes to the local streetscape. It is legible evidence (and, indeed, amongst the best physical evidence available) of the early Victorian development of a part of Sydenham Common into Upper Sydenham once the nearby London, Brighton and South Coast Railway had arrived in the 1830s. Its setting is formed by Kirkdale (and in particular, Kirkdale ASLC) and other nearby commercial premises which, when combined together, form a legible Victorian/Edwardian high street.



Plate 1: 120-132 Kirkdale, looking south. High Street Buildings are to the left

- 6.5.3. The Council's case (LBL 2023, 46, paragraph 7.121) is that:

the visual impact of the Proposal would cause a low to moderate degree of harm (less than substantial in NPPF terms) to the significance of this listed building.

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6.5.4. Although the proposed development may possibly be partially visible in some high-level views from 124-128, Kirkdale SE26, it will not be visible in views of the asset from Kirkdale, from where the asset's heritage value is best appreciated. The ability to appreciate the characteristics which give 124-128, Kirkdale SE26 its architectural and historical interest will not be affected by the proposed development, nor will the ability of an observer to understand what is important about the relationship between the listed building, Kirkdale ASLC and other nearby commercial premises.

6.6. High Street Buildings (BHA056)

6.6.1. High Street Buildings (referred to in the Council's SoC as '134-146 High Street') is a Grade II listed building (NHLE 1392512) which comprises a row of highly stylised buildings along the western side of Kirkdale from its junction with Wells Park Road. Historic England describe the row as:

'Parade of five shops with apartments above, c.1896, by Alexander Hennell. Minor later alterations mostly at ground floor level. The buildings are numbered slightly oddly with two of the five buildings having two numbers. From north to south, the numbers are: 134, 136, 138/140, 142/144 and 146'.

6.6.2. The row is in an 'attractive free Queen Anne style, with a dramatic roofline, and a presence in the streetscape'. Historic England note the good use of materials, 'particularly the extensive buff terracotta dressings', and the good survival of original features including three of the five late 19th-century shopfronts. While the plan is fairly typical, as determined by the five plots available along the road, the detailing is dramatic, particularly along the roofline where there are Flemish-style gables and Gothic pinnacles. These elements give the asset architectural interest. Historic interest is provided by their link with the locally significant architect, Alexander Hennell, 'who has other listed buildings to his name' (all quotations from Historic England's listing description).

6.6.3. The heritage value of High Street Buildings is derived from these architectural and historic interests, and the contribution it makes as a local landmark to the local streetscape. It is further evidence of the Victorian development of Upper Sydenham, in this case as the period reached its zenith towards the end of the 19th century. It can be argued that in its rather overbearing and overly fussy appearance it is characteristic of the hubristic times in which it was built.

6.6.4. Like 124-128, Kirkdale SE26, its setting is formed by Kirkdale and other nearby commercial premises which, when combined together, form a legible Victorian/Edwardian high street. Its architectural interest has been lessened in the recent past by the clumsy conversion of an entire parade of shops on Wells Park Road to residential use.

6.6.5. The Council's case (LBL 2023, 46, paragraph 7.121) is that:

the visual impact of the Proposal would cause a low to moderate degree of harm (less than substantial in NPPF terms) to the significance of this listed building.

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6.6.6. Although the proposed development will be visible from the higher floors of High Street Buildings, it will not be visible in the views which are available of High Street Buildings, all of which are from Kirkdale, Willow Way and the junction of Kirkdale and Sydenham Park. Its architectural and historical interest will not be affected, and neither will its relationship with Kirkdale ASLC and other nearby commercial premises of a similar age. There will no impact on the ability of an observer to appreciate the architectural aspects of its heritage value, nor the contribution its setting at the southern end of Kirkdale ASLC makes to its historical interest.

6.7. The Bricklayers Arms, 189 Dartmouth Road (BHA011).

6.7.1. *The Bricklayers Arms* (see AVR 8 ‘Dartmouth Road at Willow Way junction’; Preconstruct 2023, 30-32) is a locally listed building, dating to 1924, designed in the Neo-Georgian style favoured by inter-war designers of public houses (Cole 2015, 43-45). It derives its heritage value from its architectural and historical interest. Its prominent location in the angle between two roads gives it visual interest and contributes to the local streetscape. It was common for breweries and other developers of public houses to choose sites located at junctions such as these for a number of reasons. Multiple street frontages maximised the opportunities to advertise the building’s presence, which was normally achieved by the use of architectural ornamentation and design. It also increased the volume of window space available, which helped create light and airy internal spaces. Finally, it allowed the number of entries and exits to be maximised, which in turn allowed space within a public house to be segregated along sex and class lines. *The Bricklayers Arms* features many of these characteristics.

6.7.2. Its setting is the neighbourhood within which it sits and from which it historically drew its clientele. The visual connection the premises has with *The Woodman* to the south-west (see AVR View 8, ‘Dartmouth Road at Willow Way junction’; Preconstruct 2023, 30) contributes to its historic interest by illustrating one of Upper Sydenham’s historic commercial functions. The proposed development is situated little more than 25m south-east of *The Bricklayers Arms* and will introduce new, taller buildings of greater mass to the immediate environs of the public house. This will be a change to the heritage asset’s setting, but it will not change the legibility of the building’s architectural and historical interest, nor the ability of an observer to understand immediately what makes the building special, in other words, what gives it its heritage value.

6.7.3. The Council’s case (LBL 2023, 46, paragraph 7.121) is that:

the visual impact of the Proposal would cause a low degree of harm (less than substantial in NPPF terms) to the significance of this non-designated heritage asset

6.7.4. AVR View 7 ‘Dartmouth Road’ (Preconstruct 2023, 26-29) shows the view southwards from the south-eastern corner of Sydenham School on Dartmouth Road and AVR View 8 ‘Dartmouth Road at Willow Way junction’ (Preconstruct 2023, 30-33) shows the view southwards from the pavement outside Sydenham Court (179 Dartmouth Road). The two prominent buildings in this first of these views are *The Bricklayers Arms* and Sydenham Court. View 7 — Proposed — AVR2 (Form) illustrates that, as identified in the Heritage Statement (paragraph 8.6.1), the proposed development will add new, taller buildings of greater mass to the immediate

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environs of the public house. This will be a change to the heritage asset's setting, but it will not adversely affect the legibility of the building's architectural and historical interest, nor the ability of the observer to understand these interests. The visual relationship between *The Woodman* on Kirkdale and *The Bricklayers Arms* will remain unchanged. What makes *The Bricklayers Arms* special in heritage terms (its heritage value) would be unchanged by the proposal.

- 6.7.5. AVR View 7 'Proposed — AVR2 (Form) + Masterplan' and AVR View 8 'Proposed — AVR2 (Form) + Masterplan' show how the view southwards from the junction of Willow Way and Dartmouth Road would appear were the masterplan development to be added. The height and mass of the built environment surrounding *The Bricklayers Arms* would increase. It would still be possible for an observer to appreciate the architectural and historical characteristics which give the public house its heritage value, and the re-introduction of buildings between *The Bricklayers Arms* and 217 Dartmouth Road, thus restoring a street frontage lost during and immediately after WWII, would be a beneficial effect in terms of heritage value.

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7. SUMMARY AND CONCLUSIONS

- 7.1.1. Section 16 of the NPPF (paragraph 195; Core Document 4.64) requires ‘local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset)’. Paragraph 200 of the NPPF (Core Document 4.66) states that ‘Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.
- 7.1.2. The Heritage Statement¹³ which accompanied the Appellant’s planning application (planning ref DC/22/129789) identified the built heritage resource within the site and a study area of 500m surrounding it, assessed its significance (and thereby its heritage value), identified any impacts from the development proposals on that resource, and considered suitable measures to mitigate any such impacts.
- 7.1.3. A series of 19 accurate visual representations¹⁴ were produced to support the assessment of impact (if any) to heritage assets and to inform townscape and visual impact assessment (TVIA). The TVIA is set out in *21-57 Willow Way, London, SE26: Townscape and Visual Impact Assessment for the Appeal Scheme* (GJHP 2023¹⁵; see Core Document 5.3.1 Appendix 17).
- 7.1.4. The Council’s Statement of Case (LBL 2023, paragraph 7.120) considered that in relation to the following viewpoints there would be various degrees of harm to heritage assets (both designated and non-designated):
- View 5 – Kirkdale, north of junction with Panmure Road
 - View 7 – Dartmouth Road outside Sydenham School
 - View 8 – Dartmouth Road at Willow Way junction
 - View 10 – Sydenham Park opposite Shrublands Close
 - View 11 – Carlton Terrace
 - View 12 – Sydenham Park – Park Terrace
 - View 13 – Sydenham Park opposite nos. 9 and 11
 - View 17 – Dartmouth Road outside Sydenham School
- 7.1.5. Each of these AVRs has been assessed in this Proof to identify any degree of harm to heritage assets. It is to be noted that harm in this sense has been assessed within the terms set out in

¹³ PCA Heritage, 2022

¹⁴ Preconstruct, 2023; Preconstruct, 2023a

¹⁵ GJHP, 2023, *21-57 Willow Way, London, SE26: Townscape and Visual Impact Assessment for the Appeal Scheme*

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paragraph 200 of NPPF (Core Document 4.66), that is harm to the significance (in other words heritage value) of heritage assets.

- 7.1.6. The Council's Statement of Case (LBL 2023, paragraphs 7.121) argues that impacts on designated heritage assets would be as follows:
- Sydenham Park Conservation Area – the visual impact of the Proposal in the immediate setting of the conservation area would cause a degree of harm to its significance as a designated heritage asset. This would vary between low to moderate harm (less than substantial in NPPF terms), depending on the location of the viewpoint.
 - Sydenham Hill/Kirkdale Conservation Area – the visual impact of the Proposal in the setting of the conservation area would cause a low degree of harm (less than substantial in NPPF terms) to its significance as a designated heritage asset.
 - 124-128 Kirkdale and 134-146 Kirkdale – the visual impact of the Proposal would cause a low to moderate degree of harm (less than substantial in NPPF terms) to the significance of these two groups of listed buildings.
- 7.1.7. This Proof (in Section 6.2) concludes that whilst there will be a change to one part of Sydenham Park Conservation Area's setting, the change will have no impact on the ability of an observer to comprehend the historical and architectural qualities of Sydenham Park Conservation Area and its buildings. No harm to heritage significance has been identified.
- 7.1.8. This Proof (in Section 6.4) concludes that where views from Sydenham Hill/Kirkdale Conservation Area contribute to its historical interest, they are primarily to the west and south-west, where a link between Lammas Green and Sydenham Hill Wood and the green areas around Dulwich College (and the distant North Downs) establishes Lammas Green estate's credentials as an urban counterpart to Tayler and Green's estates. The view south-eastwards from the conservation area towards Kirkdale ASLC also has value for the contribution it makes to an understanding of the historic link between Upper Sydenham and Mount Gardens, the oldest part of Sydenham Hill/Kirkdale Conservation Area. The proposed development will have no impact on these visual connections, nor the ability of the observer to comprehend the historical interest which these visual links lend to the conservation area and thus to its heritage value. No harm to heritage significance has been identified.
- 7.1.9. This Proof (in Section 6.5) concludes that although the proposed development may possibly be partially visible in some high-level views from 124-128, Kirkdale SE26, it will not be visible in views of the asset from Kirkdale, from where the asset's heritage value is best appreciated. The ability to appreciate the characteristics which give 124-128, Kirkdale SE26 its architectural and historical interest will not be affected by the proposed development, nor will the ability of an observer to understand what is important about the relationship between the listed building, Kirkdale ASLC and other nearby commercial premises. No harm to heritage significance has been identified.
- 7.1.10. This Proof (in Section 6.6) concludes that although the proposed development will be visible from the higher floors of High Street Buildings (the NHLE name for 134-146 Kirkdale), it will not be visible in the views which are available of High Street Buildings, all of which are from

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Kirkdale, Willow Way and the junction of Kirkdale and Sydenham Park. Its architectural and historical interest will not be affected, and neither will its relationship with Kirkdale ASLC and other nearby commercial premises of a similar age. There will no impact on the ability of an observer to appreciate the architectural aspects of its heritage value, nor the contribution its setting at the southern end of Kirkdale ASLC makes to its historical interest. No harm to heritage significance has been identified.

7.1.11. The Council's Statement of Case (LBL 2023, paragraphs 7.122) argues that the impacts on non-designated heritage assets would be as follows:

- Kirkdale ASLC – the visual impact of the Proposal would cause a low degree of harm (less than substantial in NPPF terms) to the significance of this non-designated heritage asset.
- *The Bricklayers Arms* – the visual impact of the Proposal would cause a low degree of harm (less than substantial in NPPF terms) to the significance of this non-designated heritage asset

7.1.12. The heritage value of the proposed Kirkdale ASLC is derived from the architectural interest of its component buildings, and the complementary functions of those buildings (listed and otherwise) which emphasise the proposed ASLC's commercial character. Its historical interest is derived from its history as a mid-Victorian 'neighbourhood centre', and the artistic interest of its topography, namely its climb from the junction of Jews Walk, Sydenham Park and Wells Park Road to the higher ground beyond its junction with Dartmouth Road. Its setting is formed by the residential streets which meet it from both sides, from where its patrons were historically and are currently drawn.

7.1.13. This Proof (in Section 6.3) concludes that the effect of the proposed development in relation to the proposed Kirkdale ASLC will be to visually extend the commercial nature of the Area of Special Local Character onto a side street, in so doing mirroring the existing commercial extension onto Dartmouth Road. By visually emphasising the commercial aspects of Kirkdale, the proposed development will have a beneficial effect on the heritage value of the proposed Kirkdale ASLC. No harm to heritage significance has been identified.

7.1.14. *The Bricklayers Arms* derives its heritage significance (its heritage value) from its architectural and historical interest. Its prominent location in the angle between two roads gives it visual interest and contributes to the local streetscape. This Proof (in Section 6.7) concludes that the proposed development will add new, taller buildings of greater mass to the immediate environs of the public house. This will be a change to the heritage asset's setting, but the change will not adversely affect the legibility of the building's architectural and historical interest, nor the ability of an observer to understand these interests. The visual relationship between *The Woodman* on Kirkdale and *The Bricklayers Arms*, a relationship which lends both some heritage value, will remain unchanged. What makes *The Bricklayers Arms* special in heritage terms (its heritage value) will be unchanged by the proposal. No harm to heritage significance has been identified.

7.1.15. If the masterplan development was combined with the proposed development the height and mass of the built environment surrounding *The Bricklayers Arms* would change. It would still

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be possible for an observer to appreciate the architectural and historical characteristics which give the public house its heritage value, and the re-introduction of buildings between *The Bricklayers Arms* and 217 Dartmouth Road, thus restoring a street frontage lost during and immediately after WWII, would be a beneficial effect in terms of heritage value.

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