

## Peckham and Nunhead Area Action Plan

Development Plan Document

CD13 - Peckham and Nunhead AAP  
Urban design background paper

March 2013

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Delivering our promises



# Future Peckham

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# 1. INTRODUCTION

- 1.1 The Peckham and Nunhead Area Action Plan (CD1) includes four area-wide policies on urban design, as well as further built environment policy and guidance for each of the five character areas as well as site specific guidance. The area action plan develops specific area policies which will be used alongside the strategic, policies in our adopted Core Strategy (2011) (CDL1) as well as some of our saved Southwark Plan (2007) (CDL2) policies. This background paper provides further information on our approach to urban design policy and guidance for Peckham and Nunhead.
- 1.1 The urban design background paper is split into the following sections:
- Section 1 provides an introduction.
  - Section 2 sets out the policy background.
  - Section 3 sets out the background on other relevant design guidance.
  - Section 4 sets out the research and evidence used to inform our approach.
  - Section 5 sets out our strategy and justification for designating new open spaces,
  - Section 6 explains how we will implement our strategy.
- 1.2 This paper summarises the key plans, policies and guidance that have been prepared since the Core Strategy. Therefore, this background paper should be read alongside the Core Strategy strategic policy 12: Design and conservation background paper (CDD3) which sets out all the relevant plans and policies, key evidence, consultation responses and how they were used to inform our strategic approach to urban design and tall buildings across Southwark. The AAP provides further detailed policies to the strategic borough-wide policies in the Core Strategy, and is broadly consistent with the Core Strategy,
- 1.3 This paper should also be read alongside the Peckham and Nunhead urban design study (CDD5), which has informed the preparation of the urban design policies and guidance, particularly the building height and tall building policy.

## **2. POLICY BACKGROUND**

- 2.1 This section sets out the key national, regional and local plans and policies. It only covers the documents which have been published or adopted since the Core Strategy was adopted and the Core Strategy urban design background papers were prepared.

### **NATIONAL POLICY**

#### **National Planning Policy Framework (2012) (CDN1)**

- 2.2 Since the Core Strategy (CDL1) was adopted, the government have consulted on and adopted the National Planning Policy Framework (NPPF) (CDN1). The NPPF consolidates the raft of guidance that was previously in the range of PPSs and PPGs into a single document. It sets out the Government's priorities for the planning system in England and all major forms of development proposals handled by local authorities. It contains policies on the preparation of local and neighbourhood plans, development management decisions as well as a range of topic based policies such as design and heritage.
- 2.3 In terms of urban design, the NPPF aims to replace poor design with better design and improving the conditions in which people live, work, travel and take leisure by introducing the presumption in favour of sustainable development (para 9).
- 2.4 A number of core planning principles that underpin both plan-making and decision-taking state that planning should always seek to secure high quality design, take into account the different roles and character of different areas and conserve heritage assets in a manner appropriate to their significance (para 7 – bullet points 4, 5 and 10).
- 2.5 Section 7 of the NPPF deals specifically with how good design should be achieved. LPAs should prepare planning policies that contribute to the protection and positive enhancement of our natural, built and historic environment through better design (paras 9, 56), and that plans should establish a strong sense of place, optimise the potential of sites, respond to local character and history, and ensure that places are safe, inclusive and visually attractive. (para 58)
- 2.6 To achieve this, design policies should be based on the strategic and stated objectives for the future of an area, alongside a positive strategy for the conservation and enjoyment of our historic environments. (paras 126, 129, 132 and 137). A proportionate and up-to-date evidence base of an area's economic, social, environmental and historic characteristics is required to underpin design and heritage policies, assess the significance of heritage assets and assist the likelihood that currently unidentified heritage assets, particularly sites of historic and

archaeological interest, will be discovered in the future. (paras 158 and 169).

- 2.7 The NPPF, specifically section 12, has superseded PPS 5: 'Planning for the historic environment' which defined those parts of the historic environment that have significance because of their historic, archaeological, architectural or artistic interest as heritage assets. PPS5 covered heritage assets that were both designated (particular procedures apply to decisions that involve them) and those which are not designated but which are of heritage interest nonetheless. The PPS 5 Practice Guide remains a valid and Government endorsed document pending the results of a review of guidance supporting national planning policy. It remains almost entirely relevant and useful in the application of the NPPF.

## **REGIONAL POLICY**

### **London Plan (2011) (CDR1)**

- 2.8 The London Plan (2011) (CDR1) establishes the planning framework for London. The policies and guidance in this document are considered when preparing local plans and determining planning applications. Section 7 covers policies that relate to urban design within Peckham and Nunhead.
- 2.9 London Plan policy 7.1 'Building London's neighbourhoods and communities' states that people should have neighbourhoods with a good quality environment in an active and supportive local community with the best possible access to services, infrastructure and public transport to wider London. Their neighbourhoods should also provide a character that is easy to understand and relate to.
- 2.10 Policy 7.2 'An inclusive environment' states that all new development must achieve the highest standards of accessible and inclusive design.
- 2.11 Policy 7.3 'Designing out crime' states that boroughs should seek to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion.
- 2.12 Policy 7.4 'Local character' outlines the contextual factors that development proposals should have regards to when coming forward. This includes the existing form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings.
- 2.13 Policy 7.5 'Public realm' states that public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.



- 2.14 Policy 7.6 'Architecture' states that architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape, and should be of high quality, consider local character and heritage, potential impacts and optimise the potential of development sites.
- 2.15 Policy 7.7 'Location and design of tall and large buildings' says that tall and large buildings should meet a series of design criteria to ensure that they make positive and successful contributions, relate well to the local character and context and not impact negatively on strategic views or their surroundings. The policy recognises that tall and large buildings are likely to be sensitive in certain areas, especially in their proximity to heritage assets and their settings or other areas identified by local boroughs.
- 2.16 The policy states that boroughs should work with the Mayor to identify appropriate, inappropriate and sensitive locations for tall buildings. Whilst the Plan does not identify Peckham and Nunhead as an area for tall or large buildings, our Core Strategy (CDL1) identifies the Peckham core action area as a growth area that has the potential for taller elements.
- 2.17 Policy 7.8 'Heritage assets and archaeology' recognises the importance of sustaining, protecting or enhancing the historic context and local character of an area through managed change. It states that undertaking a characterisation study of an area can assist in understanding its character. A characterisation study (CDD5) has been carried out for the Peckham and Nunhead Area Action Plan.
- 2.18 Policy 7.9 'Heritage-led regeneration' states that regeneration schemes should identify and make use of heritage assets and reinforce the qualities that make them significant so they can help stimulate environmental, economic and community regeneration.

## **LOCAL POLICY**

- 2.19 Core Strategy (CDL1) policy 12 'Design and conservation' is the adopted borough-wide strategic urban design policy for Southwark. The detailed policy context that underpins this policy and in particular tall buildings was set in the Core Strategy design and conservation background paper (2010) (CDD3).
- 2.20 The AAP will be used alongside the Core Strategy and the saved Southwark Plan policies (CDL2) to make decisions related to urban design and together with the London Plan (2011) (CDR1) will form our development plan for Peckham and Nunhead. This relationship will change in the future as we update and replace our policies. Our timetable for preparing and updating our policies is set out in our Local Development Scheme (LDS) (CDL4). The current LDS sets out that we

will prepare a new Local Plan in accordance with the NPPF (CDN1), which will set out the strategy for development in Southwark with policies, master-plans, maps and site allocations. This will replace the Core Strategy and saved Southwark Plan policies.

### **Core Strategy (2011) (CDL1)**

- 2.21 Our adopted Core Strategy (CDL1) sets out our overall strategy for design and conservation within the borough. Strategic policy 12 sets out borough-wide design and conservation policies that require development to be of the highest possible standards of design, give consideration to the conservation or enhancement of the historic environment, height and design of tall buildings and potential impact on the historic environment and within important local views.
- 2.22 The vision for the Peckham and Nunhead action area outlined in the Core Strategy (paras 4.41 - 4.43) promotes improvements to streets and public spaces, and identifies new commercial, housing and retail opportunities. The AAP vision will supersede the vision for the area that was set out in the Core Strategy.
- 2.23 Within the Core Strategy the Peckham vision and strategic policy 12 indicate that taller buildings may be appropriate on some sites within the Peckham core action area and must be of exemplary standard of design. The supporting text for policy 12 (paragraphs 5.113 - 5.115) explain that further detail on where taller buildings will be appropriate, inappropriate and sensitive will be undertaken.
- 2.24 Strategic policy 5 sets out the density ranges for new development, splitting the borough into three areas: the Central Activities Zone, the Urban Zone and the Suburban Zone. The area covered by the Peckham and Nunhead AAP includes parts of the urban zone and parts of the suburban zone. Policy 5 also sets out that within the opportunity area and action area cores the maximum densities may be exceeded when developments are of an exemplary standard of design.

### **Saved Southwark Plan (2007) (CDL2)**

- 2.25 The Southwark Plan was adopted in 2007 and we applied to save a number of the policies in the plan beyond July 2010. The following saved policies (CDL2) that relate to design are used alongside the Core Strategy and AAPs to make decisions.
- 2.26 Policy 3.11 'Efficient use of land' requires all developments maximise the efficient use of land, positively responding to the local context and complying with all design policies

- 2.27 Policy 3.12 'Quality in design' seeks to ensure that development achieves a high quality of both architectural and urban design, enhances the quality of the built environment in order to create attractive, high amenity environments people will choose to live in, work in and visit.
- 2.28 Policy 3.13 'Urban design' states that the principles of good urban design must be taken into account in all developments, with consideration given to the relationship between different buildings and streets, squares, parks and waterways and other spaces that make up the public domain; the nature and quality of the public domain itself; the relationship of one part of an urban area to another; and the pattern of movement and activity.
- 2.29 Policy 3.14 'Designing out crime' requires development in both the private and public realm, should be designed to improve community safety and crime prevention.
- 2.30 Policy 3.15 'Conservation of the historic environment' Development should preserve or enhance the special interest or historic character or appearance of buildings or areas of historical or architectural significance.
- 2.31 Policy 3.16 'Conservation areas' seeks to ensure that development within conservation areas preserves or enhances the character or appearance of the area.
- 2.32 Policy 3.17 'Listed buildings' states that development proposals involving a listed building should preserve the building and its features of special architectural or historic interest.
- 2.33 Policy 3.18 'Setting of listed buildings, conservation areas and world heritage sites' seeks to ensure that the setting of heritage assets is preserved or enhanced.
- 2.34 Policy 3.19 'Archaeology' recognises the requirement to assess and evaluate development sites within Archaeological Priority Zones (APZs) for archaeological remains, such as the Peckham Village APZ within the AAP area.
- 2.35 Policy 3.20 'Tall buildings' sets out the criteria that is required for taller buildings, such as sites with excellent accessibility to transport facilities. A taller building should also
- make a positive contribution to the landscape;
  - be located at a point of landmark significance;
  - be of the highest architectural standard;
  - Relate well to its surroundings, particularly at street level;



- Contribute positively to the London skyline as a whole consolidating a cluster within that skyline or providing key focus within views.
- 2.36 The policy also states that taller buildings should be located within the Central Activities Zone (particularly in opportunity areas) outside landmark viewing corridors. The Core Strategy (CDL1) is used in addition to this policy and identifies further areas within the borough that may be suitable for taller buildings, including the Peckham core action area.
- 2.37 Policy 3.22 'Important local views' states that identified views, panoramas, prospects and their settings that contribute to the image and built environment of the borough and wider London will be protected and enhanced.

**Residential design standards supplementary planning document (2011) (CDL19)**

- 2.38 The council adopted an updated Residential design standards supplementary planning document (SPD) (CDL19) on 18 October 2011.
- 2.39 The updated SPD replaced the 2008 Residential design standards SPD. There were no changes within the SPD that related to more detailed policies on design.

### **3. GUIDANCE BACKGROUND**

#### **Heritage in local plans - how to create a sound plan under the NPPF, English Heritage (2012)**

- 3.1 This guidance states that LPAs have to achieve the historic environment objectives of the NPPF (CDN1) to ensure that their local plan is sound. Requirements include an up-to-date evidence base that may be used to assess the significance of heritage assets and their settings within the local plan area, and for identification of new sites of archaeological or historic interest.
- 3.2 A positive strategy for the conservation, enhancement and enjoyment of the historic environment and policies that are clearly identified as strategic are also required.

#### **Guidance on tall buildings, CABE and English Heritage (2007) (CDD1)**

- 3.3 When preparing an evidence base, LPAs should identify appropriate, inappropriate and sensitive locations for tall buildings as part of a detailed urban design study of the plan area. This should include analysis of the historic context, local character, and the identification of past mistakes and new opportunities.
- 3.4 It is recommended that LPAs use the guidance to inform policy making. The government has endorsed the guidance which is capable of being a material consideration in the determination of planning applications.
- 3.5 There are a series of criteria for evaluating tall building proposals including:
  - Relationship to context
  - Effect on the historic context
  - Effect on World Heritage Sites
  - Relationship to transport infrastructure
  - Contribution to public space and facilities
  - Effect on the local environment
  - Contribution to permeability

#### **English Heritage: Seeing History in the View - The Setting of Heritage Assets, English Heritage (2011) (CDD13)**

- 3.6 This document outlines a best practice methodology for understanding and assessing heritage significance within views.

## 4. RESEARCH AND EVIDENCE

- 4.1 This section refers to the key pieces of research and evidence that have been prepared to inform the preparation of the design policies. Most of the key evidence documents were prepared to inform the strategic design policies in the Core Strategy. As such, there is a more detailed description in the Core Strategy tall building paper and study.

### **Core Strategy: Borough-wide Strategic Tall Building Study (2010) (CDD4)**

- 4.2 This Southwark-wide study (CDD4) was carried out as part of the preparation of the Core Strategy (CDL1). It sets out the approach and analysis to establish where tall buildings could be accommodated, where they should not be located, and where they could be sensitive, and the potential urban design constraints for the location and design of new tall buildings in these locations.
- 4.3 Based on the analysis, the study sets out a number of locations where tall buildings may be suitable, which includes the Peckham Core action area. The study sets out why these locations are suitable for taller buildings, which includes:
- Where we expect higher density development.
  - Proximity to major transport hubs, including locations where major infrastructure improvements would improve existing capacity.
  - Emphasising a point of civic or visual significance.
  - Opportunities for tall buildings to enhance the public realm or improve permeability
  - Focus for regeneration and activity
  - Appropriate scale and character to the surrounds.
- 4.4 The paper identifies locations where tall buildings would not be appropriate to include: outside action area cores, conservation areas and areas of predominantly low height development.
- 4.5 It also identifies sensitivities where tall buildings are proposed to include: topography, archaeological priority zones, conservation areas and their settings, listed buildings and their settings, local character, scale and height, and important local views

### **Core Strategy: Strategic Policy 12 Design and conservation background paper (2010) (CDD3)**

- 4.6 This paper (CDD3) covers the background and research that has informed the suitable locations for tall buildings as established in Strategic Policy 12 and supporting text contained within our core strategy. It summarises our evidence base, describes our strategy and our reasons for selecting the approach we have taken.

### **Peckham and Nunhead Characterisation Study (2012) (CDD5)**

- 4.7 The characterisation study provides detailed analysis of the character of Peckham and Nunhead and considers future management guidelines.
- 4.8 The study identifies seven different character areas and looks at each of their characters in terms of:
- Summary descriptions.
  - Location, sitting and setting.
  - Land use and activity.
  - Historical development.
  - Heritage assets.
  - Urban structure/layout.
  - Townscape/built form.
  - Views and landmarks.
  - Public realm.
- 4.9 It is important to note that we decided to define five character areas within the AAP. This is because some of the areas identified in the characterisation study are similar in urban typology, morphology and structure and can be combined together, such as Peckham Rye and Nunhead to Honor Oak. Our future vision for the Peckham Core action area informs this decision, with the combining of Peckham town Centre with parts of the Peckham Spine area identified in the study.
- 4.10 The study also sets out management guidelines by considering:
- Potential threats to character.
  - Potential opportunities for managing character.
  - Management recommendations.
  - Key townscape development opportunities.

### **Peckham and Nunhead urban design study (2012) (CDD6)**

- 4.11 This document sets out the approach and analysis to inform the approach to urban design and building height in the Peckham and Nunhead action area. This study is informed by the characterisation study (CDD5), conservation area appraisals (CDD6 to CDD11) and English Heritage Central Peckham historic area assessment (CDD12).
- 4.12 The study sets out:
- Our approach for preparing an urban design study.
  - Our understanding of the character of Peckham and Nunhead
  - Our approach to prepare policy and guidance for building heights and taller buildings.

## **Conservation areas appraisals (CDD6 – CDD11)**

4.13 There are seven conservation areas located within the AAP area. Conservation area appraisals are adopted for the majority of the areas:

- Caroline Gardens
- Holly Grove (no draft published)
- Nunhead Green
- Nunhead Cemetery
- Honor Oak Rise (no draft published)
- Rye Lane Peckham
- Peckham Hill Street.

A small part of Sceaux Gardens conservation area also falls within the boundary of the AAP.

4.14 Conservation area appraisals that have been adopted for the conservation areas set out a detailed analysis of the area, explain why it is considered to be of special architectural or historic interest, and give principles for managing change by setting out a clear intention of the council's approach to its preservation and enhancement. The appraisals are also used by the council in assessing the design of development proposals.

## **Central Peckham, London Borough of Southwark, Historic Area Assessment, Joanna Smith and Johanna Roethe, English Heritage (2009) (CDD12)**

4.15 This document sets out an evaluation of the local significance of central Peckham by highlighting the more significant elements in the townscape and cityscape. The document was prepared to guide and inform the management of change.

4.16 The study sets out the following :

- An overview of the historical development of Peckham followed by a part describing the form and types of buildings in the area.
- Outlines the different character areas.
- A discussion of the distinctive elements of central Peckham.
- A gazetteer of buildings and sites.

## **5. DEVELOPMENT OF THE AAP**

- 5.1 This section sets out how the urban design policies in the AAP (CD1) have been developed, from the vision stage through to the publication/submission version taking into account the key assessments and consultation stages. We set out the chronological development of each of the four main AAP urban design policies and the justification for the final strategy:

Policy 23: Public realm  
Policy 24: Heritage  
Policy 25: Built form  
Policy 26: Building heights

- 5.2 Where more detailed design policy is required for the 5 different character areas, more information is set out in Section 5 of the AAP: Character areas in Peckham and Nunhead.
- 5.3 We also set out more information relevant to specific proposal sites in the site specific guidance in Appendix C of the AAP: Schedule of proposal sites.

### **AAP Policy 23: Public realm**

#### **The Options**

##### **Vision paper (March 2008) (CD15)**

- 5.4 The vision paper identified that design and heritage was an issue which would be looked at when preparing the AAP, though public realm was not specifically mentioned. It also set out the key development sites.
- 5.5 At this stage the AAP only covered the area in and around the town centre in Peckham, focusing solely on the area where we expected to see lots of change.

##### **Issues and options (2009) (CD16)**

- 5.6 As a result of the consultation responses received on the Vision paper (CD15) suggesting that we need to look at improvements to public spaces and public realm, particularly at the front of Peckham Rye Station, the AAP identified issues and options for public realm, and included Peckham Rye Station as a proposal site, identifying the requirement for a new public square in front of the station.
- 5.7 The issues and options set out the emerging vision for Peckham and Nunhead in Section 2, with the aim for the area to be safe, accessible with improvements to have attractive public spaces, protecting and celebrating the area's history as well as having the potential for high

quality modern development. It also set out that we would work with landowners and developers to achieve early gains and kick start regeneration.

- 5.8 The paper (CD16) set out two issues and options: the big decisions and the growth options. The big decisions identified that regardless of the level of growth, we would expect all development to be of high quality design, though public realm was not specifically mentioned.
- 5.9 The growth dependant option set out three options: high growth, low growth and limited growth and set out options for better streets and public realm for each option. The high growth option identified the potential for public realm and planting improvements in the town centre and local shopping areas, enhanced safety measures and improved walking and cycling routes in the town centre and surrounding areas, shown on figure 8. The low growth option identified the potential for public realm and planting improvements in the town centre and Evelina Road, enhanced safety measures and improved walking and cycling routes between specific destinations. The limited growth option identified the potential for improvements to Rye Lane north, Evelina Road and Queens Road, enhanced safety measures and potential for ad hoc improvements subject to funding.
- 5.10 We set out options for some of our potential development sites, setting out high low and limited growth options for 27 sites. Many of these included potential for new links and potential for new public space. The higher growth options included more sites across the wider area as well as Peckham town centre.

### **Core Strategy (2011) (CDL1)**

- 5.11 The Core Strategy was prepared between 2008 and 2011 sets out the strategic urban design policy for the whole borough, aiming to achieve high quality, attractive, safe, secure and accessible places.

### **Towards a preferred option (2011) (CD17)**

- 5.12 The towards a preferred option (CD17) further developed the vision established in the Core Strategy, to be more specific to Peckham and Nunhead incorporating responses from consultation.
- 5.13 At the towards preferred option we had our preferred option for public realm and set out in Policy 30: design general design policy to ensure high quality design for each of the five character areas, as well as overarching policies, including requiring high quality materials, clearly defined streets, and inclusive design.
- 5.14 Site specific guidance for the major development sites was refined from the previous stage of consultation.



### **Preferred Option (2012) (CD18)**

- 5.15 As a result of the consultation responses received at towards preferred option stage there was a suggestion to include a separate policy on public realm which was taken forward in the preferred option.
- 5.16 At this stage we set out Policy 23: Public realm which expanded on the principles for high quality, safe, secure and accessible design of public realm and public spaces.
- 5.17 Site specific guidance for the major development sites was refined from the previous stage of consultation and supporting text set out for each site highlighting public realm considerations where relevant.

### **Sustainability appraisal (CD2)**

- 5.18 The Sustainability Appraisal (CD2) has been used to help inform the preparation of the draft publication/submission policies and identified areas of concern to be addressed through the refinement of policies or through the use of mitigation measures to help avoid potential conflicts. The changes in the size of the action area boundary and the designation of additional conservation areas in the Peckham town centre have also informed the appraisal as the different stages of the document progressed.
- 5.19 Generally the appraisal identified that there is a need to consider the protection and enhancement of the landscape and townscape with higher growth offering more potential for positive impacts on landscape and townscape. The appraisal of the impact of site guidance also highlighted the potential impact of these development sites on quality of landscape and townscape, which were generally positive and neutral impacts.

### **Equalities**

- 5.20 The equalities impact assessment and analysis (CD3) identified various considerations that needed to be taken into account in preparing the draft submission policies.
- 5.21 It identified that if certain aspects about the quality of the built environment and public realm are not effectively addressed by the policies in the area action plan than the area will still feel threatening to different groups and may not meet their needs or ability to access local services.

### **Consultation**

- 5.22 All consultation responses received during the consultations are set out in the Peckham and Nunhead AAP Consultation Report (CD4). Those received on the vision paper suggested we need to look at improving

public spaces and public realm, particularly at the front of Peckham Rye Station.

- 5.23 The consultation responses on the issues and options included many comments about improving Peckham High Street and Rye Lane, stressing the need to make both streets cleaner and more pleasant to walk along. Subsequent policies in the towards a preferred option and the final version of the AAP set out policies on active travel as well as the aspiration to create an alternative pedestrian and cycle link to Rye Lane through the sites to the east Rye Lane.
- 5.24 The consultation on the towards a preferred option included a comment to create a policy on public realm, which was taken forward in the preferred option and the final AAP.
- 5.25 The consultation response on the preferred option from English Heritage made some suggestions to make the policies more clear, and to focus more on heritage with more consideration of local significance, which have been taken forward through the final AAP in the main policies, character area policies and site specific guidance. The GLA were supportive of the policies
- 5.26 English Heritage were in support of the heritage considerations in the policy and raised at the publication/submission stage of consultation that we should make it more clear the policy applies to improvements to existing as well as new public spaces. To ensure clarity in this policy, we have suggested a minor amendment to this policy through our table of proposed minor changes to the AAP (CD22)
- 5.27 Our consultation report sets out more information on the consultation responses and how we have taken these into account.

### **The strategy**

- 5.28 Our strategy in the final AAP is to seek high quality public squares, streets and spaces in Peckham and Nunhead and that we will work with other organisations (such as the GLA, TfL and English Heritage), developers and the community to achieve this. We have identified that new public realm should be of high quality, create a sense of place and encourage activity, consider local features and materials including those of the historic environment, be safe, secure and inclusive with new pedestrian and cycle links to key destinations and to enhance wayfinding, free of clutter and environmental considerations.

In the character area policies in Section 5 of the AAP, we set out more locally specific policy, highlighting where there is potential for enhancement of the public realm or creation of new public spaces. This may be set out in specific public realm policy or may be covered in a general built environment policy.

We also set out site specific guidance in Appendix C, highlighting potential for enhancing activity to spaces and identifying sites with opportunities for the creation of new public space.

### **Justification**

- 5.29 Good public realm helps define an areas identity, sense of place and attractiveness as a neighbourhood. The quality of public realm also contributes to a sense of safety and ensures that they active and accessible by all parts of the community. This is identified in guidance such as By Design, Buildings for Life 12 and Secured by Design. Our experience of the spaces and places in Peckham and Nunhead have identified the need to address some of the existing issues with the public realm and public space as well as well as looking at opportunities for new links and public spaces. This was an issue that was consistently raised at consultation throughout the development of the document and highlighted as an important issue to address through the preparation of the AAP.
- 5.30 The Peckham and Nunhead urban design study (CDD5) sets out an overview of the character of the action area and highlights some of the public realm issues and opportunities. The study set out our approach to public realm will be to seek to improve the quality of public realm by taking into account an area's identity, character and attractiveness to create new, inclusive public spaces with better legibility. New routes and the creation of new public spaces can also help enhance the public realm and create better connections and activate spaces. This is because the public realm is of a poor quality in some areas. The improved streetscape and public realm on Bellenden Road is an example of what we intend to achieve. This evidence has informed the approach set out in the final public realm policy.
- 5.31 Through consultation at different stages of the document, there were concerns regarding the shopping area and shop fronts around Nunhead town centre. Therefore we have prepared more detailed policies on the design of shop fronts and set out more detail in the Nunhead, Peckham Rye and Honor Oak built environment policies. We have also responded to this by securing funding through the 'Improving Local Retail Environments Programme' (ILRE) and the Mayor's Outer London Fund for improvements to Nunhead local centre shop fronts and public realm.
- 5.32 We have considered the analysis of the existing character, issues and opportunities as set out in the characterisation study and urban design study paper as well as comments raised at consultation and have highlighted that high quality design of public realm and public space is a main feature of ensuring that we can achieve our objectives for a safe, secure and attractive Peckham and Nunhead action area. This includes ensuring that the local character and historic environment.

- 5.33 Further to the general urban design and public realm policies set out in the NPPF (CDN1), London Plan (CDR1), Core Strategy (CDL1) and saved Southwark Plan (CDL2), in the AAP we set out policies which address the locally specific public realm issues and opportunities in the action area. These policies have been developed in parallel with the other urban design policies for built form, heritage and building heights to ensure that they cover all of the relevant aspects of the built environment.
- 5.34 We also set out character area specific public realm policies and guidance for proposal sites where more detail is required.

### **AAP Policy 24: Heritage**

#### **The Options**

##### **Vision paper (March 2008) (CD15)**

- 5.35 The vision paper (CD15) identified that design and heritage was an issue which would be looked at when preparing the AAP, including conservation of buildings.
- 5.36 At this stage the AAP only covered the area in and around the town centre in Peckham, focusing solely on the area where we expected to see lots of change.

##### **Issues and options (2009) (CD15)**

- 5.37 As a result of the consultation responses received on the vision paper which emphasised the importance of conserving our heritage. All subsequent versions of the AAP have placed a strong emphasis on conserving our heritage.
- 5.38 The issues and options (CD16) set out the emerging vision for Peckham and Nunhead with the aim for the area to be safe, accessible with improvements to have attractive public spaces, protecting and celebrating the area's history as well as having the potential for high quality modern development.
- 5.39 The document also set out that we were investigating whether parts of the town centre should be covered by a conservation area, which were shown in figure 6. This diagram also identified some buildings of special local interest as well as potential sites for demolition.

##### **Core Strategy (2011) (CDL1)**

- 5.40 The Core Strategy (CDL1) was prepared between 2008 and 2011 sets out the strategic urban design policies for the whole borough. It sets out

general policy for heritage, that the height and design of development should consider impacts on the historic environment and encourages heritage impact assessments for planning applications.

### **Towards a preferred option (2011) (CD16)**

- 5.41 The towards a preferred option (CD17) further developed the vision established in the Core Strategy (CDL1), which was adopted before the towards a preferred option report. The Core Strategy sets out the strategic urban design policy for the borough which highlighted the importance of conserving and enhancing the significance of Southwark's heritage assets.
- 5.42 At the towards a preferred option stage we felt we already had our preferred option for heritage and set out in policy 32: Heritage conservation, general heritage policy for the conservation and enhancement of Peckham and Nunhead's heritage assets. Following the publication of Planning Policy Statement 5 (PPS5) in 2010 (now superseded by the NPPF), which identified that consideration of heritage assets should be for both designated and non-designated assets, we added policy 33: Locally listed buildings, which set out that we will protect buildings with local value that make a positive contribution to the character or appearance of Peckham and Nunhead. We also set out for each of the five character areas in Policy 30: Design that heritage assets should be considered.
- 5.43 From consultation at issues and options there were suggestions for new conservation areas around Peckham Hill Street, Peckham High Street and Rye lane. The council's design and conservation team consulted separately on the new conservation areas in parallel with the consultation on towards preferred option report. The conservation areas for Peckham Hill Street and Rye Lane Peckham have since been designated in October 2011.
- 5.44 The heritage assets including possible locally listed buildings and proposed boundaries for the conservation areas were identified on Figure 27. We also included appendices which set out a list of the listed and possible locally listed buildings.
- 5.45 Site specific guidance for the major development sites was refined from the previous stage of consultation.

### **Preferred Option (2012) (CD17)**

- 5.46 In the preferred option (CD18), policy 26: Heritage took forward the heritage policies and refined the wording to strengthen to approach.
- 5.47 From consultation at towards a preferred option stage, English Heritage set out that there should be more consideration of the local significance of the different character areas. The preferred option introduced more

detailed, area specific built environment policies for each of the five character areas, focusing on each area's distinct character.

- 5.48 We also received a number of responses at consultation supporting proposals for locally listed buildings. The AAP provides a policy link to enable locally listed buildings, but a separate consultation will take place to identify these buildings across the whole borough.
- 5.49 Site specific guidance for the major development sites was refined from the previous stage of consultation and supporting text set out for each site highlighting urban design and historic environment considerations where relevant.

### **Sustainability appraisal (CD2)**

- 5.50 The sustainability appraisal (CD2) has been used to help inform the preparation of the draft submission policies and identified areas of concern to be addressed through the refinement of policies or through the use of mitigation measures to help avoid potential conflicts. The changes in the size of the action area boundary and the designation of additional conservation areas in the Peckham town centre have also informed the appraisal as the different stages of the document progressed.
- 5.51 Generally the appraisal identified that there is a need to consider the importance of the history and heritage of Peckham and Nunhead, that there is a need to preserve and enhance the built and archaeological environment and the potential loss of existing features and to balance potential for development with the potential impact on the historic environment, which varies across the different growth options - the higher the growth the greater the potential impacts.
- 5.52 The appraisal of the impacts of the site guidance also highlighted the potential impacts of these development sites on the quality of the historic environment, which were generally positive and neutral impacts.

### **Equalities**

- 5.53 The equalities impact assessment and analysis (CD3) identified various considerations that needed to be taken into account in preparing the draft submission policies.
- 5.54 It identified that if certain aspects about the quality of the built environment and public realm are not effectively addressed by the policies in the area action plan then the area will still feel threatening to different groups and may not meet their needs or ability to access local services.

## **Consultation**

- 5.55 All consultation responses received during the consultations are set out in the Peckham and Nunhead AAP Consultation Report (CD4). The consultation responses on the vision paper included a number of comments emphasising the importance of conserving our heritage and that new development must be a good quality of design.
- 5.56 The consultation responses on the issues and options included a number of comments emphasising the importance of conserving our heritage and that new development must be a good quality of design.
- 5.57 The consultation responses on the towards a preferred option from English Heritage highlighted the need to expand the consideration of historic environment through-out the document, including considering principles of heritage-led regeneration.
- 5.58 The consultation response on the preferred option from English Heritage made some suggestions to make the policies more clear, and to focus more on heritage with more consideration of local significance, which have been taken forward through the final AAP in the main policies, character area policies and site specific guidance. The GLA were supportive of the policies. We also received a number of comments supporting proposals for locally listed buildings.
- 5.59 In the consultation responses on the publication/submission version there was support for the heritage policies by English Heritage and others. English Heritage suggested that the policy could be strengthened by including specific references to the details of the conservation area appraisals in the supporting text. No changes are suggested as it is considered the existing policy is adequately robust.
- 5.60 Refer to our consultation report which sets out more info on the consultation responses and how we have taken these into account.

## **The strategy**

- 5.61 Our strategy for heritage policy in the final AAP is to strengthen the character of Peckham and Nunhead by sustaining and enhancing the significance of heritage assets, their settings and the wider historic environment and by ensuring heritage assets are put to viable uses consistent with their conservation. We also set out in our public realm and built form policies that there is a need to consider the existing quality, materials and features of the local area, including the local historic environment. The building height policy also sets out in the supporting text the importance of considering the impact of taller buildings on the local character and the historic environment.

In the character area policies of section 5 of the AAP, we set out more locally specific policy, highlighting where there are particular heritage



assets, features or characteristics which should be considered, such as in Nunhead, Peckham Rye and Honor Oak which has large areas covered by a number of conservation areas and registered parks. This may be set out in specific heritage policy or may be covered in a general built environment policy.

We also set out site specific guidance in appendix C of the AAP, highlighting particular heritage assets, features or characteristics which should be considered.

### **Justification**

- 5.62 The NPPF (CDN1), the London Plan (CDR1) and the Core Strategy (CDL1) emphasise that in preparing our approach for Peckham and Nunhead that we ensure the historic environment is sustained and enhanced. The Peckham and Nunhead urban design study (CDD5) sets out an overview of the character of the action area and highlights some of the heritage considerations. This approach has been informed by the analysis in the characterisation study (CDD4), conservation area appraisals (CDD6 to CDD11), English Heritage Central Peckham historic area assessment (CDD12). The study set out our approach to heritage will be to recognise and enhance the local significance of the area's heritage assets and that our policies and guidance will need to ensure new development and taller building heights aim to minimise impact on the historic environment, especially with consideration of the larger proposals sites or locations within or around the setting of a heritage asset. The urban design study has informed the approach set out in the final heritage policy.
- 5.63 Through consultation with English Heritage and published best practice guidance we have ensured that our approach provides a general overview as well as more locally specific policies and guidance. In order to ensure that our policies highlight the local distinctiveness of the character and the historic environment in Peckham and Nunhead action area and the five different character areas we have set out more detail in the supporting text of the heritage policy and also character area specific heritage policies and additional guidance for proposal sites
- 5.64 These policies have been developed in parallel with the other urban design policies for public realm, built form and building heights to ensure that they cover all of the relevant aspects of the built environment.

## **AAP Policy 25: Built form**

### **Vision paper (March 2008) (CD15)**

- 5.65. The vision paper (CD15) identified that design and heritage was an issue which would be looked at when preparing the AAP, especially in relation to the quality of design and the heights of new buildings. The paper also set out the key development sites.
- 5.66. At this stage the AAP only covered the area in and around the town centre in Peckham, focusing solely on the area where we expected to see lots of change.

### **Issues and options (2009) (CD16)**

- 5.67. As a result of the consultation responses received on the Vision paper suggesting that we need to look at improvements to public spaces and public realm, recognise the importance of conserving the built heritage and that development is of a high quality of design. As such, the AAP placed a strong emphasis on conserving our heritage and ensuring high quality design with an improved public realm.
- 5.68. The issues and options paper (CD16) set out the emerging vision for Peckham and Nunhead, with Section 2 outlining the aim for the area to be safe and accessible with improvements to have attractive public spaces, protecting and celebrating the area's history as well as having the potential for high quality modern development. It also set out that we would work with landowners and developers to achieve early gains and kick start regeneration.
- 5.69. It also set out two main issues and options: the big decisions and the growth options. The big decisions identified that regardless of the level of growth, we would expect all development to be of high quality design, and that we were investigating whether parts of Peckham town centre should be covered by a conservation area.

The growth dependant option set out three options: high growth, low growth and limited growth and set out options for building heights, better streets and public realm for each option. Options for better streets, lighting and safety, improved shop fronts and public realm were also broadly consistent. We did not mention a specific built form policy at this stage.

- 5.70. We also set out options for some of our potential development sites, setting out high low and limited growth options for 27 sites. Many of these included potential for higher building heights and scale in Peckham town centre, improved linkage and potential for new public space. The higher growth options included more sites across the wider area as well as Peckham town centre.

### **Core Strategy (2011) (CDL1)**

- 5.71. The Core Strategy (CDL1) was prepared between 2008 and 2011 sets out the strategic urban design policy for the whole borough and aims to achieve high quality, attractive, safe, secure and accessible places with consideration of the local context and historic environment.

### **Towards a preferred option (2011) (CD17)**

- 5.72. The towards a preferred option (CD17) further developed the vision established in the Core Strategy, for a more specific vision for Peckham and Nunhead incorporating responses from the previous consultation.
- 5.73. As a result of the consultation responses received at Issues and Options and the results of the interim sustainability appraisal, our preferred option reasserted public realm improvements.
- 5.74. At the towards preferred option we had our preferred option for design and set out policy 30 Design that would seek to ensure high quality design for each of the five character areas, as well as overarching policies, including requiring high quality materials, clearly defined streets, and inclusive design. Building heights was covered in Policy 31.
- 5.75. Site specific guidance for the major development sites was refined from the previous stage of consultation.

### **Preferred Option (2012) (CD18)**

- 5.76. As a result of the consultation responses received at the towards preferred option stage there was a suggestion to include a separate policy on public realm which was taken forward in the preferred option (CD18). There were also a number of comments on the need to improve the existing environment, specifically shop fronts on Rye Lane.
- 5.77. At this stage we set out policy 24: Built form which expanded on the principles for high quality design to protect and enhance character areas, considering existing features and materials and to ensure a good relationship with the public realm.
- 5.78. Site specific guidance for the major development sites was refined from the previous stage of consultation and supporting text set out for each site highlighting public realm considerations where relevant.

## **Sustainability appraisal (CD2)**

- 5.79. The sustainability appraisal (CD2) has been used to help inform the preparation of the draft submission policies and identified areas of concern to be addressed through the refinement of policies or through the use of mitigation measures to help avoid potential conflicts. The changes in the size of the action area boundary and the designation of additional conservation areas in the Peckham town centre have also informed the appraisal as the different stages of the document progressed.
- 5.80. Generally the appraisal identified that there is a need to consider the protection and enhancement of the landscape and townscape with higher growth offering more potential for positive impacts on landscape and townscape. An appraisal of the impacts of the site guidance also highlighted the potential impacts of these development sites on the quality of landscape and townscape, which were generally positive or neutral.

## **Equalities**

- 5.81. The equalities impact assessment and analysis (CD3) identified various considerations that needed to be taken into account in preparing the draft submission policies.
- 5.82. It identified that if certain aspects about the quality of the built environment and public realm are not effectively addressed by the policies in the area action plan than the area will still feel threatening to different groups and may not meet their needs or ability to access local services.

## **Consultation**

- 5.83. All consultation responses received during the consultations are set out in the Peckham and Nunhead AAP Consultation Report (CD4). The consultation responses on the vision paper suggested we need to look at improving public spaces and public realm, and protecting heritage assets.
- 5.84. The consultation responses on the issues and options included many comments about improving Peckham High Street and Rye Lane, stressing the need to make both streets cleaner and more pleasant to walk along, improving pedestrian and cycle links and suggestions for new conservation areas around Peckham Hill Street, Peckham High Street and Rye lane. Conservation areas for Peckham Hill Street and Rye Lane Peckham have since been designated in October 2011.
- 5.85. Subsequent policies in the towards a preferred option took into account comments from English Heritage that identified the need for a robust evidence base to identify the locations of tall buildings. This

background paper and the background study, which we have developed through the AAP process provides this. Comments were also received that supported taller landmark buildings. The preferred option has taken this forward by identifying where we think taller buildings should be located.

- 5.86. There were also a number of comments on the need to improve the existing built environment, specifically shop fronts on Rye Lane. The preferred option subsequently included a section with the public realm policy on shop fronts.
- 5.87. At the preferred option stage, a number of comments were received about supporting proposals for locally listed buildings. The AAP provides a policy link to identify locally listed buildings, but a separate consultation will take place to identify these buildings across the whole borough.
- 5.88. English Heritage made further suggestions to make the design policies clearer, and so that they would focus more on heritage, with greater consideration of local significance. This has have been taken forward through the final AAP in the built form policy, character area policies and site specific guidance. The GLA were supportive of the policies.
- 5.89. In the consultation responses on the publication/submission version there was support for the built form policies by English Heritage and emphasis on developments making a positive contribution to the local character and distinctiveness of Peckham and Nunhead. No changes are suggested for this policy.
- 5.90. Refer to our consultation report which sets out more info on the consultation responses and how we have taken these into account.

### **The strategy**

- 5.91. Our strategy for built form in the final AAP is to seek high quality design and architecture that makes a positive, inclusive contribution the distinctive character of the area. New development will help to create a sense of place and distinctive neighbourhoods, sustaining, enhancing or better revealing elements of the existing local and historic environment which have good character and improving the townscape in areas where its quality is poor.
- 5.92. New buildings should ensure that materials and features reflect the identity of the local surroundings, taking into consideration the local historic environment. The retention of proportions, rhythm and the form of important frontages and provide facades that add interest to the streetscape should also be retained.

- 5.93. Alongside the public realm policy, the built form policy should enhance the setting of public realm and public spaces by fronting onto those spaces and help generate activity around them.
- 5.94. The design or refurbishment of shopfronts and other non-residential frontages should incorporate generous window sizes or areas of glazing if appropriate to the heritage and character of the building. The use of solid external shutters will be resisted particularly within conservation areas, while original shopfront features that reinforce character and contribute positively to the host building and wider context should be retained
- 5.95. In the character area policies of section 5 of the AAP, we set out were necessary more locally specific policy, highlighting where there is potential for enhancement of the public realm or creation of new public spaces, the type of development that would sustain or enhance the character of character areas. This may be set out in specific public realm policy or may be covered in a general built environment policy.
- 5.96. We also set out site specific guidance in Appendix C of the AAP, highlighting potential for enhancing activity to spaces with active frontages and identifying sites with opportunities for the creation of new public realm and pedestrian and cycle links.

### **Justification**

- 5.97. Peckham and Nunhead is a diverse area which varies in the quality and character of buildings, streets and spaces. We want to ensure that development makes a positive contribution to its local character and distinctiveness. Our experience of this built environment has identified the need to address some of the existing issues with the built form. As well as well as looking at opportunities for new buildings and an improved public realm. This was an issue that was consistently raised at consultation throughout the development of the document and highlighted as an important issue to address through the preparation of the AAP.
- 5.98. The Peckham and Nunhead urban design study (CDD5) sets out an overview of the character of the action area and highlights some of the built form issues and opportunities. The study set out our approach to built form will be to ensure that new buildings and blocks enhance the character of an area, improve permeability where possible and create active frontages at ground level to encourage better integration with the public realm. Improved shop fronts in areas such as Rye Lane and Nunhead town centre will also help this.
- 5.99. Further to the general urban design and built form policies set out in the NPPF (CDN1), London Plan (CDR1), Core Strategy (CDL1) and saved Southwark Plan (CDL2), in the AAP we set policy to address the locally

specific built environment issues and opportunities in the action area informed by the evidence set out in the urban design study. We have also considered comments raised through consultation which have highlighted that high quality design of buildings and the public realm which consider the existing local and historic environment is a main feature of ensuring that we can achieve our objectives for a safe, secure and attractive Peckham and Nunhead.

- 5.100 Through consultation at different stages of the document, there were concerns regarding the Peckham shopping area and shop fronts as well as those around Nunhead town centre. Therefore we have prepared more detailed policies on the design of shop fronts and set out more detail in the Peckham core action area and Nunhead, Peckham Rye and Honor Oak character area built environment policies.
- 5.101 The council has also responded to the consultation response and received a Stage 1 pass for funding from the Townscape Heritage Initiative programme that will, in conjunction with support from local community groups, help deliver building repair, conservation and improvements to the public realm and shopfronts in the Rye Lane Peckham Conservation Area. We have also by securing funding through the 'Improving Local Retail Environments Programme' (ILRE) and the Mayor's Outer London Fund for improvements to Nunhead local centre shop fronts and public realm.
- 5.102. These policies have been developed in parallel with the other urban design policies for public realm, heritage and building heights to ensure that they cover all of the relevant aspects of the built environment.
- 5.103. We also set out character area specific built form policies and guidance for proposal sites where more detail is required.

## **AAP Policy 26: Building heights**

### **The Options**

#### **Vision paper (March 2008) (CD15)**

- 5.104. The vision paper (CD15) identified that design and heritage was an issue which would be looked at when preparing the AAP, especially in relation to the quality of design and the heights of new buildings.
- 5.105. The vision paper identified some of the major opportunities sites. This included Wooddene, the multi-storey car park/cinema and the Aylesham Centre.



5.106. At this stage the AAP only covered the area in and around the town centre in Peckham, focusing solely on the area where we expected to see lots of change.

### **Issues and options (2009) (CD16)**

5.107. The issues and options paper (CD16) set out the emerging vision for Peckham and Nunhead, in Section 2, with the aim for the area to be safe, accessible with improvements to have attractive public spaces, protecting and celebrating the area's history as well as having the potential for high quality modern development.

5.108. It also set out two issues and options: the big decisions and the growth options. The big decisions identified that regardless of the level of growth, we would expect all development to be of high quality design and highlighted in the major change, faster regeneration option, the potential for more housing on the identified opportunity sites.

5.109. The growth dependant option set out three options: high growth, low growth and limited growth and set out options for building heights for each option. The high growth option identified the potential for taller buildings on specific sites in the town centre, shown on the development sites map figure 7, the potential for additional height on existing sites and for infill to single storey shopfronts. The low growth option identified the potential for taller buildings on some sites where these would allow landmarks and public space improvements and that generally heights in the Peckham town centre would be similar to existing with potential for infill single storey shopfronts. The limited growth option identified the potential for taller buildings on some sites where these would balance with other benefits such as freeing up land for new public space, allow landmarks and public space improvements and that most new buildings in the Peckham town centre would be similar to existing heights with potential for infill single storey shopfronts.

5.110. In the high growth option, as set out in figure 7: Key to development sites and possible building heights, possible locations for tall buildings were identified on the following sites: site of former Wooddene Estate, Aylesham Centre and Industrial land off Copeland Road and Bournemouth Road with opportunity for a 10-15 storey landmark building; the Bellenden Road retail park including Lidl site with opportunity for a 7-12 storey landmark building; and Copeland Road car park and land on corner of Copeland Road and Rye Lane with opportunity for a 4-7 storey landmark building.

5.111. We also set out options for some of our potential development sites, setting out high low and limited growth options for 27 sites. The higher growth options included more sites across the wider area as well as Peckham town centre.

### **Core Strategy (2011) (CDL1)**

5.112. The Core Strategy (CDL1) was prepared between 2008 and 2011 and set out a vision for Peckham and Nunhead which included that there could be some taller buildings in Peckham town centre and that the area action plan would set out more detail on where tall buildings would be appropriate, inappropriate and sensitive. The Core Strategy also set out the strategic urban design policy for the whole borough and sets out that the height and design of new development should consider impacts on the local context and historic environment and that tall buildings could be located in Peckham action area core as identified on Figure 33. The approach to urban design and building height policy in the Core Strategy was informed by the Core Strategy strategic policy 12 Design and conservation background paper (CDD2) and the Core Strategy borough-wide strategic tall building study (CDD3) which set out evidence about the character of the borough and identified where tall buildings could be located, where they would not be suitable and where they would be sensitive.

### **Towards a preferred option (2011) (CD16)**

5.113. The towards a preferred option further developed the vision established in the Core Strategy, which was adopted before the towards a preferred option report.

5.114. The consultation responses at Issues and options included a number of comments about all of the density options. The low and medium options have been taken forward in section 4 with a few sites having taller buildings.

5.115. Policy 31: Building heights set out that we will retain the current character of places with new development being similar to existing heights. It required development of two to four storeys across the majority of the action area. It allowed some sites on landmark locations that mark a gateway point within the action area core to be taller (6 to 10 storeys). It identified the following as appropriate sites: Copeland Road Industrial Park, Wooddene, Aylesham Centre, cinema/multi-storey car park and land between the railway arches. These heights were illustrated in site specific guidance diagrams for the relevant sites.

5.116. The policy also set out that proposals must demonstrate the suitability of their location, height and design, consider surroundings, and impact on views

### **Preferred Option (2012) (CD18)**

5.117. Several people commented that they support taller landmark buildings. The preferred option (CD18) has taken this forward by identifying where we think taller buildings should be located.

5.118. In the preferred options, policy 25: Building heights took forward the building height policy and expanded the policy to set out that we would allow a taller element (six to ten storeys) on sites where there is sufficient space to accommodate a tall building fronting generous public realm. The policy set out that these sites are gateways and offer opportunity to locate a landmark building that will create a new focus. The following sites were identified: Aylesham Centre, Wooddene, Copeland Industrial Park, Copeland Road car park, and the cinema/multi storey car park.

### **Sustainability appraisal (CD2)**

5.119. The Sustainability Appraisal has been used to help inform the preparation of the draft submission policies and identified areas of concern to be addressed through the refinement of policies or through the use of mitigation measures to help avoid potential conflicts.

5.120. Generally the appraisal identified that there is a need to consider the protection and enhancement of the landscape and townscape with higher growth offering more potential for positive impacts on landscape and townscape and the need to balance potential impacts of higher growth options on the historic environment - the higher the growth the greater the potential impacts. The appraisal of the impacts of the site guidance also highlighted the potential impacts of these development sites on the quality of landscape and townscape and the historic environment, and were generally positive and neutral impacts. Acknowledged that where there are uncertain impacts when assessing the potential impacts on the historic environment, and further assessment would need to be undertaken at the design stages of any new scheme.

### **Equalities**

5.121. The equalities impact assessment and analysis (CD3) identified various considerations that needed to be taken into account in preparing the draft submission policies.

5.122. It identified that if certain aspects about the quality of the built environment and public realm are not effectively addressed by the policies in the area action plan then the area will still feel threatening to different groups and may not meet their needs or ability to access local services.

### **Consultation**

5.123. All consultation responses received during the consultations are set out in the Peckham and Nunhead AAP Consultation Report (CD4). The consultation responses on the vision paper included a number of comments emphasising that new development must be a good quality of design.

- 5.124. The consultation responses at Issues and options included a number of comments about all of the density options.
- 5.125. The consultation responses on the Towards a preferred options from English Heritage identified the need for a robust evidence base to identify the locations of tall buildings. The urban design study, which we have developed through the AAP process provides this. There were also several comments from people that they support taller landmark buildings.
- 5.126. There were only a few comments on building heights, with mixed views. Notting Hill, as developers of the former Wooddene Estate, comments that they supported the identification of the site for a taller landmark building, but that they consider that there is the potential for a series of taller buildings, and that the site has the potential to exceed the 6-10 storeys identified in the preferred option.
- 5.127. The consultation response to the publication/submission version from English Heritage and several local residents raised concerns regarding the proposed heights for taller buildings within the Peckham core action area. Some of the landowners supported this policy and the identification of the potential for taller buildings on these sites. The view of the council is that the policy is fully justified by its evidence base. However, to provide clarification, in relation to some of the comments raised, we are suggesting minor wording amendments to the policy through the table of proposed minor changes to the AAP (CD22).
- 5.128. Refer to our consultation report which sets out more info on the consultation responses and how we have taken these into account.

### **The strategy**

- 5.129. Our strategy for building heights policy in the final AAP is that we will retain the current character of places outside the Peckham core action area, generally 2 to 4 storeys, and in the Peckham core action area generally up to 7 storeys.
- 5.130. Our strategy is to set out where there are exceptions to this general policy, allowing for taller elements on some sites. Policy 26 sets out that where a local landmark is required to provide definition it will be encouraged on the following sites:
- Copeland Industrial Park and 1-27 Bournemouth Road (PNAAP 4) up to 15 storeys,
  - Site of former Wooddene estate (site PNAAP 5) up to 15 storeys,
  - Cinema and multi-storey car park (site PNAAP 2) up to 10 storeys,
  - Copeland Road car park (site PNAAP 7) up to 8 storeys and

- Aylesham Centre (site PNAAP 1) up to 20 storeys.

5.131. The policy sets out that a taller element could be provided within our identified large sites by a distinctive building of exceptional quality and exemplary design linked to an improved and generous public realm. It should be designed to improve local legibility, to act as a local landmark within a public space of its own, and as a focus of route/s across the site. This will be encouraged on the following sites:

- Copeland Industrial Park and 1 - 27 Bournemouth Road (PNAAP 4),
- Site of former Wooddene estate (PNAAP 5), and
- Aylesham Centre (PNAAP 1).

5.132. We also set out that any proposals for taller buildings must comply with our borough-wide policies, specifically saved Southwark Plan policy 3.20 (CDL2) and Core Strategy strategic policy 12 (CDL1).

5.133. The supporting text highlights that there is the need for taller building proposals to demonstrate, through a qualitative assessment, the effect of taller heights on the surrounds, responding to character, streetscape and skyline. Proposals should minimise impacts on sensitivities including views and settings of local heritage assets.

5.134. For each of the sites where we would encourage a taller element, we also set out this detail in the site specific guidance in appendix C, highlighting particular heritage assets, features or characteristics which should be considered.

### **Justification**

5.135. The Core Strategy (CDL1) sets out that tall buildings could be located in the action area cores, including Peckham and identifies that more detail about where tall buildings would be appropriate, inappropriate and sensitive would be set out in the area action plan. The Peckham and Nunhead urban design study (CDD5) sets out an overview of the character of the action area and further analysis to understand where tall buildings could be located in the Peckham core action area as well as an indication of potential heights for taller elements. This study is informed by the characterisation study (CDD4), conservation area appraisals (CDD6 to CDD11) and English Heritage Central Peckham historic area assessment (CDD12). The approach set out in the urban design paper has informed the building height and tall buildings policy and guidance set out in the AAP.

5.136. The urban design study has been prepared with consideration of the NPPF (CDN1) and London Plan (CDR1) and followed a methodology informed by the CABE and English Heritage Guidance on tall buildings (CDD1) and English Heritage best practice guidance as well as the criteria of saved Southwark Plan (CDL2) policy 3.20. This study sets out that there are potential benefits for taller elements in the core action

area to act as focal points at gateways along the main routes into Peckham and the transport hub of Peckham Rye Station, balanced with any potential impacts on the local historic environment. Taller buildings on a number of sites will contribute significantly to improving public realm with the potential for the creation of new meaningful public space on three of the largest sites.

5.137. Section 4 of the urban design study sets out a number of strategic tall building options and the testing of these options has identified that there are potential opportunities for taller buildings to assist in creating focal points at locations of landmark significance and enhance the gateway opportunities into the Peckham town centre. As a taller building can become a focal point in the local area and on the skyline their design and quality of building must be well considered and be of the highest quality.

5.138. There would be different benefits and impacts on each of the sites tested and therefore the potential height of taller elements would range across Peckham core action area:

- There is potential for a local landmark of 15 to 20 storeys on the Aylesham Centre site highlighting the location of the Peckham town centre, particularly when approaching along main routes into Peckham.
- There is potential for a group of local landmarks of 10 to 15 storeys on the Cinema / Car park, Copeland Industrial Park and Land between the railway arches sites highlighting the central transport hub around the railway station and centre of Peckham.
- There is potential for a local feature of 10 to 15 storeys on the Site of former Wooddene estate site which reinstates a local feature at the edge of the historic Peckham High Street and gateway into the town centre.
- There is potential for a local landmark of up to 8 storeys on the Copeland Road car park site highlighting the entrance into the Peckham town centre from the south.

5.139. We have set out across the Peckham core action area that a taller element will range in height, responding to the character and context and potential benefits of these heights as informed by the urban design study. The analysis also identifies potential impacts of taller elements at these heights, set out in section 4.6.4 and therefore we have included text in the policy that proposals will need to demonstrate the effect on the surrounds, and particularly to ensure that proposals minimise impacts on local heritage assets, particularly lower scale surrounds and the Rye Lane Peckham and Peckham Hill Street Conservation areas.

5.140. These policies have been developed in parallel with the other urban design policies for public realm, built form and heritage to ensure that they cover all of the relevant aspects of the built environment.

## 6. IMPLEMENTATION

- 6.1 Section 7 of the AAP sets out how the policies will be delivered, including how we are progressing on strategic public realm improvements, enhancing heritage assets and their settings, compliance with building heights policy and the number of proposals achieving Secured by Design accreditation,
- 6.2 Indicators we can assess include surveys of the local community and data collection including assessing community satisfaction and identification with the local area, if residents feel safety, crime statistics and indices of multiple deprivation, building for life assessment and reports of anti-social behaviour. Other factors include assessing historic environment objectives including areas covered by conservation area or Archaeological Priority Zones, numbers of buildings at risk, the numbers of listed heritage assets in the action area, and number of areas with heritage management plans, enhancement or educational / informational projects.
- 6.3 Section 4 of the Core Strategy Strategic Policy 12 Design and conservation background paper (CDD2) sets out a detailed implementation plan for our Core Strategy urban design policies. The urban design policies in the AAP expand on those in the Core Strategy and therefore more detail on the way they will be implemented has been set out in the AAP.
- 6.4 Many of the sites in Peckham and Nunhead are owned by the council and we are committed to bringing these forward for development. We have already successfully developed sites such as Peckham Square and the major redevelopment of the north Peckham Estate. Many of the largest proposals sites are council owned including:
- Site of the former Wooddene Estate (PNAAP 5)
  - Eagle Wharf (PNNAP 10)
  - Woods Road (PNAAP 15)
- 6.5 The council has also recently received a Stage 1 pass for funding from the Townscape Heritage Initiative programme that will, in conjunction with support from local community groups, help deliver building repair, conservation and improvements for the Rye Lane Peckham Conservation Area allowing a better understanding and appreciation of the built heritage in the Peckham town centre. This project will complement public funding with private investment to highlight the value of heritage assets, and invest in repairs and architectural reinstatement of historic and listed buildings and spaces and compliment the proposed investment in a new square in front of Peckham Rye Station.



- 6.6 We also successfully submitted a bid for the Mayor's Outer London Fund for improvements to Nunhead. This funding is targeting the area around the green and the shopping parade, much of which is in a conservation area. The proposed works will include new shop fronts, new highway and feature lighting, support for traders as well as festivals and events. The proposals will link to other proposals currently under development for development sites, the Nunhead housing site (PNAAP11) and Nunhead community centre and housing (PNAAP12).

## 7. DOCUMENT REFERENCES

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- CD3. Peckham and Nunhead AAP Equalities Analysis
- CD5. Peckham and Nunhead AAP Consultation Report
- CD15. Peckham and Nunhead vision paper (2008)
- CD16 Peckham and Nunhead Area AAP Issues and Options Paper, 2009
- CD17 Peckham and Nunhead Area Action Plan, Towards a preferred option, Southwark Council, May 2011
- CD18 Peckham and Nunhead Area Action Plan, Preferred option report, Southwark Council, February 2012
- CDL1. Core Strategy, Southwark Council, April 2011
- CDL2. Saved Southwark Plan, Southwark Council, July 2010
- CDL4. Southwark Local Development Scheme (2012)
- CDL19. Residential design standards supplementary planning document, 2011
- CDD1. Guidance on Tall Buildings, CABE & English Heritage, July 2007
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- CDD3. Core Strategy: Borough-wide Strategic Tall Building Study, July 2010
- CDD4. Peckham and Nunhead characterisation study, NLP, November 2011
- CDD5. Peckham and Nunhead urban design study, 2012

- CDD6. Nunhead Cemetery Conservation Area Appraisal, Southwark Council
- CDD7. Sceaux Gardens Conservation Area Appraisal, Southwark Council
- CDD8. Caroline Gardens Conservation Area Appraisal, Southwark Council
- CDD9. Rye Lane Peckham Conservation Area Appraisal, 2012
- CDD10. Peckham Hill Street Draft Conservation Area Appraisal, 2012
- CDD11. Nunhead Green Conservation Area Appraisal, 2010
- CDD12. Central Peckham, London Borough of Southwark, Historic Area Assessment, Joanna Smith and Johanna Roethe, English Heritage, 2009
- CDD13. Seeing The History In The View: A Method For Assessing Heritage Significance Within Views, English Heritage, June 2011