

Aylesham Centre

Environmental Statement Addendum

Volume 2: Heritage, Townscape and Visual Impact Assessment Addendum

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INTRODUCTION

- 1.1 The Heritage, Townscape and Visual Impact (HTVIA) Chapter of the July 2024 ES has been reviewed in the context of the Revised Proposed Development to determine if the conclusions of this assessment remain valid. In addition, consideration has been given to any updates / changes to baseline, policy and methodology.
- 1.2 Following validation of the planning application, the Applicant has also considered responses received from London Borough of Southwark (LBS) officers (and their independent advisors), statutory consultees, the public, and other stakeholders.

CONSULTATION SINCE THE JULY 2024 ES

- 1.3 An ES Review was provided by LUC in November 2024 (the ES Review Report being dated October 2024), responses to the clarifications raised in LUC's ES Review are presented in Table 1.1 below.

Table 1.1 ES Review Response Table

Requested Clarification / Potential Regulation 25	Response
Clarification Point (Ref: TVIA01) Paragraphs 2.75 and 2.76, detailed criteria are not presented for assessing susceptibility, value, sensitivity or magnitude of change in line with Scoping Opinion TVIA9 and these should be provided.	Paragraphs 2.75 and 2.76 within the July 2024 HTVIA provide examples of how the professional judgement of assessor may be applied in light of the previous paragraphs 2.67-2.74. All of these paragraphs should be read together. In addition, and for further clarity, four tables setting out these criteria, as requested, are appended, namely: 2024 Townscape and Visual Magnitude of Change Criteria 2024 Townscape and Visual Sensitivity Matrix 2024 Townscape and Visual Susceptibility Criteria 2024 Townscape and Visual Value Criteria
Clarification Point (Ref: TVIA03) It is not clear at what year of operation the AVR images show, particularly relevant for those near-distance views where the proposed landscape interventions are visible. This should be clarified.	The AVRs show the Proposed Development in operation after all phases of it have been built and the landscaping scheme is in place. The Proposed Development is expected to be fully complete and operational in Q4 2034 and the first occupation will occur in 2029. The AVRs therefore depict a year after 2034 when the landscaping is expected to be mature, as illustrated in the AVRs.
Clarification Point (Ref: TVIA05) The TVIA describes the characteristics of each TCA and concludes on the overall sensitivity to change. However, it is not clear what the individual ratings are for value and susceptibility, and this should be clarified with reference to the methodology.	See the four appended tables which set out the criteria for value and susceptibility and how they have been combined to come to conclusions about sensitivity in each case. Decisions on the criteria related to individual receptors have been made on the basis of professional judgement as described in the methodology.
Clarification Point (Ref: TVIA07) However, it is not clear how the sensitivities of local communities/residents have been treated for several views, with a low sensitivity assigned to some views (e.g. View 14, 15, 18, 20, 22, 23, 25, 29, 34 and 36) and this should be clarified.	Decisions on sensitivity of views were undertaken in accordance with the methodology (see paras 2.67 – 2.77 in particular). Para 2.68 notes that 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). Para. 2.74 acknowledges that the assessment of sensitivity is a matter of professional judgement, and that 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. The sensitivities of local communities/residents are considered, therefore, in a narrative way in each view and are inherent in the assessment. Views 14 and 15: The sensitivity of these views was considered to be low on the basis that their Value could be considered low to medium, and their Susceptibility to change to buildings in the location and to the height of the Proposed development was likely to be low; see 2024 Townscape and Visual Sensitivity Matrix. There only reasonable alternative would be a medium sensitivity, but this would still lead to a Minor (i.e. non-significant) effect at most because the Magnitude of Change would remain very small owing to occlusion by trees even in winter conditions.

Requested Clarification / Potential Regulation 25	Response
	View 18: The sensitivity of this view was considered to be low overall on the basis that its Value could be considered low to medium, and its Susceptibility to change to buildings in the location and to the height of the Proposed development likely to be low; see 2024 Townscape and Visual Sensitivity Matrix. This assessment took into account that the 20 storey tower at Witcombe Point can already be seen further in the distance, beyond a modern school building, indicating that residents would already be aware of the urban presence of Peckham town centre. View 20: The sensitivity of this view was considered to be low on the basis that its Value could be considered low overall, and its Susceptibility to change to buildings in the location and to the height of the Proposed development likely to be low or medium; see 2024 Townscape and Visual Sensitivity Matrix. This assessment took into account the low compositional value of the view. Were the view to be considered of a medium sensitivity, this would still lead to a Minor (i.e. non-significant) effect at most because the Magnitude of Change would remain very small owing to occlusion by trees even in winter conditions. View 22: The sensitivity of this view was considered to be low on the basis that its Value could be considered low, and its Susceptibility to change to buildings in the location and to the height of the Proposed development also likely to be low; see 2024 Townscape and Visual Sensitivity Matrix. This assessment took into account the low compositional value of the view. View 23: The sensitivity of this view was considered to be low on the basis that its Value could be considered low, and its Susceptibility to change to buildings in the location and to the height of the Proposed development also likely to be low; see 2024 Townscape and Visual Sensitivity Matrix. This assessment took into account the low compositional value of the view and the existing visibility of background buildings indicating that residents would already be aware of the urban presence of Peckham town centre. View 25: The sensitivity of this view was considered to be low on the basis that its Value could be considered low overall, and its Susceptibility to change to buildings in the location and to the height of the Proposed development likely to be low or medium; see 2024 Townscape and Visual Sensitivity Matrix. Were the view to be considered of a medium sensitivity (and the view does have some compositional value), this would still lead to a Minor (i.e. non-significant) effect in EIA terms (see Table 2.4 in July 2024 HTVIA). View 29: The sensitivity of this view was considered to be low on the basis that its Value could be considered low, and its Susceptibility to change to buildings in the location and to the height of the Proposed development could be considered low or medium; see 2024 Townscape and Visual Sensitivity Matrix. This assessment took into account the low compositional value of the view. View 34: The sensitivity of this view was considered to be low on the basis that its Value could be considered low, and its Susceptibility to change to buildings in the location and to the height of the Proposed development also likely to be low; see 2024 Townscape and Visual Sensitivity Matrix. This assessment took into account the low compositional value of the view. View 36: The sensitivity of this view was considered to be low on the basis that its Value could be considered low, and its Susceptibility to change to buildings in the location and to the height of the Proposed development likely to be medium; see 2024 Townscape and Visual Sensitivity Matrix. This led to significant effect in EIA terms because of the large magnitude of change. Were the view to be considered of a medium sensitivity, this would also lead to a significant effect in EIA terms (see Table 2.4 in July 2024 HTVIA).

Requested Clarification / Potential Regulation 25	Response
Potential Regulation 25 Point (Ref: BH01) Amended figure(s) should be provided to clearly illustrate the ZTV extent and the assets scoped into assessment.	It is considered that the figures included in the HTVIA clearly illustrate, as far is proportionate and reasonable, the extent of the ZTV as well as how the visibility of the Proposed Development overlaps with the location of heritage assets. As appendix 3 states, the ZTV uses <i>'the maximum range allowed in Vu.City, namely 2 Km.'</i> Longer range views included in the HTVIA have been considered using Accurate Visual Representations (AVRs) in parallel with the ZTV to confirm this. Each map includes the approximate radii, ranging from 1000m for the conservation area map, to 250m for heritage assets. Radii are not generally placed on maps for TCAs or views nor are required. Not showing the radii more widely on these maps does not make the assessments deficient but is based on professional judgement and informed by a site visit, desk-top research, urban pattern, form and character. The assets scoped into the assessment are those assets shown by ZTV and AVRs likely to be affected by the Proposed Development in setting terms. These are clearly identified within chapter 7 para 7.5 for heritage receptors (as well as chapter 8 figure 8.1 for townscape receptors and chapter 9 figure 9.1 for visual receptors). These parameters are explained in more detail within the methodology at section 2.54, 2.55, 2.56 and 2.57 within Chapter 2 of the HTVIA
Potential Regulation 25 Point (Ref: BH02) The conclusions on heritage, and townscape and visual, should be summarised separately for clarity in the NTS.	Chapter 11 of the HTVIA includes separate tables for heritage, townscape and visual effects conclusions. Summaries of conclusions are contained prior to these within the same chapter. The previously submitted NTS summarised the heritage, townscape and visual effects of the Proposed Development as submitted and has been updated in the context of the Revised Proposed Development.
Potential Regulation 25 Point (Ref: TVIA02) It is not clear what the magnitude of change is for individual receptors, which should be provided in line with Scoping Opinion response TVIA8.	The magnitude of change for all receptors is provided within the narrative assessment in HTVIA chapters 7, 8 and 9 and within the tables at chapter 11 Conclusion. The significance of effect from each receptor has been determined by considering the sensitivity of the affected heritage, townscape or visual receptor, and the magnitude of change acting on that resource/receptor. Clear justification for how sensitivity and magnitude are combined to determine overall effects have been included in the HTVIA, see chapter 2 paras. 2.33, 2.39, and 2.41, alongside table 2.3 for heritage assessment; and chapter 2 paras. 2.67, 2.78 and 2.80, alongside table 2.4 for townscape and visual impact assessment.
Potential Regulation 25 Point (Ref: TVIA04) No assessment is made considering the loss/ retention of trees within the site in line with Scoping Opinion response TVIA2 and this should be provided. The TVIA does not refer to an Arboriculture Impact Assessment or Tree Survey. If this has been produced and submitted with the planning application, it should be referred to in order to assist with an assessment of effect on trees.	Reference to trees and the tree strategy of the Proposed Development is made proportionately and where relevant, for example at paras. 6.52-6.53 of the HTVIA. It is not considered that the role of the tree strategy is significant in the context of the heritage, townscape and visual effects of the scheme as a whole, but reference is made to the role of the tree strategy individually where relevant (e.g. View 8). It is considered that the approach taken to trees is proportionate and appropriate given their location and role within the Proposed Development.
Potential Regulation 25 Point (Ref: TVIA06) Townscape assessment does not provide a narrative to justify the magnitude of change ratings with reference to the methodology. This should be provided with reference to the methodology.	See paragraphs 8.44 to 8.49 for an overall summary of TCA conclusions. Below expands on the findings within Chapter 8 of the HTVIA for clarification purposes: TCA A: Central Peckham The Magnitude of change on this TCA is large – as assessed within the HTVIA. This is due to the Proposed Development's location within the TCA itself, and the increase in scale and volume that it represents in comparison to the existing Site condition. As set out in the 2024 Townscape and Visual Magnitude of Change Table, a large magnitude of change represents 'Considerable change to the TCA'. This has been determined through professional judgement taking into account the AVRs in the HTVIA, the architect's DAS and drawings. TCA B: Historic Residential Peckham

Requested Clarification / Potential Regulation 25	Response
	The Magnitude of change on this TCA is small – as assessed within the HTVIA. This is due to the distance the Site is located from the TCA B boundary, being sited to the eastern edge of the neighbouring Central Peckham TCA. It would add backdrop buildings into views when experienced from within TCA B. As set out in the 2024 Townscape and Visual Magnitude of Change Table, a small magnitude of change represents 'a small change to the TCA'. This has been determined through professional judgement taking into account the AVRs in the HTVIA, the architect's DAS and drawings. TCA C: Central Peckham Housing, east of site As the assessment states at para. 8.27, 'The Proposed Development would result in a medium magnitude of change to the TCA, owing to the greater height and volume of the scheme adjacent to the boundary of the TCA.' As set out in the 2024 Townscape and Visual Magnitude of Change Table, a medium magnitude of change represents 'an obvious change to the TCA'. This has been determined through professional judgement taking into account the AVRs in the HTVIA, the architect's DAS and drawings. TCA D: Central Peckham Housing, north of the site The Magnitude of change on this TCA is small – as assessed within the HTVIA. This is owing to the Proposed Development's distance from the TCA D boundaries to the north, while taking into account that the TCA comprises low scale housing blocks. The Proposed Development will be glimpsed from some locations within the TCA and understood as a backdrop development highlighting the urban centre of Peckham. As set out in the 2024 Townscape and Visual Magnitude of Change Table, a small magnitude of change represents 'a small change to the TCA'. This has been determined through professional judgement taking into account the AVRs in the HTVIA, the architect's DAS and drawings. TCA E: Terraced Streets, north of Queen's Road The Magnitude of change on this TCA is very small – as assessed within the HTVIA. This iss because the only interaction with the Proposed Development from within the TCA will be as a relatively distant new skyline element in a small number of views. As set out in the 2024 Townscape and Visual Magnitude of Change Table, a very small magnitude of change represents 'a minimal change to the TCA'. This has been determined through professional judgement taking into account the AVRs in the HTVIA, the architect's DAS and drawings.

1.4 Comments were also provided by The Greater London Authority (GLA), Historic England (HE) and the London Borough of Lambeth in October 2024. Responses to these comments are presented in Table 1.2 below.

Table 1.2 Responses to Consultee Comments

Comment	Response
Greater London Authority (GLA) Comments	Full response appended to this addendum at HTVIA Addendum Appendix 2.
In summarizing the strategic issues in relation to urban design and heritage, the GLA stated in their Stage 1 report: <i>'No strategic concerns are raised to the principle of tall buildings on the site. Refinements to the layout and architecture should be considered. A very low to middle level of less than substantial harm is caused to heritage assets which must be outweighed by the benefits of the proposal.'</i>	In the Townscape Consultancy's view, the GLA Stage 1 report tends to overstate the level of 'less than substantial' harm arising from the Proposed Development, as well as the number of heritage assets whose significance would be affected, for the reasons set out in the appended full response. However, it is noted that the GLA assessment of harm to significance remains within the 'less than substantial' category, as was also acknowledged within the HTVIA, and as such the approach set out in para. 208 of the NPPF (2023) should be applied by the decision maker.
The GLA go on to state: <i>'Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be attributed considerable importance and weight and weighed against the public benefits of the proposal' and 'GLA officers acknowledge that the proposal would deliver public benefits such as the delivery of new housing and affordable housing, new commercial floorspace, and new public realm improvements. GLA officers will assess</i>	Paragraph 208 states that "where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".
	In the Townscape Consultancy's assessment, officers have sufficient and proportionate information on both the low level of 'less than substantial harm' arising from the Proposed Development through the submitted HTVIA, and the significant public benefits that are likely arise through the

Comment	Response
<i>whether these elements have been appropriately secured to ensure that full weight can be given to these public benefits’.</i>	Site’s regeneration (also acknowledged by the GLA), in order to determine the application positively through the application of para. 208.
Historic England (HE) Comments In summary, Historic England in principle, has no ‘issue with the redevelopment of the Aylesham Centre site which is allocated for redevelopment with buildings of increased height in the Southwark Plan. However, we consider that the overall height and distribution of tall buildings would have in an incongruous relationship with the more modest-scale and fine grain townscape along Rye Lane and Peckham High Street, from some locations appearing as an enormous wall of development in the background of key views of the Rye Lane Peckham Conservation Area. We consider that these impacts would cause harm to the conservation area’s character. This harm could be mitigated through the development of a frontage building to Rye Lane that successfully responds to the fine grain and modest scale of buildings within the conservation area . Unfortunately, we consider that this opportunity has been missed due to the overbearing presence of Buildings A, B and C in key conservation area views . Should your Council be minded to determine the application in its current form, the harm we identified should be taken into account with reference to the policies and guidance set out in this letter’ .	Full response appended to this addendum at HTVIA Addendum Appendix 3. Historic England’s post-submission response to Proposed Development focuses on the potential for the taller elements of the Proposed Development to be read as a “wall of development” in views from the west and from the north, as well as perceived harm caused to the significance of Rye Lane, Peckham, Conservation Area owing to the proposed new frontage onto Rye Lane, namely Buildings A, B and C. It is noted that HE’s assessment of harm to significance is implied to be within lower levels of the ‘less than substantial’ harm category, since they state that “some harm to the conservation area would result from the overall scale and distribution of buildings across the development site”, while pointing to the application of paragraph 208 of the NPPF which sets out the policy approach in cases of ‘less than substantial’ harm. This categorisation of harm was acknowledged within the HTVIA, and while ‘great weight’ should be applied to any such harm and it should be fully justified, it is clear that the decision maker, in applying para. 208, has the ability to determine the application by weighing the ‘less than substantial’ harm identified against the public benefits of the proposal including, where appropriate, securing its optimum viable use. In the Townscape Consultancy’s assessment, officers have sufficient and proportionate information on both the low level of ‘less than substantial harm’ arising from the Proposed Development through the submitted HTVIA, and the significant public benefits that arise through the Site’s regeneration, in order to determine the application positively through the application of para. 208.
London Borough of Lambeth (LBL) Comments LBL requested to see three Lambeth local views in order to make their assessment, these view locations are specified within the emerging Lambeth Local Views SPD, and LBL considered that the Proposed Development would sit within the view cones of the three views.	Three views from within Lambeth were requested for testing by LBL in the post-submission period. These are views identified in their emerging Lambeth Local Views SPD, namely: - Panorama 1C Brockwell Park to the City - Panorama 2 Norwood Park to the City - Panorama 3 Gipsy Hill to the City The three views were tested using 3D London software ‘Vu City’, into which the architectural model provided by the architects dRMM had been inserted. This testing showed that: In two of the views (Panorama 1C Brockwell Park; and Panorama 3 Gipsy Hill), the Proposed Development would not be visible at all, since it would be occluded behind intervening townscape elements. In the images provided, the red outline of the scheme is included to show its hidden position. In the view from the high ground of Norwood Park (Panorama 2 Norwood Park), the Proposed Development would be visible but is located significantly east (to the right, when seen from the viewpoint) of the principal aspect of the view towards the City cluster of tall buildings to the north. In the Vu City image provided the Proposed Development is shown in pink, and when focussing in on the view, it can be seen as part of the ‘foot hills’ of the taller buildings consented and under construction in the Old Kent Road area beyond. These buildings are shown in yellow and blue in Vu City. It is considered that the proposal sits entirely appropriately into the emerging panorama and would not produce an additional significant visual effect from this viewpoint.

LEGISLATION, PLANNING POLICY AND GUIDANCE

- 1.5
- There are no changes in legislation, planning policy and guidance resulting from the following matters considered / presented within the July 2024 ES.

ASSESSMENT METHODOLOGY

Defining the Baseline

- 1.6
- The method for determining the baseline conditions remain the same as presented within the July 2024 ES.

Impact Assessment Methodology

- 1.7
- There are no changes to the assessment methodology set out within the July 2024 ES HTVIA Volume. Consequently, the assessment methodology and significance criteria stated in the HTVIA July 2024 ES Methodology at Chapter 2 of the HTVIA remains applicable and valid. However, as set out above, additional tables have been provided in the ES Addendum HTVIA Volume 2 Appendix to provide clarity on:
 - 2024 Townscape and Visual Magnitude of Change Criteria
 - 2024 Townscape and Visual Sensitivity Matrix
 - 2024 Townscape and Visual Susceptibility Criteria
 - 2024 Townscape and Visual Value Criteria

Methodology For Defining Effects

Receptors And Receptor Sensitivity

- 1.8
- No amendments have been made to the receptors or their sensitivity considered in the July 2024 ES ‘Methodology’ at Chapter 2 of the HTVIA.
- 1.9
- See additional methodology tables at Appendix 1.

Magnitude of Impact

- 1.10
- No amendments have been made to the method to determine magnitude of impact and it remains the same as considered in the July 2024 ES ‘Methodology’ at Chapter 2 of the HTVIA.
- 1.11
- See additional methodology tables at Appendix 1.

Defining the Effect

- 1.12
- No amendments have been made to the method used for defining the effects and it remains the same as considered in the July 2024 ES ‘Methodology’ at Chapter 2 of the HTVIA.
- 1.13
- See additional methodology tables at Appendix 1.

Categorising Likely Significant Effects

- 1.14
- No amendments have been made to the categorisation of likely significant effects and it remains the same as considered in the July 2024 ES ‘Methodology’ at Chapter 2 of the HTVIA.

BASELINE CONDITIONS

Current Baseline Conditions

- 1.15
- There is no material change to the baseline conditions as presented within the July 2024 ES.

IMPLICATIONS OF THE REVISED PROPOSED DEVELOPMENT

- 1.16** The implications of the Revised Proposed Development on the HTVIA assessment relate to adjustments to the internal layouts and unit typology mix, resulting in minor changes to the fenestration and balcony placement on some of the proposed buildings within the Site boundary.
- 1.17** These changes have been considered in respect of the likely heritage, townscape and visual effects, making use of updated elevational drawings and the Design & Access Statement provided by the architects. It is considered that there would be no additional significant effects on heritage, townscape or visual receptors as a result of the minor changes to fenestration and balcony placement or on the assessments reached within the July 2024 ES.

Embedded Mitigation

- 1.18** There is no material change to the future baseline conditions as presented in the July 2024 ES.

POTENTIAL EFFECTS

Demolition and Construction

- 1.19** There are no changes that will affect the previous assessment undertaken and therefore the July 2024 ES HTVIA chapter remains robust and valid.

Completed Development

- 1.20** The design changes as they relate to the Heritage, Townscape and Visual Impact Assessment primarily pertains to adjustments to the internal layouts and unit typology mix, resulting in minor changes to the fenestration and balcony placement to buildings A, B, C, H, K, L, N, P and Q. The following remaining buildings D, E, F, G, J, and M are largely unchanged. There are also changes to the elevational treatment of Building L cycle hub at ground and first floor levels. Further details are set out within the updated Design and Access Statement (document ref. AC02A) Based on an assessment of the Revised Proposed Development, it is considered that the changes are minor and would not materially affect the previous assessment undertaken and therefore the July 2024 ES HTVIA chapter remains robust and valid.

MITIGATION, MONITORING AND RESIDUAL EFFECTS

Demolition and Construction Mitigation

- 1.21** There are no changes in mitigation measures and residual effects remain the same, and therefore the conclusions of July 2024 ES HTVIA chapter remain robust and valid.

Completed Development Mitigation

- 1.22** There are no changes in mitigation measures and residual effects remain the same, and therefore the conclusions of July 2024 ES HTVIA chapter remain robust and valid.

Residual Effects

- 1.23** There are no changes in residual effects of the Revised Proposed Development, as assessed within the HTVIA chapter included within the July 2024 ES as a separate volume, with all findings remaining unchanged, robust and valid.

ASSESSMENT OF THE FUTURE ENVIRONMENT

Evolution of the Baseline

- 1.24** There is no material change to the evolved baseline conditions as presented in the July 2024 ES.

Future Baseline Conditions

- 1.25** An updated cumulative schemes axonometric map has been provided by visualisers Millerhare and can be found at HTVIA Addendum Appendix 5. It includes additional cumulative schemes (i.e. those that have received consent since the application was made) highlighted in green on the axonometric map, alongside a list of scheme details. These are all at some distance from the Site, and there is considered to be no material change to the future baseline conditions as presented in the July 2024 ES.

CUMULATIVE EFFECTS ASSESSMENT

Demolition and Construction

- 1.26** An updated cumulative schemes axonometric map has been provided by visualisers Millerhare and can be found at HTVIA Addendum Appendix 5. It includes additional cumulative schemes (i.e. those that have received consent since the application was made) highlighted in green on the axonometric map, alongside a list of scheme details.
- 1.27** Having taken the additional cumulative schemes into account, it is considered that there would be no changes in cumulative demolition and construction and effects would remain the same, and therefore the conclusions of July 2024 ES HTVIA chapter remain robust and valid.

Completed Development

- 1.28** An updated cumulative schemes axonometric map has been provided by visualisers Millerhare and can be found at HTVIA Addendum Appendix 5. It includes additional cumulative schemes (i.e. those that have received consent since the application was made) highlighted in green on the axonometric map, alongside a list of scheme details. The likely impact of the updated cumulative schemes on the future baseline was reconsidered using the newly prepared axonometric map, while cross referencing to the original cumulative views included in the July 2024 HTVIA. This process indicates that, from those viewpoints that look more directly northeast (views 3, 20 and 21 for example) towards where these additional cumulative schemes are located, there will be no additional visibility of the Revised Proposed Development with the additional cumulative schemes. This is due to the existing geography and townscape conditions. The larger cumulative schemes that are within the July 2024 views are shown dotted and therefore fully occluded behind dense trees or behind tight rows of terraced houses. The additional cumulative schemes will be similarly occluded, leading to no additional effects.
- 1.29** From other elevated viewpoints, (views 30, 31, 32 and 33 for example) looking more directly northwards, visual receptors may experience some minimal visibility of new schemes 11 and 27 (6-12 Verney Road London SE16 3DH and 310-330 St James's Road London Southwark SE1 5JX) alongside the cumulative schemes already included in the July 2024 HTVIA. These additional cumulative schemes are smaller in scale and will likely be partly occluded by the July 2024 cumulatives or the Revised Proposed Development itself. New cumulative schemes 25 and 26 are located further to the east and would be separate and visually distanced from the Revised Proposed Development and therefore would not lead to any material additional cumulative effects, whether in respect of heritage, townscape or visual receptors.
- 1.30** It was not considered proportionate to update the submitted AVRs to include the additional cumulative schemes identified.
- 1.31** In summary, there are considered to be no material changes to cumulative effects, and therefore the conclusions of July 2024 ES HTVIA chapter remain robust and valid.

LIKELY SIGNIFICANT EFFECTS

- 1.32** The likely significant effects remain the same, and therefore the July 2024 ES remains robust and valid. Neither the minor changes to the fenestration or balcony placement, nor the additional cumulative schemes identified, would give rise to additional significant effects in EIA terms.

**THE
TOWNSCAPE
CONSULTANCY**

 **TRIUM**

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AYLESHAM CENTRE ADDENDUM APPENDIX

Project

Aylesham Centre, Hanover Park, London SE15 5EW

Client

Berkley Homes (Capital) PLC

Architects

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

Visualisers

Millerhare

Prepared by

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

Cat Rossborough, BArch (Hons), MA
Junior Consultant

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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Appendix 1: Additional Methodology Tables

1.1 Within this appendix, additional tables to complement the July 2024 HTVIA’s methodology are provided. These set out, in more detail, the criteria for value and susceptibility and how they have been combined to come to conclusions about the sensitivity of townscape and visual receptors.

townscape and visual receptors	
Large	Considerable change to the TCA or view experienced by a person.
Medium	An obvious change to the TCA or view.
Small	A small change to the TCA or view that would not be readily noticed.
Very small	Minimal change to the TCA or view that would be difficult to discern.
No Change	No discernible change to the TCA or view.

Figure 1.1: Townscape and Visual Magnitude of Change Criteria

Sensitivity (Townscape and visual)		Susceptibility to change		
		High	Medium	Low
Value	Very High	Very High or High	High or Medium	Medium or Low
	High	High	High or Medium	Medium or Low
	Medium	High or Medium	Medium	Medium or Low
	Low	Medium or Low	Medium or Low	Low
	Very Low	Medium or Low	Medium or Low	Low or Very Low

Figure 1.2: Townscape and Visual Sensitivity Matrix

Susceptibility to Change of townscape or visual receptor	Criteria
High	- The Townscape Character Area has a high level of coherence and definable character, and therefore the receptor has limited capacity to accommodate change within its boundary or setting without its townscape value, or ability to appreciate that value, being affected. - The visual receptor (a person) places importance on a view and therefore has limited capacity to accommodate change within it without their visual amenity being affected.
Medium	- The Townscape Character Area has a reasonable level of coherence and definable character, and therefore the receptor has some capacity to accommodate change within its boundary or setting without its townscape value, or ability to appreciate that value, being affected. - The visual receptor (a person) places some importance on a view and therefore has some capacity to accommodate change within it without their visual amenity being affected.
Low	- The Townscape Character Area has little coherence or definable character, and therefore the receptor has the capacity to accommodate change within its boundary or setting without its townscape value, or ability to appreciate that value, being affected. - The visual receptor (a person) places limited or no importance on a view and therefore has the capacity to accommodate change within it without their visual amenity being affected.

Figure 1.3: Townscape and Visual Susceptibility Criteria



Appendix 1: Updated Methodology Tables (cont.)

Townscape and Visual Value	Criteria
Very High	- Highly valued Townscape Character Areas, such as those designated as World Heritage Sites, including views to and from them. - Views identified in WHS Management Plans. - LVMF Views. - Grade I Registered parks and gardens, likely to also include highly graded listed buildings or scheduled monuments, their setting, including views to and from them. - Exceptionally coherent and characterful townscapes, distinct and nationally recognised skylines, or views of international or national importance. - Conservation areas of exceptional unity or character with national or international importance, often overlapping with other important designations.
High	- Conservation areas or Townscape Character Areas of particular coherence or unity, also including a high number of listed buildings or overlapping with other designations. - Views identified in conservation area character appraisals or management plans. - Grade II* and II registered parks and gardens, their setting, including views to and from them. - Registered battlefields, and their setting, including views to and from them. - Designated historic landscapes of outstanding interest, or high quality and importance and of demonstratable national value, their setting, including views to and from them. - Planned open spaces, including views to and from them. - Views from identified viewing places offering a high level of visual amenity to those experiencing them.
Medium	- Townscape Character Areas of good quality, including conservation areas of unified character, often including locally listed buildings, their setting, and views to and from them. - Locally designated or identified views.

Townscape and Visual Value	Criteria
	- Other historic townscapes and landscapes with a good level of coherence, expressing time-depth or other critical factor(s), their setting, including views to and from them. - Designated historic landscapes and their setting, including views to and from them. - Attractive local views with notable pictorial or compositional qualities offering a good level of visual amenity to those experiencing them. - Parks and public open spaces of some formality, especially those of local historic interest, identified by the local authority, their setting, including views to and from them. - Coherent and legible Townscape Character Areas of some compositional quality.
Low	- Undesignated historic landscapes and their settings, including views to and from them. - Mixed or ordinary Townscape Character Areas with limited compositional quality. - Local open spaces. - Views of limited quality offering some visual amenity to those experiencing them.
Very low	- Built fabric, Townscape Character Areas or landscapes with little or no architectural or historical interest, including views to and from them. - Townscape Character Areas of little or no compositional quality. - Incidental views of poor quality offering little visual amenity to those experiencing them.

Figure 1.4: Townscape and Visual Value Criteria



Appendix 2: Greater London Authority (GLA) Response

2.1 This appendix includes the full response to the GLA comments received in October 2024. This response is summarised in table 1.2 within the HTVIA Addendum chapter.



RESPONSE TO GLA STAGE 1 REPORT (Ref: GLA/2024/0474/S1/01) ON MATTERS RELATING TO HERITAGE, TOWNSCAPE AND VISUAL IMPACT

- 1.1 This post-application response has been prepared by The Townscape Consultancy on behalf of Berkeley Homes (Capital) PLC ('Berkeley'), in respect of comments received from the Greater London Authority (GLA) on planning application (LPA ref: 24/AP/2074) at The Aylesham Centre, Hanover Park, London SE15 5EW (the 'Site').
- 1.2 This response deals with matters relating to the heritage, townscape and visual impact of the Proposed Development. It makes reference to the heritage assets and townscape views referred to within the GLA Stage 1 report dated 21st October 2024.
- 1.3 It is noted that at paras. 27 and 28 of the Stage 1 report, the GLA's officers are "supportive of the approach to height with the tallest buildings to the east of the site which gradually reduce to the west. The varied heights of the buildings help to break up the overall mass whilst the stepped mass of taller buildings would result in an interesting silhouette and skyline", and consider that "the HTVIA demonstrates that the proposed development would have an acceptable impact in immediate, mid-range and long-range townscape views".
- 1.4 The GLA includes a table of indirect (setting) impacts at para. 48 of their report, and states at para. 49 that "as the proposal is considered to result in a very low to middle level of less than substantial harm to heritage assets, the proposed development is therefore contrary to Policy HC1."
- 1.5 It goes on to state at para. 50 that, "GLA officers acknowledge that the proposal would deliver public benefits such as the delivery of new housing and affordable housing, new commercial floorspace, and new public realm improvements. GLA officers will assess whether these elements have been appropriately secured to ensure that full weight can be given to these public benefits."

Response

- 1.6 In general terms the GLA's findings are in accordance with the findings of the HTVIA submitted with the application and authored by The Townscape Consultancy, in that the masterplan principles of the scheme are considered appropriate. The HTVIA also considers that some 'less than substantial harm' would arise from the Proposed Development. The HTVIA found, however, that the number of instances of 'less than substantial harm' to the significance of designated heritage assets was smaller than identified by the GLA, and that the 'less than substantial harm' identified was at the low end of the scale, rather than rising to the 'middle' of the scale, as the GLA believes.
- 1.7 There is limited information provided on the method of assessment used by the GLA to come to their conclusions on harm in the Stage 1 report. The methodology for identifying harm undertaken in the HTVIA is explicitly set out and is based on recognised best practice as set out in Historic England's GPA3 guidance note, 'The Setting of Heritage Assets'. The staged approach advocated by Historic England includes consideration of what is significant about each heritage asset, including the contribution to significance made by its setting. Use of this methodology avoids conflating 'visibility' within setting to 'harm' to significance.
- 1.8 Set out below are specific responses to the GLA's findings on specific heritage assets, as tabulated at para 48. of their report. These responses make use of the assessments set out in the HTVIA, but the assessments are no repeated in full. Consideration should therefore be given to chapter 7.0 'Heritage Assessment' of the HTVIA, alongside this high level response.

No. 58 Peckham High Street, listed Grade II
- 1.9 The GLA make no conclusion in respect of potential harm to this asset and state that no view was provided in the HTVIA. This is incorrect, as View 10 in the HTVIA illustrates the relationship between No. 58 High Street and the Proposed Development to the east. The HTVIA concludes, in this case, that there would be a low level of less than substantial harm arising owing to a small diminution of the prominence of the listed building on the skyline. More specifically, it points out at, at para. 7.119, that "larger and later buildings...have represented the context of the listed building since the 19th C and contribute to its varied setting" and that "the Proposed Development would rise into the sky space behind [the listed building] without affecting its visibility...in the foreground". "The fragmented relationship of the listed building to the other periods of Peckham's commercial development through the 19thC and early 20thC would remain, while its principal elements of significance would be maintained in its fabric, however its prominence on the skyline would be slightly diminished, and overall this is considered to give rise to a very low level of 'less than substantial harm' to the heritage significance of the heritage asset in its context".



Appendix 2: GLA Response (cont.)

Baptist Chapel, listed Grade II;

- 1.10 The GLA consider there would be a very low level of less than substantial harm arising to this asset owing to the visual conjunction shown in HTVIA View 9. The HTVIA's conclusion in respect of this asset, at paras 7.129, 7.130 and 7.131, is that "the Proposed Development would provide a new frontage onto Rye Lane, replacing the shopping centre's elevation, somewhat to the north of the chapel but seen together with it in long views looking north (View 9). The chapel will remain set back from Rye Lane and separated from the visible new elements of the Proposed Development

on Rye Lane. The new frontage to the north will enhance the setting of Rye Lane as a whole and to an extent that of the chapel, providing an improved context within which to appreciate the significance of the heritage asset. Other taller elements of the Proposed Development will be set back from the Rye Lane and Hanover Park edges of the Site, rising towards its centre and east. These will not be visible in relation to the chapel on Rye Lane. Lower new blocks on Hanover Park will also not be visible in relation to the listed chapel, at least in any direct way, because of intervening townscape".

- 1.11 The HTVIA goes on to say that these elements of the scheme are likely to improve the wider setting and street edge into Hanover Park close to its junction with Rye Lane. In summary, the heritage significance of the heritage asset would be unchanged, but the context within which to appreciate the significance of the heritage asset would be slightly improved.

Post Office Depot (former Quaker Meeting House), listed Grade II;

- 1.12 The GLA make no conclusion in respect of potential harm to this asset and state that no view was provided. While it is true that there is no view in the HTVIA that directly includes the Post Office Depot, it is set back behind the 19th Century houses on Highshore Road in View 19, and the setting relationship between the Post Office Dept and the Proposed Development can therefore be interpolated. The conclusions of the HTVIA in respect of this asset, at para 7.140, are that the "ZTV assessment shows that there would be some visibility of the Proposed Development from close to the listed Post Office Depot on Highshore Road. This would likely include some of the buildings of the Proposed Development set back behind Rye Lane, seen over the top of the back of the existing west elevation of Rye Lane. Since these are views quite close to Post Office Depot, it would hold primacy in the view, while the Proposed Development would be experienced as a relatively distant backdrop element that would not affect the significance of the heritage asset or its appreciation". "This would result in no harm to the heritage significance of the heritage asset or the ability to appreciate it".

Peckham Rye Station, listed Grade II;

- 1.13 The GLA make no conclusion in respect of potential harm to this asset and point out that no view was provided. No AVR view was provided in this case, as the 19th C listed building is in a location, set back on the west side of the High Street, where there is no realistic prospect of a material visual conjunction or change to setting owing to the Proposed Development. This is illustrated further by the ZTV provided for the application, which shows no visual conjunction with the listed building itself. It is therefore considered that there would be no harm to the significance of this heritage asset, or the ability to appreciate it, owing to the Proposed Development, which would be located some distance to the north beyond an intervening, and densely urban, townscape.

Numbers 8 to 14, 16 and 18, 79, 9 and 11, 17 and 19, 21 and 23 and 25 Highshore Road, listed Grade II;

- 1.14 The GLA consider there would be a low to middle level of less than substantial harm arising to this group of heritage assets owing to the visual conjunction shown in HTVIA View 19. The HTVIA acknowledges some 'less than substantial harm' to these assets, but considers that the GLA's assessment of the level of harm is overstated. The HTVIA notes, at paras 7.152 and 7.153, that "ZTV assessment shows that there would be some visibility of the proposed development from the south side of Highshore Road, looking over the north terrace of listed houses (i.e. Nos. 8-18). View 19 illustrates how the tallest elements of the Proposed Development...would be visible above the centre of the north of the terrace, with a lower building to the south also being visible though in combination with the 21st C building recently developed at the east end of Highshore Road" and "while it is the immediate and group setting of these listed buildings that contributes to their significance, and their wider setting has long included visible commercial and taller development close to Rye Lane, there would be a small diminution of the appreciation of Nos. 8-18 in one view owing to the tall new buildings introduced into the wider skyline setting. This is addressed, in part, through detailed architecture and materiality of the visible element. In NPPF terms, and in the context of the heritage significance of the listed houses as a whole, this would result in a very low level of less than substantial harm to the heritage significance of the heritage assets and the ability to appreciate this significance".

- 1.15 In suggesting a level of harm to significance in the 'low to middle' category of 'less than substantial harm' (i.e. higher than the HTVIA assessment), it is likely that the GLA have not taken into account how the wider setting of these houses has long included visible commercial and taller development close to Rye Lane, or how the fabric, form and immediate setting of the houses contributes to their significance.



Appendix 2: GLA Response (cont.)

Rye Lane Conservation Area;

- 1.16 The GLA consider there would be a middle level of less than substantial harm arising to the conservation area owing the Proposed Development as illustrated in Views 5, 6, 7, 8, 9, 10, 11, 12a, 12b, 17, 35. This assessment is contrary to the assessment in the HTVIA, which states (paras. 7.24-7.25) that “taking into account the low level of contribution to significance arising from the setting of the Peckham Rye Conservation Area; the poor setting provided by the existing Aylesham Shopping Centre and its associated car parks; the work undertaken by the architects to locate the principal volumes of the Proposed Development further east, while meeting the edge of the conservation area with appropriate architecture and a sense of ‘layering’ behind lower existing buildings, it is considered that the final scheme avoids harm to the significance of the conservation area, in accordance with the NPPF. The new Buildings A, B and C replace a detracting element within the boundary of the conservation area with a taller, but much more thoughtfully designed new building which references the existing character and appearance of the conservation area, allowing routes through into the new spaces of the Proposed Development behind and is more active at ground level, reflecting the materiality and character of the original Jones & Higgins frontage. In NPPF terms, the Proposed Development is considered not to result in harm to the heritage significance of the conservation area as a whole or the ability to appreciate that significance”.
- 1.17 In suggesting a level of harm to significance in the ‘middle’ category of ‘less than substantial harm’, it is considered likely that the GLA have not taken into account all aspects of the existing setting of the conservation area, and the qualities of the Proposed Development, as set out above.

Peckham Hill Street Conservation Area including Numbers 98 to 108 Peckham Hill Street, listed Grade II;

- 1.18 The GLA consider there would be a low to middle level of less than substantial harm arising to the conservation area and listed buildings within it, and they refer to the visual conjunctions illustrated in Views 4, 5, 15, 16. This assessment is contrary to the assessment in the HTVIA, which states (at paras 7.38-7.39), that “the Proposed Development is at some distance from the conservation area and the only material effects on the significance of the heritage asset arise potentially from the change in setting to the south, looking south on Peckham Hill Street or on the Surrey Canal Walk. The fabric of the conservation area would not be affected, meaning that all the effects arising in this case would be indirect setting effects. The Proposed Development will be experienced as a taller background development in the relatively distant setting of the conservation area”, and “the design intention has been to break the Proposed Development into a series of parts, such that a layering is achieved with the lower buildings of the development sitting behind the low Peckham High Street frontage, and taller buildings behind to the south and east, rising to heights set out in the LB Southwark’s Sites Allocations DPD”.

- 1.19 In summary, it is considered that the Proposed Development, through visible from within the boundary of the conservation area, “would result in no harm to the heritage significance of the conservation area at some distance to the north or the ability to appreciate it”.

- 1.20 It is considered that this remains a reasonable assessment both in respect of the conservation area, and the in respect of the significance and appreciation of the listed buildings within it, also at some distance to the north on Peckham Hill Street.

Holly Grove Conservation Area;

- 1.21 The GLA consider there would be a very low level of less than substantial harm arising to the conservation area, and they refer to the visual conjunctions illustrated in Views 18, 19, 20 of the HTVIA. This assessment is contrary to the assessment in the HTVIA, which states (at para 7.54) that, “given the Holly Grove Conservation Area derives little significance from the sky space to its east, and it is clear to those within the conservation area that the more urban centre of Peckham is located there, with its larger and more prominent buildings, it is unlikely that some additional visibility of taller buildings to the east [i.e. the upper levels of the Proposed Development] will lead to harm to the significance of the asset or affect the ability to appreciate that significance. The Proposed Development is some distance away and would be a new skyline element understood as separate to the more intimate character of the conservation area”.

Sceaux Gardens Conservation Area;

- 1.22 The GLA consider there would be a very low level of less than substantial harm arising to the conservation area, and they refer to the visual conjunctions illustrated in View 13 of the HTVIA. This assessment is contrary to the assessment in the HTVIA, which states (at para 7.109), that “in addition to the conservation area deriving little of its significance from its setting, its location in relation to the Proposed Development is such that there is unlikely to be any significant visual conjunctions between them, as illustrated in View 13, and confirmed by the ZTV in this HTVIA. In NPPF terms, this would result in no harm to the heritage significance of the conservation area or the ability to appreciate it”.
- 1.23 It is considered that this remains a reasonable assessment of the potential affect of the Proposed Development on the significance of the conservation area, and that visibility of a new tall element some distance away from the edge of the conservation area, should not be misconstrued as harm to significance.



Appendix 2: GLA Response (cont.)

Summary

1.24 This response has sought to provide a high level commentary and response on the assessment undertaken by the GLA. In our view, the GLA Stage 1 report tends to overstate the level of 'less than substantial' harm arising from the Proposed Development, as well as the number of heritage assets whose significance would be affected. However, it is noted that the GLA assessment of

The Townscape Consultancy Ltd, 100 Pall Mall, London SW1Y 5NQ

Registered in England with number: 13474294 | +44 (0)20 7250 1120 | hello@thetownscapeconsultancy.com | www.thetownscapeconsultancy.com



Appendix 3: Historic England (HE) Response

3.1 This appendix includes the full response to the Historic England comments received in September 2024. This response is summarised in table 1.2 within the HTVIA Addendum chapter.



RESPONSE TO HISTORIC ENGLAND’S POST-SUBMISSION RESPONSE (DATED SEPTEMBER 2024) ON MATTERS RELATING TO HERITAGE

- 1.1 This post-application response has been prepared by The Townscape Consultancy on behalf of Berkeley Homes (Capital) PLC ('Berkeley'), in respect of comments received from Historic England (HE) on planning application (LPA ref: 24/AP/2074) at The Aylesham Centre, Hanover Park, London SE15 5EW (the 'Site').
- 1.2 It is noted that within their post-application response, HE state that "The Aylesham Centre site is of low townscape value" and that they "consider that its redevelopment presents exciting opportunities to improve the quality of the built environment and connectivity to Peckham's historic heart as part of its ongoing regeneration", and "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". HE also note that Southwark's Rye Lane Peckham Conservation Area Appraisal identifies the Aylesham Centre as a 'Negative Element' (Section 4.4) with 'an indifferent character which does little to enhance the conservation area'.
- 1.3 In respect of the Proposed Development, however, HE also set out how they consider that "the overall height and distribution of tall buildings would have in an incongruous relationship with the more modest-scale and fine grain townscape along Rye Lane and Peckham High Street, from some locations appearing as an enormous wall of development in the background of key views of the Rye Lane Peckham Conservation Area. We consider that these impacts would cause harm to the conservation area's character". They consider that the "harm could be mitigated through the development of a frontage building to Rye Lane that successfully responds to the fine grain and modest scale of buildings within the conservation area. Unfortunately, we consider that this opportunity has been missed due to the overbearing presence of Buildings A, B and C in key conservation area views". HE consequently raise concerns regarding the application on heritage

Response

- 1.4 The findings of the HTVIA submitted with the application, and authored by The Townscape Consultancy, are that the masterplan principles of the scheme are considered appropriate and in accordance with the site allocation (NSP74: Aylesham Centre and Peckham Bus Station) in the Southwark Plan 2022. These principles reflect extensive discussions with the officers of Southwark Council, and subsequent iterative design work undertaken by the architects, including considering alternative approaches, to ensure that the taller buildings proposed were sufficiently set back to the east of the Site, allowing the Jones and Higgins clocktower and its 'shoulders' to sit free of development as it is approached along Peckham High Street from the west. As such, it will continue to maintain its role as a local landmark in the townscape at the junction between Peckham High Street and Rye Lane. It is considered that the distribution of the lower volumes towards the west of the Site is appropriate in the context of the adjacent conservation area and the layering of forms achieved by the architects, also in discussion with Southwark's officers, is successful in avoiding the so called 'wall of development' alleged by Historic England in the backdrop of views looking eastward on Peckham High Street.
- 1.5 In respect of views looking south from Peckham Hill Street (for example, View 4 in the HTVIA), HE state that the "20-storey building [i.e. Building M] would become the dominant townscape feature, drawing attention away from the predominantly Georgian houses that characterise this part of the conservation area". They consider also, that in closer views looking south (e.g. Views 5 and 35 in the HTVIA) that the Proposed Development would be experienced as a "wall of development behind the modest-scale and partly 18th century townscape on the south side" of Peckham High Street. The HTVIA's assessment in relation to these southward views acknowledges that there will be an increase in scale in the background, with new buildings rising above the roof lines of the residential buildings. It considers, however, that the design and tonality of materials of the Proposed Development is sensitive to the more homogeneous brick colours in the immediate surroundings, while the layered massing works well to create visual interest on the skyline and depth within the view, with sky space being maintained between the taller buildings in longer views and therefore reducing the overall visual impact and ensuring that the significance of both the Rye Lane Peckham, and Peckham Hill Street Conservation Areas, is preserved, and the ability to appreciate that significance in the townscape remains.
- 1.6 HE comment more specifically on the design of Buildings A, B and C which are located on the Rye Lane frontage of the Site and are therefore within the Rye Lane Peckham Conservation Area boundary. HE refers to views 6, 8 and 9 along Rye Lane and states that, "These images suggest that the glazed tile shopfronts would be an attractive and contextual addition to the street scene. However, the frontage block as a whole would have an overbearing presence in our view due to its large scale, and somewhat impervious and monolithic form".



Appendix 3: HE Response (cont.)

- 1.7 The Townscape Consultancy's assessment is that Buildings A, B and C are of a high quality architectural design, with elements of verticality, detailing, materials, and an expressed base that are in character with the conservation area of which they would form part. The new shopfronts have been inspired by, and would reflect, the shopfronts that historically activated Rye Lane when the Jones and Higgins department store was in operation and prior to its replacement by the Aylesham Centre. It is considered that Buildings A, B and C, though taller than the existing, as well as taller than buildings on the opposite side of Rye Lane, would nevertheless represent a positive addition to the townscape within the conservation area boundary and would preserve the significance of the designated heritage asset. The HTVIA submitted with the application summarises that the conservation area is "defined by its eclectic and varied appearance which contributes to the vibrant and cosmopolitan character of Peckham. Rye Lane itself is defined by legible and dominant retail function and is a good example of a traditional High Street". The Proposed Development is assessed within the HTVIA to contribute to this eclectic variation and add positively to Rye Lane by replacing the detracting elements of the existing building on Site.
- 1.8 HE go on to acknowledge that Buildings A, B and C have been designed to respond to the finer grain and lower scale of the buildings within the conservation area and along Rye Lane, but state that visibility of the former Jones and Higgins department store would be lost when viewed looking north, as shown in HTVIA View 9, as well as obscuring the 'striking silhouette' of the former HSBC bank building at the corner of Rye Lane and Hanover Park because of the bulk, scale and massing of the frontage block on Rye Lane. HE argue that, in consequence, the Proposed Development would cause harm to the character of the Rye Lane Peckham Conservation Area.
- 1.9 It is acknowledged that views of the Jones and Higgins Clocktower would be blocked by Buildings A, B and C from the south (View 9 in the HTVIA), but it should be noted that these are effectively views of the side elevation and part of the rear elevation of the clocktower, seen above foreground development on the street. In the Townscape Consultancy's assessment, these views of the clocktower, while of some townscape value, are of lesser importance than views of the Jones and Higgins building and clocktower from the west on Peckham High Street where the principal elevation of the locally listed building is appreciated in the streetscape at the junction with Rye Lane. It is in these views that the building is most explicitly designed to be a marker in the townscape, and in response the design team have sought to safeguard the most important of them, namely the views on Peckham High Street at Collyer Place and further east, so that the clocktower and its 'shoulders' are visible against a clear backdrop of sky. This is an approach that was discussed and agreed with Southwark officers.

- 1.10 Furthermore, View 9 is, in reality, part of a kinetic sequence as local residents and visitors head north into and through the urban centre. As they walk north on Rye Lane, the clocktower would come back into view. The experience of the locally listed former HSBC bank building as assessed in Views 8 and 9 in the HTVIA, would not be one of obscurity, but the Proposed Development would introduce new elements into its background in northward views on Rye Lane, and eastward views on Hanover Park. In these instances, the main recognisable features of the roofscape and elevations of the locally listed building would still be readable in the townscape and enjoyed by the viewer, with View 8 being considered to give rise to beneficial effects due to the new edge buildings along Rye Lane and Hanover Park forming a more contextual, coherent and complete streetscape and therefore improving the setting of the non-designated heritage asset. Its significance would be preserved. The HTVIA assesses at para 9.68 that "Its stepped massing and setbacks at roof level creates a layered effect which helps to settle its additional height within the setting of the former bank. The green glazed lower floors align with the architectural building lines of its neighbour and help to continue the activated commercial offering. At high level, the Proposed Development maintains the sky space behind much of Nos. 43-49 Rye Lane roof, allowing its form to be appreciated."
- 1.11 The HTVIA considers that the Proposed Development is likely to improve the wider setting and street edge onto Rye Lane, increase permeability into the Site to the east and define a strong urban centre: "The new Buildings A, B and C replace a detracting element within the boundary of the conservation area with a taller, but much more thoughtfully designed new building which references the existing character and appearance of the conservation area, allowing routes through into the new spaces of the Proposed Development behind and is more active at ground level, reflecting the materiality and character of the original Jones & Higgins frontage".

Summary

- 1.12 This response has sought to provide a high-level commentary and response on the assessment undertaken by HE for planning submission. The HE response focuses on the potential for the taller elements of the Proposed Development to be read as a "wall of development" in views from the west and from the north, as well as perceived harm caused to the significance of Rye Lane, Peckham, Conservation Area owing to the proposed new frontage onto Rye Lane, namely Buildings A, B and C. It is noted that HE's assessment of harm to significance is implied to be within lower levels of the 'less than substantial' harm category, since they state that "some harm to the conservation area would result from the overall scale and distribution of buildings across the development site", while pointing to the application of paragraph 208 of the NPPF which sets out the policy approach in cases of 'less than substantial' harm.



Appendix 3: HE Response (cont.)

1.13 This categorisation of harm was acknowledged within the HTVIA, and while 'great weight' should be applied to any such harm and it should be fully justified, it is clear that the decision maker, in applying para. 208, has the ability to determine the application by weighing the 'less than substantial' harm identified against the public benefits of the proposal including, where appropriate, securing its optimum viable use. In the Townscape Consultancy's assessment, officers have sufficient and proportionate information on both the low level of 'less than substantial harm' arising from the Proposed Development through the submitted HTVIA, and the

The Townscape Consultancy Ltd, 100 Pall Mall, London SW1Y 5NQ

Registered in England with number: 13474294 | +44 (0)20 7250 1120 | hello@thetownscapeconsultancy.com | www.thetownscapeconsultancy.com



Appendix 4: London Borough of Lambeth (LBL) Response

- 4.1 Three views from within Lambeth were requested for testing by LBL in the post-submission period. These are views identified in their emerging Lambeth Local Views SPD, namely:
- Panorama 1C Brockwell Park to the City

• Panorama 2 Norwood Park to the City

• Panorama 3 Gipsy Hill to the City
- 4.2 The three views were tested using 3D London software 'Vu City', into which the architectural model provided by the architects dRMM had been inserted. The following pages show those views in the cumulative condition. See table 1.2 within the HTVIA Addendum chapter for the assessment undertaken.



Panorama 1C: Brockwell Park to the City

View Location:



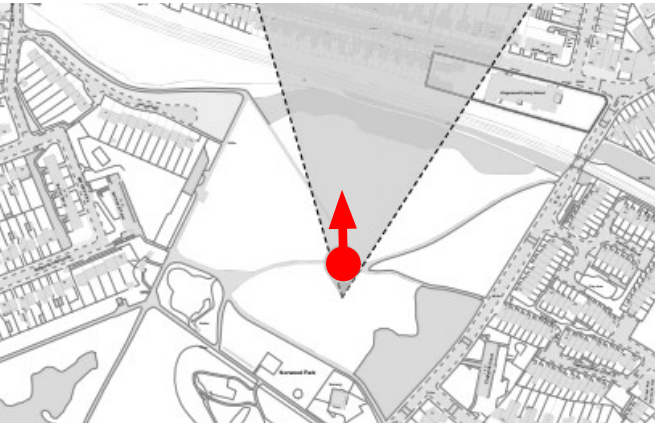
Camera Location [531580, 37, 174123] Bearing 27° Pitch 0° Focal Length 24mm 21/06/2023 16:00

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Panorama 2: Norwood Park to the City

View Location:





Panorama 3: Gipsy Hill to the City

View Location:



Camera Location [533370, 107, 170771] Bearing 8° Pitch 0° Focal Length 24mm 21/06/2023 16:00

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Appendix 5: Additional cumulative schemes

5.1 Additional cumulative schemes have been identified by Trium since the July 2024 submission. These schemes have been placed into a cumulative axonometric diagram/map by specialist visualisers Millerhare, which shows their location and scale in relation to the Proposed Development and to the cumulative schemes identified in the July 2024 EIA (additional cumulative schemes are shown in green on the axonometric map below). Itemised in the list provided are the details of the additional cumulative schemes for clarity. The use of the axonometric map in a re-assessment of potential cumulative effects is set out in the HTVIA Addendum.

5.2. The additional schemes are as follows:

No.	Site	App Ref	Status
11	6-12 Verney Road London SE16 3DH	17/AP/4508 23/AP/0948	Approved 10 Feb 2022
25	Surrey Canal Triangle To North Of, Surrey Canal Road, London, SE14	DC/13/085143 *LB Lewisham*	Approved 18 Dec 2015
26	79-161 Ilderton Road London SE16 3JZ	18/AP/2497	Approved 21 Feb 2022
27	310-330 St James's Road London Southwark SE1 5JX	21/AP/1667	Validated 14 May 2024 <i>Awaiting Decision</i>
28	Daisy Business Park, 19-35 Sylvan Grove, London SE15 1PD	23/AP/0582	Validated 02 June 2023 <i>Awaiting Decision</i>

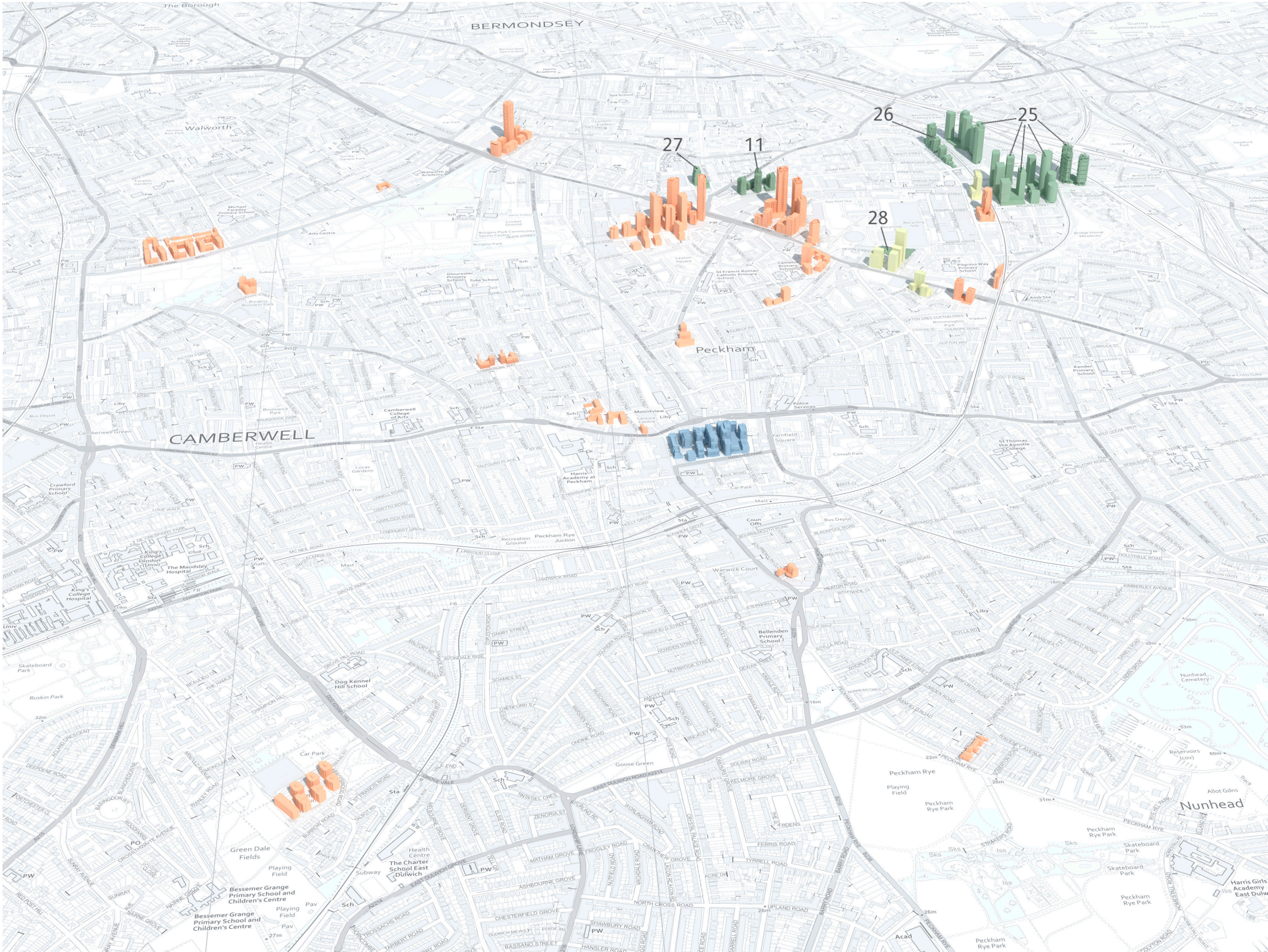


Figure 5.1: Cumulative Schemes Map



Trium Environmental Consulting LLP
+44 (0) 20 3887 7118
hello@triumenv.co.uk
www.triumenvironmental.co.uk