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| **From:** | Redman, Matt |
| **To:** | Knibbs, Mark (Avison Young - UK) |
| **Cc:** | Lewis, Victoria; Matheou, Tom (Avison Young - UK) |
| **Subject:** | Aylesham Centre - consultation responses - 24/AP/2074 |
| **Date:** | 26 September 2024 12:15:31 |
| **Attachments:** | 22EQ0015_CCTV_Costs_requirements_Aylesham Shopping CentreSPV1 .docx |

CAUTION: External Sender

Hi,
I wanted to advise that further consultation comments have been received and I have copied these below or are attached.
Please can you look into and address.
Thanks
Matt

Comments:

TFL – London Underground

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

This response is made as Railway Infrastructure Manager under the “Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Historic England

Thank you for your letter of 5 September 2024 regarding the above application for planning permission. Historic England was briefly involved in pre-application discussions regarding these proposals earlier this year. The submitted plans appear similar to those we reviewed at that stage. Therefore, the following advice largely reflects our position set out then.

**Summary**

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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, 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.

**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 with a fine grain of buildings which capture different phases of Peckham's historic development from the 18th to the 20th century. These are:

- 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 generally 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, it's 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 your Council's recently adopted Local List in recognition of their local importance.

The proposals and their impact

The plans involve the demolition of the Aylesham Centre and the erection of a large and dense residential and commercial development including many tall buildings of up to 20 storeys in height. The submitted documents suggest that this part of Peckham would be transformed into a high-density area with buildings that incorporate a wide range of brightly coloured materials (Design and Access Statement Executive Summary, July 2024, p15-16).

While the tallest of these would be located in the eastern portion of the site, the western end would include a 11-storey building (Building E). The Rye Lane frontage block (comprising Buildings A, B and C) which would be entirely 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 submitted Heritage, Townscape and Visual Impact Assessment (The Townscape Consultancy, July 2024).

Views 6, 8 and 9 assess the impact of the proposals, particularly the frontage block, in key views of Rye Lane. An additional visualisation along Rye Lane is included in the Design and Access Statement Executive Summary (p15). 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.

While we note that Buildings A and C would step down towards the Jones & Higgins department store and corner bank building respectively, visibility of the department store would be entirely lost in the conservation area's 'key approach' to the north along Rye Lane (as illustrated in View 9). The striking silhouette of the corner bank building would also be obscured due to the bulk, scale and massing of the proposed frontage block. For these reasons, the proposed development when viewed from Rye Lane would cause harm to the conservation area's character.

Views 10, 11, 12a and 12b assess the kinetic 'key views' east along Peckham High Street where the department store clock tower acts as a 'full stop' as set out in the conservation area appraisal. In the proposed views, the various tall buildings would merge to form a wall of development, appearing to the east of the department store tower in Views 10, 11 and 12b, and directly behind it in View 12a. In our opinion, the landmark status of the department store clock tower and its role as a 'full stop' in these key conservation area views would be diminished due to the visual encroachment and distraction presented by the tall building development. These impacts would therefore cause additional harm to the conservation area in our opinion.

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 18$^{th}$ century townscape on the south side of the street. These impacts on key approaches to the conservation area would further harm the conservation area in our view.

We note that an assessment of your Council's Local Views has been included in the document

(View 1 from One Tree Hill, and View 2 from Nunhead Cemetery). We do not wish to raise any concerns about the impact of the proposed development in these views.

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). The Government's Planning Practice Guidance (updated 14 February 2024) which supports the NPPF explains that public benefits can include heritage benefits (Para 020, revised 23 July 2019).

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. 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.

The NPPF also seeks to achieved well-designed places, stating that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve (Paragraph 131). Paragraph 135 sets out criteria, including ensuring that developments 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).

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”.

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.

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

As well as the Conservation Area Appraisal (Southwark Council) further information on Peckham’s historic development can be found in the Centre Peckham Historic Area Assessment (English Heritage, 2009) which was undertaken by our Architectural Investigators in 2009. The document can be accessed via:

https://historicengland.org.uk/research/results/reports/7094/CentralPeckhamHistoricAreaAssessment

Historic England’s Position

The Aylesham Centre site is of low townscape value in our view, and we 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. 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 indicate to us that masterplan as a whole, comprising 9 tall buildings (of 9 storeys or more) and 4 mid-rise buildings, would have an incongruous relationship with the prevailing suburban scale of development in key views of the conservation area, diminishing its character. Some of these impacts would also undermine the landmark status of the former Jones & Higgins department store on the approach from the west. We therefore consider that some harm to the conservation area would result from the overall scale and distribution of buildings across the development site.

The allocation for redevelopment of this site set out in the Southwark Plan (NSP74) specifically states that taller buildings should be "set back from the Rye Lane shopping frontage, towards the eastern end of the site" to minimise harm to the conservation area, reflecting Paragraphs 135 and 201 of the NPPF. We would therefore question whether these proposals would fulfil the requirements of the allocation. This will be for your Council to consider.

In line with Paragraph 208 of the NPPF, the harm identified we have identified should be weighed against the public benefits of the proposals which can include heritage benefits. The NPPF also states that opportunities for new development within conservation areas to enhance or better reveal their significance should be treated favourably (Paragraph 212).

The proposed Rye Lane frontage block does seek to respond to the conservation area's character through its inclusion of shopfronts and the lower heights of Buildings A and C which step down towards the Jones & Higgins building and corner bank building respectively. However, at a maximum of 7 storeys, it would be significantly taller than the majority of buildings along Rye Lane and taking account of the frontage block as a whole, would harm rather than enhance the conservation area's character for the reasons previously set out. We therefore consider that an opportunity has been missed to deliver meaningful heritage benefits and enhancements to the conservation which could support the NPPF policies set out above.

We therefore would encourage your Council to seek revisions to the frontage block which would mitigate the overall harm to the conservation area, and deliver a more contextual component of the scheme that would meaningfully enhance what is one of London's most celebrated and culturally vibrant historic high streets.

**Recommendation**

Historic England has concerns regarding the application on heritage grounds.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. Please seek the views of your Council's Archaeologist regarding the potential implications of these proposals on unscheduled archaeology.

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