

Lewisham Local Plan

Heritage Assessment background paper

Prepared to support the Regulation 19 stage consultation on the
Proposed Submission document

October 2022

Contents

1	About Lewisham’s Local Plan	3
2	What are heritage assessments?	4
3	Why have the heritage assessments been prepared?.....	5
4	What sites have been assessed?.....	5
5	Outcome of the heritage assessments	7
	Appendix A – Heritage assessment of proposed site allocations	11
	North Area: 11 Former Hatcham Works, New Cross Road.....	11
	North Area: 18 Sun Wharf Mixed-use Employment Location (including Network Rail Arches).....	19
	North Area: 19 – Creekside Village East, Thanet Wharf Mixed-Use Employment Location.....	26
	North Area: 17 Lower Creekside Locally Significant Industrial Site	33
	South Area: 1 Former Bell Green Gas Holders and Livesey Memorial Hall	42

1 About Lewisham's Local Plan

- 1.1. The Local Plan forms part of Lewisham council's statutory development plan alongside the London Plan and adopted neighbourhood plans. It is used in the determination of planning applications. It also helps to inform investment decisions made by the council, its key delivery partners and other stakeholders.
- 1.2. The current Local Plan comprises a suite of documents including the Core Strategy (2011), Site Allocations (2013), Development Management (2014) and Lewisham Town Centre Local Plan (2014). The council is now reviewing these documents in the preparation of a new Local Plan. The new plan, once adopted, will update and replace the existing aforementioned documents, bringing them together into a single document.
- 1.3. Lewisham's new Local Plan sets out a vision, strategic objectives and planning policies that together provide the overarching framework for the delivery of sustainable development in the Borough. It covers the twenty-year period from 2020 to 2040. The plan will help to support implementation of the draft London Plan and its aspirations for achieving 'Good Growth' locally, recognising that Lewisham is an integral part of London.
- 1.4. Heritage forms an integral part of the draft Local Plan. Strategic Objective 15 of the draft Local Plan seeks to "Set a positive framework for conserving and enhancing the historic environment, and promoting understanding and appreciation of it, including by working with local communities and community groups, neighbouring authorities and other stakeholders to sustain the value of local heritage assets and their setting, along with the Outstanding Universal Value of the Maritime Greenwich World Heritage Site".
- 1.5. The draft Local Plan also contains policies that cover:
 - Policy HE1 - the value and significance of Lewisham's historic environment and its setting;
 - Policy HE2 – designated heritage assets including the Maritime Greenwich World Heritage Site Buffer Zone, Conservation Areas, Listed Buildings, Scheduled Ancient Monuments, Registered Parks and Gardens and London Squares;
 - Policy HE3 – locally listed buildings and other non-designated assets including Areas of Special Local Character and archaeology.

2 What are heritage assessments?

- 2.1. Guidance on integrating positive strategies for heritage in development plans, based on a sound understanding of the historic environment is set out in NPPF, the London Plan and Historic England guidance, as follows.
- 2.2. NPPF states that Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
 - a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place.
- 2.3. The London Plan Policy HC1- Heritage conservation and growth states that:
 - A. Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area; and
 - B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
 - 1) setting out a clear vision that recognises and embeds the role of heritage in place-making;
 - 2) utilising the heritage significance of a site or area in the planning and design process;
 - 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place;
 - 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

- 2.4. Historic England provides guidance on the consideration of heritage in site allocations in their Advice Note 3: The Historic Environment and Site Allocations in Local Plans, 30 October 2015. This provides advice to help ensure that the historic environment plays a positive role in allocating sites for development. It offers advice on evidence gathering and site allocation policies, as well as setting out in detail a number of steps to make sure that heritage considerations are fully integrated in any site selection methodology.
- 2.5. It proposes a methodology with 5 steps:
1. Identify which heritage assets are affected by the site allocation;
 2. Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s);
 3. Identify what impacts the allocation might have on that significance;
 4. Consider ways of maximising enhancements and avoiding harm; and
 5. Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness

3 Why have the heritage assessments been prepared?

- 3.1. Historic England's response on the Regulation 18 draft Local Plan consultation noted that there were a number of site allocations in or adjacent to conservation areas, or that may affect the setting of listed buildings. There was no visibility of the analysis of how the allocations would affect the significance of the relevant heritage assets.
- 3.2. They also noted that the Site Allocations did not include indications of maximum building heights as is specified in London Plan policy D9 B(2), and that doing so would also satisfy the requirements of NPPF para 16, which states that local plan policies should be unambiguous.
- 3.3. They advised that 5 site allocations in the North Area should be revisited, and pointed to their Advice Note 3: The Historic Environment and Site Allocations in Local Plans. (Note that SA numbers have changed since Regulation 18 and the Regulation 19 numbers are as set out below).

4 What sites have been assessed?

- 4.1. The draft site allocations were informed by input from LPA conservation officers at pre Regulation 18 stage. This comprised identifying known heritage assets in or around the site allocation that could be affected by the development; identifying potential impacts and providing advice on means to avoid harm.

- 4.2. In response to Historic England's consultation response, the council's conservation officer re-assessed the 5 site allocations in the north area as identified by Historic England, as well as an additional site in the south area. These sites were:

North Area:

11 - Former Hatcham Works

16 - Land north of Reginald Road and south of Frankham Street (former Tidemill School).

18 - Sun Wharf Mixed-Use Employment Location (including Network Rail Arches)

19 - Creekside Village East, Thanet Wharf Mixed-Use Employment Location

17 - Lower Creekside Locally Significant Industrial Site.

South Area:

1 - Former Bell Green Gas Holders and Livesey Memorial Hall.

- 4.3. Of the 5 site allocations requested by Historic England, one, 16 - Land north of Reginald Road and south of Frankham Street (former Tidemill School), was granted planning permission for development of the entirety of the land in the site allocation in 2018 and works on site were well underway on the site by the end of the regulation 18 consultation. Preservation of heritage assets on the site and the setting of the adjacent conservation area had been taken into consideration in the design of the proposal and played a key role in the scheme. It was therefore considered that undertaking an additional heritage assessment on this site was no longer necessary.
- 4.4. The additional site allocation in the south area, 2-Former Bell Green Gas Holders and Livesey Memorial Hall, was considered important to assess in more detail as, at Regulation 18 stage, it comprised two site allocations, one containing a listed building and its curtilage, and one directly adjacent to it which could affect the heritage asset's setting. There was a need to ensure that these sensitivities were properly reflected in the revised, site allocation which merged these two together.

5 Outcome of the heritage assessments

- 5.1. A summary of findings was as follows:

North Area:

11- Former Hatcham Works

- 5.2. The assessment highlighted a number of potential impacts, in particular the increase in traffic and footfall that would be generated by the development, changing the secluded character of part of Hatcham CA and bringing more visitors to Telegraph Hill parks; and the impact on views from surrounding conservation areas. It highlighted the need for an appraisal of the Deptford Town Hall Conservation Area to be undertaken and adopted so as to allow the significance of this CA to be clearly understood. Potential benefits were identified including archaeological investigation that could further knowledge about former activity on the site, including railway heritage, and opportunity to reveal it through interpretation on site; and the opportunity to improve the southern end of Harts Lane, reinstate the lost built form on New Cross Road and enhance the presence of New Cross Gate station.

- 5.3. The Development Guidelines were amended to include more specific guidance relating to reducing harmful impacts on the neighbouring CAs. This included that street layouts should respond to the historic street pattern of the adjoining Hatcham CA to the west; the buildings on the western edge should respond sensitively to the residential dwellings and street character immediately adjoining; and the location of tall buildings should be within the centre of the site and should be rigorously tested to ensure no visual impact on townscape of merit in Deptford Town Hall CA, nor harm to views from Telegraph Hill CA.

16- Land north of Reginald Road and south of Frankham Street (former Tidemill School)

- 5.4. A re-assessment was not undertaken as explained above, but minor amendments were made to the text to explicitly identify the heritage assets on and adjacent to the site.

17- Lower Creekside Locally Significant Industrial Site

- 5.5. The assessment identified key characteristics of historic and architectural value including the light industrial character and uses; and river related industry and dwellings; cultural and artistic activities; and presence of modest buildings and structures which make a positive contribution to the CAs significance.

- 5.6. Viewpoints were identified from which development should be considered, including from the DLR viaduct; from Crossfield Street estate amenity space within the CA; and from Church Street outside the CA. It also identified outward views towards the listed Mumford's Mill (in Royal Borough of Greenwich) which would be seen in the context of the Creek.
- 5.7. The assessment identified potential pressure for the loss of historic buildings that make a positive contribution to the CA's character and appearance, and the loss of the intimacy of the narrow street with solid boundary wall and glimpsed views to yards beyond as a result of the desire to open up and activate the street edge.
- 5.8. Amendments were made to the Development Requirements to include ways that development can preserve the character of the CA, including the creation of new yards behind the street frontage, and the retention of the street edge boundary walls.
- 5.9. The development guidelines were also amended to identify elements to be protected, including the workspace and cultural uses, buildings that make a positive contribution to the CA, and open spaces. Guidance on heights was also added, referring to existing building heights within the CA and the distinction between taller buildings on Church Street and lower height on Creekside. It was also amended to explicitly identify nearby designated heritage assets, and include specific guidance on ways to better reveal the Creek, its history and presence in the CA, along with significant historic buildings on its banks, and opportunities for river related occupations.

18-Sun Wharf Mixed-Use Employment Location (including Network Rail Arches)

- 5.10. The assessment identified key townscape elements and characteristics that needed greater emphasis in the SA text, including the importance of the creek and opportunities to enhance access to it; the significance of the listed railway viaduct and future opportunities to integrate development with it and create public access alongside and through it; and the significant history of art and in particular murals to the local area.
- 5.11. The Development Requirements were amended to include the need for an active frontage on the southern side of the site facing the listed railway Viaduct so as to optimise the potential for the use of the adjacent roadway by the public in the future, including as a way to access the Creek; the provision of a public path alongside the Creek with the potential for access through one of the arches of the listed Viaduct to the Ha'penny Bridge path; and incorporation of means of revealing and conveying the history and heritage of the site and its surroundings, including riverine, railway, industrial and social history.

- 5.12. The development guidelines were amended to include guidance on locations for tall buildings on site, and locations from which to assess views of the development.

19 - Creekside Village East, Thanet Wharf Mixed-Use Employment Location

- 5.13. The Assessment identified particular sensitivities in regard to tall buildings on the site on the setting of nearby heritage assets, in particular St Paul's Church, listed buildings on Albury Street and the Maritime Greenwich World Heritage Site, including the setting of the Georgian town centre of Greenwich.
- 5.14. It noted the significant change in character to the setting of the Creek and associated heritage assets (Creekside CA, Viaduct & Lifting Bridge, NDHAs in Creekside CA) that has already occurred locally, in terms of scale, height, introduction of residential accommodation, and loss of industry and wharfs, which would be continued by development on this site.
- 5.15. It identified opportunities for development to enable benefits such as continuation of a river walkway along the Creek through the site and the revealing of new views of the non-designated heritage assets to the south along the Creek.
- 5.16. It also identified the potential for the neighbouring Trinity Laban's building to be considered of greater architectural significance if reassessed in the future.
- 5.17. The Development Requirements were amended to include the need to provide public access to the Creek.
- 5.18. The Design Guidelines were amended to explicitly identify the heritage assets that would be affected by the development of tall buildings on the site, and the need for harm to be assessed and avoided through the design process.

South Area:

2 - Former Bell Green Gas Holders and Livesey Memorial Hall

- 5.19. The assessment identified the need for the Livesey Memorial Hall site to be incorporated into the Bell Green Gasholder Site Allocation so that both could be considered holistically.
- 5.20. Potential impacts were identified, including the substantial change to the listed building group's setting; new higher density development becoming visible in the immediate and wider setting of the heritage assets; creation of a public face to the rear and desire to make alterations to its envelope, servicing and access; and new vehicular routes to the rear, potentially providing new improved access to the heritage assets.
- 5.21. These impacts include potential benefits, including the opportunity to reconnect the listed building into a sensitively designed new townscape; enhance its community focus through the uplift in numbers of local residents; generate income to maintain and enhance the heritage assets and the curtilage into the future; and the potential for new development to reveal the site's history and heritage through interpretation and re-use of the salvaged gasholder fragments.
- 5.22. The Development Requirements were amended to require sensitivity to the setting of the group of heritage assets at the Livesey Memorial Hall and their curtilage; to incorporate them into the wider townscape; and to reveal the history and heritage of the former South Suburban Gas Works site through a site wide interpretation strategy including the re-use of the retained gasholder elements.
- 5.23. The Development Guidelines were amended to include that the Livesey Memorial Hall should be a focal point within the wider site; access to it should be enhanced; the open spaces in its curtilage should be retained as open space ancillary to the use of the hall; and it should continue to be used as a community asset.

Appendix A – Heritage assessment of proposed site allocations

North Area: 11 Former Hatcham Works, New Cross Road		
STEP 1 Identify which heritage assets are affected by the potential site allocation	<ul style="list-style-type: none"> ■ Informed by the evidence base, local heritage expertise and, where needed, site surveys 	See table of heritage assets, below. New Cross Gate Framework SPD
	<ul style="list-style-type: none"> ■ Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases. Heritage assets that lie outside of these areas may also need identifying and careful consideration. 	1km radius as shown in New Cross Gate Framework
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	<ul style="list-style-type: none"> ■ Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual) 	See table below
	<ul style="list-style-type: none"> ■ Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration) 	See table below

	<ul style="list-style-type: none"> ■ Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information ■ For a number of assets, it may be that a site makes very little or no contribution to significance. 	<p>Deptford Town Hall CA has a draft CAA dated 2009 which has not been consulted upon or adopted. This will need to be updated in due course so further understanding of the significance of that CA and the setting will then be available</p>
<p>STEP 3 Identify what impact the allocation might have on that significance, considering:</p>	<ul style="list-style-type: none"> ■ Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views ■ Form and appearance of development e.g. prominence, scale and massing, materials, movement 	<p>Hatcham CA – the aspiration to connect the SA into the local network of streets will impact on existing routes at the eastern side of the CA. Harts Lane and Brighton Grove likely to be particularly impacted by increased traffic. Close proximity to denser/taller development will impact on the immediate setting of the eastern side of the CA, and could appear overwhelming and uncontextual if a real transition in heights is not provided. The CA’s regular perimeter block street pattern should form the basis of a street connection into the site, development that fails to respond to the street layout and building lines could harm the setting. Taller buildings will be visible over the roofscape from other parts of the CA, and their impact will depend on their footprint scale, proportions and elevational detailing. They will erode the existing inward looking/secluded character of the residential streets. Difference in levels could result in abrupt change in heights and lack of active street edge at western side. Frontages along New Cross Road and Harts Lane could be improved and made more active.</p> <p>Telegraph Hill CA– development will be visible in short –long views, from New Cross Road at the southern boundary of the CA, and up Jerningham Road and from the Parks on the higher ground particularly. Will be prominent and may be dominating in views north, changing the sense of spaciousness and long reaching views in that direction</p> <p>Deptford Town Hall CA – tall buildings that extend above the roofplane of New Cross Road (north side) will impact on the appearance of that street which is an</p>

		important and architecturally coherent set piece, marked by the dome of the New Cross Inn at its eastern end which is a high quality landmark at roof level.
	<ul style="list-style-type: none"> Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use 	<p>Hatcham CA – Current secluded character would be substantially changed by opening up the eastern side and linking with a new residential area. Could result in higher footfall on streets, greater use of Eckington Gardens. Brighton Grove could be dwarfed or overshadowed by surrounding built form.</p> <p>Telegraph Hill CA – greater use of Telegraph Hill Parks</p>
	<ul style="list-style-type: none"> Secondary effects e.g. increased traffic movement through historic town centres as a result of new development 	<p>Hatcham CA - Increased traffic through the CA – particularly domestic, public transport and service traffic at the eastern side, which may result in new and extended traffic infrastructure that could harm the appearance and character. Harts Lane and Brighton Grove likely to be particularly impacted by increased traffic. Connection to cycle route 1 will also bring more cycle traffic – whilst this is likely to have less harmful impact itself, implications of associated infrastructure, and relationship with existing street layout should be considered. Potential for increased footfall through the CA towards the site if Bakerloo Line extension arrives at the site.</p> <p>Telegraph Hill – Provision for traffic entering the site at from New Cross Road could impact on traffic which blights the northern end of the CA. Potential for increased footfall through the CA towards the site if Bakerloo Line extension arrives at the site.</p> <p>Deptford Town Hall –Impacts on traffic flow could result in new requirements for traffic entering the site from New Cross Road. Changes to Station use to improve pedestrian access/flow e.g. a new entrance on western side - could reduce pressure on the currently constricted entrance on the bridge. Potential for increased footfall through the CA towards the site if Bakerloo Line extension arrives at the site.</p>

STEP 4 Consider maximising enhancements and avoiding harm through:	Maximising Enhancement	
	<ul style="list-style-type: none"> ■ Public access and interpretation ■ Increasing understanding through research and recording ■ Repair/regeneration of heritage assets ■ Removal from Heritage at Risk Register 	<p>Archaeology may reveal hitherto unknown evidence about former activity on the site; new understanding could be revealed through interpretation materials, public art, street / building naming etc.</p> <p>Opportunity for revealing the railway history of the site</p> <p>Opportunity for improving the southern end of Harts Lane</p> <p>Opportunity for enhancing the Station presence on the bridge, better designed solution for railings along pavement at this point.</p>
	<ul style="list-style-type: none"> ■ Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design 	Reinstatement of lost building frontage along New Cross Road to respond to existing shopping frontages
	Avoiding Harm	
	<ul style="list-style-type: none"> ■ Identifying reasonable alternative sites ■ Amendments to site boundary, quantum of development and types of development ■ Relocating development within the site ■ Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings. 	<p>Quantum of development should enable a genuine transition of heights on boundaries so as to preserve the setting of neighbouring CAs.</p> <p>Commercial development should be located at southern boundary to reinforce New Cross Road character</p> <p>Higher development should be located in the centre of the site so as to minimise impact on the neighbouring CAs</p> <p>Protect views over the roofscape from within Deptford Town Hall CA</p>

	Addressing infrastructure issues such as traffic management	<p>Reinforce street network within Hatcham CA</p> <p>Remove and minimise harmful traffic infrastructure including signage and street clutter on New Cross Road and avoid proliferation of such within the CAs</p> <p>Provision of sufficient external amenity space to avoid impacts on existing green spaces in CAs</p>
STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness	<ul style="list-style-type: none"> ■ Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment) 	Yes, if amended as proposed
	<ul style="list-style-type: none"> ■ Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence 	Yes, if amended as proposed
	<ul style="list-style-type: none"> ■ Effective in terms of deliverability, so that enhancement is maximised and harm minimised 	Unit numbers need to reflect the fact that development must respond sensitively to lower heights of development in CAs on west and south sides, and also sensitivity to tall buildings from within DTHCA in the east
	<ul style="list-style-type: none"> ■ Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance 	Yes, if amended as proposed

North Area: 11 Former Hatcham Works – Table of Heritage Assets				
HA	Significance	Setting	Experience of the asset and its associations (e.g. cultural or intellectual)	Relationship of site to HA
Conservation Areas				
Hatcham CA	Residential C19th CA with commercial New Cross Road as southern boundary. Strong uniformity and consistency of form and materials. Particularly unified roofscape with view buildings seen beyond	More varied and disparate housing to north, west and south. SA to east. Telegraph Hill CA to the SE.	Residential	Directly adjacent to boundary
Telegraph Hill CA	Residential later C19th CA, with residential part of New Cross Road as northern boundary. Uniformity and consistency of form and materials. Topography and far reaching views contribute to significance.	More residential areas of less high quality/unified design to the west, south and east. Hatcham CA to NW. SA to the north.	Residential	Directly opposite to south Clear views from higher ground within CA
Deptford Town Hall CA	Later C19th and later commercial buildings fronting both sides of New Cross Road. Variety and ornamentation on elevations and roofscape, but well coo-ordinated in terms of height building line and general character. A number of key buildings, including listed buildings – Deptford Town Hall, Laurie Grove Baths and NDHAs e.g. New Cross Inn.	Complex and varied development to all sides. Relationship with THCA and HCA to the W.	Commercial	Forms part of the wider setting of the SA, some views of the SA will be achievable from within the CA.
Deptford High Street and St Paul’s Church CA				At outer edge of 1km radius

Brockley CA				At outer edge of 1km radius
Listed buildings LBL within the 3 neighbouring CAs				
Deptford Town Hall	II	Streetscape, south side of New Cross Road, within DTH CA		Visually separate
Ventilation Shaft Clifton Rise	II	Outside NDHA & local landmark New Cross Inn		Visually separate
K2 TELEPHONE KIOSK AT JUNCTION WITH NEW CROSS ROAD & Jerningham Road	II	Telegraph Hill CA		Close, visual
K2 TELEPHONE KIOSK NEAR JUNCTION WITH NEW CROSS ROAD & Troutbeck Road	II	Telegraph Hill CA		Close, visual
223-229, NEW CROSS ROAD	II	Streetscape, north side of New Cross Road, in a group with 221 & 207-209 below.		Visually separate
221, NEW CROSS ROAD	II	As above		Visually separate
207-219, NEW CROSS ROAD	II	As above		Visually separate
VENTILATING PIPE TO FORMER PUBLIC CONVENIENCES Queens Road	II	Street junction, focal point, historic site of former tollgate.		Visually separate

THE WHITE HART 184 New Cross Road	II	Street junction, focal point, historic site of former tollgate.		Visually separate
NDHAs				
See CAA audits				
Archaeology				
APA 2. Thames and Ravensbourne Terrace Gravels				SA is within this APA
APA3. Watling Street and the 'Deep-Ford'				APA runs along the southern boundary of the site

North Area: 18 Sun Wharf Mixed-use Employment Location (including Network Rail Arches)		
STEP 1 Identify which heritage assets are affected by the potential site allocation	<ul style="list-style-type: none"> ■ Informed by the evidence base, local heritage expertise and, where needed, site surveys 	See table of Heritage assets below
	<ul style="list-style-type: none"> ■ Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases. Heritage assets that lie outside of these areas may also need identifying and careful consideration. 	Buffer zone: the CA boundary; and sites outside it relating to key views, straddling the borough boundary and include HAs in Deptford High Street at St Paul's Church CA and RBGreenwich
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	<ul style="list-style-type: none"> ■ Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual) 	See table below
	<ul style="list-style-type: none"> ■ Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration) 	See table below
	<ul style="list-style-type: none"> ■ Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information. For a number of assets, it 	N/a

	may be that a site makes very little or no contribution to significance.	
STEP 3 Identify what impact the allocation might have on that significance, considering:	<ul style="list-style-type: none"> ■ Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views ■ Form and appearance of development e.g. prominence, scale and massing, materials, movement 	<ul style="list-style-type: none"> • Viaduct – There is the potential to create a new public access route to the south of the SA along the northern side of the Railway Viaduct which will diversify use, increase public access and potentially improve maintenance of this structure by incorporating it into a new public realm. • Deptford Creekside CA – The scale of development on the western side of the SA should relate sensitively to the prevailing scale (generally no higher than 5 storeys) to create a coherent and comfortable street enclosure. • Views through the site, or over lower development towards the Creek should be created/maintained so that the presence of the Creek (if not actual views) as a gap in the townscape enable views with more sense of space and sky remains appreciable in views from the CA and surrounding streets. E.g. from the roadway between Farrer House and Congers House.
	<ul style="list-style-type: none"> ■ Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use 	<p>Improved public access to the Creek, through the site. Potential for additional access to the south of the SA – a link through the easternmost arch to connect with the Ha’penny bridge, and align the northern side of the Viaduct.</p> <p>Loss of <i>Love over Gold</i> mural on western boundary wall – not considered a heritage asset but of local communal interest and provides a links with the social history of the Crossfields Estate within the CA, contributing to its setting.</p>
	<ul style="list-style-type: none"> ■ Secondary effects e.g. increased traffic movement through historic town centres as a result of new development 	<p>Increase pedestrians will need enhanced footpaths. At the western edge of the SA the pavement is inconsistent and very narrow at the southern end, and it doesn’t align well with the viaduct arch to allow continuous pedestrian movement on the west side of the street.</p> <p>The site boundary should be set back to widen the pavement and create an alignment with the adjacent arch to the east of that currently spanning the road (currently within NR ownership and in use as a scaffold yard).</p>
STEP 4 Consider maximising	Maximising Enhancement	

<p>enhancements and avoiding harm through:</p>		
	<ul style="list-style-type: none"> ■ Public access and interpretation ■ Increasing understanding through research and recording ■ Repair/regeneration of heritage assets ■ Removal from Heritage at Risk Register 	<p>Public art on buildings to reveal and convey the history and heritage of the site (including including riverine, railway, industrial history, and the artistic/social history of the Crossfield Estate). Preservation by record of <i>Love over Gold</i> mural; re-use of elements/motifs in new buildings;</p>
	<ul style="list-style-type: none"> ■ Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design 	<p>Potential for opening up the roadway to the north of the viaduct as a new public space – development facing that space should create active frontages and positive enclosure of that space. Increasing use and public access will potentially result in improved maintenance of this structure by incorporating it into a new public realm. Reference to former wharfs and inlets in the landscaping</p>
	<p>Avoiding Harm</p>	
	<ul style="list-style-type: none"> ■ Identifying reasonable alternative sites ■ Amendments to site boundary, quantum of development and types of development ■ Relocating development within the site ■ Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings ■ Addressing infrastructure issues such as traffic management 	<ul style="list-style-type: none"> • New routes through to Creek • New walkway along Creek edge and through arches to Ha’penny bridge • Taller buildings should be located to south east corner (adjacent to viaduct/Creek). • Buildings on the Creek edge should aim to provide a consistent height and uncomplicated form that contributes a legible edge to a new pedestrian route • Taller buildings on the western edge should be avoided – Additional height at south west corner (adjacent to viaduct and Creekside, may harm the setting of the CA and detract from the character of Creekside which is largely no more than 5 storeys. It could also create an unsatisfactory relationship with the Viaduct – overwhelming it rather than reinforcing its presence in the townscape.
<p>STEP 5 Determine whether the proposed site allocation is</p>	<ul style="list-style-type: none"> ■ Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is 	<p>Yes, if amended as proposed</p>

appropriate in light of the NPPF's tests of soundness	reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment)	
	■ Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence	Yes, if amended as proposed
	■ Effective in terms of deliverability, so that enhancement is maximised and harm minimised	Yes, if amended as proposed
	■ Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance	Yes, if amended as proposed

North Area: 18 Sun Wharf - Table of Heritage Assets				
HA	Significance	Setting	Experience of the asset and its associations (e.g. cultural or intellectual)	Relationship of site to HA
Conservation Areas				
Deptford Creekside CA	Local			Immediate setting of CA
Deptford High Street and St Paul's Church CA	Local			SA is within the wider setting of CA. Unlikely to affect it unless taller elements are visible from the CA.

Listed buildings LBL				
RAILWAY VIADUCT BETWEEN DEPTFORD CREEK AND NORTH KENT JUNCTION, II	High The lifting bridge is acknowledged to be a curtilage structure of the listed viaduct.	CA to the south, SA to the north. Linear feature extends to DHS in the west, with varied development on either side. Strong built element in the townscape, creates a physical barrier in many places.	As a strong townscape element, from the street and paths adjacent From within where retail units occupy the arches. From Deptford Station platforms; from ha'penny bridge. Visual feature crossing the Creek, containing the views southwards.	Adjacent to southern boundary, visual
WALLS OF FORMER GRAVEYARD TO OLD BAPTIST CHAPEL (NOW DEMOLISHED) AND SOUTH EAST ANGLE OF ST PAUL'S CHURCHYARD, II	High	Churchyard, Church Street	No visual or physical connection	Distant, to west of SA
CHURCH OF ST PAUL, I	High	Churchyard; wider townscape, including glimpse views from Creekside.	Church and spire is an important landmark building in near and far views of Deptford.	Distant, to the west
WALLS AND RAILINGS TO NORTH AND EAST OF ST PAUL'S CHURCHYARD, II	High	Churchyard	No visual or physical connection	Distant , to the west
Listed Buildings RBG				
RAILWAY VIADUCT EXTENDING FROM PLATFORMS OF	High	The Creek	Continuation of listed viaduct to south of SA. Visual element crossing	To the east of the SA, visual

GREENWICH RAILWAY STATION TO DEPTFORD CREEK, II			the Creek, containing the views	
PAIR OF BEAM ENGINE HOUSES WITH LINKING BOILER HOUSE AT DEPTFORD SEWAGE PUMPING STATION, II	High	Remnants of Industrial landscape to either side of Creek.	Minimal visual connection	To the south east of the SA, distant
COAL SHED IMMEDIATELY TO SOUTH WEST OF PAIR OF BEAM ENGINE HOUSES WITH LINKING BOILER HOUSE AT DEPTFORD SEWAGE PUMPING STATION, II		Remnants of Industrial landscape to either side of Creek.	Minimal visual connection	To the south east of the SA, distant
SOUTHERNMOST OF PAIR OF COAL SHEDS TO SOUTH WEST OF PAIR OF BEAM ENGINE HOUSES WITH LINKING BOILER HOUSE AT DEPTFORD SEWAGE PUMPING STATION, II		Remnants of Industrial landscape to either side of Creek.	Minimal visual connection	To the south east of the SA, distant
NDHAs LBL				

Non designated HAs within Deptford Creekside CA	Of local interest	Two types - Remnants of Industrial landscape to either side of Creek; and social housing blocks of Crossfields Estate.		To the west and south of the SA
Archaeology				
APA 8 – Deptford Creek	Local/Regional			SA is within the APA

North Area: 19 – Creekside Village East, Thanet Wharf Mixed-Use Employment Location		
STEP 1 Identify which heritage assets are affected by the potential site allocation	<ul style="list-style-type: none"> ■ Informed by the evidence base, local heritage expertise and, where needed, site surveys 	See table below
	<ul style="list-style-type: none"> ■ Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases Heritage assets that lie outside of these areas may also need identifying and careful consideration. 	Buffer zone: the CA boundary; and sites outside it relating to key views, straddling the borough boundary and include HAs in Deptford High Street at St Paul’s Church CA and RBGreenwich
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	<ul style="list-style-type: none"> ■ Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual) 	See Heritage Assets table below Further information on the importance of views and tall buildings in relation to Maritime Greenwich is set out in Section 5.8 of the Maritime Greenwich Management Plan, Third Review, 2014: http://www.greenichworldheritage.org/assets/ugc/docs/Maritime_Greenwich_Manag
	<ul style="list-style-type: none"> ■ Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration) 	Relationships with neighbouring HAs include particularly the following: functional (historically and remaining industrial uses; routes and boundary provided by the Creek); visual (architectural, materiality, scale, aesthetics);
	<ul style="list-style-type: none"> ■ Recognising that additional assessment may be required due to 	N/a

	the nature of the heritage assets and the lack of existing information ■ For a number of assets, it may be that a site makes very little or no contribution to significance.	Note that Trinity Laban is not currently recognised as a heritage asset but may be reconsidered in the future due to its highly appreciated architectural form
STEP 3 Identify what impact the allocation might have on that significance, considering:	<ul style="list-style-type: none"> ■ Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views ■ Form and appearance of development e.g. prominence, scale and massing, materials, movement 	<p>St Paul's Deptford – tall development would be seen in the backdrop of views from the setting of St Paul's Church; could compete with the primacy of the church and spire and harmfully 'crowd' this view.</p> <p>Albury Street (within Deptford HS CA) – tall development could fill the gap at the eastern end of Albury Street – current gap is evidence and reference to the historic townscape gap created by the Creek.</p>
	<ul style="list-style-type: none"> ■ Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use 	Continuation of the substantial change in character to the setting of the Creek and associated heritage assets (Creekside CA, Viaduct & Lifting Bridge, NDHAs in Creekside CA), in terms of scale and height, introduction of residential accommodation, loss of industry and wharfs
	<ul style="list-style-type: none"> ■ Secondary effects e.g. increased traffic movement through historic town centres as a result of new development 	Increased residential and pedestrian activity
STEP 4 Consider maximising enhancements and avoiding harm through:	Maximising Enhancement	

	<ul style="list-style-type: none"> ■ Public access and interpretation ■ Increasing understanding through research and recording ■ Repair/regeneration of heritage assets ■ Removal from Heritage at Risk Register 	Could enable a river walkway to be continued along the Creek through this site.
	<ul style="list-style-type: none"> ■ Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design 	New access to Creek allowing new views of the NDHAs further south
	Avoiding Harm	
	<ul style="list-style-type: none"> ■ Identifying reasonable alternative sites ■ Amendments to site boundary, quantum of development and types of development ■ Relocating development within the site ■ Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings ■ Addressing infrastructure issues such as traffic management 	<p>Height and footprint should be designed with careful regard to the setting of the HAs, in particular St Paul's Church and the WHS, including the setting of the Georgian town centre of Greenwich. See also WHS Management Plan.</p> <p>LVMF 6A view from Blackheath Point.</p>
STEP 5 Determine whether the proposed site allocation is appropriate in light of	<ul style="list-style-type: none"> ■ Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do 	Yes, if amended as proposed

the NPPF's tests of soundness	so, and consistent with achieving sustainable development (including the conservation of the historic environment)	
	■ Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence	Yes, if amended as proposed
	■ Effective in terms of deliverability, so that enhancement is maximised and harm minimised	Yes, if amended as proposed
	■ Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance	Yes, if amended as proposed

North Area: 19 Creekside Village East - Table of Heritage Assets				
HA	Significance	Setting	Experience of the asset and its associations (e.g. cultural or intellectual)	Relationship of site to HA
Conservation Areas				
Deptford Creekside CA	Local The CA's significance is two-fold: firstly it lies in the development from the 16th century onwards of wharfs	Comprises the industrial area on Creekside south of the railway viaduct as well as Sue Godfrey Park and part of the Crossfield Estate.	Streetscape and buildings, open space, relationship with Creek and historic riverine activities. The Creek itself is a key topographical feature in between the important	Site lies to the northeast of the CA

	and industrial activities along the Creek: the tight urban grain of the wharves at its southern end revealing those medieval origins and the area housed the slaughterhouse for Greenwich Palace. It also contains the only remaining historic river-related industrial quarter of significant coherence within Deptford and along the Creek itself. The Ha'penny railway lifting bridge and the railway viaducts are identified as key landmark buildings as is the Laban Centre beyond the CA boundary.		historic maritime centres of Greenwich and Deptford and which both have an intimate relationship with	
Deptford High Street and St Paul's Church CA				Historic - by virtue of proximity Visual - potential views from Railway Station Platforms and from street level at northern end of the CA
Listed buildings LBL	National			
St Paul's Church, grade I (1712-30)	By Thomas Archer, of exceptional architectural and historic interest as recognised by its grade I listing, set in its original churchyard setting to	Its churchyard; wide setting the townscape of Deptford High Street and environs.	Views of the church and spire visible over longer distances and it is an important historic landmark.	Distant but visually connected due to views of the spire.

	the west of Deptford High Street (and within the DHS &SPCCA);			
C18th listed terraced houses on Albury Street (3 at grade II and 18 at II*)	High	The townscape of Deptford High Street and environs.	Group value within the street, part of the history of development of Deptford High Street in response to the Royal Naval Dockyard; and part of the storey of architectural development of the Georgian terraced house outside the metropolis.	Distant, will be visible in the view towards the eastern end of the street
The railway viaduct from the Creek to North Kent Junction (II, 1836)	High The lifting bridge is acknowledged to be a curtilage structure of the listed viaduct. The list description notes that the 32 arches from Deptford Creek to Deptford Church Street are the most attractive part of the line and that the viaduct carried the first passenger railway in London, and considers it one of the first major achievements of railway engineering in Britain.	Deptford Creekside CA The Ha'penny bridge The Creek CA to the south, Linear feature extends to DHS in the west, with varied development on either side. Strong built element in the townscape, creates a physical barrier in many places.	As a strong townscape element, from the street and paths adjacent From within where retail units occupy the arches. From Deptford Station platforms; from ha'penny bridge. Visual feature crossing the Creek, containing the views southwards.	Visual - visible to the south of the site across the Creek
NDHAs LBL	Local			
See Deptford Creekside CA for buildings identified as making a positive contribution				

Trinity Laban	This has been acknowledged as NOT being a heritage asset in past pre-app discussions, but it is a locally significant building of exceptional design quality and could in future be considered for statutory listing, along with its landscaped setting.	Creekside; The Creek; the east side of the Creek.	From the Creek, on Ha'penny bridge, from Creekside.	Direct visual – adjacent to the SA
APA 8: Deptford Creek Archaeological Priority Area,	Regional	APA is drawn around the site of a mid to late Saxon settlement and medieval village of Deptford Green, located adjacent to the creek's mouth (part of which falls within RB Greenwich).	Archaeological remains from the western bank of the Creek reveal the history of flood defence, water supply and secondary riverside industries. Surviving sections of existing timber Creek wall are also of archaeological significance.	Site is within the APA
WHS Greenwich	International http://www.greenwichworldheritage.org/assets/ugc/docs/Maritime_Greenwich_Manag			

North Area: 17 Lower Creekside Locally Significant Industrial Site		
STEP 1 Identify which heritage assets are affected by the potential site allocation	<ul style="list-style-type: none"> ■ Informed by the evidence base, local heritage expertise and, where needed, site surveys 	See table of Heritage Assets, below
	<ul style="list-style-type: none"> ■ Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases Heritage assets that lie outside of these areas may also need identifying and careful consideration. 	Buffer zone: the CA boundary; and sites outside it relating to key views, straddling the borough boundary and include HAs in Deptford High Street at St Paul's Church CA and RBGreenwich
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	<ul style="list-style-type: none"> ■ Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual) 	<ul style="list-style-type: none"> • Light Industrial character and uses – historic significance • River related industry – no longer active in the CA but currently possible • Cultural Quarter – current character and stemming from Crossfield Estate history • Positive contributors – architectural significance as well as historic • Boundary walls and some (small amounts) of surface materials
	<ul style="list-style-type: none"> ■ Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration) 	Relationship with HAs particularly functional (historic and remaining industrial uses, routes); visual (architectural, materiality, scale, aesthetic)
	<ul style="list-style-type: none"> ■ Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information ■ For a number of assets, it 	N/a

	may be that a site makes very little or no contribution to significance.	
STEP 3 Identify what impact the allocation might have on that significance, considering:	<ul style="list-style-type: none"> ■ Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views ■ Form and appearance of development e.g. prominence, scale and massing, materials, movement 	<ul style="list-style-type: none"> • Potential pressure for loss of positive contributors (NHDA's) • Layout – courtyards behind solid boundary wall, pressure for opening up at ground floor • Impact on potential for new river related industry on southern side of SA, or use of river for transportation to local industries if viable wharfs are lost. <p>Need to consider views from</p> <ul style="list-style-type: none"> • DLR –opportunity for views into sites to understand the complex layout and activities behind the boundary wall. • Church street entrance to the CA • Views of Mumford's Mill 1) looking south down Creekside - desire not to compete with this historic and listed mill which is a remnant of the last remaining riverside industries; 2) looking from e-w stretch of Creekside through gate under DLR – view across Creek allows mill to be seen in context. • Crossfield Street estate amenity space – impact on daylight and sunlight, sense of openness and viability as a growing / amenity space
	<ul style="list-style-type: none"> ■ Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use 	<p>Use – need to retain employment space with sufficient outside space; potential for river relate industry.</p> <p>Potential for noise, outside activity impacting on upper floor uses.</p> <p>Need for sufficient vehicular traffic entrance to service that use.</p> <p>Need to mediate the boundary between employment uses and residential uses at the northern boundary.</p> <p>Impact on wildlife habitats along Creek edge – particularly from increased lighting,</p> <p>Impact on industrial character – how to retain this sense of 'edge', history and texture.</p>

	<ul style="list-style-type: none"> ■ Secondary effects e.g. increased traffic movement through historic town centres as a result of new development 	<p>Increased pedestrian footfall along Creek Road – need to widen pavements as currently very narrow.</p> <p>Increased pedestrian activity adjacent to Creek – conflict with privacy for residential moorings and use of wharf for industry.</p>
STEP 4 Consider maximising enhancements and avoiding harm through:	Maximising Enhancement	
	<ul style="list-style-type: none"> ■ Public access and interpretation ■ Increasing understanding through research and recording ■ Repair/regeneration of heritage assets ■ Removal from Heritage at Risk Register 	<p>Reinforcing pattern of courtyards behind continuous boundary wall – creating new public access to the Creek</p> <p>Repair and retention of boundary wall/piers and granite setted entrances.</p> <p>Retention, refurbishment and enhancement of positive contributors (NDHAs) in the CA.</p> <p>Extend the urban greening from Crossfields sub area to Creekside sub area.</p> <p>Mitigating harm - Opportunity to contribute to the Crossfields Estate open space –works to the bomb shelter for instance to enable use of its roof as a seating area?</p> <p>Gap between Birds Nest PH and entrance to the Gibbes / Skill Centre Island is one of the few areas allowing direct views, and historically also access, into the Creek (currently compromised by the boundary treatment). Proposals should not hinder potential to re-open and enhance this relationship between PH and Creek.</p>
	<ul style="list-style-type: none"> ■ Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design 	<p>Enhance the pedestrian experience, use of appropriate historic materials</p> <p>Public art – responding to the history of the Creek, local Industries, Crossfields Estate</p> <p>Retention of solid boundary wall</p> <p>Building of a scale that retains the distinction between Church Street (wider and higher) and Creekside (narrow and lower).</p> <p>Public realm materials of material, texture and grain that reflect the historic character – e.g. use of granite setts on crossovers.</p>
	Avoiding Harm	

	<ul style="list-style-type: none"> ■ Identifying reasonable alternative sites <ul style="list-style-type: none"> ■ Amendments to site boundary, quantum of development and types of development ■ Relocating development within the site ■ Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings ■ Addressing infrastructure issues such as traffic management 	<p>Quantum of development – must consider height onto Crossfields Estate – no higher than the height of the historic blocks - 5 storeys height on Creekside - max height the datum of 1 Creekside – if this high could include a setback top floor Public/vehicular access and internal courtyard. Retention of positive contributors on site Protection of boat residents Narrow width of plots on south side of Creekside</p> <p>SA currently states 160 residential units which includes no. 1 Creekside which has provided 56. SA states 8201 m2 employment floorspace, no. 1 Creekside has provided 1541.</p>
<p>STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF’s tests of soundness</p>	<ul style="list-style-type: none"> ■ Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment) 	<p>Unit numbers need to be reduced to reflect significant constraints created by HAS Insufficient detail re significance, setting and means of enhancement of HAS?</p>
	<ul style="list-style-type: none"> ■ Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence 	<p>Greater direct impacts on HAS here than other sites in Deptford because there are more HAS within the SA. Based on evidence but unit numbers problematic as will drive overly high and dense development and loss of NDHAS</p>
	<ul style="list-style-type: none"> ■ Effective in terms of deliverability, so that enhancement is maximised and harm minimised 	<p>The SA contains a number of separate plots/sites/spaces with no masterplan for coherent re-development. 2 are delivered (no. 1 and Harold Wharf) 3 others under consideration (2, 3, 5-9) but not completely connected.</p> <p>The potential for development that is not guided by a masterplan will not satisfactorily achieve enhancement or minimise harm. E.g. harm caused by No. 1 (to setting of Crossfields Estate) being used to justify more harm)</p>

	<p>■ Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance</p>	<ul style="list-style-type: none"> • No – the SA currently appears to drive the loss of NDHAs so is not in line with the policy aim to conserve HAs. • The balance of employment space vs residential being proposed is skewed towards residential, despite the existing character and use of the area being employment. Likelihood that density and amount of residential will impact detrimentally on employment potential. External/amenity space for employment use and residential use proposed on 5-9 also low and not supportive of high quality employment space.
--	--	---

North Area: 17 Lower Creekside – Table of Heritage Assets				
HA	Significance	Setting	Experience of the asset and its associations (e.g. cultural or intellectual)	Relationship of site to HA
Conservation Areas				
Creekside CA	See CAA	The Creek Church Street	River related industry	SA is within and integral to the character and appearance of the CA
Deptford High Street CA				Historic - by virtue of proximity Visual - potential views from Railway Station Platforms
Listed buildings LBL				
Railway viaduct, II	High The lifting bridge is acknowledged to be a curtilage structure of the listed viaduct.	CA to the south, SA to the north. Linear feature extends to DHS in the west, with varied development on either side. Strong built element in the townscape, creates a	As a strong townscape element, from the street and paths adjacent From within where retail units occupy the arches. From Deptford Station platforms; from	Visual - within the same CA and visible to the north of the site

		physical barrier in many places.	Ha'penny bridge. Visual feature crossing the Creek, containing the views southwards.	
St Paul's Church I				
Listed Buildings RBG				
Mumford's Grain Silo	1897 by Aston Webb. II	Creek Wharfs on both sides – River related industry mostly lost – e.g. former Tide Mill on Skills Centre island site, demolished 1970s)	Associations with the Creek industries, experienced now simply by proximity and views from the Creek, the DLR, Creekside and Deptford Broadway	Visual – key view is southwards along Creekside
NDHAs LBL (see audit from CAA below)				
2 Creekside, Birds Nest PH	NDHA Landmark Social and communal	Church Street The Creek	Public access - Social and cultural venue Visual & architectural as local landmark and remaining historic building on the much altered Church Street Direct physical relationship with the Creek to its south.	SA includes the HA
Crossfield Estate	Illustrative of a new stage of the LCC's programme when, in response to Government incentives, the focus shifted from creating cottage garden estates	1,3, 5-9 all form the setting to the south of the Estate		Physical and visual Immediately beyond the northern boundary of the SA

	<p>outside the established borough boundaries to the clearance of the historic urban grain of inner-city areas, and their replacement with planned, single-phased housing blocks.,</p> <p>Evidential, historical and, to a lesser extent, aesthetical value, the estate also has considerable significance for its communal value.</p>			
No. 3 Creekside, Medina Works	<p>ca. 1922, an Art Deco style office and factory building and a warehouse behind. Architectural and historic.</p>	<ul style="list-style-type: none"> • Neighbouring buildings adjacent and opposite on Creekside • Creekside boundary walls 		SA includes the NDHA
No. 4 Creekside	<p>One of the earliest surviving buildings on Creekside. Charming early Victorian house with raised ground floor, projecting front entrance and slated mansard. It is notable as the one and only residential building on Creekside's river-facing side and for much of its history has been in this isolated position. On Charles Booth's 1899 map, its owners are identified as being socially in a better position than any other of the residential properties east of Church Street.</p>	<ul style="list-style-type: none"> • Neighbouring buildings adjacent and opposite on Creekside • Creekside boundary walls • The Creek and wharfs to the south 		SA includes the NDHA
Evelyn Wharf	<p>Evelyn Wharf is a working yard. It has a 19th century two storey workshop building facing the street, though much of it appears to have been rebuilt. The yard is notable for the good survival of</p>	<ul style="list-style-type: none"> • Neighbouring buildings adjacent and opposite on Creekside 		SA includes the NDHA

	historic granite setts and the historic brick boundary wall with substantial gates framing the entrance, all of which make an important contribution to the character of the street.	<ul style="list-style-type: none"> • Creekside boundary walls • The Creek and wharfs to the south 		
Between Evelyn Wharf and Harold Wharf (No. 6 Creekside)	An interesting industrial building dating from the late 19th century with a gently curving frontage, crenelated roof line and cast-iron windows. The building is used as a workshop building and might be the remainder of a formerly two storey building, perhaps reduced in size by bomb damage. Its rather unusual curved frontage, age and detailing add interest and positively contribute to the streetscene.	<ul style="list-style-type: none"> • Neighbouring buildings adjacent and opposite on Creekside • Creekside boundary walls • The Creek and wharfs to the south 		SA includes the NDHA
6, Harold Wharf	Harold Wharf occupies the site thought to be location of Henry VIII's abattoir (re Slaughterhouse Lane). Remains may still be in situ below ground. The existing prominent building is 1911 for J & A Dandridge Ltd; changed hands in 1970s to the Stewart & Dennis Engineering Ltd whose diverse projects included the hovercraft which took test trips on the Creek. Now APT Studios, owned by the Art in Perpetuity Trust –important art facility for the area provides studios and gallery space. Front elevation richly decorated with rusticated red-brick pilasters and classical detailing in terracotta, topped by an imposing curving pediment within a high	<ul style="list-style-type: none"> • Neighbouring buildings adjacent and opposite on Creekside • Creekside boundary walls • The Creek and wharfs to the south 		SA includes the NDHA

	parapet. The side and rear elevations are plain and industrial in character, tall windows and loading bays. Modern sheet pile extension to the front built to accommodate a gallery and studios. Until 2009, the small yard to the side contained one of the two last remaining cranes at the Deptford Creek – once a landscape dotted with cranes. Its demolition is the most regrettable loss in the area in recent years.			
NDHAs RBG				
Archaeology				
Within APA 8 – Deptford Creek	The Archaeology of the area has the potential to provide further evidence of earlier periods, from the late Iron Age to the Roman period and from the Roman period to the mid-Saxon centuries. A number of sites have high potential to yield evidence of former medieval and post-medieval industries	Creek Route of Creekside and wharf layout	Predominantly sub surface archaeological deposits though some structures may be considered of archaeological interest (e.g. boundary walls)	Within the APA

South Area: 1 Former Bell Green Gas Holders and Livesey Memorial Hall		
STEP 1 Identify which heritage assets are affected by the potential site allocation	<ul style="list-style-type: none"> ■ Informed by the evidence base, local heritage expertise and, where needed, site surveys 	See table of Heritage Assets below
	<ul style="list-style-type: none"> ■ Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases. Heritage assets that lie outside of these areas may also need identifying and careful consideration. 	500m radius around site
STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:	<ul style="list-style-type: none"> ■ Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual) 	See table below
	<ul style="list-style-type: none"> ■ Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration) 	See table below
	<ul style="list-style-type: none"> ■ Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information. ■ For a number of assets, it 	N/a

	may be that a site makes very little or no contribution to significance.	
STEP 3 Identify what impact the allocation might have on that significance, considering:	<ul style="list-style-type: none"> ■ Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views ■ Form and appearance of development e.g. prominence, scale and massing, materials, movement 	<ul style="list-style-type: none"> • Development would be located in close proximity of the rear of the LB, and, depending on height, would be visible rising above the building in views of the principal elevation. • Views would also be obtained of new development sitting to the rear of the LB across the Bowling Green and tennis courts, in oblique views from Perry Hill. • The SA omits the land at the junction of Alan Pegg Place and Perry Hill, and so wouldn't facilitate a reinstated streetscape here that the LB could benefit from being re-incorporated into. Achieving this would require co-ordination with the land that falls outside the SA. • The height and footprint of the former gasholders are likely to be used as a precedent for scale of development - this will not necessarily be appropriate as the impact of a solid building in unrelated use would be different to a partially transparent structure in directly connected use. • Creation of a public face to the rear of the LB will be important in knitting it into development of the SA. This could include a new public space to the rear, removal of the later extensions; enhancements to the rear elevations. This would require co-ordination with the land that falls outside the SA. • Vehicular access to the LB is currently provided by a road running around the outside of the SA. New routes n-s & e-w through the SA should provide improved access to the LB; this would require co-ordination with the land that falls outside the SA.
	<ul style="list-style-type: none"> ■ Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use 	<ul style="list-style-type: none"> • Retention of the LB's social and communal use is important to preserve the significance of the LB. This would also provide a beneficial facility for the emerging residential development. • Could result in significantly greater use of the building and its open spaces to north and south. • Could generate increased income/funding for the building's repair and future maintenance

	<ul style="list-style-type: none"> ■ Secondary effects e.g. increased traffic movement through historic town centres as a result of new development 	
STEP 4 Consider maximising enhancements and avoiding harm through:	Maximising Enhancement	
	<ul style="list-style-type: none"> ■ Public access and interpretation ■ Increasing understanding through research and recording ■ Repair/regeneration of heritage assets ■ Removal from Heritage at Risk Register 	<ul style="list-style-type: none"> • Repair and future funding for ongoing maintenance of all 3 Listed structures and removal of later accretions to memorial hall and war memorial – generated by the potential for greater use by development of adjacent site? This may be more directly achievable if the LB were within the SA, so proposals for the LB could be tied to future planning permissions, and potentially benefit from s106 funding. • The LB should be the focus for interpretation about the history and heritage of the wider Gasworks site.
	<ul style="list-style-type: none"> ■ Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design 	<ul style="list-style-type: none"> • Creation of better vehicular access to the LB from the site to the east. • Addition of a pedestrian crossing over Perry Hill to access the community uses in the LB. • Public realm improvements to the rear – between the LB and the new development to the east • Repair/ reinstatement of the site of the former tennis courts to the south of the LB. Re-instatement of the former use as amenity space for the health and wellbeing of the users of the building.
	Avoiding Harm	
	<ul style="list-style-type: none"> ■ Identifying reasonable alternative sites ■ Amendments to site boundary, quantum of development and types of development ■ Relocating development 	Co-ordinating layout of roads, open space and frontages to enhance the setting of the LB.

	<p>within the site</p> <ul style="list-style-type: none"> ■ Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings ■ Addressing infrastructure issues such as traffic management 	
<p>STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness</p>	<ul style="list-style-type: none"> ■ Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment) 	<p>The proposed SA boundary excludes the LB and small parcels of land around it which would compromise ability to integrate the LB into wider development.</p> <p>I recommend amending the proposed SA boundary to include the LB and the surrounding small parcels of land to avoid their development in a poorly co-ordinated way, and optimise chances to enhance the setting of the LB and generate funding for its repair and maintenance.</p>
	<ul style="list-style-type: none"> ■ Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence 	<p>No</p>
	<ul style="list-style-type: none"> ■ Effective in terms of deliverability, so that enhancement is maximised and harm minimised 	<p>No – see above re potential difficulties in co-ordinating development outside the SA.</p>
	<ul style="list-style-type: none"> ■ Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance 	<p>The proposed SA boundary excludes the heritage assets and thus does not create opportunity to conserve them.</p>

South Area: 1 Bell Green Gas Holders and Livesey Memorial Hall – Table of Heritage Assets				
HA	Significance	Setting	Experience of the asset and its associations (e.g. cultural or intellectual)	Relationship of site to HA
Listed buildings	National			
Livesey Memorial Hall II	Architectural, social function.	Former bowling green to north, tennis courts to south. Perry Hill low rise development to west. Relationship to gasworks site now gone with recent removal of gasholders and earlier removal of gasworks buildings to the south. Currently rather disconnected.	<p>From Perry Hill as part of the rather fragmented townscape.</p> <p>Community uses of the building and history as a social club for workers mean people have social and communal connections with the building which are relevant to its significance as a LB.</p> <p>The bowling green is a curtilage structure; the pavilion also probably is. The tennis court to the south of the LB falls within the curtilage – the extent of the curtilage needs to be ascertained – it is currently not known if it extends to the former tennis court to the north east of the LB.</p>	<p>The SA sits to the immediate east of the LB, and development will impact on its setting.</p> <p>The SA boundary follows the line of the former gasholders, which now appears arbitrary (apart from the presence of the bentonite wall which reflects that line) since the gasholders have been removed. It creates a strangely shaped land parcel immediately outside the SA, which the LB falls within.</p> <p>The land within the SA previously had a strong functional, historic, visual and physical connection but since the end of operation of the gasworks and more recently the removal of the gasholders, this connection is now only historic and evidential.</p>

Boundary wall II	Associated with the memorial hall and the former gasworks	Livesey Memorial Hall, Perry Hill, the bowling green and tennis courts		To the west of the SA, beyond the memorial hall
War memorial II	Associated with the memorial hall and the former gasworks/employees	Livesey Memorial Hall, The boundary wall, Perry Hill.		To the west of the SA, beyond the memorial hall
Archaeology				
APA 15 -Perry Street	The medieval manor house of Sydenham Place, later known as Place House adjoined a small hamlet known as Perry Street which was located along the London-Lewes Road. This small settlement persisted into the 17th and 18th century, before succumbing to suburban estates. Evidence of the medieval manor house and tenements may survive beneath recent housing development.	Perry Hill	No visual presence; sub-surface archaeology possible.	Short distance to the north of the SA, probably all outside the SA, but evidence of field systems related to the Manor could survive on the SA depending on the nature of later ground works.