



Historic England

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Direct Dial: 020 7973 3763

Our ref: PA01200798

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Dear Mr Eldridge

Pre-application Advice

THE AYLESHAM CENTRE RYE LANE LONDON SOUTHWARK SE15

Thank you for involving Historic England in pre-application discussions regarding plans for the Aylesham Centre site in Peckham. It was useful to hear more about the scheme at our virtual meeting last month. On the basis of those discussions, and the pre-application provided, we offer the following advice.

Summary

Historic England has no in-principle issue with the redevelopment of the Aylesham Centre site which is allocated for redevelopment with buildings of increased height in the Southwark Plan. However, the proposed buildings towards the north west of the site would have an incongruous relationship with the more modest-scale suburban townscape along Rye Lane and Peckham High Street, causing harm to the Rye Lane Peckham Conservation Area. We recommend that the scale and massing of development in this part of the site is lowered in height and potentially redistributed to less heritage-sensitive parts of the site to reduce the harm.

Historic England Advice

Significance of the historic environment

The development site is centrally located in Peckham and contains the Aylesham Centre - a 1980s shopping centre and supermarket with a large footprint and associated carpark. Much of the site is of low townscape value. However, the west façade along Rye Lane and a shop unit on Hanover Park to the south are included in the Rye Lane Peckham Conservation Area.

Peckham evolved from a small village into a flourishing inner-London suburb, and is now a vibrant, multi-cultural destination. The Conservation Area comprises three historic routes which capture different phases of Peckham's historic development from the 18th to the 20th century. These are:



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- Rye Lane: Peckham's main shopping street and the centrepiece of the Conservation Area which contains mainly Victorian and 20th century commercial buildings;
- Peckham High Street: An ancient route connecting New Cross and Camberwell, which contains some of the oldest buildings in the area on its south side;
- Peckham Hill Street: a predominantly residential street which contains a number of Georgian houses.

Building heights general range between two and four storeys, except around Peckham Square (built on the site of the Grand Surrey Canal's southern basin) where these historic routes meet. The Square contains a number of larger modern public buildings including Peckham Library and Peckham Pulse leisure centre. Nearby, on the corner of Rye Lane and Peckham High Street is another larger building - the former Jones & Higgins department store. Built in 1894 in an elaborate Renaissance style and featuring a prominent 1930s clock tower, the building is one of Peckham's most important historic landmarks.

The Rye Lane Peckham Conservation Area Appraisal (Southwark Council, 2011) identifies the vista east along Peckham High Street as a 'key view' (Section 3.6.2) where the department store 'acts as a full stop to eastern views' (ibid). Views south down Peckham Hill Street towards the historic high street, and north along Rye Lane are also identified as 'key approaches' (Section 3.6.1) within the conservation area.

The Aylesham Centre's west façade features in views north along Rye Lane. The Conservation Area Appraisal identifies it as a 'Negative Element' (Section 4.4) with 'an indifferent character which does little to enhance the conservation area'. However, in these views, its modest scale and red brick materiality provides a contextual and subservient response to the townscape, particularly to the decorative late-Victorian bank building on the corner of Rye Lane and Hanover Park.

The corner bank building, Jones & Higgins department store, and the earliest buildings along Peckham High Street have all been included in Southwark Council's recently adopted Local List in recognition of their local importance.

There are a number of locally protected views in the wider area including:

- Nunhead Cemetery (Grade II* Registered Park and Garden) towards St Paul's Cathedral (Grade I) (London Borough of Southwark)
- Horniman Museum Gardens (Grade II* listed, Grade II Registered Park and Gardens) panorama which includes views towards St Paul's Cathedral (Grade I)

The proposals and their impact



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The plans involve the demolition of the Aylesham Centre and the erection of a large residential and commercial scheme including many tall buildings of up to 20 storeys in height. While the tallest of these would be located in the eastern portion of the site, the western end would include a 11-storey building. The Rye Lane building within the conservation area would rise to a maximum height of 7 storeys.

The impact of the proposals on the historic environment is set out in the draft Heritage, Townscape and Visual Impact Assessment (The Townscape Consultancy, March 2024) which includes an assessment of the Key Views as set out above.

View 11 from Peckham Road / Peckham High Street, demonstrates that the Jones & Higgins building would retain its silhouette in this static view from the southside pavement. However, the 20-storey and 11-storey buildings can be seen to the right in this view, and of a similar perceived height to the department store tower. This suggests that the proposed masterplan would become more visible from the north-side pavement and possibly more visually prominent in kinetic views. It is therefore likely that the development would diminish the landmark status of the department store building by visually competing with its clock tower in these key views, and cause harm to the conservation area.

In distant views along Peckham Hill Street (View 4), the 20-storey building would become the dominant townscape feature, drawing attention away from the predominantly Georgian houses that characterise this part of the conservation area. In views closer to the junction with Peckham High Street (View 5 and View 35), the proposed buildings would appear as a wall as development behind the modest-scale and partly 18th century townscape on the south side of the street. These impacts on key approaches to the conservation area would also cause some harm in our view.

Views 6, 8 and 9 provide some analysis of the impact the masterplan on Rye Lane in terms of its overall scale and massing. The assessment of these static views suggests that the tallest elements of the scheme would be on the periphery of these views and would not undermine the character of the high street to any significant extent.

However, apart from the elevation provided in the Historic England Presentation document (p35), limited information has been provided about the design of the proposed frontage building to Rye Lane. We note that the building would have an active frontage with shopfronts along the ground floor, and that its massing would step down at the south end to address the corner bank building. While these are positive elements, the 7-storey height of the frontage building would be at odds with the prevailing 3-4 storey scale of buildings found along Rye Lane, and has the potential to detract from the conservation area's character and cause harm.

The proposals would not appear to affect Southwark Council's Local Views from One Tree Hill (View 1) or Nunhead Cemetery (View 2), although we note that local views in



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the neighbouring London Borough of Lewisham have not been included in this assessment.

Relevant legislation, policy and guidance

Sections 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) impose a statutory duty on planning authorities to consider the impact of proposals upon listed buildings and their settings. Section 72 of the Act requires local authorities to have special regard to the desirability of preserving or enhancing the character or appearance of conservation areas.

Government policy on how to carry out these duties is found in the National Planning Policy Framework (NPPF, December 2023). Section 16 of the Framework sets out how the historic environment should be conserved and enhanced. Paragraph 200 requires an applicant 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' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 201 states that development proposals should seek to avoid or minimise any conflict between the conservation of the heritage asset and any aspect of the proposal. In practice that means that less harmful alternative solutions should be fully explored before any application is determined.

Paragraph 205 states that that when considering the impact of a proposed development on a heritage asset (which includes its setting), local planning authorities should give 'great weight' to preserving the asset's significance.

Any harm or loss should require clear and convincing justification (paragraph 206). If any harm is deemed to be 'less than substantial', it should be weighed against the public benefits of the proposals (paragraph 208).

Paragraph 212 states that local planning authorities should look for opportunities for new development within Conservation Areas [...] and within the setting of heritage assets, to enhance or better reveal their significance.

Historic England's recently revised Tall Buildings advice note supports an evidence-based and plan-led approach for the development of tall buildings. It encourages development plans to include "specific tall building policies to support area/sites identified as appropriate tall buildings" (p11). This is echoed in the London Plan, which has a specific policy relating to tall building development (D9). The Policy requires Boroughs to identify appropriate locations and heights for tall buildings and provides that "Tall buildings should only be developed in locations that are identified as suitable in Development Plans".



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The development site is supported by a site allocation (NSP74: Aylesham Centre and Peckham Bus Station) in the Southwark Plan 2022. The allocation allows for:

“taller buildings subject to consideration of impacts on existing character, heritage and townscape. Assessment of the site concluded that development of up to 20 storeys could be appropriate in this location. Any taller development should be set back from the Rye Lane shopping frontage, towards the *eastern end of the site* [my emphasis].

The Southwark Plan includes a specific Tall Buildings policy (P17) which is supported by a map (on p137) where tall buildings “would be an appropriate form of development in principle” in accordance with the London Plan. The map includes the Old Kent Road, but does not appear to extend south to central Peckham.

Southwark Council’s Local Views identified in the Southwark Plan include View 1: The London Panorama of St Paul’s Cathedral from One Tree Hill, and View 2: The Linear view of St Paul’s Cathedral from Nunhead Cemetery (P22, Borough Views, p141).

Lewisham Council’s Local Views set out in the draft Local Plan (proposed submission document, Regulation 19 stage, January 2023) include Horniman Gardens and Telegraph Hill Upper Park (Schedule 1: strategic and local views, vistas and landmarks, p802).

Views and Vistas are also identified the Rye Lane Peckham Conservation Area Appraisal (Southwark Council, 2011) as previously set out.

Historic England’s Position

The Aylesham Centre site is of low townscape value in our view, and we consider that this scheme presents exciting opportunities to improve the quality of the built environment and connectivity to Peckham’s historic heart as part of its ongoing regeneration. We note that the Southwark Plan considers that buildings of up to 20 storeys could be accommodated on this site, (although there appears to be some conflict with the tall buildings map as set out above), and we consider that taller buildings could be accommodated on site with relatively minor impact on the historic environment.

However, the visualisations provided strongly suggest that the taller buildings to the north west of the development site, particularly the 11 storey building, as well as the 20-storey building would have an incongruous relationship with the prevailing suburban scale of development in key views and approaches of the conservation area, diminishing its character. Some of these impacts would also undermine the landmark status of the former Higgins and Jones department store on the approach from the



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west. We therefore consider that some harm to the conservation area would result from the scale of development as currently configured.

The proposed Rye Lane frontage building does seek to respond to the conservation area's character through its inclusion of shopfronts, its varied façade treatments, and lower height where it meets the corner bank building. However, at a maximum of 7 storeys, it would be significantly taller than the majority of buildings along Rye Lane. While the tallest elements would be slightly set back from the frontage, this element of the scheme has the potential to cause additional harm, although full rendered images of this building would help provide a clearer understanding of its impact on the conservation area.

Finally, while it is unlikely that the proposed development would have significant impacts on Local Views beyond Southwark, we recommend that the future townscape assessment considers Local Views in the neighbouring borough of Lewisham.

Recommendation and Next Steps

Historic England welcomes the opportunity to comment on these plans at pre-application stage. On the basis of the information provided, we consider that some harm would be caused to the Rye Lane Peckham Conservation Area. We recommend that the taller elements of the scheme, particularly the 11-storey and 20-storey tall buildings are reduced and potentially redistributed further east to better reflect the Council's local policies and our own tall buildings guidance, as we as the heritage policies of the NPPF as set out above.

A slight reduction in height, and a more articulated roofline of the proposed Rye Lane building would also help to reduce its potential for harm. We would welcome the opportunity consider more detailed plans for this building as well as any wider changes in response to these comments as part of our extended pre-application advice service, the details of which can be found on our website via:

<https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisory-services/extended-pre-application-advice/>.

I hope this advice is helpful, but please let me know if you would like clarification on any of the points set out. Please note that this letter does not address archaeological matters which should be sought from the Council's own archaeologist.

Yours sincerely

Alasdair Young

Inspector of Historic Buildings and Areas

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Information Provided

Aylesham Centre, Historic England Presentation (dRMM et al, 19 March 2024)

The Aylesham Centre, SE15 5EW, Heritage, Townscape and Visual Impact

Assessment (The Townscape Consultancy, March 2024)

Masterplan Development (The Townscape Consultancy)



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