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The Aylesham Centre, Peckham

Environmental Impact Assessment

Environmental Statement Volume 2: Heritage, Townscape and Visual Impact Assessment

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Berkeley
Designed for life

Project

Aylesham Centre, Hanover Park, London SE15 5EW

Client

Berkley Homes (Capital) PLC

Architects

dRMM, Downen Farmer Architects (DFA), Feix&Merlin, Jas Bhalla Works, Nimtim, Gillespies (landscape)

Visualisers

Millerhare

Prepared by

Megan Townsend, BSc (Hons), MArch, DipArch, RIBA, ARB
Consultant

Roshan Kerr, BArch (Hons)
Technical Lead

Checked by

Lewis Eldridge, BSocSc (Hons) MA, MSc
Director

Disclaimer

Assumptions and Limitations

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

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Contents

1. Introduction	1
2. Methodology	3
3. Policy and Guidance	13
4. Historical Development	19
5. The Site and Surroundings	28
6. The Proposed Development	30
7. Heritage Assessment	38
8. Townscape Assessment	62
9. Visual Impact Assessment	67
10. Demolition & Construction	183
11. Conclusion	186
Appendix 1: Millerhare's Methodology	192
Appendix 2: Cumulative schemes	194
Appendix 3: Zone of Theoretical Visibility	196
Appendix 4: Additional Views suggested by Historic England	198
Appendix 5: Addressing Scoping Response	200
References	203

1. Introduction

1.1 This Heritage, Townscape and Visual Impact Assessment (HTVIA) has been prepared by The Townscape Consultancy (TTC) to accompany an application for full planning permission being submitted by the Applicant, Berkeley Homes (Capital) PLC, to the London Borough of Southwark (LBS). It presents the findings of an assessment of the effects of the development proposals ('the Proposed Development'), at Aylesham Centre, Hanover Park, Peckham, SE15 5EW, ('the Site') on the heritage significance of above ground heritage assets, townscape, and visual amenity. TTC is a practice that provides independent expert advice on architecture, urban design, townscape and heritage.

1.2 The area highlighted in red in Figure 1.1 illustrates the approximate Site location.

1.3 The Proposed Development, designed by dRMM Ltd, DFA, Feix&Merlin, Jas Bhalla Works and Nimtim ('the architects') and Gillespies (landscape) consists of the following:

'Demolition of existing buildings and phased redevelopment to provide a replacement supermarket and associated service yard and car parking (Use Class E(a)); flexible retail, leisure (including drinking establishment), and commercial accommodation (Use Class E/Sui Generis); dwellings (Use Class C3); landscaping; and associated works.'

1.4 TTC has collaborated with the Architects during the design development process. It has undertaken baseline research into the Site and surrounding built context, sharing initial assessments with the Architects and providing design feedback from a heritage, townscape, and visual impact perspective. This has been done in an iterative manner, using 3D computer models of the Proposed Development within its existing and emerging context.

1.5 This HTVIA considers the impact of the Proposed Development on the significance of relevant heritage receptors (above-ground heritage assets) in light of policy set out in the National Planning Policy Framework (NPPF), the London Plan and the Southwark Local Plan, as well as the national Planning Policy Guidance (PPG). It also considers the visual impact of the Proposed Development on the townscape of the area around the Site, analysing the character of the surrounding townscape, and assessing the effect of the Proposed Development on views from locations around the Site.

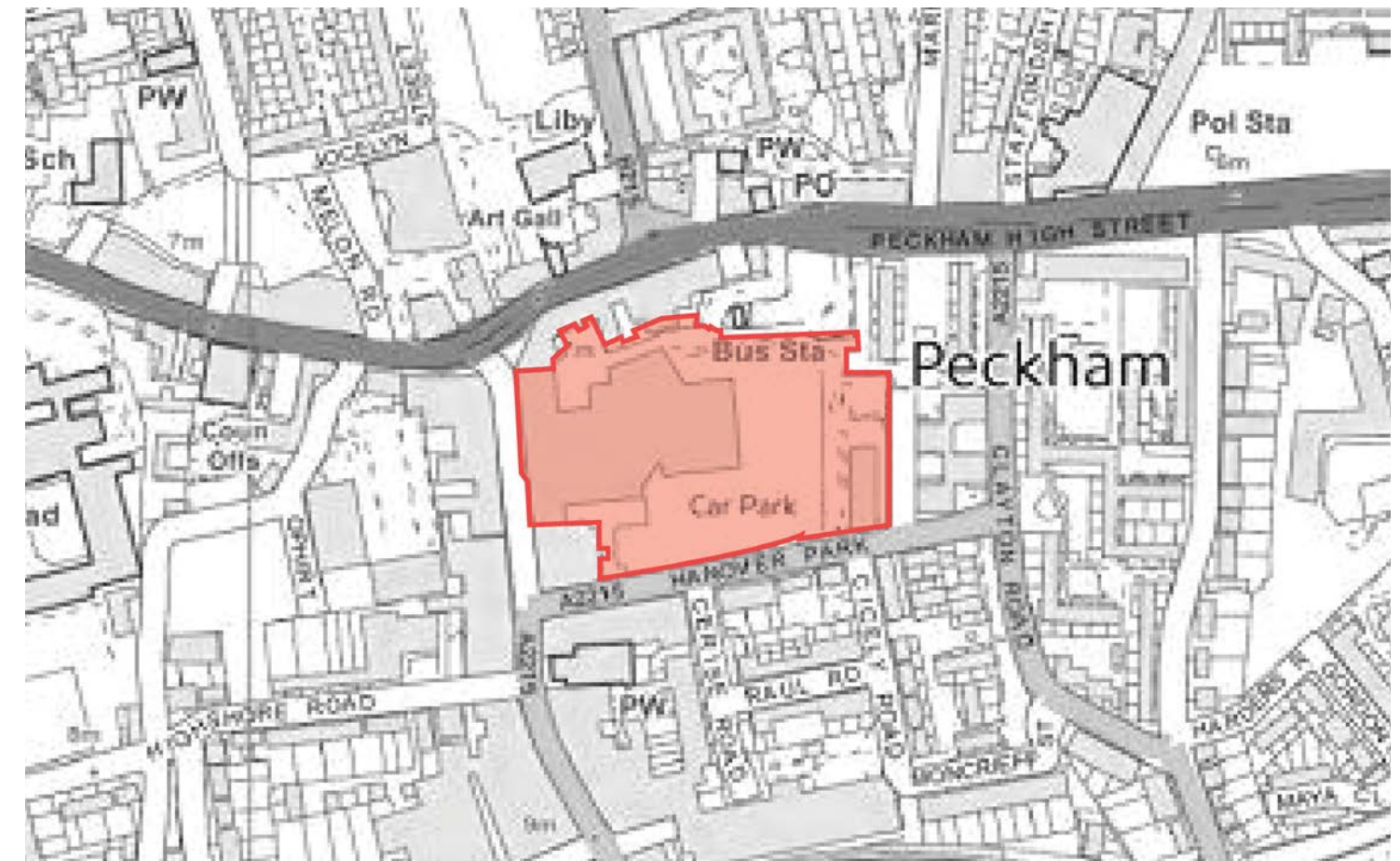


Figure 1.1: Plan showing Site Boundary.

- 1.6

The HTVIA sets out:

- TTC’s methodology for assessment in Chapter 2;
 - Relevant statutory duties as well as design and historic environment policy and guidance in Chapter 3;
 - The historic development of the Site and its surroundings in Chapter 4;
 - A description of the Site and its context in Chapter 5;
 - A description and assessment of the architectural and urban design quality of the Proposed Development in Chapter 6;
 - Identification of relevant HAs pertaining to the Site and in the area around it, including relevant heritage designations (type and grade) and Statements of Significance for identified HAs in line with NPPF paragraph 200 as well as an assessment of the effect of the Proposed Development on the settings and significance of identified heritage assets in Chapter 7. The assessments of effects on heritage significance are undertaken with regard to the statutory duties of the Planning (Listed Buildings and Conservation Area) Act 1990, in the context of national and local policy and guidance, and with regard to EIA Regulations 2017 (as amended in 2019 and 2020);
 - An assessment of the effect of the Proposed Development on the local townscape in Chapter 8;
 - Consideration of the visual effect of the Proposed Development from 37 viewpoints, agreed with LBS, in Chapter 9;
 - Consideration of the effects of the Proposed Development during demolition of the existing buildings and construction of the new buildings and associated landscape in Chapter 10; and
 - Conclusions in Chapter 11.
- 1.7

The views contained within Chapter 9 of this HTVIA have been prepared by Millerhare, a specialist visualisation company. Their methodology has been included in Appendix 1 of this report.
- 1.8

This HTVIA forms Volume 2 of the Environmental Statement (ES) coordinated by Trium Environmental Consulting LLP. The report will be submitted as part of the planning application and should therefore be read alongside other planning documents within this submission, including the Design and Access Statement (DAS) produced by the architects.



2. Methodology

2.1 This chapter sets out the assessment methodologies used in this HTVIA report.

2.2 There are two methodologies used to assess and explain the likely effects of the Proposed Development on (i) the significance of nearby above ground heritage receptors, and (ii) on the surrounding townscape and on the visual amenity of people experiencing views in the context of the Site. The topics covered in this chapter include: mitigation of effects through design; effects on the heritage significance of heritage receptors; effects on the townscape and visual receptors; and assumptions and limitations.

2.3 When assessing the potential impacts of new development within an existing built context there is often an overlap between the resulting effects on built heritage and on the surrounding townscape and its visual amenity. Therefore, these are assessed in the same document, albeit using distinct methodologies throughout, following national law, policy and guidance. This approach pays due regard to the GLA's Planning Practice Note: Heritage Impact Assessments and the Setting of Heritage Assets (Nov 2023) by ensuring the clear separation between Heritage Impact Assessment and Townscape and Visual Impact Assessment, while also conforming to the EIA Regulations 2017 (as amended in 2019 and 2020).

Mitigation through design and consultation

2.4 As part of the design development process TTC advised the Architects on ways to mitigate any potential adverse effects arising from the Proposed Development on: the setting and significance of nearby heritage receptors; sensitive townscape receptors; and the visual amenity of people experiencing views. TTC also advised on ways to maximise any opportunities for enhancement in relation to these same receptors. This process included the iterative use of 3D computer models and architectural drawings to illustrate and analyse the effects of different design options.

2.5 Given the above design development process, it is considered that mitigation is embedded in the design of the Proposed Development and that it is unlikely that any further or 'supplementary mitigation' will be needed. If necessary, however, it would be clearly stated in the assessments.

2.6 Additionally, the detailed process of consultation with LBS planning officers, which included pre-app meetings, design workshops and meetings with the Greater London Authority (GLA) and Historic England (HE), enabled the Proposed Development to be optimised prior to the final assessments being undertaken.

2.7 A detailed account of pre-application consultation can be found in the Planning Statement submitted with this application.

EIA scoping process

2.8 The proposed scope of the ES was formally submitted to LBS by Trium Environmental Consulting LLP on behalf of the Applicant on the 11th of January 2024 in the form of an EIA Scoping Opinion Request Report. The LBS's EIA Scoping Opinion was received on the 27th of March 2024.

2.9 The Scoping Opinion noted the presentation of the heritage, townscape and visual impact assessments in one volume of the ES. TTC confirms that the methodologies for the assessment of these topics are distinct, as set out in chapter 2.0 Methodology, at the beginning of the HTVIA. To ensure separation between assessments, the heritage topic is dealt with in a separate stand-alone chapter for heritage assessment (chapter 7.0), while townscape and visual assessment are also dealt with in separate chapters, with clear differentiation between the distinct assessments running through to the conclusions in chapter 11.0.

2.10 In respect of heritage, the Scoping Opinion noted comments made by HE on the scope of designated and non-designated heritage receptors to be considered in the HTVIA. In response, TTC have reviewed the

study area and have included further receptors to the assessment, including some located beyond the initial study area. As suggested in the Scoping Opinion, TTC has also reviewed the Greater London Historic Environment Record (GLHER) and confirms that all the relevant above ground heritage receptors have been proportionately considered in this report.

2.11 The Scoping Opinion recommended the involvement of LBS and Historic England (HE) during the development of the assessment and the study area. HE was consulted alongside LBS Conservation and Design Officers throughout pre-application discussions about design and potential effects of the Proposed Development, and when selecting the study areas and scoping process for heritage, townscape and visual receptors for assessment in this report.

2.12 A note on cumulative development was also included in the Scoping Opinion, setting out that; 'cumulative assessment should distinguish between the more certain cumulative scenario (which would include all consented but unbuilt schemes), and the less certain scenario (which would include all consented but unbuilt schemes as well as undetermined planning applications).'It was suggested within the Scoping Opinion that the focus within the report should be on the more certain cumulative scenario. This HTVIA considers both consented and submitted applications in the cumulative scenario.

2.13 Appendix 4 of this HTVIA, sets out in more detail how the points raised in the Scoping Response have been addressed.

Assessment sources

2.14 The following sources of information, which define and explain the Proposed Development, have been reviewed and form the basis of the assessment of likely significant heritage, townscape and visual effects:

- The detailed plans, sections and elevations submitted alongside the planning application;
- The Design and Access Statement; and
- The Accurate Visual Representations (AVRs) contained within this Volume.

2.15 See also ES **Volume 1, Chapter 4: The Proposed Development**, which details description of the Proposed Development.

Heritage effects

2.16 This section sets out the approach to assessment of the likely effect of the Proposed Development on the following heritage receptors within the study area:

- Listed buildings;
- Conservation areas;
- Non-designated heritage receptors, including locally listed buildings and buildings included within the Peckham Townscape Heritage Initiative;
- Registered Parks and Gardens, where relevant.

2.17 Effects as a result of the Proposed Development can be temporary, relating to the demolition and construction phases, or permanent, relating to the completed Proposed Development. Throughout this HTVIA, above ground heritage receptors likely to be affected by the Proposed Development are referred to as '*heritage receptors*', which have the potential to be affected by the proposals either directly or indirectly. For the purposes of this HTVIA, direct heritage effects are considered to arise from changes to the fabric of a heritage asset, while indirect effects are considered to arise from changes to its setting.

2.18 In this HTVIA, the term 'heritage receptor', used in Environmental Impact Assessment (EIA), is utilised synonymously with the term 'heritage asset', whether designated or non-designated, which is the term commonly used in NPPF heritage impact assessment.

2.19 This assessment does not assess the likely effect on below ground heritage receptors or Scheduled Ancient Monuments (SAMs), this has been assessed separately within **ES Volume 1, Chapter 12: Archaeology**. Where a statutorily listed building is also scheduled this is noted in the baseline section for completeness, but the assessment only considers the receptor as a listed building.

2.20 The architectural, urban design and townscape qualities of the Proposed Development are assessed in the townscape and visual impact assessment within this Volume of the ES, and the heritage assessment draws upon these findings.

Heritage assessment

2.21 The National Planning Policy Framework, 2023 (NPPF) states, at para. 200, that Local planning authorities should require Applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' significance and no more than is sufficient to understand the potential impact of the proposal on their significance. This includes designated and non-designated heritage assets. The following terminology has been adopted within this assessment for classifying and discussing the historic environment:

- a) A '*heritage asset*' is a building, monument, site, place, area or landscape identified as meriting consideration in planning decisions because of its heritage interest (NPPF, Annex 2 Glossary). In this HTVIA, those assets likely to be affected by the Proposed Development are referred to as '*heritage receptors*';
- b) The '*setting*' of a heritage receptor is the surroundings in which a heritage asset is experienced. Its extent is not fixed, can extend

beyond the asset's curtilage and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral (NPPF, Annex 2 Glossary);

c) '*Significance*' (for heritage policy), as defined in the NPPF (Annex 2 Glossary) is used to describe the heritage interest of an asset to this and future generations. This interest may be archaeological, historic and/or architectural/artistic. Significance can derive not only from a heritage asset's physical presence, but also from its setting.

2.22 In reading this HTVIA, it is important to differentiate the use of the term 'significance' in a heritage policy context, which is defined by the NPPF as the significance of the heritage asset in question, from the separate use of 'significance' in Environmental Impact Assessment (EIA) terms, which primarily relates to the 'significance of environmental effect' as a result of change owing to the Proposed Development. To make an appropriate distinction, this assessment will utilise the term 'heritage significance' in relation to the significance of heritage receptors, while referring separately to the 'significance of the environmental effects' for EIA purposes.

Study area

2.23 A study area was defined based on consideration of a Zone of Theoretical Visibility (ZTV) as the design of the Proposed Development emerged, as well as professional judgement, to identify heritage receptors potentially affected, whether directly or indirectly, by the Proposed Development. The extent of the area identified was informed by knowledge of the Site and the surrounding area, its size and topographic nature, and desktop research and detailed discussion with LBS during the pre-application process. It also included consideration of:

- National and local heritage policy and guidance;
- The physical characteristics of the Site and its context; and
- The nature of the Proposed Development, including its height, form and materials.

2.24 Within the study area, heritage receptors have been selected for assessment if the asset displays intervisibility with the Proposed Development through the ZTV, or where the asset's setting is identified to be related to the Site in another significant way, for example, by way of a distinct historical connection. It is not considered appropriate to identify a study area for heritage assessment on the basis solely of a radius from the centre of the Site, since some heritage receptors potentially affected by the Proposed Development would be located beyond the study area given their intervisibility in longer views beyond the given radius.

2.25 The heritage receptors considered as part of the assessment are set out in Chapter 7 of this HTVIA.

Baseline characterisation

2.26 An initial assessment was made of the existing condition of the Site and its surroundings to understand the physical characteristics and qualities of the area. The assessment, coupled with a historical map regression exercise and archival research where appropriate, informed an in-depth understanding of the historical development of the Site and its surroundings. Understanding the history and context of the relevant heritage receptors is important to establishing their heritage significance and the contribution that their setting makes to that significance.



2.27 In order to determine which heritage receptors may be affected by the Proposed Development, a broad range of documentary and cartographic sources and historic environment datasets have been examined. These sources have helped to determine the likely nature, extent, preservation and heritage significance of any known or possible heritage receptors that may be present within or in the vicinity of the Site. Sources consulted included:

- Historic England's National Heritage List for England (online);
- Greater London Historic Environment Record (online);
- LBS's Local Plan (2022), and other guidance (including Conservation Area Appraisals/ Character Statements);
- Bridget Cherry and Nikolaus Pevsner (1983), *The Buildings of England, London 2: South*, (Yale University Press); and
- Online digital records and historic maps, among other sources.

2.28 A detailed list of references can be found at the back of this report. Listed building descriptions and Registered Parks and Gardens of Special Historic Interest (RPGSHI) register entries can be found on the National Heritage list for England and on Historic England's website historicengland.org.uk. Conservation area boundary maps and details of non-designated heritage receptors were accessed through the local authority's website. The Greater London Historic Environment Record (GLHER) has also been consulted, via its online platform.

2.29 Site visits were undertaken to check the desktop assessment with regard to the potential significance of effect of the Proposed Development on the heritage receptors within the surrounding area (and to check for any additional receptors that were not originally identified). Multiple site visits were undertaken from March 2022 to November 2023.

2.30 Following the characterisation of the baseline environment and the identification of heritage receptors within the study area, the methodology used to assess the likely effects on above ground heritage receptors in the vicinity of the Site entailed:

- Evaluating the heritage significance of identified heritage receptors, based on existing designations and professional judgement, and considering historic, architectural/ artistic interest as outlined in the NPPF and Historic England's policy and guidance;
 - Evaluating the contribution that setting makes to the overall heritage significance;
 - Establishing the heritage receptor's 'sensitivity to change', on the basis of the evaluations carried out in (a) and (b) above;
 - Considering the 'magnitude of change' to the heritage significance of heritage receptors and the likely resulting scale of environmental effect arising from the Proposed Development;
 - Considering the mitigation measures that have been included within the design of the Proposed Development and any additional mitigation that might be required in order to avoid, reduce or offset any significant adverse effects on the heritage receptor; and
 - Quantifying any residual effects (those that might remain after mitigation through design).
- g) Making a separate narrative statement about the effect of the Proposed Development on the significance of a heritage asset in NPPF terms.

2.31 The guidance and criteria set out in the following key documents have been considered in developing this staged assessment methodology:

- Section 16 of the NPPF and associated Planning Practice Guidance (PPG);
- Historic England guidance: Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) (Para 2.41);
- Historic England guidance: Conservation Area Appraisal, Designation and Management Note 1 (2019) (Para 2.32); and
- Department for Digital, Culture, Media and Sport guidance: Principles of Selection for Listing Buildings, 2018.

Heritage Significance/ Sensitivity to Change	Criteria
Very High Of International Importance	• World Heritage Sites and the individual attributes of those sites that convey their 'Outstanding Universal Value'.
High Of National Importance	• Scheduled monuments. • Listed buildings (Grade I, II*). • Registered historic parks and gardens (Grade I, II*). • Grade II listed buildings which can be shown to have exceptional qualities in their fabric or historic associations. • Registered battlefields. • Designated and undesignated historic landscapes of outstanding interest, or high quality and importance and of demonstratable national value.
Medium Of Regional Importance	• Conservation areas. • Grade II listed buildings. • Grade II registered historic parks and gardens. • Historic townscapes and landscapes with reasonable coherence, time-depth and other critical factor(s). • Designated special historic landscapes. • Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value.
Low Of Local Importance	• Locally listed buildings • Parks and gardens of local historic interest, identified by local authority • Areas of local interest, identified by local authority
Very low	• Built fabric, townscapes or landscapes with little or no architectural or historical interest.

Table: 2.1: Sensitivity table

2.32 A more detailed list of all planning policy and guidance reviewed and considered in support of the assessments undertaken is presented in Chapter 3 of this report.

Sensitivity of receptors

2.33 The sensitivity to change of each heritage asset or groups of receptors is considered in relation to both potential direct and indirect impacts. In this HTVIA direct effects are considered to be effects on the fabric of heritage receptors (in this case including the Rye Lane Peckham Conservation Area, within which the Site is partially located); indirect effects are considered to be on the setting of heritage receptors. Consideration of the sensitivity to change involves professional judgement, but is related to the designation and grade of the heritage asset and an assessment of which elements of its fabric and setting contribute to its heritage significance.

2.34 The NPPF defines heritage significance as ‘the value of a heritage asset to this and future generations because of its heritage interest. That interest may be historic, archaeological, architectural or artistic.’ The determination of the significance of a heritage asset has been based on statutory designation and/or professional judgement against these values:

- *Archaeological interest*: deriving from the potential of a place to yield evidence about past human activity that is worthy of expert investigation;
- *Historic interest*: an interest in past lives and events. It tends to be illustrative or associative. Providing a material record of the nation’s past, it can also provide meaning for communities derived from their collective experience of a place and it can symbolise wider value such as faith or cultural identity; and
- *Architectural and artistic interest*: interest arising from the design or general aesthetics of a place, whether derived from conscious design or fortuitously through evolution. More specifically, it relates to the science of design, construction, craftsmanship and decoration. Artistic interest is an interest in other human skills, such as sculpture.

Magnitude of Change to heritage significance	Criteria
Large	• Complete removal of an asset; • Change to an asset’s fabric or setting resulting in a fundamental change in our ability to understand and appreciate the significance of the resource and its historical context or fundamental character (whether positive or negative); • The transformation of an asset’s setting in a way that fundamentally changes the ability to understand or appreciate its significance (whether positive or negative); • A scale of change that could result in a designated asset being undesignated or having its level of designation lowered.
Medium	• Change to an asset’s fabric or setting resulting in an appreciable change in the ability to understand or appreciate the asset’s significance, historical context or character (whether positive or negative);
Small	• Change to an asset’s fabric or setting resulting in a small change in the ability to understand or appreciate the asset’s significance, historical context or character (whether positive or negative);
Very small	• Change to an asset’s fabric or setting resulting in very limited change in the ability to understand or appreciate the asset’s significance, historical context or character (whether positive or negative);
No Change	• No change arising from the Proposed Development to the significance of a heritage asset or the ability to appreciate that significance.

Table 2.2: Magnitude of Change to heritage significance table

Receptor sensitivity to change						
Magnitude of change to heritage significance (as a result of the Proposed Development)		Very High	High	Medium	Low	Very Low
Large		Major	Major	Moderate to Major	Minor to Moderate	Negligible to Minor
Medium		Major	Moderate to Major	Moderate	Minor	Negligible to Minor
Small		Moderate	Minor to Moderate	Minor	Minor	Negligible
Very Small		Minor	Negligible to Minor	Negligible to Minor	Negligible	Negligible or No effect
No Change		No Effect	No Effect	No Effect	No Effect	No Effect

Table 2.3: Scale and Significance of Effect

2.35 In determining an asset’s heritage significance, its setting has also been considered in line with the Historic England’s Historic Environment Good Practice Advice in Planning guidance notes. In particular the following documents have been considered:

- Advice Note 2 – Managing Significance in Decision-Taking in the Historic Environment (March 2015);
- Advice Note 3 (2nd Ed.) – The Setting of Heritage Assets (December 2017).

2.36 Based on the above, the heritage significance of each heritage receptor (or group of receptors) has been determined. This provides an understanding of what fabric / constituent parts or elements of setting of the receptor contribute to its heritage significance and are therefore sensitive to change. It informs the assessment of heritage sensitivity of the asset (together with its designation/grade) in light of the nature of the likely effects of the Proposed Development - direct or indirect. The heritage significance of each receptor is summarised as part of the baseline consideration.

2.37 The sensitivity to change is a professional judgement and is assessed as **very high, high, medium, low** or **very low**. This overall assessment of sensitivity to change will not necessarily correspond with the assessment of the heritage significance of the receptor as high, medium or low. The sensitivity to change of each heritage receptor or group of heritage receptors is set out in the baseline section of each heritage assessment.

2.38 Categories of heritage significance and potential sensitivity to change are set out in Table 2.1.

Magnitude of change

2.39 The magnitude of change refers to the degree of change to the heritage significance of a receptor, whether the change arises from direct change to its fabric or indirect change to its setting, as set out in Table 2.2. Magnitude of change is assessed as **large, medium, small, very small** or **no change**.



2.40 In many cases, the magnitude of change to heritage significance is likely to be greater where there is direct impact on the heritage receptor, such as non-reversible works to historic fabric or demolition of a large building that detracts from the character and appearance of a Conservation Area. In terms of indirect impact, however, a new development obscuring an important view that contributes to the heritage significance of a receptor, or opening up an important space close to receptor and therefore 'better revealing it', could also represent a high magnitude of change.

Scale and Significance of effects

2.41 The significance of the environmental effect is established by combining decisions about the sensitivity of the receptor to change and the magnitude of change to heritage significance arising from the Proposed Development, as set out in Table 2.3. The terms in the boxes in the table indicate the significance of the environmental effect which results from the relevant combination of magnitude of change and sensitivity. Likely significant environmental effects, for the purposes of EIA assessment, are those which fall in the shaded area of the table (i.e. effects of 'moderate' significance or above). Minor to moderate effects are not considered significant, because they are considered to be below the moderate threshold.

2.42 The matrix is not intended to 'mechanise' judgement of the significance of environmental effects, but to act as a check to ensure that judgements regarding a receptor's sensitivity to change and the magnitude of change resulting from the Proposed Development give rise to a level of significance of the environmental effect that is reasonable, balanced and can be supported by more nuanced narrative assessment which sets out 'what matters and why' in accordance with Historic England's guidance and in NPPF terms.

2.43 Where information is insufficient to be able to quantify either the receptor's sensitivity to change or the magnitude of change to heritage significance arising from the Proposed Development with any degree of certainty, the effect may be given as 'uncertain'.

2.44 The nature of the effects have also been assessed qualitatively as 'beneficial', 'adverse', or 'neutral' in respect of their effect on the significance heritage of the receptor. This assessment, based on professional judgement, is in recognition of the fact that an effect on a heritage receptor or its setting can enhance its heritage significance or appreciation of that significance (a beneficial effect), harm its heritage significance or appreciation of that significance (an adverse effect) or lead to a balance between heritage benefits and harms (a neutral effect). This consideration is independent of whether the scale of the environmental effect is major, moderate, minor or negligible.

2.45 This approach is in line with how decisions are made in relation to changes to heritage receptors in the planning process as set out in the NPPF and described specifically in relation to elements of setting in Annex 2 of the NPPF. It reflects the statutory requirement to pay special regard to the desirability of preserving a listed building or its setting, or any features of special architectural or historic interest which it possesses; and the statutory requirement that special attention is paid to the desirability to preserve or enhance the character and appearance of a Conservation Area.

2.46 The following terms have been used to define the significance of the environmental effects identified:

- **Major effect:** where the Proposed Development could be expected to have a considerable effect (either adverse or beneficial) on the heritage significance of heritage receptors (assets). For the historic environment, if the effect is adverse in nature, this could equate to 'substantial harm' to, or total loss of, the heritage significance of an asset. A major effect is considered 'significant' in the context of the EIA Regulations.
- **Moderate effect:** where the Proposed Development could be expected to have a noticeable effect (either adverse or beneficial) on the heritage significance of heritage receptors (assets). For the historic environment, if the effect is adverse in nature, this would likely equate to 'less than substantial harm' (in NPPF terms) to the heritage significance of an asset, as a result of changes to its physical form or setting. In

some cases, depending on the exact nature of the effect, this can be found to be at the lower end of the scale of 'less than substantial harm'. A moderate effect is considered 'significant' in the context of the EIA Regulations.

- **Minor effect:** where the Proposed Development could be expected to have a small, barely noticeable effect (either adverse or beneficial) on the heritage significance of heritage receptors (assets). For the historic environment, if the effect is adverse in nature, this would likely equate to a low degree of 'less than substantial harm' (in NPPF terms) to the heritage significance of an asset of very high, high or medium heritage significance, as a result of changes to its physical form or setting. A minor effect is considered 'not significant' in the context of the EIA Regulations.
- **Negligible:** where a very minor effect is expected as a result of the Proposed Development on the heritage significance of heritage receptors (assets). In this case the nature of the effect may also be identified as neutral. A negligible effect is considered 'not significant' in the context of the EIA Regulations.
- **No effect:** where no discernible effect arises to the heritage significance of heritage receptors (assets), and would be considered 'not significant' in the context of the EIA Regulations

2.47 Effects can fall between the categories above, as shown in the table. Thus 'Moderate to Major', 'Minor to Moderate' and 'Negligible to Minor' are possible outcomes.

2.48 Cumulative heritage assessment

2.49 A number of proposals for new development near the Site have been granted planning permission or are under planning consideration (having been submitted and validated, but not yet determined) or are under construction. These are considered 'committed' schemes, because they are reasonably likely to be built out. These committed schemes are included for cumulative assessment in the EIA and are listed in **ES Volume 1, Chapter 2: EIA Methodology**. The list of committed schemes for cumulative assessment was agreed with the local planning authority through the EIA Scoping process.

2.50 The committed schemes identified contribute to what is called the 'future baseline'; that is, a future scenario in which they have been constructed and therefore change the environment within which they are located, including the setting of heritage receptors. If any adverse effects were derived from each committed scheme contributing to the future baseline, it is considered that the local authority would have considered any mitigation as part of the planning process. The effect of the future baseline as a whole, therefore, is not assessed further in this HTVIA. Rather, in this HTVIA, the cumulative assessment focusses on the 'additional' effects of the Proposed Development on each heritage receptor (or group of heritage receptors) over and above the future baseline scenario, rather than the effect of all committed schemes and the Proposed Development together in 'combination'.

Townscape and visual effects

2.51 This section explains the method that is used to carry out the townscape and visual impact assessment. It is based on the principles set out in the third (2013) edition of Guidelines for Landscape and Visual Impact Assessment (GLVIA), produced by the Landscape Institute with the Institute of Environmental Management and Assessment.

2.52 The assessment method is described in the following sections. In general terms it is carried out as follows:

- Buildings and the relationships between them, and with the topography in the study area, are identified and analysed. Visual connections between these elements, including those which illustrate historical development and the value of the townscape as a resource in its own right, are identified. A list of representative views from distinct viewpoints, which have the potential to be affected by the Proposed Development, is produced. Views which have been previously identified as significant by designation or in other ways, such as through townscape characterisation studies produced by LPAs, are also considered.
- The potential impacts of development on these buildings, open spaces, relationships between them and views are studied as part of the process of developing the design. This includes computer-based modelling, so that townscape and visual impacts can be tested.
- The overall effects of the Proposed Development, in the form in which it is submitted for planning permission, on the identified characteristic elements of townscape and on views and the visual amenity of people experiencing them, are assessed by the townscape assessor. In addition to scheme drawings and the architect's Design & Access Statement, this assessment is informed by representative images showing the 'existing' view from a defined viewpoint, and a 'proposed' view from the same viewpoint. Images showing the effect of the Proposed Development in combination with relevant 'cumulative' schemes are also provided.

2.53 The process is an iterative one, so that any potential for adverse townscape or visual effects can be considered and resolved through the design development process.

Study area

2.54 A study area of between approximately 500m and 750m radius from the Site was established, within which individual Townscape Character Areas (TCAs) were identified on the basis of distinct townscape

characteristics, taking into account any previously published characterisation studies undertaken by LBS including the Peckham and Nunhead Characterisation Study (2012). The extent of the study area was based on professional judgement and informed by a Site visit, as well as a preliminary desk-top appraisal that focused on understanding the area's historical development, urban pattern, form and character. A prescriptive circular radius was avoided for the assessment of TCAs, because areas of defined character do not normally fit within geometric shapes.

2.55 The study area for understanding visual impact was centred on the Site and was limited to locations from which the Site can be seen, or from which the Proposed Development on it will be seen at the height proposed. The maximum study area for local and medium range views extends to approximately 2.6km, the distance from the Site to One Tree Hill and Nunhead Cemetery on the hills to the south. At a distance greater than this, development of the scale envisaged is unlikely to be a significant visual presence.

2.56 The judgement made on the geographic extent of the likely significant effects of the Proposed Development on townscape and views was also informed by the use of Vu.City (an interactive 3D visualisation software which enables the user to view a scheme from areas within London), and by previous experience of the effect of developments of a similar scale in this part of London. The visual study undertaken during the course of the assessment enabled this judgement to be validated.

2.57 A Zone of Theoretical Visibility (ZTV) map was also used to help understand the geographical extent of the visual effects of the Proposed Development. The ZTV is a computer generated map that highlights, in a spatial manner, open areas (such as streets, parks and gardens) from where the Proposed Development would be visible and not obstructed by existing built form.

Baseline characterisation - Townscape Character Areas

2.58 An assessment was made of the Site and its surroundings. This analysed the physical characteristics of the townscape and considered the current status of the Site. This was carried out through research and field survey, and by using information available that may have already been produced by others, for example by the local planning authority. Where conservation areas are designated in proximity to the Site, their appraisals may also have been relevant to understanding the key characteristics of the townscape. Bridget Cherry and Nikolaus Pevsner's *'The Buildings of England, London 2: South'* (1983) was also reviewed during this study.

2.59 Following establishment of the baseline, the townscape within the study area was divided into separate TCAs, each with common characteristics within its boundary. These characteristics may arise from the topography; natural characteristics such as waterways; patterns of land use; urban grain; and distinct building form or typologies. Where there are major elements of infrastructure such as roads and railways, these often serve to divide one area from another. The division of the study area into TCAs is carried out on the basis of professional judgement, and the study of appropriate sources, as described above. TCAs are considered townscape receptors in this assessment.

2.60 The townscape receptors considered as part of the townscape assessment are set out in Chapter 9 of this HTVIA.

Baseline characterisation – Views

2.61 The assessment of visual effects is focused on understanding change to townscape views, as a result of the Proposed Development, and to the visual amenity of people experiencing those views. Visual amenity is described in the glossary of GLVIA (2013), as *'the overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area'*.

2.62 Following an initial assessment of the existing condition of the Site and its surroundings, a study was undertaken to establish a set of potential viewpoint locations from which 'existing' and 'proposed' views are provided.

2.63 Within this study area, four types of views/viewpoints were identified:

- Views that have been identified as significant, by the planning authority or others, e.g. in planning policy, guidance documents, viewing plaques or conservation area appraisals;
- Other locations or views of particular sensitivity, including those viewpoints in which the Proposed Development may significantly affect the settings of heritage receptors;
- Representative townscape locations from which the Proposed Development would be visible; and
- Locations where there is extensive open space between the viewer and the Proposed Development so that it would be prominent rather than obscured by foreground buildings. This includes areas of open space that are important in a local context, e.g. for leisure purposes.

2.64 The set of viewpoints was chosen to cover:

- 'Maximum exposure' of the Proposed Development in the view, as well as its 'maximum conjunction' with sensitive elements in the built environment;
- The range of points of the compass from which the Proposed Development would be visible;
- A range of distances from the Site; and
- Different areas of distinct townscape character.

2.65 Possible locations in these categories within the study area were identified based on an examination of maps and aerial photographs; the documents referred to above; and field study. These were tested in Vu.City and refined. The study area and the possible locations were then visited to establish candidate viewpoints. A photographic record was made of this visit together with a map showing viewpoint locations. These locations were agreed in consultation with local authority officers.



Townscape and visual impact assessment methodology

2.66 As with the heritage assessment, the effects of the Proposed Development on townscape and visual receptors are assessed by combining judgements about the 'sensitivity of the receptor' and the 'magnitude of change' it would experience as a result of the Proposed Development, in order to establish the significance of the environmental effect.

Sensitivity of receptors

2.67 The sensitivity of the existing townscape receptor or view (as experienced by a person or 'visual receptor' in the location in question) has been assessed as **high, medium, low** or **very low** (or at an intermediate point between these sensitivity levels, e.g. **low to medium**).

2.68 The sensitivity of the townscape or view is dependent on:

- the importance, value and quality of the townscape or view; and
- the susceptibility to change of the receptor (this includes, for views, the nature and expectation of the viewer).

2.69 The importance of a view or townscape within a TCA is determined by any recognition that it may have, the importance of elements within it, and by its amenity value. In terms of views, recognition includes viewpoints identified by the local authority or others in planning documents, and viewpoints visited by large numbers of people. This includes relevant views identified in the LVMF. In terms of townscape receptors, recognition includes heritage designation e.g. of a Conservation Area.

2.70 The value of a view or TCA is likely to be higher if it includes valued heritage receptors. In respect of townscape, the overall character and coherence of the townscape is relevant to an assessment of its value and quality. In respect of views, the value and

quality of the view is a reflection of its visual interest, its character and coherence, and any attractive or notable pictorial or compositional qualities.

2.71 With regard to amenity value, locations such as parks and riverside walkways which are used for leisure purposes are often considered to be more sensitive in visual and townscape terms than everyday streetscapes with no heritage designation.

2.72 The assessment of value and importance of views and townscapes takes into account the presence of heritage receptors and their settings. In decreasing order of heritage significance, these include:

- World Heritage Sites, Grade I Listed Buildings and Registered Parks and Gardens, above-ground Scheduled Ancient Monuments;
- Grade II* or Grade II Listed Buildings, Conservation Areas and Registered Parks and Gardens; and
- Non-designated heritage receptors (e.g. locally listed buildings).

2.73 The susceptibility to change of a townscape receptor includes consideration of its ability to accommodate the type of change proposed. The susceptibility to change of a viewer or viewers experiencing a view includes consideration of the nature and expectation of the viewer(s), which reflects the occupation or activity of the people who experience the view. Those experiencing views are taken to be the general public affected by development, taking into account the differing interests and expectations likely to be found in residents, visitors and those who work in a place or area. For example, people who walk in a park in their leisure time or people in their street of residence are likely to have a higher sensitivity than people at their place of work, or people on the move along main roads.

2.74 The assessment of sensitivity is a matter of professional judgement, and a number of factors are likely to be relevant to each individual receptor, such that the assessment of sensitivity will be different in every case. However, the following examples are provided by way of general guidance; it should be noted that the assessment of sensitivity may fall between the different levels set out below.

Magnitude of change (as a result of the Proposed Development)	Receptor sensitivity to change (townscape and visual receptors)				
		High	Medium	Low	Very Low
	Large	Major	Moderate to Major	Minor to Moderate	Negligible to Minor
	Medium	Moderate to Major	Moderate	Minor	Negligible to Minor
	Small	Minor to Moderate	Minor	Minor	Negligible
	Very Small	Negligible to Minor	Negligible to Minor	Negligible	Negligible or No Change
	No Change	No Effect	No Effect	No Effect	No Effect

Table: 2.4: **Receptor sensitivity to change (townscape and visual receptors) table**

2.75 A TCA largely comprising a World Heritage Site or a large number of Grade I and II* buildings, with a strongly coherent form of development and including buildings of high visual quality, would likely be of high sensitivity. A TCA largely comprising a conservation area, open spaces or settled residential areas, with considerable character and coherence evident in the form of development, would likely be of medium sensitivity. A TCA with development of little notable character or coherence, buildings of generally low or mediocre quality, and few if any heritage receptors may be considered of low sensitivity. Alternatively, some townscapes of robust character, such that they could easily accommodate change - for example, an overwhelmingly commercial environment - may also be considered to be low sensitivity.

2.76 In respect of views, the overall sensitivity will depend on the susceptibility to change of the people experiencing the view, as previously noted, and the view's value/ importance. A view which is notably coherent and characterful, which is of high visual amenity value and/or contains highly graded heritage receptors in a prominent manner, which is from an identified viewpoint location, and which is experienced by people with the specific expectation of enjoying the view, is likely to be of high sensitivity. A view from a point of some sensitivity due to heritage designations - e.g. conservation areas, open spaces or settled

residential areas - and which displays considerable visual interest and compositional quality, experienced largely by residents and people in their leisure time, may be considered of medium sensitivity. A view that has no particular qualities of character and coherence and is dominated by buildings or townscape of poor or mediocre visual quality, or a view which is transient in nature or from a location within a business or other largely non-residential environment, may be considered of low sensitivity.

2.77 The overall assessment of the sensitivity of the receptor under consideration may be moderated to take into account a judgement about its susceptibility to change in the round. For example: a listed building or a part of a conservation area may be a prominent aspect of a view, or it may be present in the view but only incidentally; TCAs include within them areas of greater and lesser quality; and so on.

Assessment of magnitude of change		Cumulative townscape and visual effects		
2.78	The magnitude of change resulting from the Proposed Development relates to the amount of change experienced by the receptor. This is assessed as large, medium, small or very small using the criteria set out below. In some cases, there may be no change as a result of the Proposed Development. • Large: considerable change to the townscape or view; • Medium: an obvious change to the townscape or view; • Small: a small change to the townscape or view that would not be readily noticed; or • Very small: there would be minimal change to the townscape or view that would be difficult to discern; or • No change: where there is no discernible change to the townscape of view.			
2.79	The assessment of the magnitude of change includes consideration of a range of factors, including the loss of existing features on the Site, and the overall scale and nature of the visibility of the Proposed Development within a TCA or view; the degree to which the effect of the Proposed Development’s scale, form, appearance and character are consistent with or contrast with that of the existing character of the view or TCA; the geographical extent of the effect; and the duration of the effect. The assessment of the magnitude of change will be different in every case; however, the following examples are provided by way of general guidance. A change of large magnitude is likely to involve extensive visibility of the Proposed Development, and/or visibility at an apparent scale that may be as large or larger than most existing elements in the townscape or view, or the appearance of the Proposed Development may be in notable contrast to the existing character of the townscape or view. A change of medium magnitude is likely to involve considerable visibility of the Proposed Development, and/or visibility at an apparent scale similar to existing elements in the townscape or view, and/ or it may form a noticeable contrast with the general existing character of the townscape or view. A change of small magnitude is likely to involve a relatively small degree of visibility of the Proposed Development, and/or	visibility at a similar or lesser apparent scale than existing elements in the townscape or view; or it may be of greater visibility and scale, but consistent with the existing character of the townscape or view to the extent that it would be little noticed. Significance of effects 2.80 The assessment of the environmental significance of the effects of the Proposed Development on existing townscape and views/visual amenity is a matter of professional judgement, taking into account relevant planning policies and guidance, and based on the following method. 2.81 The two measures of sensitivity and magnitude of change, once separately established, are combined to provide a measure of the significance - major, moderate to major, moderate, minor to moderate, minor, negligible to minor, negligible or no change - of the effect on townscape or views which will result from the Proposed Development. The most significant effects are those high of a magnitude change on receptors of high sensitivity to change. The terms in the boxes in Table 2.4 indicate the significance of the environmental effect that results from the relevant combination of magnitude of change and sensitivity. Likely significant effects, for the purposes of EIA assessment, are those which fall in the shaded area of Table 2.4 (i.e. those of ‘moderate’ significance or above). Minor to moderate effects are not considered significant, because they are considered to be below the moderate threshold. 2.82 If the magnitude is identified as ‘no change’, then there would be ‘no effect’ as a result of the Proposed Development. 2.83 The magnitude of change and / or the sensitivity may be assessed as being at an intermediate point between the criteria set out above e.g. a change of ‘moderate or major’ magnitude. Where this is the case, all possible significance criteria that fall under the combinations of the magnitude and sensitivity criteria have been considered and the most appropriate significance assessment, based on professional judgement, has been chosen.	2.84 Effects have also been assessed qualitatively as beneficial, adverse or neutral in respect of their effect on the townscape or visual receptor under consideration. Within any given view or area of townscape that is being assessed, there may be both beneficial and adverse effects as a result of the Proposed Development. The question of whether an effect is beneficial or adverse relies on a judgement of the qualitative effect in the round and is a ‘net equation.’ A neutral effect is one in which there is no noticeable beneficial or adverse effect, or in which the effect is considered neither beneficial nor adverse overall, having made a ‘net equation’ judgement that takes into account both beneficial and adverse impacts. Any effect, including one that is significant (because of the combination of sensitivity and magnitude of change), may be neutral in respect of the qualitative effect on the receptor under consideration. 2.85 By way of example, a beneficial effect in terms of views and the visual amenity of people experiencing them, could derive from the high architectural quality of a proposal, or from providing a focal point in a view with a directional quality, or from coherently consolidating an existing skyline composition. A beneficial effect in townscape terms could derive from the reinforcement of an existing pattern and form of development in a coherent manner, for example. An adverse effect in terms of views could derive from the introduction of a building of low architectural quality, or of a form or scale of development which disrupts views with strong compositional or picturesque qualities. An adverse effect in townscape could derive from a form and scale of development which contrasts (in a disruptive manner) with an established high-quality townscape, for example. A neutral effect in views and townscape could derive from a balanced judgement in which both positive and negative effects such as the examples cited above are apparent, and therefore a neutral effect can apply to effects that are ‘significant’ as well as situations in which the Proposed Development has no significant effect. 2.86 In cases where the Proposed Development results in no change to a receptor, an assessment of ‘no effect’ is given, and this is considered ‘not significant’ in environmental terms.	2.87 A number of proposals for new development near the application Site have been granted planning permission, are under planning consideration (having been submitted and validated, but not yet determined) or are under construction. These are considered ‘committed’ schemes, because they are reasonably likely to be built out. These committed schemes are included for cumulative assessment in the EIA and are listed in ES Volume 1, Chapter 2: EIA Methodology. The list of committed schemes for cumulative assessment was agreed with the local planning authority through the EIA Scoping process. 2.88 The committed schemes identified contribute to what is called the ‘future baseline’; that is, a future scenario in which they have been constructed and therefore change the environment within which they are located and experienced. In this HTVIA, the cumulative assessment focusses on the ‘additional’ effects of the Proposed Development on each townscape or visual receptor over and above the future baseline scenario, rather than the effect of all committed schemes and the Proposed Development together in ‘combination’. 2.89 In circumstances where the Proposed Development would not be seen in conjunction with committed future baseline schemes in the view, there is considered to be ‘no cumulative effect’. This may occur, for example, where the Proposed Development is completely occluded by committed schemes in the foreground, or where no committed schemes are visible in the view at all. Where ‘no cumulative effect’ arises, the assessment of the significance of the effect in EIA terms is not applicable (N/A) and is categorised as such in this HTVIA.



Accurate Visual Representation (AVR) Production

- 2.90 For each of the identified views in the assessment, three images of the view are presented. The first is an 'existing' view, showing baseline conditions using photography; the second is a 'proposed' view, showing the Proposed Development placed accurately into the baseline photography; and the third is a 'proposed with cumulative schemes' view, showing the Proposed Development and committed schemes placed accurately together into the baseline photography so that a cumulative assessment can be undertaken. These representations of the Proposed Development are provided as a guide to the effect on views as they would be experienced on Site; to act as an aide-memoire; and to assist Site visits. The assessment provided in this HTVIA represents a professional judgement of the likely effect of the Proposed Development on the view or the townscape, informed by Site visits, scheme drawings, the architect's Design and Access Statement and the representative images provided, rather than an assessment of the images in isolation.
- 2.91 Representative images of this type are called Accurate Visual Representations (AVRs). They are produced by combining images of the Proposed Development (typically created from a three-dimensional computer model) with a surveyed photograph of the existing view or context. The AVRs in this HTVIA were produced and verified by specialists Millerhare in accordance with good practice in urban contexts. The detailed method by which the AVRs were produced by Miller Hare is included in Appendix 1 of this Volume.
- 2.92 In the AVRs, the Proposed Development has been depicted either as a 'rendered' image, which is 'photorealistic' or as a 'wireline' image, which is a diagrammatic representation showing the outline of the Proposed Development. The wireline is a solid blue line where the Proposed Development would be clearly visible in the view, and dashed where the scheme would be occluded by foreground development or trees. Rendered and wireline images illustrate accurately the degree to which the Proposed Development would be visible, and its form in outline. Rendered images also show the detailed form of the proposal and the proposed use of materials.

- 2.93 Cumulative schemes that are likely to come forward and produce a new future baseline condition, are also shown as wireline representations. These are shown on the baseline photography as either orange or yellow wirelines, again dashed where occluded in the foreground. Cumulative schemes shown in orange benefit from a granted planning consent, while those in yellow have been submitted for planning, but are not yet determined.
- 2.94 Where appropriate, different seasonal or diurnal conditions may be represented in the AVRs, to illustrate changes in the townscape such as different degrees of tree foliage in summer and winter, or different lighting levels in night-time views.
- 2.95 For each of the AVRs produced from the agreed viewpoints, a description and assessment have been given:
- a) Existing view: a description of the existing condition, describing its townscape qualities and the likely visual amenity derived from it;
 - b) Sensitivity to change: consideration of the townscape value of the existing view, the receptors likely to experience it and their susceptibility to change in the visual amenity;
 - c) Proposed view: a description of the Proposed Development's appearance and role in the view;
 - d) Magnitude of change: a quantitative assessment of the amount of change in the view as a result of the Proposed Development;
 - e) Significance of effect: the result of combining the sensitivity of the view and the magnitude of change to establish the significance of the environmental effect, and an assessment of the overall qualitative aspects (beneficial, adverse or neutral) of the Proposed Development to determine the likely nature or direction of the effect after mitigation measures have been incorporated through design; and
 - f) Cumulative effect: where relevant, an assessment is made of the potential cumulative visual effects arising from the additional visibility in the view of the Proposed Development in relation to other proposed and consented schemes.

Demolition and construction effects

- 2.96 The methodology used for determining demolition and construction effects is the same as that set out above for operational effects (i.e. the effects when the Proposed Development has been built and is occupied). The effects of the demolition and construction process on heritage receptors, townscape and views/visual amenity will vary in intensity across the construction programme, as is normal in any construction project. The assessment takes into account the temporary nature of demolition and construction effects with regard to each receptor. This assessment considers a peak demolition and construction period, which is **Q4 2031 as per ES Volume 1, Chapter 5**.
- 2.97 In the assessment, the maximum magnitude of change as a result of demolition and construction works for the erection of the Proposed Development is taken to be the same as the magnitude of change arising from the finished building. The effects arising during the demolition and construction works would be temporary, short-term and would typically be 'adverse' in nature in terms of the townscape and visual amenity, and harmful to the setting of heritage receptors, as the Proposed Development is erected behind scaffolding, hoarding, and with the visible use of heavy machinery, such as large cranes that are visible from very long distances. Though temporary, construction effects could also be potentially significant, especially for people (visual receptors) who live or work in the area around the Site.
- 2.98 Cumulative effects as a result of construction and demolition stages have also been considered in this report. The assessments of all demolition and construction effects are presented in Chapter 10 of this report.

Assumptions and limitations

2.99 The methodology in this HTVIA report includes some assumptions and limitations, which are common for assessments undertaken in urban settings:

- This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate;
- The views included in this HTVIA do not cover every possible view of the Proposed Development but were selected in consultation with the LPA, and by using professional judgement that considered instances of heritage, townscape or visual sensitivity;
- The assessment of views using AVRs attempts to consider effects as they would be experienced in reality. It should be noted, however, that AVRs based on photographic images of townscape are no more than an approximation of reality, for a number of reasons:
 - a) Viewers have peripheral vision; their view is not restricted by borders as a photograph is, and they can move their eyes and heads to take in a wide field of view when standing in one place;
 - b) Viewpoints themselves are not generally fixed. Townscape is experienced for the most part as a progression of views or vistas by people who are moving through streets or spaces rather than standing still;
 - c) Photographs do not reflect the perception of depth of field as experienced by the human viewer due to binocular vision and parallax;
 - d) 'Existing' and 'proposed' views illustrate the experience from the viewpoint in conditions that are particular in respect of time of day and time of year, daylight and sunlight, and weather. The view will appear differently to varying degrees when any or all of these things vary;
 - e) Photo-realistically rendered AVRs present a degree of artistic judgement to interpret the design and portray an accurate representation of materials in different weather and lighting conditions; and

f) Townscape is experienced not by the eye alone but by the interpretation by the mind of what the eye sees, considered in the light of experience, knowledge and memory.

2.100 Assumptions have been made in this HTVIA about the susceptibility of people to visual changes in the townscape, as well as on the types of people likely to experience specific views. These assumptions are based on professional judgement. However, it is also acknowledged that the response of individuals varies and cannot all be covered in the assessment.

2.101 ZTV mapping, when used, is a tool helpful in eliminating areas from which the Proposed Development would definitely not be visible. However it is less accurate as a tool to ascertain areas from which there would be visibility, as the data informing the analysis is not as accurate as reality and there may be visual obstructions such as fences, street signage and trees, reducing or hindering visibility of the Proposed Development. The potential limitations of using a ZTV analysis are noted in the GLVIA (3rd edition, 2013) and Historic England's 'Note 3: The Setting of Heritage Assets' (2nd edition, 2017), although it is acknowledged that technological advancements have recently improved the accuracy of ZTV analysis, especially where LiDAR or similar data can be used to determine the exact form and location of obstructions.



3. Policy and Guidance

3.1 This Chapter sets out the relevant national, regional and local planning policy and guidance. For the purposes of this assessment, it is those policies relating to townscape and the historic environment that are of most relevance.

STATUTORY DUTIES

3.2 The legislation set out below is relevant to this assessment:

- The Town and Country Planning Act 1990 (as amended);
- The Planning (Listed Buildings and Conservation Areas) Act 1990;
- The Planning and Compulsory Purchase Act 2004;
- The Levelling-up and Regeneration Act 2023; and
- The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Levelling-up and Regeneration Act 2023

3.3 The Levelling-up and Regeneration Bill received royal assent on 26 October 2023, becoming an Act. Changes to planning procedures will begin to take place from 2024. It includes (at section 102(1)) a new section 58B, 'Duty of regard to certain heritage assets in granting permissions', to be inserted into the Town and Country Planning Act 1990, though not yet in force. This provides (in sub-section (1)) as follows: 'In considering whether to grant planning permission or permission

in principle for the development of land in England which affects a relevant asset or its setting, the local planning authority or (as the case may be) the Secretary of State must have special regard to the desirability of preserving or enhancing the asset or its setting.' This includes 'preserving or enhancing any feature, quality of characteristic of the asset or setting that contributes to the significance of the asset' (sub-section (2)). 'Relevant assets' and their 'significance' are identified in sub-section (3): Scheduled Monuments; Registered Parks and Gardens of Special Historic Interest; Protected Wreck sites; and World Heritage Sites.

The Planning (Listed Buildings and Conservation Areas) Act 1990

Listed Buildings

3.4 Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (the 1990 Act) states that, when considering applications for planning permission which affect a listed building or its setting, local authorities should have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

Conservation Areas

3.5 Section 72 of the 1990 Act requires that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.

PLANNING POLICY

National planning policy and guidance

The National Planning Policy Framework, 2023

3.6 The Government issued the latest version of the National Planning Policy Framework (NPPF) in December 2023. The NPPF sets out planning policies for England and how these should be applied.

3.7 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development, which has three overarching objectives; economic, social and environmental. The NPPF states, at paragraph 10, that 'at the heart of the Framework is a presumption in favour of sustainable development.'

NPPF Section 12: Achieving well-designed and beautiful places

3.8 Section 12 of the NPPF deals with design. At paragraph 131, the NPPF states that 'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'

3.9 Paragraph 135 notes that 'Planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.'*
- 3.10 Paragraph 137 states that: *'Design quality should be considered throughout the evolution and assessment of individual proposals. Early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.'*
- 3.11 Paragraph 139 states that *'Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes'*. It goes on to say that *'Conversely, significant weight should be given to:*
- a) *development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and/or*
 - b) *outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.'*
- NPPF Section 16: Conserving and enhancing the historic environment**
- 3.12 Section 16 of the NPPF deals with conserving and enhancing the historic environment. It applies to plan-making, decision-taking and the heritage-related consent regimes under the 1990 Act.
- 3.13 Heritage assets are defined in Annex 2 of the NPPF 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).'*
- 3.14 The NPPF notes, at paragraph 195, that heritage assets *'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'*
- 3.15 The NPPF requires an applicant to describe the heritage significance of any heritage assets affected by a proposal, including any contribution made by their setting (para 200). It goes on to say that *'the level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.'*
- 3.16 The NPPF identifies three key factors that local authorities should take into account in determining applications (para 203):
- a) *'The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - b) *The positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - c) *The desirability of new development making a positive contribution to local character and distinctiveness.*
- 3.17 Paragraph 205 states that in assessing impact, the more important the asset, the greater the weight should be given to its conservation. It notes that *'this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.'*
- 3.18 The setting of a heritage asset is defined in Annex 2 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.'*
- 3.19 Paragraph 206 of the NPPF 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.
- 3.20 The NPPF states, at paragraph 207, that where a proposed development would lead to *'substantial harm'* or total loss of heritage significance of a designated heritage asset, consent should be refused, *'...unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss'*, or all of a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.
- 3.21 Paragraph 208 states that where a development proposal will lead to *'less than substantial'* harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. Legal judgements have confirmed that considerable importance and weight should be placed on the impact of development on heritage assets or their settings when undertaking the requisite balancing exercise.
- 3.22 Paragraph 209 states the effect of an application on the significance of a non-designated heritage asset requires a balanced judgement having regard to the scale of any harm or loss and the heritage significance of the heritage asset.
- 3.23 The NPPF requires local planning authorities to look for opportunities for new development within conservation areas and World Heritage Sites (WHSS) and within the setting of heritage assets to enhance or better reveal their heritage significance. Paragraph 212 goes on to say: *'Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.'*
- 3.24 Paragraph 213 states *'Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance' and that 'Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area ... should be treated either as substantial harm under paragraph 207 or less than substantial harm under paragraph 208, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area [...] as a whole'.*
- Planning Policy Guidance**
- 3.25 The national Planning Practice Guidance (PPG) was launched on the 6th March 2014 and provides a web-based resource in support of the NPPF. It is updated on an ongoing basis, and the parts cited below are current at the time of writing.
- 3.26 The PPG includes a section called *'Design: process and tools'* which *'provides advice on the key points to take into account on design'*. This was issued on 1 October 2019; it replaces a previous section called *'Design'*.
- 3.27 The PPG deals with the processes of the planning system with respect to design, and notes that guidance on good design is set out in the National Design Guide.
- 3.28 The PPG includes a section called *'Historic environment'* which was updated on 23 July 2019. It explains which bodies are responsible for the designation of HAs and provides information on heritage consent processes.
- 3.29 The PPG considers the factors that should inform decision taking about developments that would affect HAs. It notes that *'HAs may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a HA, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals'* (18a-007-20190723). It goes on to say *'understanding the significance of a heritage asset and its setting from an early stage in the design process can help to inform the development of proposals which avoid or minimise harm'* (18a-008-20190723). It states that in assessing proposal, where harm is found, the extent of harm should be *'clearly articulated'* as either *'substantial'* or *'less than substantial'* (18a-018-20190723).



3.30 The PPG notes that setting is defined in the NPPF and that *'all heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent'* (18a-013-20190723). It goes on to say, *'the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each'* (18a-013-20190723).

3.31 With regard to non-designated HAs, the PPG notes that *'there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence.'* It states *'it is important that all non-designated heritage assets are clearly identified as such'* noting it is *'helpful if local planning authorities keep a local list of non-designated heritage assets, incorporating any such assets which are identified by neighbourhood planning bodies'* (18a-040-20190723).

The National Design Guide

3.32 The National Design Guide (September 2019) ('NDG') states (paragraph 3) that it *'forms part of the Government's collection of planning practice guidance'*.

3.33 At paragraph 21 the NDG states that well-designed places are achieved by making the right choices at all levels, including:

- *'The layout (or masterplan)*
- *The form and scale of buildings*
- *Their appearance*
- *Landscape*
- *Materials; and*
- *Their detailing'*

3.34 At paragraph 35 the NDG sets out ten characteristics which contribute to the character of places, nurture and sustain a sense of community, and address issues affecting climate. These are described as follows:

- *'Context - enhances the surroundings.*
- *Identity - attractive and distinctive.*
- *Built form - a coherent pattern of development.*
- *Movement - accessible and easy to move around.*
- *Nature - enhanced and optimised.*
- *Public spaces - safe, social and inclusive.*
- *Uses - mixed and integrated.*
- *Homes and buildings - functional, healthy and sustainable.*
- *Resources - efficient and resilient.*
- *Lifespan - made to last.'*

Historic England Advice Note 1 (Second Edition) - Conservation Area Appraisal, Designation, and Management (2019)

3.35 This note gives advice on managing conservation areas so that the potential of historic areas which are worthy of protection is fully realised, and provides information on conservation appraisals. The note emphasises that evidence required to inform decisions should be proportionate to the importance of the asset.

3.36 It suggests a number of questions to assess the value of an unlisted building to the significance of a conservation area, provided its historic form and values have not been eroded. Any one of these characteristics could provide the basis for considering that a building may make a positive contribution to the special interest of a conservation area, i.e. its significance, subject to consideration of whether or

not these values have been compromised. Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (2015)

3.37 This guidance, published by Historic England, provides information to assist in the implementation of historic environment policy in the NPPF and the related guidance given in the PPG. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

3.38 The guidance notes at paragraph 4 that *'The first step for all applicants is to understand the significance of any affected heritage asset and, if relevant, the contribution of its setting to its significance. The significance of a heritage asset is the sum of its archaeological, architectural, historic, and artistic interest'*.

3.39 At paragraph 5, it is stated that *'The National Heritage List for England is the official database of all nationally designated heritage assets – see www.HistoricEngland.org.uk/listing/the-list. Non-designated heritage assets include those that have been identified in a Historic Environment Record, in a local plan, through local listing or during the process of considering the application. Archaeological potential should not be overlooked simply because it is not readily apparent'*.

3.40 At paragraph 6, it is stated that *'Where the proposal is likely to affect the significance of heritage assets, applicants are encouraged to consider that significance at an early stage and to take their own expert advice, and then to engage in pre-application discussion with the local planning authority and their heritage advisers to ensure that any issues can be identified and appropriately addressed'*. It goes on to set out several stages that indicate the order in which this process can be approached, although the reader is advised that while it is good practice to check individual stages *'they may not be appropriate in all cases and the level of detail applied should be proportionate'*. It gives the following example:

'For example, where significance and/or impact are relatively low, as will be the case in many applications, only a few paragraphs of information might be needed, but if significance and impact are high then much more information may be necessary'.

3.41 The stages are as follows:

- *'Understand the significance of the affected assets*
- *Understand the impact of the proposal on that significance*
- *Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF*
- *Look for opportunities to better reveal or enhance significance*
- *Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change*
- *Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected'*.

3.42 At paragraph 52, it is noted that while there will not always be opportunities to enhance the significance or improve a heritage asset, *'the larger the asset the more likely there will be'*. It acknowledges that *'most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation'*.

3.43	Paragraph 53 discusses design and local distinctiveness. With reference to the NPPF and PPG, it notes that <i>'In terms of the historic environment, some or all of the following factors may influence what will make the scale, height, massing, alignment, materials and proposed use of new development successful in its context:</i>	3.45	At paragraph 2 it states that <i>'The advice in this document, in accordance with the NPPF, emphasises that the information required in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision [...] At the same time those taking decisions need enough information to understand the issues.'</i>	Historic England Advice Note 4 – Tall Buildings (2022)	3.55	Paragraph 3.4 and 3.4 notes that tall buildings vary in their impact depending on their height, mass and locations, and what is considered tall depends on the nature of the local area. Definitions of tall buildings vary, but in general they should be informed by local character.	
	• <i>The history of the place</i> • <i>The relationship of the proposal to its specific site</i> • <i>The significance of nearby assets and the contribution of their setting, recognising that this is a dynamic concept</i> • <i>The general character and distinctiveness of the area in its widest sense, including the general character of local buildings, spaces, public realm and the landscape, the grain of the surroundings, which includes, for example the street pattern and plot size</i> • <i>The size and density of the proposal related to that of the existing and neighbouring uses</i> • <i>Landmarks and other built or landscape features which are key to a sense of place</i> • <i>The diversity or uniformity in style, construction, materials, colour, detailing, decoration and period of existing buildings and spaces</i> • <i>The topography</i> • <i>Views into, through and from the site and its surroundings</i> • <i>Landscape design</i> • <i>The current and historic uses in the area and the urban grain</i> • <i>The quality of the materials.'</i>	3.46	At paragraph 9 it states that, <i>'setting is not a heritage asset, nor a heritage designation, although land compromising a setting may itself be designated...its importance lies in what it contributes to the significance of the heritage asset. This depends on a wide range of physical elements within, as well as perceptual and associational attributes pertaining to, the heritage asset's surroundings.'</i>	3.51	Paragraph 1.3 states that when planning for tall buildings it is important to avoid or minimise impacts on the significance of heritage assets, and principles to consider that help to do this include: • A plan-led approach to tall buildings to determine their location; • Evidence base exploring alternative options for location and heights; • Decision making informed by understanding of place, character and historic significance; • Tall building proposals which take account local context and historic character; and • Early and effective engagement at plan-making and decision-taking stages including the use of design review panels.	3.56	Section 4, 'Development plans', covers the production of development plans and tall building policies, summarising the main considerations for a plan-led approach for tall buildings within the historic environment.
	Historic England: Historic Environment Good Practice Advice in Planning Note 3 (second edition): The Setting of Heritage Assets (2017)	3.47	At paragraph 11 the guidance sets out the type of views which contribute more to the understanding of the significance of a heritage asset, including those where the composition of the view <i>'[...] was a fundamental aspect of the design or function of the heritage asset'</i> , those with unplanned or unintended beauty, those with historical or cultural associations, and those where relationships between the heritage asset and other assets or natural features or phenomena are relevant.	3.52	Paragraph 3.1 states that <i>'In the right locations tall buildings can support major change or regeneration while positively influencing place-shaping and conserving the historic environment'</i> and that <i>'in the right place well-designed tall buildings can make a positive contribution.'</i> It notes that several tall buildings are listed.	3.57	Section 5, 'Developing proposals for tall buildings', stresses the need to have a good understanding of significance of any heritage assets that may be affected by the proposal, as well as the character of the place. It states that supporting information required describing the impacts on the historic environment should be proportionate, precise and accurate.
3.44	This guidance provides <i>'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties'</i> and states that <i>'alternative approaches may be equally acceptable, provided they are demonstrably compliant with legislation, national policies and objectives'.</i>	3.48	At paragraph 18 the guidance states that <i>'conserving or enhancing heritage assets by taking their settings into account need not prevent change; indeed change may be positive, for instance where the setting has been compromised by poor development'</i> . It goes on to say that <i>'many places coincide with the setting of a heritage asset and are subject to some degree of change over time'</i> .	3.53	Paragraph 3.2 states that if a tall building is not in the right place, by virtue of its size and visibility, it can harm the qualities of place that people value. It continues that there are places which are so distinctive, where the level of heritage significance is so great, that tall buildings will be too harmful, regardless of the perceived quality.	3.58	Section 6, 'Assessing proposals', notes that many of the heritage implications that arise with proposals for tall buildings are the same for other applications, and advice set out in Historic England's GPA Managing Significance in Decision Taking note 2 is relevant. However, issues which frequently arise include location and height parameters; context and local character; high quality design; significance and risk of harm to the significance of heritage assets; and cumulative impacts.
		3.49	The guidance proposes a five stage programme of assessment: 1) Identifying the assets and their settings which are affected; 2) Assessing the degree to which setting makes a contribution to heritage significance; 3) Assessing the effect of the development; 4) Maximising enhancement and avoiding or minimising harm; and 5) Making and documenting the decision and monitoring outcomes.	3.54	Paragraph 3.3 notes that the following factors - quality of place, heritage, visual, functional, environmental and cumulative - need to be considered when determining the impacts of a tall building could have on the historic environment.	3.59	Paragraphs 6.3 states that the key considerations for local authorities is the ability to secure public benefits from tall building developments. Paragraph 6.4 continues that the extent, nature and justification of public benefits will be carried out by decision makers in light of potential harm and long-term impacts on the significance of heritage assets and the integrity of historic townscapes. It states that the <i>'conservation of the historic environment is itself a public benefit and secures its existence for future generations.'</i>



Historic England Advice Note 12 - Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)

3.60 Historic England issued Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets in October 2019. The note covers the NPPF requirement that heritage significance is described in order to help local authorities make decisions on the impact of proposals for change to heritage assets. It states, in paragraph 2 of the introduction, that *'the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance'*. It describes a statement of heritage significance as *'an objective analysis of significance, an opportunity to describe what matters and why'*.

3.61 The advice note states that a staged approach to decision making, where the significance is assessed before the design of the proposal commences, is the best approach. It states in paragraph 29, under *'proportionality'*, that while *'analysis should be as full as necessary to understand significance, the description provided to the LPA need be no more than sufficient to understand the potential impact of the proposal on significance'*.

Regional Planning Policy and Guidance

The London Plan, 2021

3.62 The London Plan (2021) is the *'overall strategic plan for London'* and sets out a *'framework for the development of London over the next 20-25 years'*.

3.63 The policies most relevant to townscape, visual impact and heritage are found in Chapter 3, *'Design'*, and Chapter 7, *'Heritage and Culture'*.

3.64 Policy D1 on *'London's form, character and capacity for growth'* highlights the necessity for Boroughs to identify an area's capacity for growth by undertaking an assessment of the *'characteristics, qualities and values of different places'*. This should include the

consideration of urban form and structure, historical evolution and heritage assets, and views and landmarks.

3.65 Policy D3 on *'Optimising site capacity through the design-led approach'* states that *'All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.'* The policy states that development proposals should *'enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.'* Development should *'respond to the existing character of a place'*, and *'provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest.'* The policy further states that development design should *'be of high quality, with architecture that pays attention to detail,'* and use *'attractive, robust materials which weather and mature well'*.

3.66 Policy D8 on *'Public realm'* states that development plans and proposals should ensure that the public realm is *'[...] well-connected, related to the local and historic context [...]'*. It states that there should be *'a mutually supportive relationship between the space, surrounding buildings and their uses'* and that development should *'ensure that buildings are of a design that activated and defines the public realm, and provides natural surveillance.'*

3.67 Policy D9 on *'Tall buildings'* notes that the height of what is considered a tall building should be defined in development plans and identified on maps, and that although this will vary in different parts of London, *'should not be less than 6 storeys or 18 metres'*. The policy also notes that *'tall buildings should only be developed in locations that are identified as suitable in Development Plans.'*

3.68 Policy D9 also notes that the views of buildings from different distances should be considered. This includes long-range views (developments should make a *'positive contribution to the existing and emerging skyline and not adversely affect local or*

strategic views'), mid-range views (developments should a *'positive contribution to the local townscape in terms of legibility, proportions and materiality'*), and immediate views (developments should *'have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street'*). Proposals should *'take account of, and avoid harm to, the significance of London's heritage assets and their settings'* and should *'positively contribute to the character of the area.'* It goes on to note that the architectural quality and materials should be of an exemplary standard. Buildings that are situated in the setting of a World Heritage Site *'must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it.'* Buildings near the River Thames should protect the open quality of the river, including views.

3.69 Policy HC1 on *'Heritage conservation and growth'* notes that development proposals that affect heritage assets and their settings should *'conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings'*.

3.70 Policy HC3 on *'Strategic and Local Views'* states that *'development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.'* The Mayor will identify Strategically-Important landmarks within designated views and will *'seek to protect vistas towards Strategically-Important Landmarks by designating landmark viewing corridors and wider setting consultation areas. These elements together form a Protected Vista'*. The Mayor will *'identify and protect aspects of views that contribute to a viewer's ability to recognise and appreciate a World Heritage Site's authenticity, integrity and attributes.'*

3.71 Policy HC4 on the *'London View Management Framework'* states that *'development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements.'* It notes that development should not be *'intrusive, unsightly or prominent to the detriment of the view'*, when it falls within the foreground, middle, or background of a designated view. With regard to protected vistas, development should protect and enhance, not harm,

the viewer's ability to recognise and appreciate the strategically important landmark, and it should not harm the composition of the protected vista, whether it falls within the wider setting consultation area or not.

London View Management Framework Supplementary Planning Guidance (March 2012)

3.72 In March 2012 the Mayor published the *'London View Management Framework Supplementary Planning Guidance'* (LVMF) which is designed to provide further clarity and guidance on London Plan policies for the management of these views. The Site is located well outside view corridors defined within the LVMF.

Local Planning Policy and Guidance The Southwark Plan 2019-2036

3.73 The majority of policies of relevance to tall buildings, townscape and heritage are located under section 9, Development Management Policies, sub section *'Southwark Together'*. In addition, information related to the application of the Borough Views policy is set out in Annex 1. Review of this Annex confirms that the site does not sit within the viewing corridor of any of the Borough Views. The site is within the Old Kent Road Opportunity Area, with Policy AV.13 Old Kent Road Area Vision also applicable.

3.74 The Southwark Together chapter begins with policy P13, Design of Places, which centres the principle of urban design within new development. This policy requires development to: *'1. ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context ; 2. Better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment; 3. Ensure the urban grain and site layout take account of and improve existing patterns of development and movement, permeability and street widths';* among other policy points less specifically relevant to this THVIA assessment.

3.75 P14 Design quality which states that the development must provide a number of features of which the following are directly relevant to this assessment: '1.High standards of design including building fabric, function and composition; 2. Innovative design solutions that are specific to the site's historic context, topography and constraints; 4. Respond positively to the context using durable, quality materials; 6. Buildings and spaces that utilize active design principles that are fitting to the location, context, scale and type of development; 7. Active frontages and entrances that promote activity and successfully engage with the public realm in appropriate locations.'

3.76 With regard to tall buildings, P17 states the following:

The areas where we expect tall buildings are shown on the adopted Policies Map and on Figure 4. These are typically within our Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone. Individual sites where taller buildings may be appropriate have been identified in the site allocations. Some of these site allocations have identified possible locations for tall buildings in Peckham and Camberwell town centres taking account of conservation areas and other heritage assets.

Tall buildings must:

- Be located at a point of landmark significance; and
- Have a height that is proportionate to the significance of the proposed location and the size of the site; and
- Make a positive contribution to the London skyline and landscape, taking into account the cumulative effect of existing tall buildings and emerging proposals for tall buildings; and
- Not cause a harmful impact on strategic views, as set out in the London View Management Framework, or to our Borough views; and
- Respond positively to local character and townscape; and
- Provide a functional public space that is appropriate to the height and size of the proposed building; and

The design of tall buildings will be required to:

- Be of exemplary architectural design and residential quality; and
- Conserve and enhance the significance of designated heritage assets and make a positive contributions to wider townscape character. Where proposals will affect the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) clear and convincing justification in the form of public benefits will be required; and
- Have a positive relationship with the public realm, provide opportunities for new street trees, and design lower floors to successfully relate to and create a positive pedestrian experience; and provide widened footways and routes to accommodate increased footfall.

3.77 With regard to listed buildings and structures, P19 states that:

Development relating to listed buildings structures and their settings will only be permitted if it conserves or enhances their special significance in relation to:

- The historic fabric, architectural style and features, curtilage, site layout, plan form and readability, and land use; and
- The contribution of the building to its setting or its place within a group; and
- Views that contribute positively to the significance of the building or structure or their setting; and
- The viable use of listed buildings and structures that is consistent with their on-going and long term conservation.'
- Any harm to the significance of the listed building or structure that results from a proposed development must be robustly justified.

3.78 This policy goes beyond and further strengthens the requirements in relation to listed buildings than is set out in legislation and the NPPF.

3.79 With regard to conservation areas, P20 states that:

- Development relating to conservation areas will only be granted where it preserves or enhances the character or appearance of conservation areas and their settings, taking into account their significance, views into and out of the conservation area and its positive characteristics identified in Conservation Area Appraisals and Conservation Area Management Plans.
- The demolition of buildings or structures that make a positive contribution to the historic character an appearance of a conservation area will not generally be permitted. Any replacement buildings or structures must conserve and enhance the conservation area's historic character and distinctiveness.
- Any harm to the significance of the conservation area or its setting that results from a proposed development must be robustly justified.

3.80 The Peckham and Nunhead Area Action Plan, adopted in 2014 identified 24 development sites within the area. The Aylesham Centre site is one of the 24 site allocations. The Policy AV14. with regard to Peckham Area Vision states the following about the growth opportunities within the area:

- Complement and improve the town centre with more large and small shops, market stalls, and entertainment, cultural, community and leisure spaces alongside new employment space for small and medium enterprises including start-ups;
- Provide as many homes as possible of all tenures including social housing while respecting the local character. Residential development must not compromise the operation of existing commercial and night time uses, particularly in the town centre;
- Support new educational centres which will increase education and employment opportunities and bring new footfall to the town centre;
- Increase or improve the quality of local open spaces and squares, particularly Peckham Rye, Peckham Square and Peckham Rye Station Square to meet the needs of the growing population and provide new opportunities for recreation and leisure;

- Prioritise walking, cycling and improve public transport, including accessibility to Peckham Rye station from the new square, while improving servicing and waste management on the high street;
- Contribute towards the development of the Low Line and the Peckham Coal Line, new public realm corridors adjacent to historic railway arches, with lively accessible spaces for creativity, new jobs and retail;
- Reveal and enhance Peckham's underlying historic townscape.

3.81 The Aylesham Centre and Peckham Bus Station Site Allocation, numbered NSP74 in the Southwark Plan states the following requirements for the redevelopment of the Site:

- Retain the supermarket use (E(a)); and
- Provide at least the amount of retail floorspace currently on the site;
- Retain bus station capacity; and
- Provide enhanced public realm and civic space; and
- Provide new north-south and east-west green links; and
- Provide active frontages with retail, community or leisure uses (as defined in the glossary)at ground floor facing Rye Lane and Peckham High Street; and
- Diversify and complement the existing retail offer in the town centre, with new opportunities for a range of shop sizes, including suitable space to attract a variety of retailers to Peckham; and
- Provide new homes (C3); and
- Provide new intermediate affordable housing through a community land trust.
- Redevelopment of the site may:
- Accommodate meanwhile uses on the car park.
- The Site Allocation further notes the Site could include taller buildings up to 20 storeys subject to consideration of impacts on existing character, heritage and townscape.

4. Historical Development

4.1 This chapter sets out the historic development of the Site and the surrounding area. It has been prepared to inform the heritage, townscape and visual assessments carried out in the later sections of this HTVIA. The information presented is based on archival and secondary resources, a full list of which is included at the end of this document.

Historical overview

4.2 Peckham began as a small rural hamlet that lay in London's rural surrounds. Without a direct connection to the metropolis, the hamlet's nearest major route was the Old Kent Road to the northeast. Peckham was first mentioned as "Peccheham" in the 11th century Domesday Book.

4.3 Market gardening had started in London's rural fringe by the early sixteenth century. By the 1660s, London was surrounded by about 10,000 acres of market gardens, supplying it with fresh fruit and vegetables. Areas south of the city like Camberwell and Peckham were particularly competitive. This was due to their relative proximity to the City, their easy access to the markets via the Old Kent Road, and their supply of pumped river water.

4.4 From the 17th century, Peckham started to become a place of out-of-town residence for courtiers and merchants. This was a typical pattern of development for villages in London's orbit. In his *Tour through the whole island of Great Britain of 1724-26*, Daniel Defoe describes the view of 'the pleasant villages of Peckham and Camberwell, with some of the finest dwellings about London.'. At this point in time, Peckham's amenities included an annual fair, a theatre, a number of public houses, schools and non-conformist chapels; all contributing to its desirability for the middle classes.

4.5 John Rocque's map of 1746 (Fig. 4.1) shows that by the middle of the 18th century, the village of Peckham and its road structure was well established. The major roads that the Site sits on are all well established. Peckham High Street, at this point in time called Peckham Lane, was a major east-west route, south of the Thames, that branched off important the ancient Watling Street at New Cross. Peckham Hill Street can be seen leading north towards what is now Bermondsey. Rye Lane can also be seen leading southward from the Site but at this point was called South Street. To the northwest of the Site one can see Meeting House Lane, that at this point in time was called Old Meeting House Lane, leading northwest towards Watling Street. The Site itself appears to have been part of the wider tapestry of market gardens that served the appetites of the City of London and that were proliferate across south London.



Fig. 4.1: John Rocque's Map of London (1746).

4.6 During the 18th century, Peckham grew from about 120 households in 1697 to about 340 in 1792. From about 1722 Peckham was sometimes described as a 'town.' For example, in 1722 a list of post offices includes 'deliveries to Peckham Town and Peckham Rye'; and a map dated 1739 also labels the settlement 'Peckham Town.' The choice of 'town' perhaps reflects an increasingly urbane character, despite its relatively small size.

4.7 It was not until the 19th century that Peckham eschewed its largely rural character and developed into a suburb of London. The building of new residencies was encouraged by the construction of three new bridges, Vauxhall in 1816, Waterloo in 1817) and Southwark in 1819. The building of the Grand Surrey Canal through Peckham, between 1801 and 1811, spurred further development.

4.8 By the time of C. and J. Greenwood's map of 1828 (Fig. 4.2), there has been some limited infilling of the market garden landscape. The development is focused along the main roads, with new dwellings lining modern-day Rye Lane, Peckham Hill Street, and Peckham High Street. This is especially clear when looking at Peckham High Street, which has changed from being called Peckham Lane to its current designation. This highlights its growing position as a relatively higher density residential and commercial road. This map is also the first instance where the notable heritage assets of the Quaker Meeting House (now a constituent building of the Grade II listed Post Office Depot on Highshore Road) and of Shard's Terrace on Peckham High Street. The Site has also seen further development. Moving from its appearance as an orchard on Rocque's map, in the Greenwood's map shows larger buildings established away from the roadside, as well as two oval gardens. It is likely that the Site was utilised by a few of the many incoming middle classes from central London, for their villas in London's peri-urban fringe.

4.9 The arrival in the 1860s of the railways at Peckham Rye Station, and of tram links along Peckham High Street, ushered in a period of extensive development in Peckham. Formerly open land was developed for streets of housing, and the town centre developed as a location with substantial amenities and services. Rye Lane was established as a major retail street by the late 19th century and it included larger stores, such as the Jones and Higgins department store, opened in 1867 (which remains in altered form, with 1930s clocktower). A map of 1875 shows the Site occupied with terraced development along its frontages to Peckham High Street and the northern part of Rye Lane. Larger properties were located along the southern part of the Rye Lane frontage, and along Hanover Park, with substantial gardens set behind them.

4.10 While Peckham's pre-Victorian development was significant, what followed, between the 1840s and 1870s, could be described as 'hypergrowth.' Between 1841 and 1881 the population of London doubled, while in Peckham it grew fivefold, rising from 12,563 to 71,089 persons. Peckham's open ground disappeared beneath a network of streets, while its population soared and its commercial activity intensified. As development accelerated, the area's upper middle-class population was replaced with a population comprised of the lower middle class, artisans and the skilled working class.

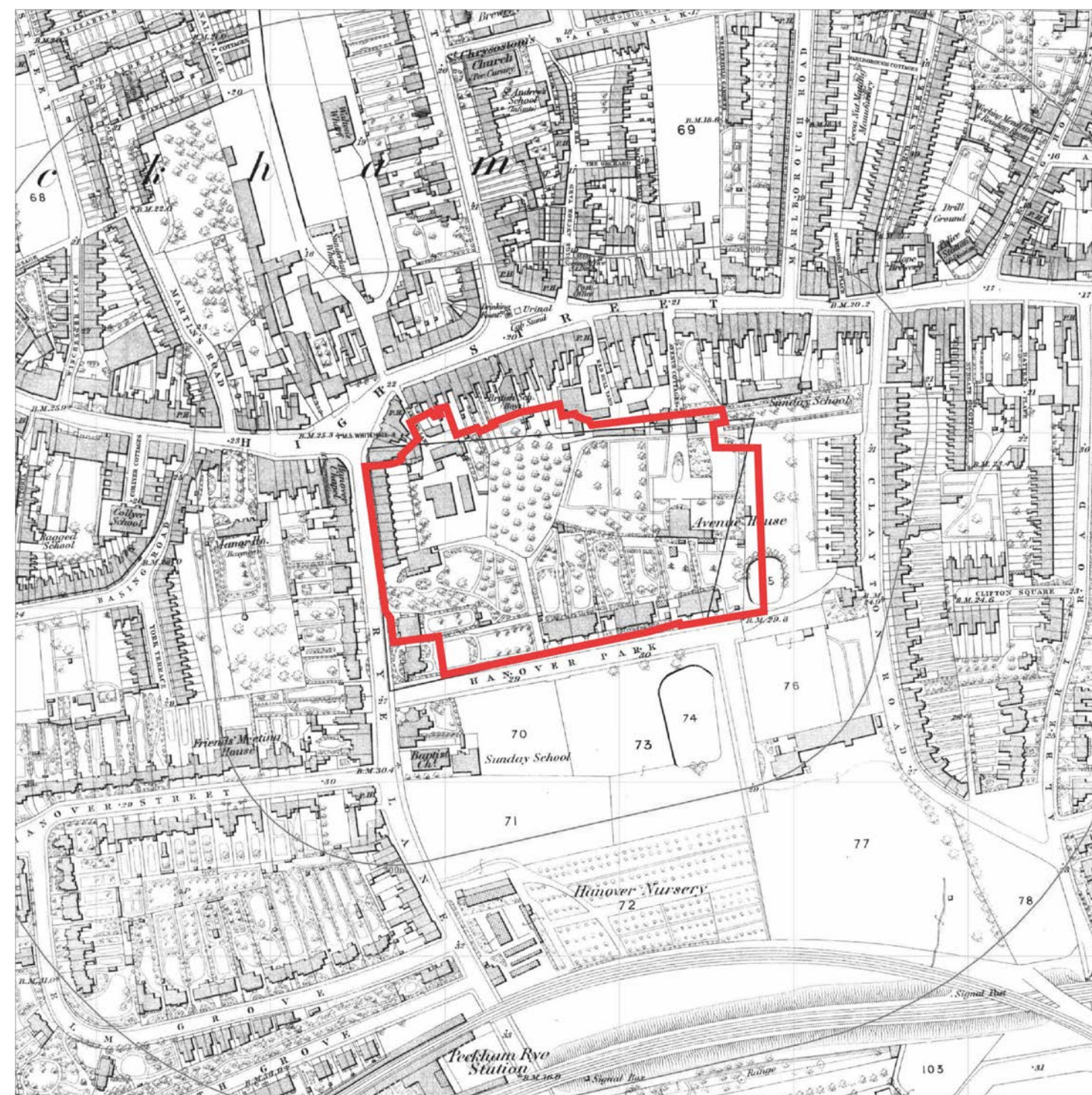


Fig. 4.2: OS Map (1875)

4.11 When looking at the OS Map of 1874 (Fig. 4.3) Peckham's large population increase can be easily seen. To house Peckham's growing population, one can see the proliferation of three types of housing. The first of these three are the narrow terraces, with limited rear garden space, that front directly onto the street. These properties predominate along the major commercial streets, such as Peckham High Street, but are also present on newer and more regimented developments that can be seen on the east of the map. Some of them had commercial uses on the ground floor, while others were completely in residential use. The second building type that can be seen Rye Lane's Baptist Chapel can be seen for the first time, is the semi-detached early Victorian/Georgian townhouse. These are the least common of the three, but can be seen along with their narrow but generous gardens, on several streets including Peckham Hill Street and Hanover Street (today Highshore Road) where they exist, in part, to the current day. The final building type is the large detached and semi-detached villa or small mansion. These buildings, reserved for the most affluent residents, can be seen in pockets of land that has not yet been more densely redeveloped. The Site can be seen to contain around 8 of these building types and their large gardens. This map shows for the first time the Grade II listed, Rye Lane Baptist Chapel. Peckham Rye station, to the south of the site, and the railway that serves it can first be seen in this map, showing that this area of Peckham had reached a critical mass of people that would allow it to become a local centre of commerce.

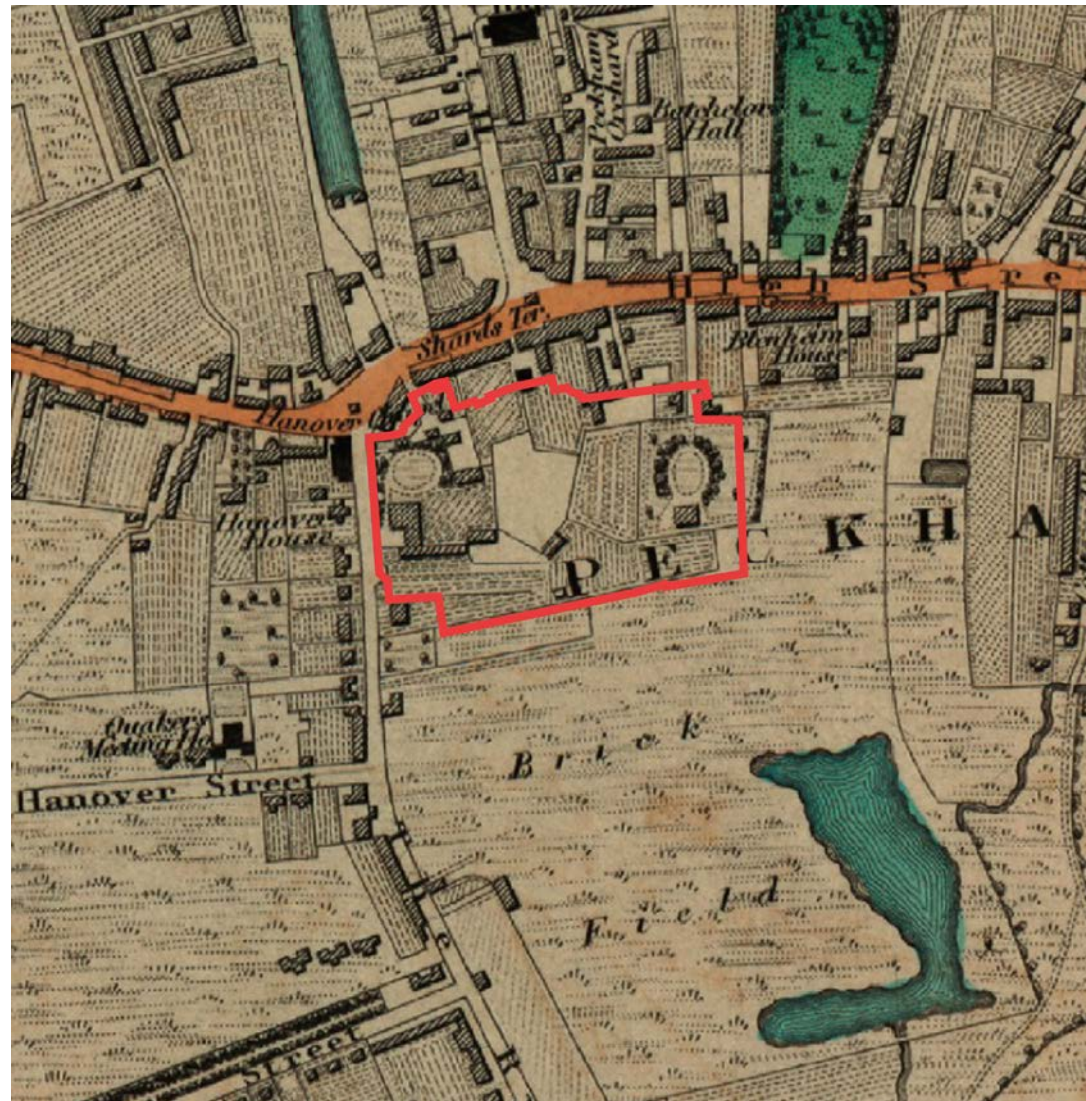


Fig. 4.3: C. and J. Greenwood's Map of London (1828)

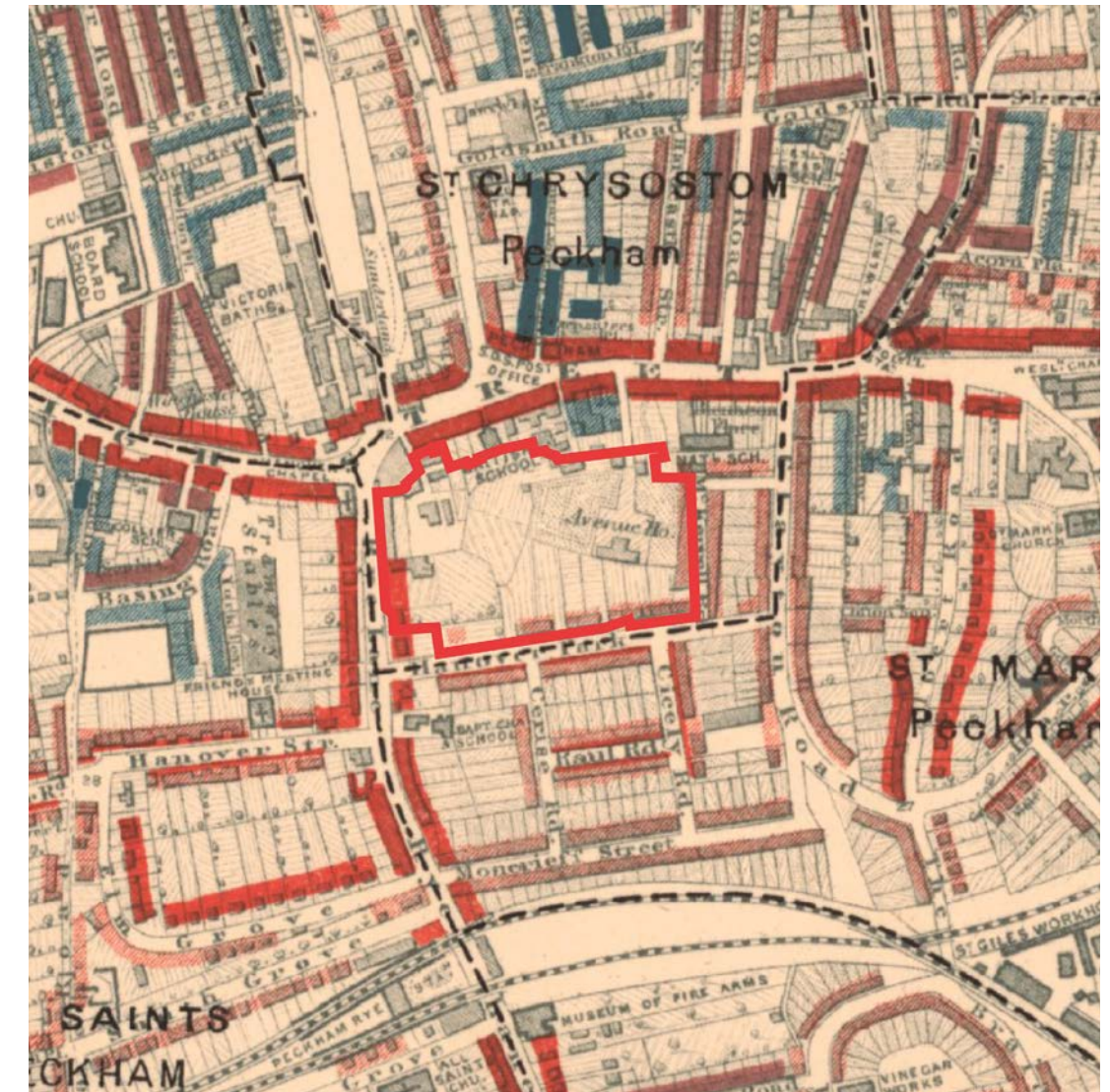


Fig. 4.4: Charles Booth's Poverty Map (c. 1880s).

4.12 As can be seen by Charles Booth's map (Fig. 4.4), which was published around 1880s, there was little additional development in the area. Despite this, there was some significant development on the Site. This map shows the first instance of McKerrrell Road, that can be seen on the east of the site and that exists to this day. The map also shows the first instance of the naming of Avenue House on the east of the Site. Notably, a large area of gardens off Basing Road can be seen to have been bought to be used as "Tramway Stables" in the map. It is likely, this area was purchased prior to the rollout of the wider tram network.

- 4.13 The OS Map of 1896 (Fig. 4.5) shows that by the eve of the 20th century, almost all undeveloped land in central Peckham has been built on, which the exception of some generous garden space on the Site. Despite this, the west of the Site has been significantly developed, likely with the initial establishment of the Jones & Higgins department store on Rye Lane. Also this map represents the first time the Conservative Club is labelled as part of the Site. The introduction of the tram system to Peckham can also clearly be seen, with a two-way tramway running along Peckham High Street, and a small branch line running to a depot on Basing Road.
- 4.14 Figure 4.6 shows that around the turn of the 20th century, the Jones and Higgins department store had come to define the northern extent of Rye Line. In a departure from the grandeur of its Peckham High Street-Rye Lane corner façade, much of the Jones and Higgins department store was of a uniform 3 storey height and was plainly constructed in a red-brick. To pedestrians using Rye Lane, the uninterrupted sequence of Jones and Higgins advertising shopfronts would have represented one of the most striking aspect of the street. Jones and Higgins' rapid expansion came alongside Peckham's continued population growth. Peckham's population peaked at 93,033 in 1901 before dropping to 89,563 in 1911. Furthermore, the area to the southwest of the Site, that was previous undeveloped in figure 4.5, is developed by the time of figure 4.6 (c. 1900).
- 4.15 Two recognisable symbols of Peckham can be seen side-by-side in figure 4.7. Firstly, the servicing of the number 12 (Peckham-Oxford Circus) bus route can be seen to take place in the foreground, while the recognisable Jones and Higgins corner façade rises in the background.
- 4.16 The department store with its striking Italianate clocktower (the original clocktower no longer exists) can clearly be seen in figure 4.8, with a branded Jones and Higgins water tower rising behind it. Behind the Jones and Higgins clocktower, one can clearly see a blocky Jones and Higgins branded tower that is of a similar scale to the clocktower itself. This map also shows the first instance of the tram network reaching Peckham High Street.

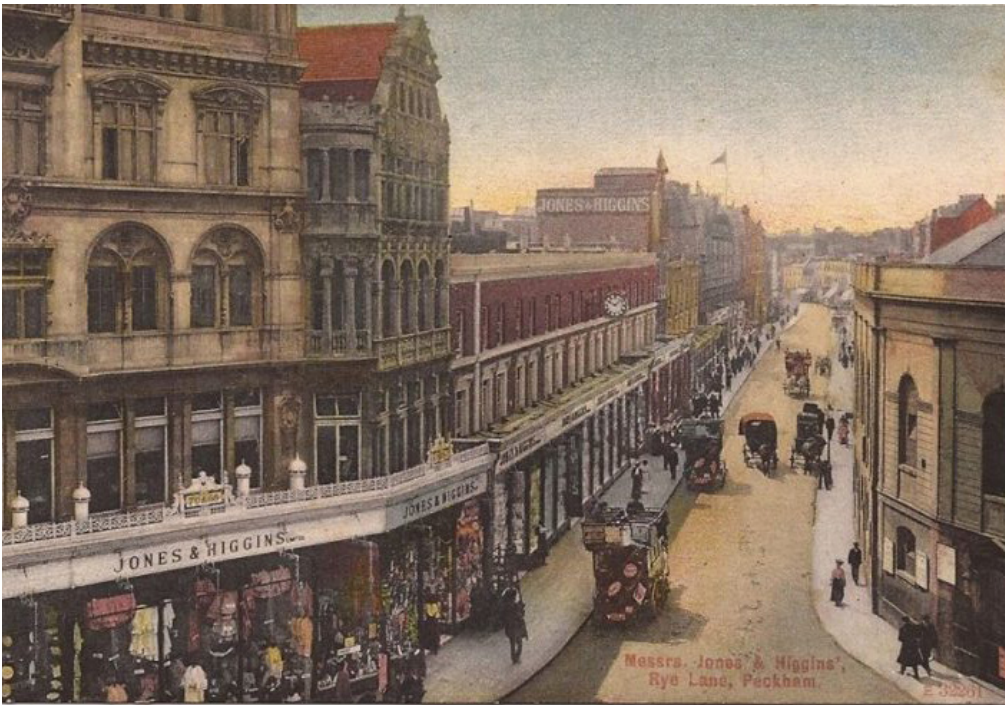


Fig. 4.5: View of Rye Lane from the north (c. 1900).



Fig. 4.6: Picture of a Thomas Tilling Omnibus in front of Jones and Higgins (c. 1900).



Fig. 4.7: Jones and Higgins department store, taken from Peckham High Street (c.1910).



Fig. 4.8: Jones and Higgins department store, taken from Peckham High Street (c.1915).

4.17 Figure 4.9, likely photographed a few years after Figure 4.8, shows some minor changes to the façades of buildings on the Peckham High Street and Rye Line junction. The most noticeable of these changes is the introduction of street awnings to the shopfronts of the Jones and Higgins department store. These changes correspond to other commercial redevelopment that took place in the area at this time. Shops in the area sought to maintain fashionableness or gain advantage over their competitors, and a number of arcades and covered markets were built

4.18 The general situation in Peckham remained largely the same into the early 20th century. Intensification of development took place on the Site in this period, such that by the time of the OS map of 1916 (Fig. 4.10), the Rye Lane frontage was completely developed, along with much of the interior of the Site.

4.19 Figure 4.11 shows that Rye Lane continued to be a popular shopping destination into the second decade of the 20th century. It also shows the transition between the 5 styles of façade that were present on the Rye Lane side of the Site. Today only the main Jones and Higgins corner façade and the façade for 47 and 49 Rye Lane remain, with the three central building types having been replaced by the Aylesham Centre. Figure 4.12, which shows a view northwards up Rye Lane, displays the two tall and mansard aspects of the building to the southwest of the Site. Today only the southern end building exists. Both 59 Rye Lane and the Rye Lane Baptist Chapel (both of which are still standing) can be seen on the right side of Figure 4.12. Figure 4.13 shows the widespread use of branded awnings on the south of Rye Lane, up to and around 1930.



Fig. 4.9: OS Map (1916).



Fig. 4.10: Jones and Higgins department store, taken from Rye Lane (c.1920).



Fig. 4.11: A view up Rye Lane (c.1920).



Fig. 4.12: A view up Rye Lane (c.1930).

4.20 Extensive bombing during the Second World War led to significant redevelopment in Peckham in the post-war period, with many local authority-built estates replacing older housing. Industrial decline and population decrease contributed to economic problems for the area. There was bomb damage across the Site, with the most serious damage leading to the demolition of a building on the western end of Hanover Park, the destruction of Avenue Hall on the eastern central part of the Site, and the razing of a large building on the northeast of the Site (Fig. 4.14). Besides these three cleared aspects of the Site, it is hard to distinguish any further demolitions when looking at aerial photography of the Site (Figs. 4.15 & 4.16). Despite this, Figure 4.17 clearly shows that much of the Site was damaged, with the Jones and Higgins corner façade being designated as “Seriously Damaged – Doubtful if repairable.” It is probably that the bombing led directly to the building’s replacement clocktower.



Fig. 4.13: A view eastward down Hanover Park (c.1940).

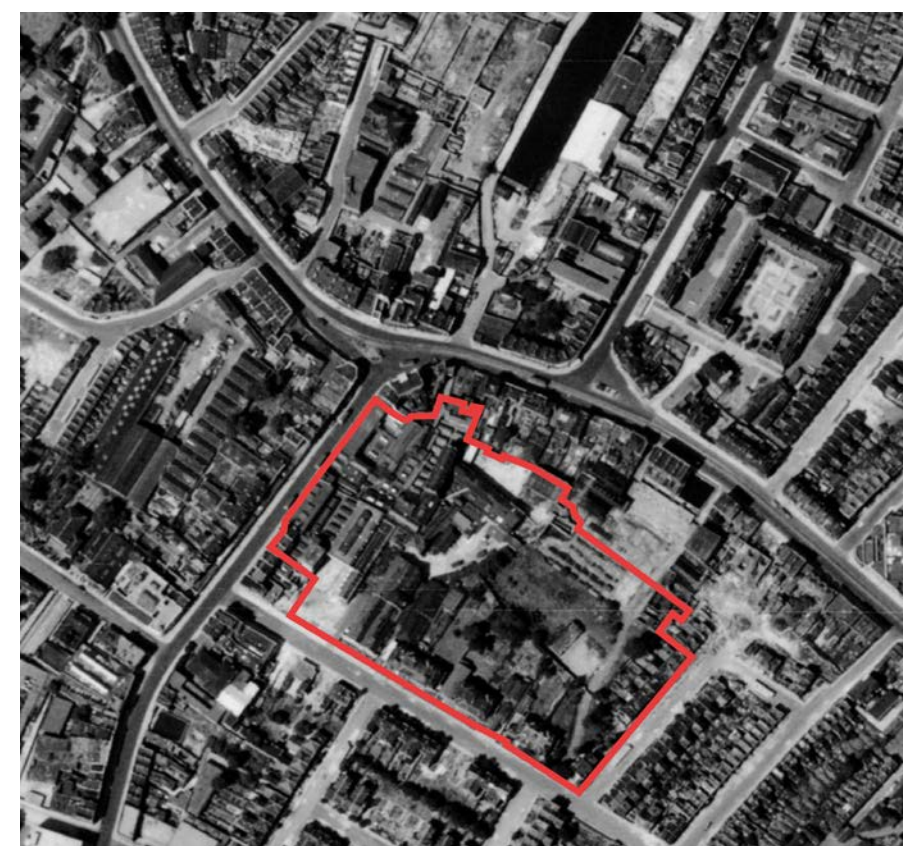


Fig. 4.14: RAF Photo (August 1944).



Fig. 4.15: RAF Photo (July 1946).



Fig. 4.16: London Bomb Damage (c. 1946).

4.21 Much of the Site, including its frontage to Rye Lane, is shown as being occupied by a large footprint buildings in maps from the early 1950s onwards, while smaller scale buildings remain on Peckham High Street and Hanover Park. The OS Map of 1950 (Fig. 4.18) shows that the Jones and Higgins department store ceased the opportunity presented by bombing to redevelop their Site, enlarging, connecting and internalising several buildings that were once separate. They also enlarged the department store eastward across the Site. It is also clear that much of the development on the northeast of the Site was deemed unsalvageable, and was subsequently demolished.

4.22 By 1955 a large bus garage was located on the north-eastern part of the Site (Figs. 4.19 & 4.20). Figure 4.21 shows that by the 1960s Jones and Higgins had managed to establish a strong and inviting Rye Lane frontage, following the destruction of the Second World War. Unlike the current Aylesham Centre, Jones and Higgins succeeded in creating a department store that both expressed the outlet's monumental scale and that also responded to the human scale of Rye Lane. The curving glazed ground floor façade of each departments entrance functioned as one individual shop frontage. The upper floors however created pleasant and ornate visual continuity across the entirety of the Site. Figure 4.22 shows the mid-century modernist bus depot that was built to the northeast of the Site between 1950 and 1955.



Fig. 4.17: OS Map (1950).



Fig. 4.18: RAF Photo (June 1955).

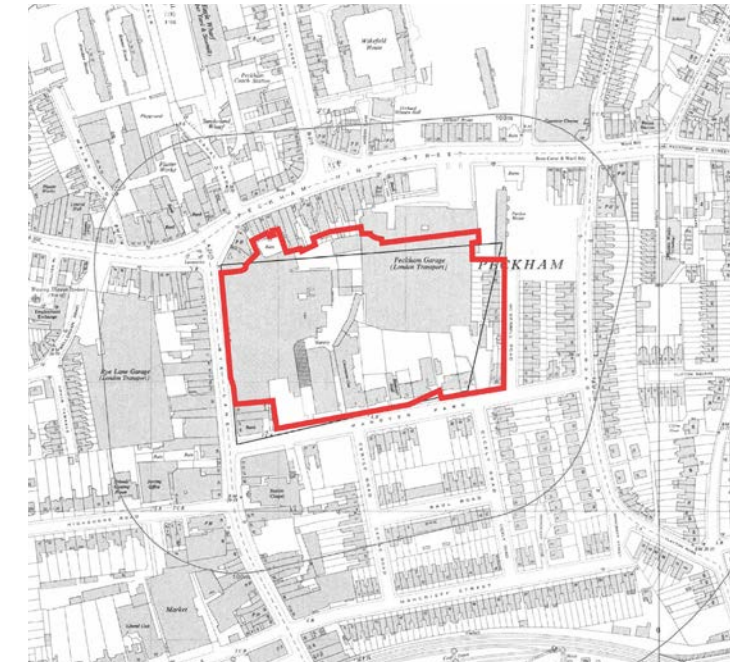


Fig. 4.19: OS Map (1955).



Fig. 4.20: View of Jones and Higgins, taken from Rye Lane (c. 1960s).



Fig. 4.21: Peckham Bus Garage (c. 1960s).

- 4.23 By the time of the OS Map of 1971 (Fig. 4.24), the large houses with sizeable gardens present on the southeast of the Site were redeveloped for the first time. Just south of the Bus depot appears to be two rows of small garages or light industrial buildings.
- 4.24 Figure 4.25 presents a very recognisable view down Peckham High Street toward the former Jones and Higgins department store tower. This view has changed little since the 1980s. The exceptions to this lack of change being the replacement of the buildings on the Peckham High Street-Bellenden Road junction with a single-storey Burger King outlet, the amendment the modern ground floor of the Jones's and Higgins tower building with a more in keeping and traditional expression, and finally, the erection of a permanent advertising board in front of 72-74 Peckham High Street.
- 4.25 The Site was redeveloped in the 1980s with the present Aylesham shopping centre, and associated hardstanding being constructed. As part of this development, the longstanding Conservative Club that sat on Hanover Park, was demolished and replaced with an extensive car park.



Fig. 4.22: A view of Jones and Higgins Department Store (1965-1975).

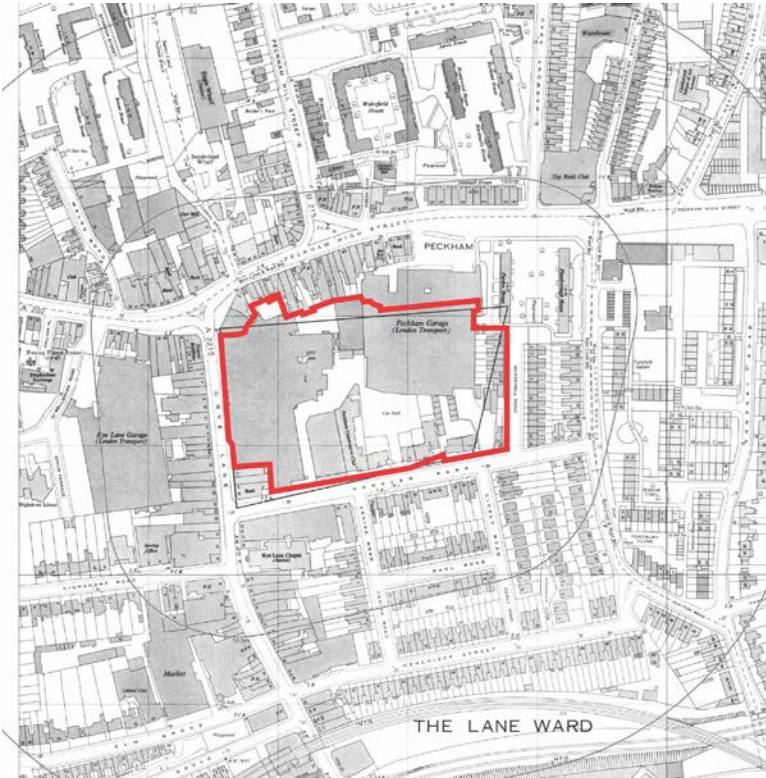


Fig. 4.23: OS Map (1971).



Fig. 4.24: Jones and Higgins Department Store, taken from Peckham High Street.



Fig. 4.25: OS Map (1985).



- 4.26 By the time of the OS Map of 1985 (Fig. 26), the majority of the buildings on the Site had been demolished to make way for the building of the Aylesham Centre. The exceptions to this being the Conservative Club, the and the southern aspect of the bus garage. It is also important to note that the Mckerrell Road terraces were also demolished in this period.
- 4.27 Later in 1985, the Aylesham Centre designs of the Birmingham based Seymour Harris partnership, were built out. This came with the demolition of the longstanding Conversative Club. The Aylesham Centre can be divided into approximate thirds, the first third being the expansive car park, the second being the Morrisons supermarket, and third part being the other outlets of the Aylesham Centre. This development, along with the creation of a new Leisure Centre and car park just southeast of the Site, can be seen in both figures 4.28 and 4.29.
- 4.28 The leisure centre to the east of the Site only lasted around 20 years as it was quickly replaced by the Hanover Park flat development around the year 2000. Around this time, Peckham Library designed by Will Allsop and situated to the north of the Site was also built.

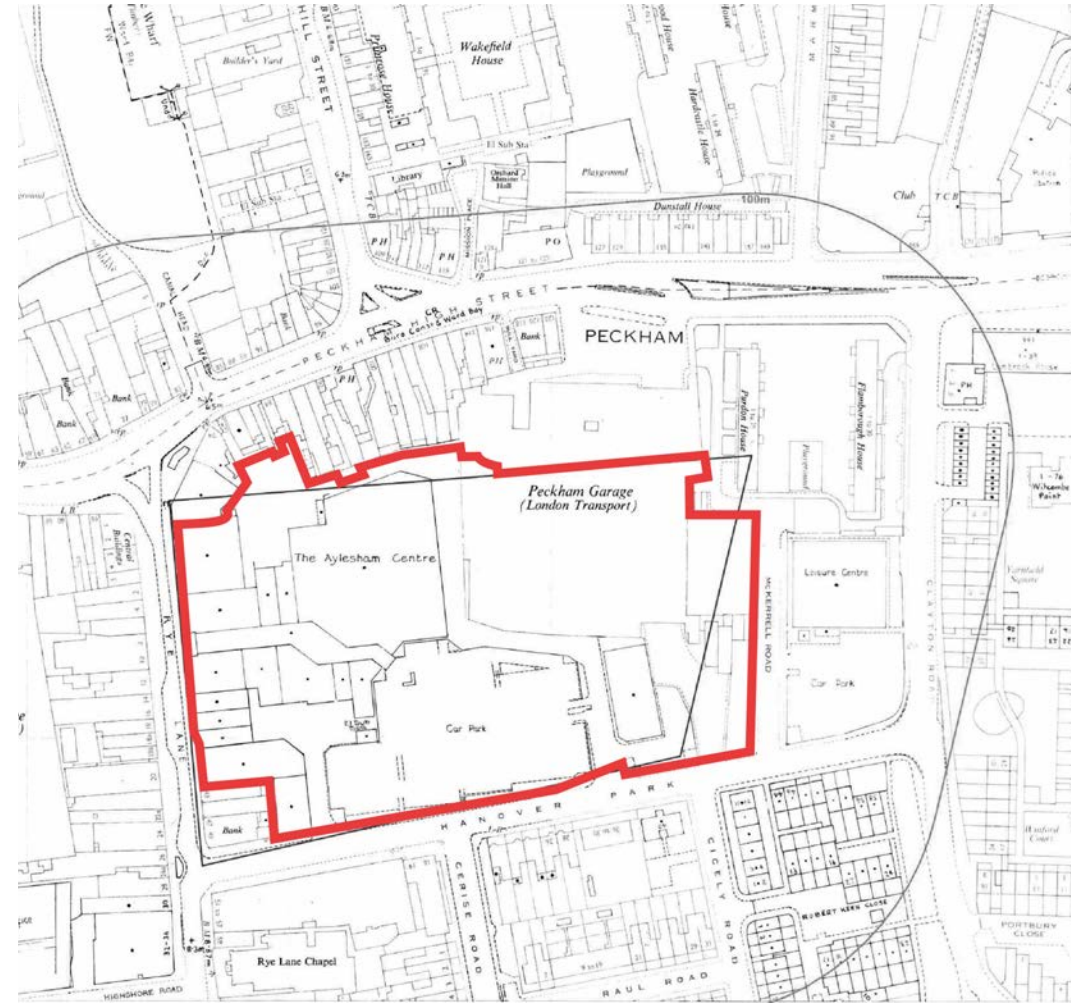


Fig. 4.26: OS Map (1989).

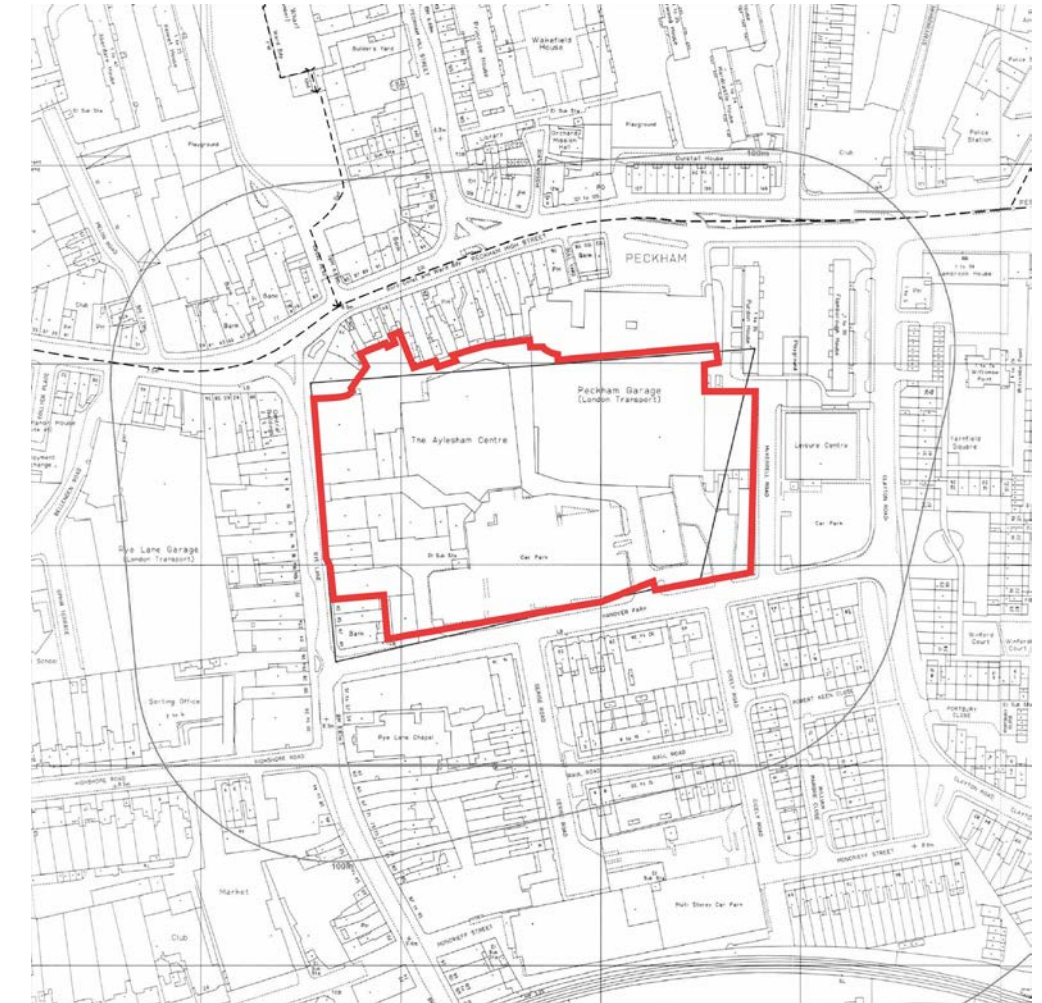


Fig. 4.27: OS Map (1991).

5. The Site and Surroundings

5.1 This section presents a brief description of the Site and its surrounding townscape, accompanied by a selection of photographs that help to illustrate its character and qualities. The information gathered presents the baseline conditions against which the heritage, townscape and visual assessments are made, following the methodology presented within Chapter 2 of this HTVIA.

Location

5.2 The Site is located in central Peckham, in the London Borough of Southwark. It is bounded by Peckham High Street and the backs of buildings on that street to the north; Mckerrell Road and an access road and parking for an apartment block, Purdon House, to the east; Hanover Park to the south; and Rye Lane to the west. Parts of the Site, particularly along Rye Lane and at the west end of Hanover Park, fall within the Rye Lane Peckham Conservation Area.

The Site

5.3 The Site is irregular in shape. It is largely occupied by the Aylesham Shopping Centre, including a large supermarket, and associated car parking areas. Some trees are located within the car park, including mature trees on its south edge. These form a significant boundary onto Hanover Park, particularly in summer when the trees are in leaf. A small number of additional trees are located on Mckerrell Road, to the east of the Site. A bus station/layover is located to the north-east corner of the Site, outside of the red line boundary.

5.4 The Aylesham Centre is a late 20th century brick shopping centre, including an arcade with a glazed roof and a large single storey supermarket set within the interior of the Site. The building was constructed in 1985 to the designs of The Seymour Harris Partnership, an architectural partnership based in Birmingham. The shopping centre has its main frontage to Rye Lane, the principal shopping street in Peckham. This frontage is generally two storeys in height, with barrel-shaped attic elements extending higher at the northern and southern ends of the frontage. A series of ground floor retail units, typically extensively glazed with plastic or metal fascias, are located along the Rye Lane frontage. The facades above are in red brick, with semi-circular windows framed in buff brick, which is also used for string courses. The barrel elements are edged in buff brick and have porthole windows, also framed in buff brick, and faux-balconies in blue metal.

5.5 An arched entrance to the glazed arcade is located in the middle of the frontage. The arcade runs through the shopping centre, in a broadly east-west direction, connecting Rye Lane with the large supermarket located in the centre of the Site, and a car park surrounding it to the south and east.



Fig. 5.1: Western elevation of Site. Looking south along Rye Lane, at junction with Peckham High Street.



5.6 A service yard and access route separate the northern edge of the supermarket and shopping centre from the backs of terrace properties to the north, along Peckham High Street. A petrol station lies east of the car park, and a bus layover area lies to the north-east of the supermarket.

5.7 The visual quality of the buildings forming the shopping centre ranges from poor to mediocre. The Rye Lane frontage of the Aylesham Shopping Centre appears long and relatively unrelieved in its form and expression, with the treatment of windows, false balconies and barrel roof elements providing only superficial articulation. The entrance arch and glazed arcade are heavy and somewhat crude in their form and execution. The supermarket is drab in appearance, with large areas of blank frontage.

5.8 The dominance of parking areas on much of the Site is such that it provides little or no definition or animation to some surrounding streets, most notably a long stretch of Hanover Park. As experienced from Hanover Park, the Site has a somewhat out-of-town character which feels incongruous given the Site's central location in Peckham, not withstanding some softening provided by the street trees on the southern edge of the car park.

5.9 The Site can be considered to belong to a wider urban block, of which it is the largest single constituent element to the south-west of the block. This wider block is defined by Peckham High Street to the north, Rye Lane to the west, Hanover Park to the south, and Clayton Road to the east.

The Surrounding Area

5.10 The northern edge of the urban block along Peckham High Street is occupied by a varied set of buildings, from one to four storeys in height, in a range of styles and ages. This includes the former Jones and Higgins department store building on the north-west corner of the urban block, at the junction of Peckham High Street and Rye Lane. Its clock tower is a distinctive piece of the townscape, albeit one much altered from its original appearance. The junction at Peckham High Street and Peckham Hill Street presents a picturesque group formed by Nos. 98-104 Peckham High Street, a survival of Peckham's past as a rural village.

5.11 Two post-war residential slab blocks are located to the east of the bus layover, occupying the north-east corner of the Site's urban block. The buildings are set perpendicular to Peckham High Street and surrounded by grassed open space. The western block, Purdon House, is six storeys and the eastern block, Flamborough House, is five storeys.

5.12 A residential development constructed in relatively recent years lies to the south of these post-war buildings, and on the south-east corner of the Site's urban block (No. 81 Hanover Park). This takes the form of four buildings, two each set to either side of a central circulation block aligned north-south. The buildings range between five and seven storeys in height.

5.13 The south-west corner of the Site's urban block is occupied by relatively ornate Victorian red-brick bank buildings at Nos. 43-49 Rye Lane, rising up to five storeys including a mansard storey on the corner.

5.14 Beyond the Site's urban block, the character of the local area is varied, with different types of development often located in close proximity to each other. Along that part of Rye Lane opposite the Site and extending south, the buildings generally take the form of three storey terraced properties with ground floor retail units. The same is true to a large extent of Peckham High Street, particularly west of the Site, and to some extent on its northern side opposite the Site. There is considerable variety in the form and expression of the buildings along these streets, with a varied vertical rhythm to the building frontages.

5.15 A major exception to this is the area occupied by Peckham Square, a hard-landscaped urban space, and the Peckham Library and Peckham Pulse buildings set on either side of the square. This area is located north of terraced development along Peckham High Street, accessed through a large arch from the High Street which sits opposite the north-west corner of the Site and its urban block. Peckham Library, designed by Alsop and Störmer and opened in 2000, is a notable landmark in the local area. It is clad in pre-patinated copper and has a distinctive form, with upper levels overhanging the ground level entrance, and connected to ground level with angled pilotis.

5.16 The area to the south of the Site is occupied by mainly two-three storey residential development, a mixture of 19th century and post-war housing. To the east of the Site's urban block, an extensive post-war estate mainly comprising two-five storey housing dominates the area between Clayton Road and Consort Road. A twenty-storey tower, Witcombe Point, is also located within this estate.

5.17 The wider area around the Site is, save for the retail centre along Rye Lane, predominantly residential in nature, with a mixture of historic terraced development, post-war estates and housing built in recent decades.

5.18 Peckham Rye Railway and London Overground Station lies approximately 250m south of the Site, and Queen's Road Peckham Railway and London Overground Station lies approximately 600m east. Peckham High Street is part of a major east-west route in this part of London, ultimately connecting Blackheath in the east with Vauxhall in the west, and central London to the north via the junction with Camberwell Road.

5.19 The Site and area around it is largely absent of greenery, aside from a row of mature trees which bound the Site along Hanover Park to the south and a cluster of trees to the north eastern corner. Surrey Canal Walk by grassed spaces around apartment buildings provides some additional green space.

5.20 The largest green spaces in the wider area, Peckham Rye and Nunhead Cemetery, lie approximately 900m south and 1.4km south-east of the Site respectively. The latter is a Grade II* Registered Park and Garden.



Fig. 5.2: Southern approach to the Site. Looking west along Hanover Park.



Fig. 5.3: Southern approach to the Site. Looking north from Hanover Park.



Fig. 5.4: Western elevation of the Site. Looking west from Rye Lane.

6. The Proposed Development

- 6.1 A summary of the design of the Proposed Development is set out below. Please refer to the Design and Access Statement submitted with the planning application for further detail. The design has been progressed through a series of 20 pre-application meetings with LBS as well as sessions with Southwark Design Review Panel, the GLA and HE, alongside public consultations - after which advice and suggestions have been taken on board to help progress the design.
- 6.2 The Proposed Development is made up of 16 high quality and varied buildings, all unified at ground level with a landscape design providing new public realm and creating new green routes through to the existing local townscape.
- 6.3 See below further summary on each building's design and the overall landscaping strategy.

Masterplan Overview

Overall architecture and urban design:

- 6.4 The Proposed Development has been designed in response to its prominent town centre location, the local fabric and culture of the area as well as its nearby heritage. By providing active frontages with a variety of commercial uses, large open landscaped spaces, legible and safe public access to create a more permeable Site, as well as considering sensitive placement of height, the intention of the Proposed Development has been to deliver a comprehensive mixed use development including new homes and complementary town centre uses through high quality architecture that adds to the already distinctive feel of Peckham.
- 6.5 All buildings on Site are intended to work cohesively, by providing appropriate use of materiality, colour, articulation, the integration of public art, and consideration of the varied conditions surrounding the Site. Driven by the key urban design principles of *'Connected neighbourhood / Distinctly Peckham / Stitching into context'*, the Proposed Development is intended to ensure it has its own distinctive and cohesive identity within the wider existing townscape.

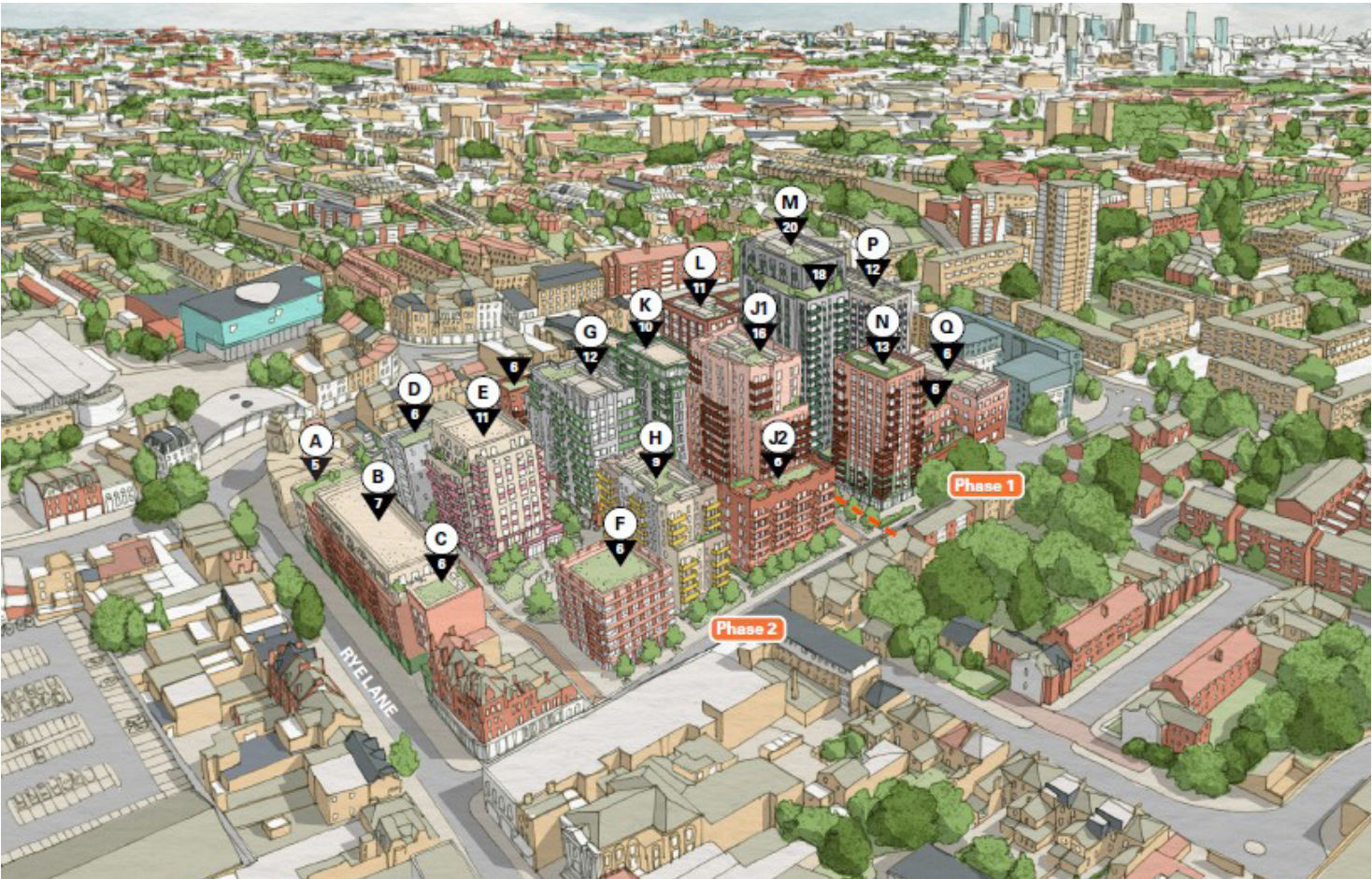


Fig. 6.1: DAS aerial sketch of Proposed Development

Overall height and massing

6.6 The height of the Proposed Development has been developed to consider local heritage and LBS local viewing corridors, GLA and HE, as well as feedback from residents. A layering approach has been employed within the overall design, with taller buildings located towards the eastern end and closer to the centre of the Site, helping to minimise or avoid impact on the Rye Lane Peckham and Peckham Hill Street CAs and the built fabric within them.

6.7 The massing approach is similar, with low shoulder heights at the Site's edges and a distribution of mass across the Proposed Development that responds to sensitive views and assets within the area. The orientation of the buildings supports this, with the generally north-south organisation creating permeability and views through the Proposed Development. This is intended to allow a reduced sense of enclosure and the maintenance of sky views both from within and when looking through the Site. The creation of new edges defines the Site in its townscape context, while also allowing for legible permeability in from surrounding thoroughfares.

Overall materiality

6.8 The site-wide strategy will define individual buildings by colour whilst using a vertical gradient, most often in brick, that fades in tone as the buildings rise. This is complemented by the addition of ground floor datums across the buildings, defined by 'colourful glazed bricks to enliven the public realm and create good wayfinding.'

6.9 There was a combination of the design strategies explored throughout the design development process; wayfinding through creating distinctive buildings, lessening the impact of taller buildings on the skyline and using bold colours to highlight entrances and to make sure the Proposed Development is reflective of Peckham's existing eclectic character.

6.10 Below is an overview of the buildings on Site and how they come together to form the character and appearance of the Proposed Development overall.

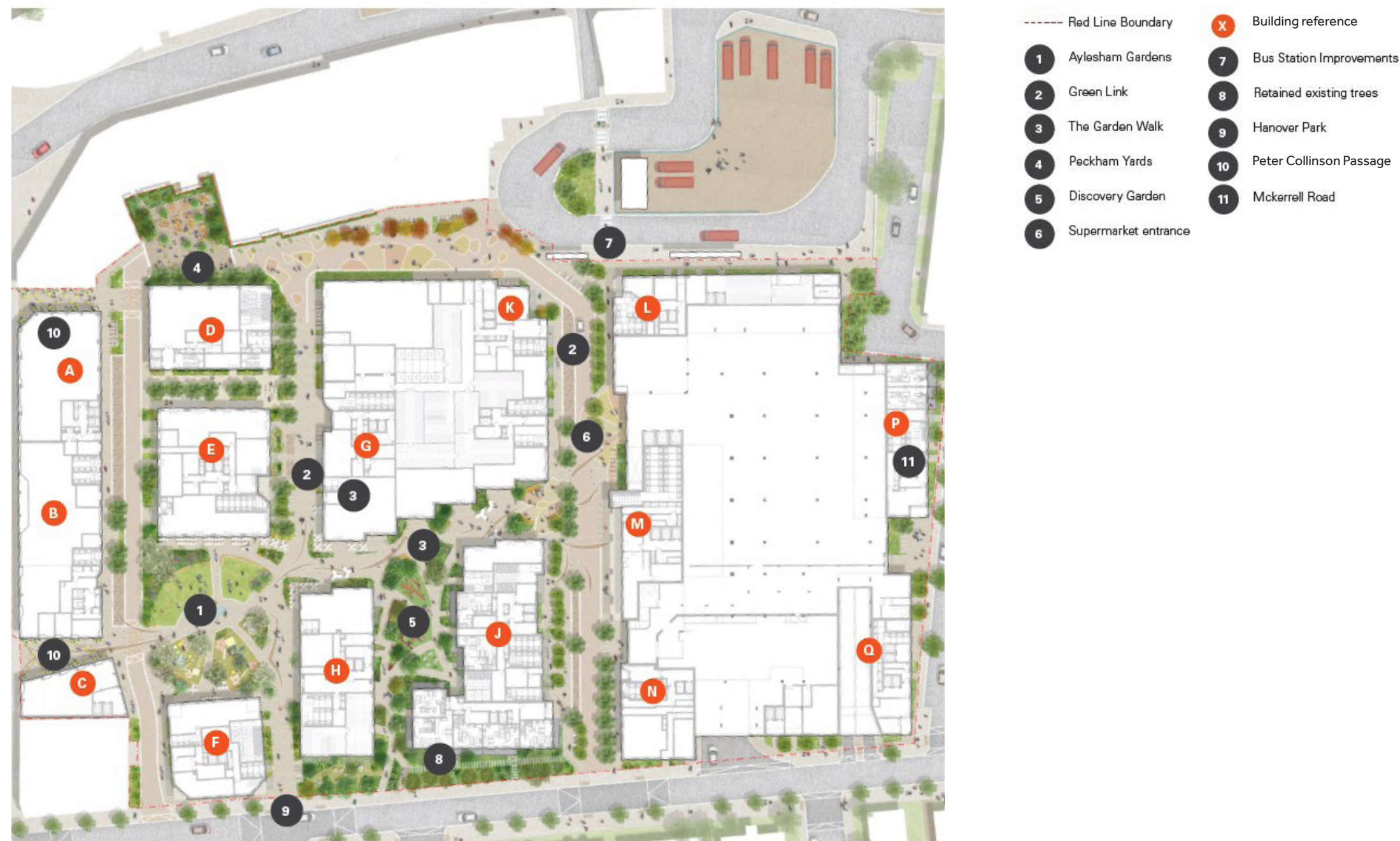


Fig. 6.2: Proposed plan taken from DAS.

Buildings A, B and C

Architecture and urban design:

- 6.11 Buildings A, B and C effectively form a single building within the streetscape, incorporating a ground level route into the Site from Rye Lane between B and C. The building meets the street on Rye Lane and is the principal building on Site that is located within the conservation area. Designed by three local architectural practices; Building A to the north is designed by Downen Farmer Architects, Building B in the centre is a composition by Feix & Merlin, and Building C to the south is by Jas Bhalla Works. The three practices have worked collectively together to produce a coherent piece of architecture, which nevertheless includes variation reflective of their individual input.
- 6.12 The buildings, together, have been designed to respond to their context and the character and appearance of the Rye Lane Peckham Conservation Area, while also picking up on the architecture of the former Jones & Higgins Building adjacent to the Site, adding arched elements that reflect the existing shopping centre frontage that will be replaced. Understanding the context on Rye Lane has fed into the design from the outset, including adding distinctive variation and relief in the elevations, that is already part of the character of the area.
- 6.13 The design of all three buildings is considered and addresses both the busy street frontage of Rye Lane, with a bold and modern interpretation of the Jones & Higgins shop front bays, as well as providing a quieter and more private residential frontage onto the new Aylesham Gardens to the east. Chamfers and setbacks from the Jones & Higgins clock tower to the north on Building A, gives the landmark space, but also opens the plot and allows for a cut through into the rest of the Site further east, a characteristic seen elsewhere off Rye Lane. Building C also provides a distinctive and celebrated double height gateway from the CA and Rye Lane, through to the rest of the Proposed Development.

- 6.14 To the north and west facades of Building A, and west facades of Buildings B and C, a combination of recessed balconies to the main body of the buildings, and projecting balconies to the upper levels of Building C, create depth, texture, and articulation of the facades, animating the elevations and adding character to frontages overlooking Rye Lane. They also work to enhance the verticality of the building design, which seeks to reflect the verticality seen in the individual plots in the surrounding townscape. To the rear, all three buildings provide balcony space overlooking Aylesham Gardens, which further adds interest and articulation to the private frontages.

Height and massing

- 6.15 All three buildings seek to reference the existing building on Site, as well as the local scale of this part of Peckham. The main part of the building is set at a constant ground plus 4 storeys across the three buildings. This parapet datum allows for an uncluttered roofline and a consistency across the whole building, providing coherence of form within which the variety provided by the individual architectural practices can be expressed.
- 6.16 Above, a 2-storey upper level has been set-back to reduce its visual dominance when experienced from street level. Further, to Buildings A and C, the setback floors are pushed in from the northern and southern ends respectively, to be subservient to the townscape roles of the Jones & Higgins clock tower, and the former bank building at the junction with Hanover Park (47-49 Rye Lane), both of which are locally listed. The setbacks allow for greening and terraces at roof level, adding to the amenity provision.

Materiality

- 6.17 The brick materiality of all three has been sampled from the local vernacular, with the colours being 'modest' and intending to reflect Rye Lane's texture and tonality. The brick tones also get lighter as the buildings get taller, again to reduce visual impact.

- 6.18 The colours of the ground floor were taken from the original Jones & Higgins former shop front bays, which were located on this edge of Rye Lane and can be seen in contemporary colour photographs of the building (included in the DAS). This leads to the use of dark and light glazed green brickwork and a predominantly pink and green palette of metalwork for the balconies above, also fading as the building rises.
- 6.19 To the rear, a similar selection of materials and colours are being used creating coherence, but with the addition of more playful brick patterns and artwork proposed by local artists.



Fig. 6.3: Sketch of Proposed Buildings A,BC from the junction of Peckham High Street and Rye Lane.

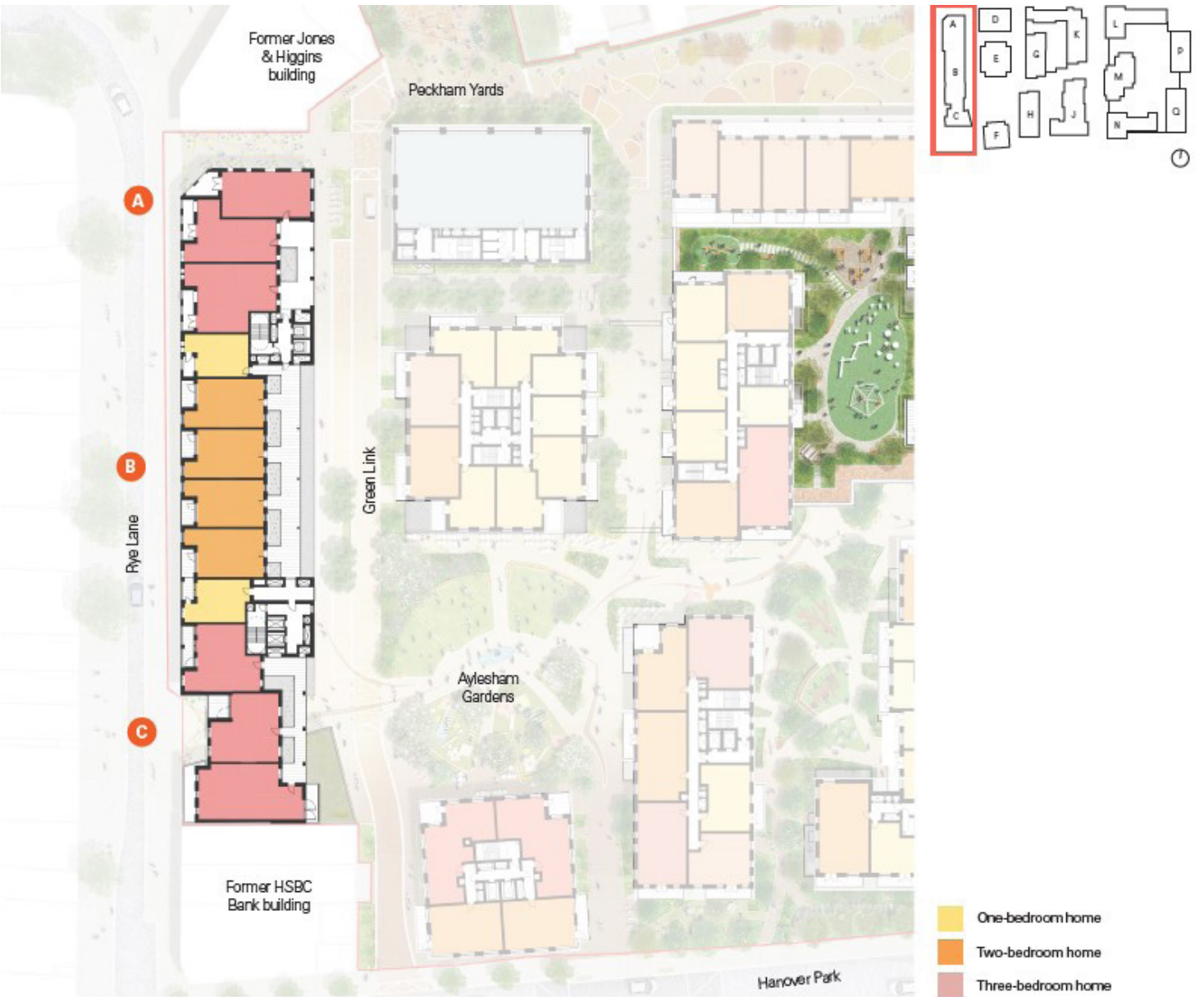


Fig. 6.4: Building A,B,C floor plan



Buildings D, E, F, G, H, J & K

Architecture and urban design:

- 6.20 These buildings are all located within the western central part of the Proposed Development and step up in height and massing towards the east, mediating between the scale of Rye Lane and the tallest buildings on Site.
- 6.21 Building D (designed by dRMM) is located on the north west of the Site orientated to face Peckham Yards, displaying a contextual elevation of large arches helping to define the scale of the building as non-residential and inspired by the existing motif along Rye Lane. Its activated ground floor will add to the streetscape and create more exciting public realm.
- 6.22 Building E (designed by dRMM) is located at the centre of the western part of the Site and is a point building addressing views from Rye Lane, Hanover Park and further reaching townscape views. Its southern façade forms one of the main frontages onto Aylesham Gardens within the Proposed Development Site, with an expression of civic architecture. Its activated ground floor will add to the streetscape and create a more exciting public realm, allowing permeability and interaction with the building on a public level. Its 'Art Deco Inspiration' helps to imply its civic use, adding character and details are incorporated in locations that will enhance the pedestrian and user experience.
- 6.23 Building F (designed by nimtim) sits to the southwest of the Site, to the right of the locally listed 47, 49 Rye Lane, and along the boundary line of the Site to the south on Hanover Park Road where it interacts closely with the boundary of the Rye Lane Peckham Conservation Area. It provides commercial shop fronts to ground floor, continuing Rye Lane's character, and residential above rising to 6 storeys in height, providing mediation to the more residential nature of the Proposed Development the further east along Hanover Park Road. The building provides four facades to the public realm, two of which will have active frontages, including onto Aylesham Gardens. The others will provide access to the residential units above. With each elevation having to respond to distinct contexts, the Proposed Development has evolved to have four distinctly designed facades, whilst maintaining coherence in design. The façade

facing Aylesham Gardens has strong verticality and large openings, and corner balconies to optimise views. To the east and west, facing the residential and commercial buildings to either side, the façades are also vertical in expression, but have smaller more uniform openings and projecting balconies within the facades. To the south, the façade faces the street and displays a calmer elevation, with stronger horizontality, less articulation, and no balconies.

- 6.24 Building G (designed by Jas Bhalla Works) is located at the northern end of the Aylesham Site, the Proposed Development shares a ground floor podium with the adjacent Building K. It sits in a key position within the Proposed Development, linking the character areas of Peckham Yards to the north, Aylesham Gardens to the southwest and Market Lane to the immediate south. The building acts as a 'gateway building' marking the transition between the public open space of Aylesham Gardens, to the retail led spaces towards the eastern end of the Site. Responding to multiple conditions and character areas surrounding it, the southwest corner has been articulated to emphasize its prominent location on the Site.

- 6.25 The residential entrance is located on the northern side of the building, recessed, and highlighted through materiality; it faces an activated frontage housing workspace within Building E. Amenity space to all dwellings has been considered, alongside a large communal terrace which is afforded views towards the City of London. The facades incorporate a series of punched openings and recessed brickwork panels, alongside the addition of projecting balconies to the east and west, there are recessed balconies to the north and south, creating depth and interest to the elevations.

- 6.26 Building H (by dRMM) is in the southern half of the Site within a key position; 'the western facade faces Aylesham Gardens, the northern facade forms part of the key retail journey from Rye Lane towards the Morrisons store, and the southern facade fronts onto Hanover Park.' A step in the massing to the south and Hanover Park responds to the finer grain and more residential nature of the context to the south side of the Site, bringing verticality to a more horizontal mass, with articulation in form and expressed and recessed balconies creating depth and texture to the facades.



Fig. 6.5: Building D, E, F, G, H, J & K floor plan

6.27 Building J (by dRMM) is located to the south of the Site and responds to an existing line of trees on Site, stepping back and away from Hanover Park to maintain a more residential scale to the south. Its taller element is towards the north and the Centre of the Site, adding to the graded and layered approach. Its architecture is inspired by the '*mansion block typology*' with solidity and two grounded volumes creating a more traditional feel, whilst providing amenities at ground level that can interact with and spill out onto the newly created Flora Walk. Access on the eastern side of the building allows for easy access to pedestrian and cycle routes, as well as green space – which envelops the building at ground floor level.

6.28 Building K (by dRMM) is at the centre of the northern edge of the Site, facing the Green Link and Peckham Yards and is another gateway building at a key entry point to the Proposed Development from Peckham High Street and the bus station. Its form is regular, with a shorter gallery wing, helping to draw people through and into the Site. It sits on and shares a podium garden with Building G next door which also houses the activated frontages to the north and south, creating a '*retail journey*' through the Site.

6.29 The addition of façade divisions, splitting the mass down into smaller readable elements is successful, added to strong grounding of the building, contextual articulations, and horizontality, the bringing together of the massing through architectural expression creates an interesting backdrop to the buildings on Peckham High Street – including some Townscape Heritage Initiative (THI) buildings. '*The facades take inspiration from local historic architectural design, such as in their use of brick patterns and specific window types.*'

Height and massing

6.30 The buildings range in height from 6 to 20 storeys, with all of them responding to local views and heritage constraints. Some to the north and east step down to address the commercial street scale of Peckham Yards and those smaller scale buildings lining Rye Lane, whilst others address the more residential scale of Hanover Park to the south.

6.31 To the centre of the Site, the buildings respond more to their new neighbours, creating a comfortable and open environment for green spaces and new yards, parks, and lanes throughout the Site. A general approach of layered massing, with stepping and articulation at the top and corners is employed, creating a visually interesting skyline and maintaining sky space between buildings.

6.32 Those buildings along Hanover Park respond to the nearby building heights seeking to be respectful of the locally listed building at the corner of Hanover Park and Rye Lane. Including chamfered corners at ground floor defines entrances to Aylesham Gardens, opening views of the green spaces from Hanover Park Road. This creates permeability to the Site's edge and will help draw people in.

6.33 Materiality is consistently used alongside massing to further break down the facades and create texture and interest, reducing any perception of height.

Materiality

6.34 There is a mixed and expressive material palette for all buildings on Site, being split to further enhance the vertical and horizontal elements of the façade designs.

6.35 Some use a singular brick type, or use primarily light brickwork in a limited palette, with subtle detail and metalwork features to add '*hierarchy and interest*'. The addition of mortar tones and colour pops to door and window frames creates a sense of fun and distinctiveness - a sensitive collection of textural and tonal elements adding to the cohesion across the Site. Bold glazed brickwork treatment at ground floor levels adds to the fun of the public realm and creates distinctive facades as a backdrop to the public open spaces.

6.36 Altogether, though, they add up to create a '*familiar character*' and an identifiable language understood as part of the wider design concept of this part of the Proposed Development.



Buildings L, M, N, P & Q

Architecture and urban design:

- 6.37 These buildings are all located within the eastern part of the Proposed Development and contain the tallest and lowest building heights within the Site. To the east, the buildings step down dramatically, responding to the local residential character. And to the centre, the tallest - Building M - avoids impact on local views, heritage and local experience from outside the Site.
- 6.38 Building L (designed by dRMM), located on the northern edge of the Site, adjacent to the bus station land to the north, wraps around the podium to direct the public from the transport hub into the Proposed Development along the linear park to the west. The Proposed Development is designed to be complimentary to Peckham and although it has a distinct architecture, the idea is to stitch it into the town's existing fabric for the residents of Peckham to use.
- 6.39 The arched motif is carried through to Building L, with the north parapet of the building facing onto the bus depot displaying a rolling arched form, softening, and articulating the top storey. The two masses that make up the building have strong grounding, and again use large double order arched openings to help achieve this. Detail in the façade is expressed through vertical and horizontal elements. Emphasis of the weight of the east/west building onto the bus depot is achieved through horizontal banding, and the contrasting verticality of the north/south building to the west through more vertical design. The public frontages of the buildings display strong articulation and detail, but to the rear of the building, overlooking the more private rear podium courtyard, the design becomes calmer, with more regularized bays and balcony treatment.
- 6.40 Building M (designed by dRMM) sits on the eastern side of the Site, with the eastern and southern facades facing the podium and the western façade looking out over the Green Link. *'Its position next to the Morrisons entrance makes building M a significant visual part of the retail journey through the site from Rye Lane.'* Its

architectural response, as the DAS explains, uses heat mapping to establish *'zones on facades that benefit from different treatments: of colour, window size and balcony positioning. In building M, the facade strategies are a direct response to environmental conditions in order to improve the residential experience, and through this creating an interesting design.'*

- 6.41 Building N (designed by dRMM) sits on the south eastern corner of the Proposed Development, with the taller element framing a key entrance into the Site from Hanover Park. It has a more domestic architectural response being divided into smaller elements, creating a southern boundary to the podium garden, with the ground floors creating an articulated and activated public realm.
- 6.42 Building P (by dRMM) is located on the north eastern corner of the Site, facing the bus depot land. It faces mid-rise residential buildings, enveloping the existing Morrisons shop on Site. With a rectangular form and striking facades, the building creates a distinctive corner building to the Proposed Development. Strong verticality in its design works together with Building P's frontage to create a statement at the northern boundary of the Site.
- 6.43 Building Q (by dRMM) is located on the south eastern corner of The Site, with the south façade facing Hanover park and the eastern façade running along Mackerrell Road. It displays strong horizontal banding with articulation, grounding the building and mitigating the visual impact of the replacement supermarket at ground floor. Playful gradients and the addition of balconies help with wayfinding and adds activation and distinction to the corner plot.

Height and massing

- 6.44 These buildings create a collection of larger scale buildings to this side of the Site, including Building P (12 storeys), Building M (20 storeys) and Building K (10 storeys) which define entry into the Proposed Development from the north.
- 6.45 Building M is the tallest on Site at 20 storeys, adding a new key addition to the Peckham skyline. Many elements have been considered when developing the

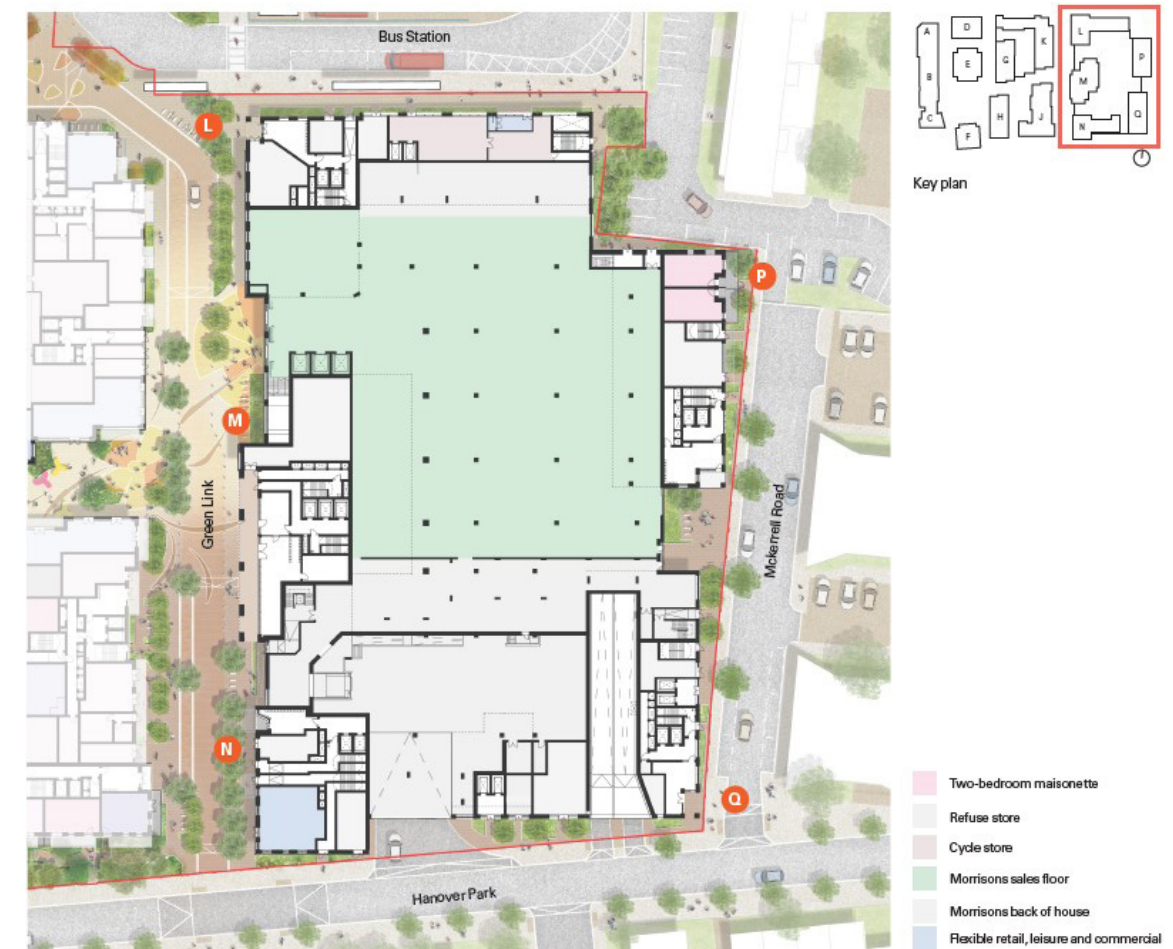


Fig. 6.6: Building L, M, N, P & Q floor plan

massing to reduce its visual impact on the area. The added articulation and shifted volumes, alongside a layered approach, help to further break down the perceived massing from viewpoints locally and further afield.

- 6.46 Some buildings, such as Building Q, are designed in response to a neighbouring residential building and are therefore much smaller than other buildings within the Proposed Development. Sitting at only six storeys, Building Q's massing steps down in response to its local surroundings creating a more human scale edge to the Site, creating an overall feeling of a tailored design.

Materiality

- 6.47 Brickwork is prominent throughout this group of buildings also, with expanded metal mesh and muted metalwork following the monochromatic palette of many of the buildings to the east. Orange, light buff,

grey and white brickwork in tonal hues offer texture and contrast with the balcony colours designed to match yet contrast with the brickwork.

- 6.48 Metalwork in a range of colours will add a lightweight veil over the heavier elevations behind, creating moments of visual interest despite the buildings larger scale, with detailed elements adding further textural qualities and articulation visible from both near and far.
- 6.49 Differentiation between uses is also expressed in the materiality, with the use of more muted colours and tones for office use and a more expressive and fun palette for the residential buildings. This helps create distinction, different characters for each area of the Proposed Development, as well as aiding with wayfinding within the Site.

Landscaping & public realm

- 6.50 The site-wide landscaping strategy is focused on creating a diverse and vibrant addition to the existing character of Peckham. Emphasising its existing popularity with residents due to its local art and events scene, as well as creating a new destination for visitors that mirrors the rich cultural background and unique Peckham identity.
- 6.51 The landscape design is centred around three 'design pillars,' 1: Enhance public activation, 2: Create place of wonder and 3: Strengthen Peckham's green infrastructure. These are applied to four different character areas within the Proposed Development, reflecting the local vernacular and the use of the spaces created. 'Garden Walk', 'Peckham Yards', 'Green Links and Roof Landscapes'. These help create a journey through the Site, allowing for incidents of play, discovery, and unplanned nature to evolve as people use the space.
- 6.52 Above ground within the private realm, the green footprints of the residential buildings are translated into residential courtyards, roof terraces, a planted podium space and biodiverse wildflower roof planting. The tree strategy across the Site is one of retention, with some existing trees being retained and celebrated. New tree planting will 'strengthen the masterplan and provide features within each character area, aid wayfinding and provide a legacy for this site and its context'.
- 6.53 The heavy focus on retention of existing trees across the Site, as well as the addition of multiple new tree species will add to the creation of diverse spaces that are identifiable not only by the surrounding architectural character of the Proposed Development but supported by distinct planting and tree typologies.
- 6.54 The addition of plentiful planting at ground, podium and roof levels will draw people through the Proposed Development, offering the public and those visiting the Site a break away from the busy surrounding thoroughfares, whilst maintaining the vibrant town centre character of Peckham. This level of greening will help in creating distinctiveness, visually soften its architectural impact and offer Peckham a new exciting typology.



Fig. 6.7: Landscape Ground Floor Masterplan.

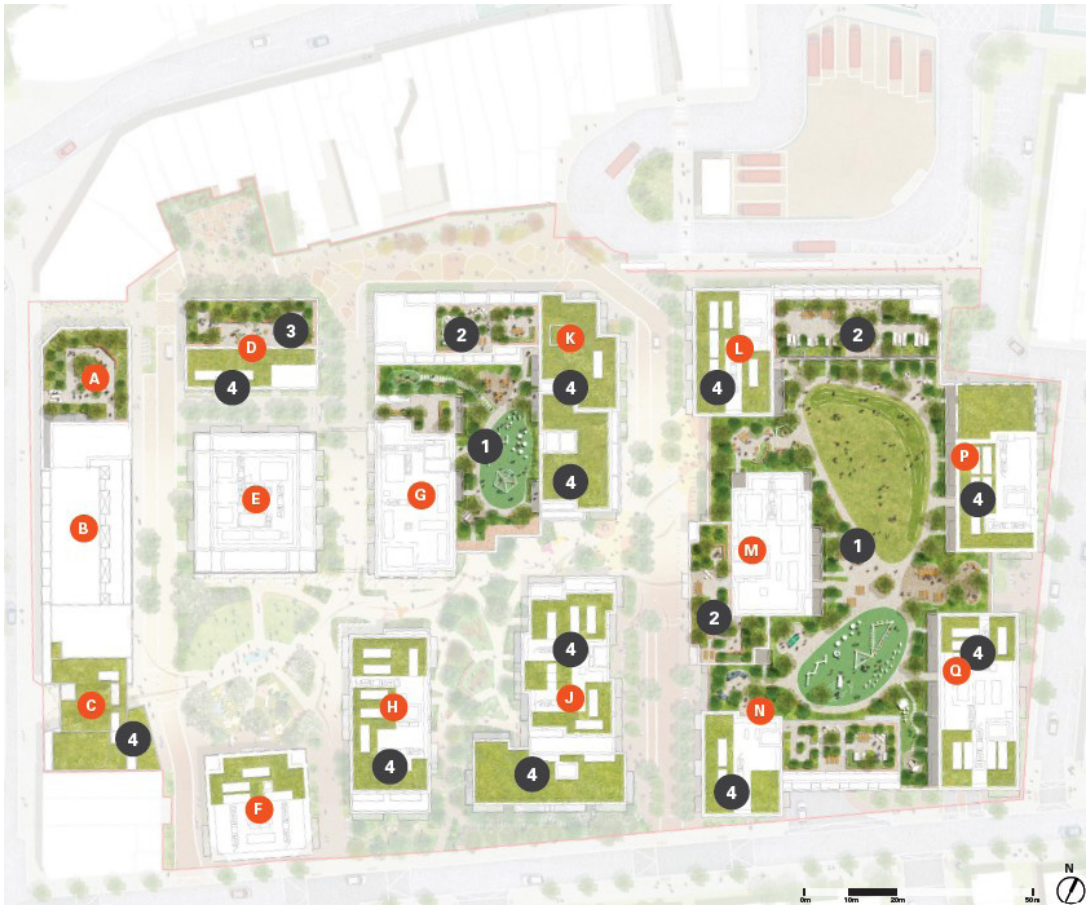


Fig. 6.8: Landscape Upper Levels Masterplan.



Fig. 6.9: Landscape Garden Walk CGI



Fig. 6.10: Landscape Overview

7. Heritage Assessment

- 7.1

The majority of the Site does not lie within a conservation area or contain any listed buildings. There are, however, a number of above ground Heritage Receptors (HRs) in the area around the Site, as described below, while the Rye Lane frontage of the shopping centre is located within the Rye Lane Peckham Conservation Area. Those HRs considered as part of this Heritage Assessment comprise Listed Buildings (LBs), Conservation Areas (CAs), Registered Parks and Gardens (RPGs), and Locally Listed Buildings (LLBs). No Scheduled monuments lie within a radius of 500m of the Site and it is not considered proportionate to consider the setting of those beyond that boundary. In addition to well established designated and non-designated heritage categories, the Peckham Heritage Townscape Heritage Initiative (THI), run by Peckham Heritage Regeneration Partnership with the support of LB Southwark, identified a long list 44 buildings eligible for restoration within Peckham in 2016. Of these nine were restored on the basis of grants and match funding. All the THI buildings identified in 2016 are considered non-designated heritage assets for the purposes of this heritage assessment and are also assessed in this section.
- 7.2

3D London software 'Vu City' was used to produce a Zone of Theoretical Visibility (ZTV) of the Proposed Development as a basis for understanding the potential intervisibility between it and heritage assets in the area. Consideration was also given to the distance of these heritage assets from the Site, in accordance with the need for the assessment of effects to be proportionate and in recognition of the perceptibility of a Proposed Development tending to fall over distance in relation to the setting of heritage assets. Thereafter, statements of significance for the heritage assets potentially affected by the Proposed Development were prepared and are set out below. This approach is considered sufficient to assess the effects of the Proposed Development on surrounding heritage assets in light of the scale of the Proposed Development.
- 7.3

The National Planning Policy Framework defines heritage significance at 'Annex 2: Glossary' as:

'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site's Statement of Outstanding Universal Value forms part of its significance'.
- 7.4

The heritage significance of HRs forming part of this assessment, including the special architectural or historic interest of the listed buildings (including discussion of the nature and extent of their settings in so far as they contribute to that heritage significance), and character and appearance of CAs, is assessed below. The following assessments of significance are proportionate both to the importance of the asset and to the nature and extent of the Proposed Development. They are sufficient to understand the likely effect of the Proposed Development on heritage significance.



7.5 The following heritage assets are included in the mapping. In the interests of proportionality, as set out in para. 200 of the NPPF, those potentially significantly affected by the Proposed Development, given their location in relation to the Site and the outcome of the ZTV study undertaken, are assessed thereafter:

Conservation Areas:

- 1) Rye Lane Peckham Conservation Area
- 2) Peckham Hill Street Conservation Area
- 3) Holly Grove Conservation Area
- 4) Caroline Gardens Conservation Area
- 5) Nunhead Green Conservation Area
- 6) Kentish Drovers and Bird in Bush Conservation Area
- 7) Camberwell Grove Conservation Area
- 8) Sceaux Gardens Conservation Area

Listed Buildings:

- 9) 58 Peckham High Street
- 10) Baptist Chapel, Rye Lane
- 11) Post Office Depot
- 12) 8-14 Highshore Road
- 13) 16 and 18 Highshore Road
- 14) 7, 9 and 11 Highshore Road
- 15) 17 and 19 Highshore Road
- 16) 21 and 23 Highshore Road
- 17) 25 Highshore Road

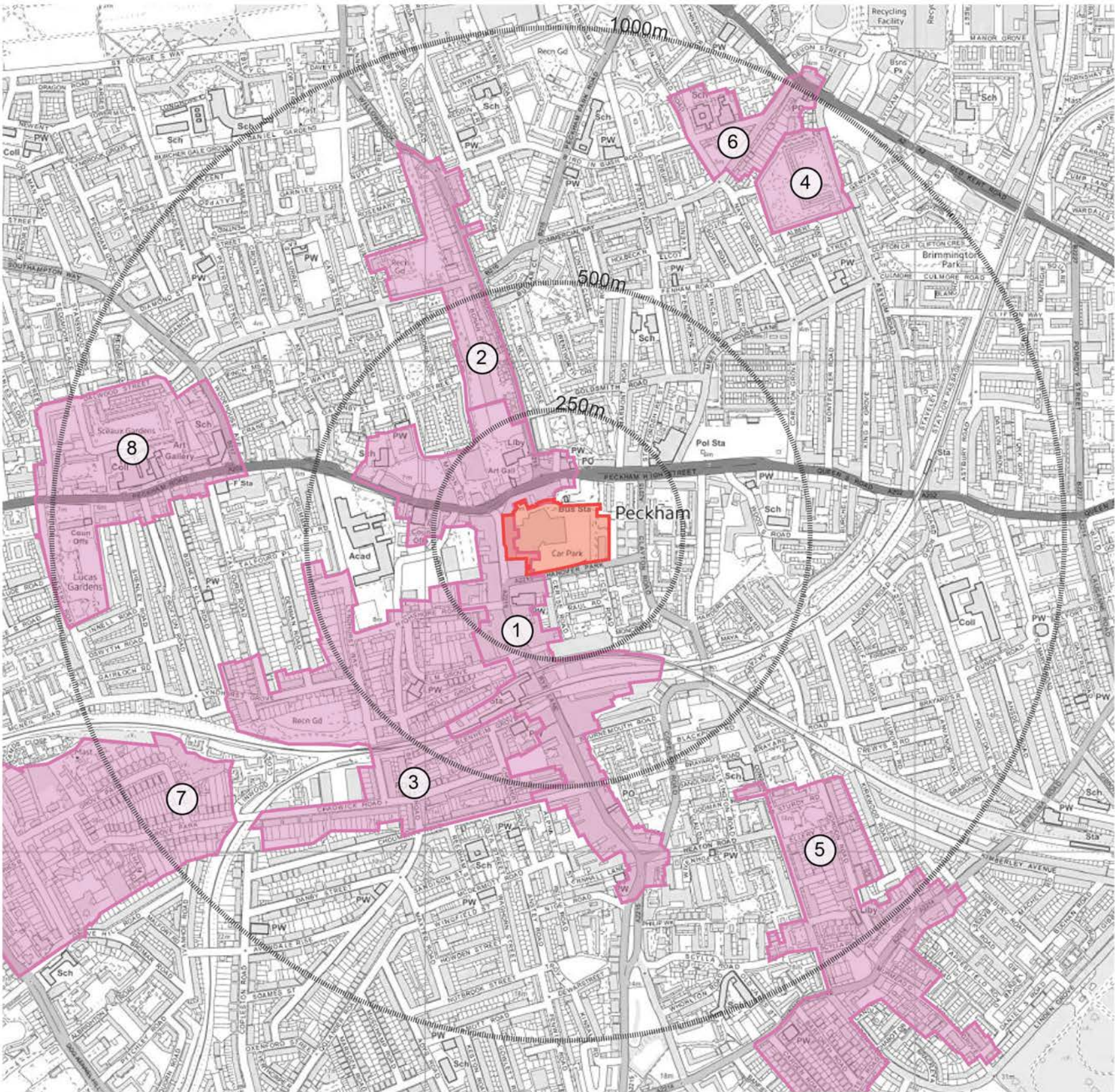
Locally Listed Buildings:

- 18) 110-114 Peckham Hill Street
- 19) Peckham Library
- 20) Shard's Terrace
- 21) Peckham Arch
- 22) 71-77 Peckham Hill Street
- 23) 65, 67 Peckham High Street
- 24) 41-43 Peckham High Street
- 25) 32 Peckham High Street
- 26) The former Jones & Higgins Department Store
- 27) 86-88 Peckham High Street
- 28) The Bun House, 96 Peckham High Street
- 29) 98-104 Peckham High Street
- 30) Public House, 1 Clayon Road
- 31) Peckham Police Station
- 32) 119 Peckham High Street
- 33) 109 Peckham High Street

- 34) Orchard Place Mission Hall
- 35) Wakefield House
- 36) Central Buildings, Rye Lane
- 37) 12-16 Rye Lane
- 38) 22A-24 Rye Lane
- 39) 47, 49 Rye Lane
- 40) 28 Rye Lane
- 41) 51-57 Rye Lane (odd)
- 42) 61-63 Rye Lane
- 43) 13, 15 Highshore Road
- 44) 64 Rye Lane
- 45) 66 Rye Lane
- 46) 72-76 Rye Lane

**Peckham Townscape Heritage Initiative Buildings
(some also locally listed)**

- 47) 126 Peckham Hill Street
- 48) 128 Peckham Hill Street
- 49) 111 Peckham High Street
- 50) 63 Peckham High Street
- 51) 61 Peckham High Street
- 52) 59 Peckham High Street
- 53) 86 Peckham High Street
- 54) 88 Peckham High Street
- 55) 90 Peckham High Street
- 56) 92 Peckham High Street
- 57) 94 Peckham High Street
- 58) 98 Peckham High Street
- 59) 100 Peckham High Street
- 60) 102 Peckham High Street
- 61) 104 Peckham High Street
- 62) 106 Peckham High Street
- 63) 116 Peckham High Street
- 64) 118-120 Peckham High Street
- 65) 122 Peckham High Street
- 66) 62 Peckham High Street
- 67) Central Buildings Rye Lane
- 68) 12 Rye Lane
- 69) 14, 16 Rye Lane
- 70) 18, 18a and 18b Rye Lane
- 71) 26 Rye Lane



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Approximate Site boundary marked in red for indicative purposes only. Approximate 1000m, 500m and 250m radii are marked on the map. Conservation areas are identified within these radii.

Conservation areas are identified below.

- Conservation areas:
- 1

Rye Lane Peckham Conservation Area
- 2

Peckham Hill Street Conservation Area
- 3

Holly Grove Conservation Area
- 4

Caroline Gardens Conservation Area
- 5

Nunhead Green Conservation Area
- 6

Kentish Drovers and Bird in Bush Conservation Area
- 7

Camberwell Grove Conservation Area
- 8

Sceaux Gardens Conservation Area

Figure 7.1: TTC conservation area map.