

## **S.78 of the Town and Country Planning Act (as amended)**

### **Appeal against the non-determination of planning application ref. 24/AP/2074.**

The Aylesham Centre, Rye Lane, Peckham, SE15 5EW

Statement of Case on behalf of the Appellant, Berkeley Homes (Capital) Plc

May 2025

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**For and on behalf of Avison Young (UK) Limited**

# 1. Introduction

- 1.1 This Statement of Case (SoC) has been prepared by Avison Young on behalf of Berkeley Homes (Capital) Plc (the 'Appellant'), in connection with its appeal (the 'Appeal') against the non-determination of planning application ref. 24/AP/2074 (the 'Application').
- 1.2 The Application seeks approval for the redevelopment of the Aylesham Centre and associated car park and petrol filling station at Rye Lane, London, SE15 5RW (the 'Site'). A Site Plan is enclosed at Appendix A.
- 1.3 The description of development for the Application (the 'Proposed Development') is as follows:

*Demolition of existing buildings and phased redevelopment to provide a replacement supermarket and associated service yard and car parking (Use Class E(a)), flexible retail, leisure (including drinking establishment), and commercial accommodation (Use Class E/Sui Generis), dwellings (Use Class C3), landscaping and associated works.*
- 1.4 The Application was submitted to the London Borough of Southwark (LBS) (the 'Council') as Local Planning Authority (LPA) on 15<sup>th</sup> July 2024 and subsequently validated with a start date of 3<sup>rd</sup> September 2024.
- 1.5 The Appellant submitted amendments to the Application to the Council in December 2024 in response to consultation responses and a further review of the financial viability of the proposals undertaken by the Appellant.
- 1.6 Under the terms of a Planning Performance Agreement ('PPA') dated 16<sup>th</sup> January 2024 and entered into by the Appellant and the Council, the agreed determination period for the Application expired on 31<sup>st</sup> January 2025. The appeal is lodged on the basis that the Council has not determined the Application within this agreed period and no further extensions of time have been agreed.
- 1.7 The Appellant requests that the Appeal is considered via the public inquiry procedure given the scale and complexity of the proposed development, the issues surrounding the proposals, and the level of public interest. The Application comprises EIA development and a project that would comprise significant housing provision and economic investment and as such there are complex matters which will require testing by cross examination of expert witnesses. We consider it cannot properly be dealt with via any other procedure.
- 1.8 The purpose of this Statement is to set out the Appellant's case against the non-determination of the Application by the Council which will be advanced by the Appellant at the public inquiry. It demonstrates that planning permission should be granted for the Proposed Development. It has been prepared in accordance with the guidance set out in the Procedural Guide to Planning Appeals (England) (updated April 2025) published by the Planning Inspectorate (PINS).
- 1.9 A draft Statement of Common Ground (SOCG) is submitted with the Appeal. The intention is that this is a working document which will be progressed further over the course of the appeal process.

## 2. Context

### Building the Homes we Need

2.1 On 31st July 2024, the Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government made a statement to the House of Commons, setting out the steps in its plan to build the homes that this country needs.

2.2 The following extracts from the statement are particularly relevant to this Appeal:

*Sustainable economic growth is the only route to improving the prosperity of our country and the living standards of working people..... Nowhere is decisive reform needed more urgently than in housing. We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home. That is why today I have set out reforms to fix the foundations of our housing and planning system – taking the tough choices needed to improve affordability, turbocharge growth and build the 1.5 million homes we have committed to deliver over the next five years.*

*The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes..... Reversing the change made last December that allowed local character to be used in some instances as a reason to reduce densities; and in addition, strengthening expectations that plans should promote an uplift in density in urban areas.*

2.3 The Deputy Prime Minister's 31<sup>st</sup> July 2024 statement was followed up with a letter to all local authority leaders and Chief Executives in England on the same day. The following extract is particularly relevant to this appeal:

*As the Leaders and Chief Executives of England's local authorities, you know how dire the situation has become and the depth of the housing crisis in which we find ourselves as a nation. You see it as you place record numbers of homeless children in temporary accommodation; as you grapple with waiting lists for social housing getting longer and longer; and as your younger residents are priced out of home ownership.*

*It is because of this I know that, like every member of the Government, you will feel not just a professional responsibility but a moral obligation to see more homes built. To take the tough choices necessary to fix the foundations of our housing system. And we will only succeed in this shared mission if we work together – because it falls to you and your authorities not only to plan for the houses we need, but also to deliver the affordable and social housing that can provide working families with a route to a secure home.*

2.4 The key steps referred to in the above extracts have subsequently been accounted for in the updated version of the National Planning Policy Framework (NPPF) (December 2024). This includes the introduction of paragraph 125(c) which requires decision makers to give substantial weight to the value of using suitable brownfield land within settlements for new homes and other needs, proposals for which should be approved unless substantial harm would be caused. Further action in delivering the Government's objectives is being delivered as part of the broader planning reform agenda (for example in the Policy Paper: Brownfield Passport, Making the Most of Urban Land).

### The Plan-led Approach

2.5 The Site comprises suitable, underutilised, previously developed land in a highly accessible town centre location in inner South London. The process of planning for its redevelopment commenced over 10-years ago, led by LBS in its capacity as Local Planning Authority (LPA).



- 2.6 The Site was first allocated for development in the Peckham and Nunhead Area Action Plan (AAP) in 2014, site ref. PNAAP1. This established site specific development plan policy support for the redevelopment of the Site for retail, residential and public space/realm including the opportunity for a taller landmark building of up to 20-storeys. The AAP was prepared and adopted by the Council following extensive public consultation and independent examination by an independent planning inspector appointed by the Secretary of State to ensure its soundness.
- 2.7 The Council subsequently prepared the new Southwark Plan which was adopted in 2022. This was informed by extensive public consultation at each stage in its preparation, extending over the period October 2014 to September 2021. As per the AAP, it was subject to independent examination by a planning inspector acting on behalf of the Secretary of State to ensure its soundness. It includes an updated allocation for the Site (NSP74) (the 'Allocation') which replaced the AAP allocation.
- 2.8 The new Southwark Plan remains up to date (for the purposes of National Planning Policy Framework (NPPF) paragraph 34). The Allocation provides site-specific development plan policy support for the Site's redevelopment for residential (indicative capacity of 850 homes), retail, and other Main Town Centre uses including public realm/spaces and the opportunity for buildings of up to 20-storeys.
- 2.9 The delivery of the requirements of the Allocation is necessary to meet the objectives of the strategic policies contained within the Southwark Plan. This includes the targets for new homes and other development set by Policy ST1; the place-based strategies set by Policy ST2; and the Area Vision for Peckham (Policy AV.14). The delivery of these local plan policy objectives/requirements is necessary to achieve the strategic objectives of the London Plan and the NPPF, particularly in respect to increasing housing supply and other identified needs and the need to use as much brownfield land to do so. This is also firmly aligned with the overarching purpose of the planning system which is to contribute to the achievement of sustainable development.

### **Delivering the Site Allocation**

- 2.10 Previous landowners consulted the public and other stakeholders on plans to redevelop the Site over the course of 2016-21 but failed to submit a planning application.
- 2.11 The Site was subsequently acquired by the Appellant in 2021 who prepared and submitted the Application.
- 2.12 The Application seeks planning permission for development that delivers the requirements of the Allocation, including:
- 867 homes.
  - A replacement supermarket.
  - An increase in the amount of Main Town Centre use floorspace currently on the Site.
  - Retention of bus station capacity.
  - Enhanced public realm and civic space.
  - New north-south and east-west links.
  - Active frontages with retail and leisure uses at ground floor fronting Rye Lane.
  - Diversification and complementing of the existing retail offer in the town centre with new opportunities for a range of shop sizes, including suitable space to attract a variety of retailers to Peckham.
- 2.13 The Proposed Development accords with the design guidance set out in the site allocation, including with regards to impacts on neighbouring residential areas; heritage buildings; conservation areas and views; and observing the 20-storey height restriction.

- 2.14 It is also in accordance with the broader framework of up-to-date development plan policies set out in the Southwark Plan and London Plan (and associated guidance). Accordingly, the Proposed Development will not cause harm to designated heritage assets (having regard to NPPF paragraphs 214 and 215) nor substantial harm with respect to the environment or living conditions (having regard to NPPF paragraph 125(c)).
- 2.15 Therefore, having regard to s.38(6) of the Planning and Compulsory Purchase Act (2004) and paragraph 11(c) of the NPPF, the Application should have been approved by the Council without delay and the appeal should therefore be allowed.

### **Capability of the Appellant**

- 2.16 The Appellant, Berkeley Homes (Capital) Plc, is the intended developer.
- 2.17 Berkeley Homes (Capital) Plc is part of the Berkeley Group, which was established in 1976.
- 2.18 The Berkeley Group has firmly established itself as one of the largest home builders in London (including in LBS), specialising in brownfield regeneration. In 2023 it delivered approximately 10% of the total number of new homes delivered in London. Some examples of current/recent developments include the following:
- One Tower Bridge, LBS;
  - One Blackfriars, LBS;
  - Chambers Wharf, LBS;
  - Royal Arsenal Riverside, London Borough of Greenwich;
  - Woodberry Down, London Borough of Hackney
  - Alexandra Gate, London Borough of Haringey
  - Camden Goods Yard, London Borough of Camden;
  - Kidbrooke Village, London Borough of Greenwich; and
  - Oval Village, London Borough of Lambeth.
- 2.19 The Appellant is working with Morrisons (the operator of the Site's existing supermarket) to bring the Site forward for development. Morrisons is the intended operator for the replacement supermarket.

### **Delivery Programme**

- 2.20 It is anticipated that the development will commence in 2026/27 with a delivery period of 8-10 years.

### 3. The Site and Surroundings

#### The Site

- 3.1 The Site extends to 2.7ha.
- 3.2 It is located within Peckham Town Centre. It is bound to the north by Peckham Bus Station and the rear of buildings that front onto Peckham High Street; Mckerrell Road to the east; Hanover Park to the south; and Rye Lane to the west.
- 3.3 The Site currently accommodates the Aylesham Centre alongside an associated 353 space surface car park, service yards and petrol filling station. The Aylesham Centre was built in 1988. It comprises a series of retail units extending over 2-3 storeys that front onto Rye Lane, with further retail units within a covered mall/atrium, including a supermarket operated by Morrisons. A number of traders also operate from hand carts within the internal mall/atrium. The Aylesham Centre is nearing the end of its economic life, and would require significant investment to bring it up to modern standards (including with regards to its Energy Performance Certificate) in order to extend its life.
- 3.4 An overview of the amount and composition of the existing development is set out below in Table 3.1.

*Table 3.1 Existing Development*

Description/Use	Floorspace (GIA)
Supermarket	4,975.7sqm
Other Retail, Leisure, Sui Generis	5,109.2sqm
Internal Mall/Atrium	1,392sqm
Petrol Filling Station	98.0sqm
<b>Total Existing Floorspace (including internal mall/atrium and petrol station)</b>	<b>11,574.9sqm*</b>
Car Parking	353 spaces

\*In accordance with the RICS Code of Measuring Practice (5<sup>th</sup> edition), this excludes the basement level within the western part of the Site as this has headroom (floor to ceiling height) of less than 1.5m.

- 3.5 The Site is broadly flat. There is a row of trees along the southern boundary of the Site plus a small number of trees and isolated areas of planting elsewhere within the Site.

#### Access

- 3.6 Vehicular access to the car park and petrol filling station is from Hanover Park. Vehicular access to the service yards is from Peckham High Street (via Peckham Bus Station) and Hanover Park.
- 3.7 Pedestrian and cycle access to the site is from Rye Lane, Hanover Park and the bus station (which connects to Peckham High Street). Rye Lane and Peckham High Street function as important east-west and north-south cycle routes which connect into London's wider cycle infrastructure.
- 3.8 The Site has a Public Transport Accessibility Level (PTAL) rating of 6a/6b (where 1a is the lowest and 6b is the highest).
- 3.9 Peckham Rye Station, served by London Overground and South-eastern Rail services, is located approximately 250m to the south west of the Site. Peckham Bus Station which abuts the Site is served by four bus routes (nos. 37, 197, 345 and P13). Additional bus services operate along Peckham High Street and Rye Lane (including routes 12, 36, 136, 171, 343, 345, 436).

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## Heritage

- 3.10 The existing buildings on the Site are not listed at either statutory or 'local' level. The closest Listed Buildings are located at 58 Peckham High Street (approximately 60m to the west) and Baptist Chapel, Rye Lane (approximately 70m to the south). Both are Grade II.
- 3.11 The former Jones & Higgins Buildings and 47-49 Rye Lane (former HSBC building) are both Locally Listed buildings and abut the Site to the north west and south west respectively. A number of other buildings within the Site's immediate vicinity are also Locally Listed, including no.'s 1-5, 12-16, 22a-24, 28 and 51-57 Rye Lane and nos. 86-88 & 98-104 Peckham High Street.
- 3.12 The western part of the Site (fronting onto Rye Lane) falls within the Rye Lane Peckham Conservation Area. Peckham Hill Street Conservation Area lies to the north of the Site (approximately 175 m from the Site at its nearest point).

## Surrounding Character

- 3.13 The built form and mix of uses in the surrounding area to the north, west and southwest is typical of an inner London town centre, with a broad mix of retailers and other commercial uses predominantly found at ground floor level with residential/commercial uses at upper levels. The town centre has the largest amount of shopping floorspace of all of the borough's town centres, focussed on Rye Lane (including the Aylesham Centre) and Peckham High Street.
- 3.14 The town centre has a vitality and vibrancy which gives it a character that is distinctive from other town centres. There is a high proportion of independent retailers, a growing night-time economy, and a significant number of small businesses which reflect the demographic characteristics of Peckham. It is a focus for creative industries and cultural events, anchored by the Bussey Building/Copeland Park and Peckham Levels (to the south of the Site), among other locations.
- 3.15 The character of the area to the east and southeast is more residential in character.
- 3.16 Building heights along Rye Lane and Peckham High Street are typically 3-4 storeys, however these increase to 20-storeys to the east (Clifton Estate, immediately to the north east of the Site).
- 3.17 The age, form and architectural style of surrounding buildings is mixed. Peckham Arch is a notable physical feature which sits alongside the architecturally distinctive Peckham Library and Peckham Pulse to the north of the Site.
- 3.18 Peckham Square provides the town centre's main area of public space (including green space). There is limited other green infrastructure in the town centre. The surrounding street network, particularly Rye Lane and Peckham High Street, suffer from congestion (with associated air quality and noise issues).
- 3.19 The surrounding area is undergoing significant change, with a number of significant planning permissions approved in the last 10 years, including Peckham Place; 97 Peckham Road; Peckham Rye Station; Eagle Wharf; and Sumner House and Flaxyard. In addition, a number of sites have been allocated for development in the local plan, including Blackpool Road Business Park and Copeland Industrial Estate, which are expected to come forward for development in due course.

## 4. Planning History

- 4.1 A planning history search of the Site has been undertaken using LBS' online planning register.
- 4.2 We understand that the existing Aylesham Centre was developed and operates pursuant to planning application ref. 84/AP/1725 which was approved in September 1985 for the following:
- The redevelopment of 1-41 Rye Lane plus associated land to the rear, The Peckham Conservative Club, 5 and 7 Hanover Park, London SE15 by the erection of a supermarket (3200sqm), 17 retail shops (totalling 4506sqm) with integral glazed mall together with associated service areas, car park and formation of access.*
- 4.3 There is an extensive subsequent history of planning applications associated with the management and operation of the existing Aylesham Centre, including:
- Extensions to the existing supermarket;
  - Minor applications for works (alterations to shop fronts, canopies, plant, antenna, small scale extensions);
  - Change of use of individual units; and
  - Advertisement consent applications.
- 4.4 A previous landowner consulted the public and other stakeholders on plans for the comprehensive redevelopment of the Site for retail and residential led uses over the course of 2016-21 but failed to submit a planning application.

## 5. Planning Policy and Material Considerations

### Policy Framework

- 5.1 The development plan affecting the Site comprises:
- The London Plan (2021); and
  - The Southwark Plan (2022).
- 5.2 The London Plan and Southwark Plan are supplemented by numerous Supplementary Planning Documents (SPDs) and Supplementary/London Planning Guidance (SPGs/LPGs), which are also a material consideration.
- 5.3 The Site is not located within a Neighbourhood Plan area.
- 5.4 The National Planning Policy Framework (NPPF or the 'Framework') (December 2024) and the associated Planning Practice Guidance (PPG), including the National Design Guide, are material considerations. Ministerial Statements (including those relating to the Government's ongoing planning reforms) are also a material consideration.
- 5.5 The above framework of policies and guidance will be referred to by the Appellant at the inquiry in evidence.

### Site Allocation

- 5.6 The Site is allocated for development in the Local Plan.
- 5.7 It forms the majority part of site allocation ref. NSP74 (the 'Allocation') which covers the Site and the adjacent Peckham Bus Station.
- 5.8 An extract of the Allocation is enclosed at Appendix B.
- 5.9 The Allocation supports the redevelopment of the Site which is required to:
- Provide new homes (an indicative capacity of 850 homes is stated)
  - Retain the supermarket use
  - Provide at least the amount of retail floorspace currently on the site
  - Retain bus station capacity
  - Provide enhanced public realm and civic space
  - Provide new north-south and east-west green links
  - Provide active frontages with retail, community or leisure uses at ground floor facing Rye Lane and Peckham High Street
  - Diversify and complement the existing retail offer in the town centre, with new opportunities for a range of shop sizes, including suitable space to attract a variety of retailers to Peckham
  - Provide new intermediate affordable housing through a community land trust.
- 5.10 The Allocation also includes design guidance which, among other matters, supports the principle of tall buildings on the Site (of up to 20-storeys) subject to the consideration of impacts on existing character, heritage and townscape.

### Area Specific Policies

- 5.11 The Site is located within the Peckham and Nunhead Action Area; the Peckham Action Area Core; and the Peckham Area Vision boundary where Local Plan Policy AV.14 applies.

## Policy Designations

- 5.12 The Site is subject to the following Local Plan policy designations:
- Major Town Centre (Peckham)
  - Protected Shopping Frontage (Rye Lane and internal mall frontages)
  - Borough View - View 1: The London Panorama of St Pauls Cathedral from One Tree Hill
  - Rye Lane Peckham Conservation Area (western part of the Site)
  - Archaeological Priority Area
  - Air Quality Management Area (AQMA)
- 5.13 Neighbouring land is subject to the following designations:
- Peckham Hill Street Conservation Area lies to the north of the Site (approximately 175 m from the Site at its nearest point).
  - Rye Lane Chapel (Grade listed II)
  - 58 Peckham High Street (Grade II listed)
  - Former Jones and Higgins Department Store (Locally Listed)
  - 47-49 Rye Lane (Locally Listed).
  - No.'s 1-5, 12-16, 22a-24, 28 and 51-57 Rye Lane (Locally Listed)
  - 86-88 Peckham and 98-104 Peckham High Street (Locally listed)

## Development Management Policies

- 5.14 The Southwark Plan and London Plan also provide a comprehensive package of broader development management policies.

## Historic Policy Context

- 5.15 For the purposes of context, the Site was first allocated for development in the Peckham and Nunhead Area Action Plan (AAP) in 2014, site ref. PNAAP1. This established site specific development plan policy support for the redevelopment of the Site for retail, residential and public space/realm including the opportunity for a taller landmark building of up to 20-storesys. The AAP was replaced by the Southwark Plan (2022).

## Material Considerations

### Five Year Housing Land Supply Position

- 5.16 LBS has not published up to date details regarding its five-year housing land supply position. This will be considered in evidence presented at the inquiry.

### Housing Delivery Test

- 5.17 LBS scored 82% in the most recent Housing Delivery Test, published in December 2024.

### LBS/GLA Publications

- 5.18 The Appellant may also refer to evidence base documents published by the Council, GLA and Government at the inquiry (for example, the Rye Lane Peckham Conservation Area Appraisal).

## 6. The Proposed Development

- 6.1 The Proposed Development comprises the demolition of all existing buildings and redevelopment to provide:
- 16 new buildings ranging from 4 to 20-storeys in height
  - 867 new homes
  - 17,250sqm of commercial floorspace as follows:
    - o Supermarket (Use Class E(a)): 5,980.7sqm (GIA)
    - o Supermarket car park, service yard and associated plant (Use Class E(a)): 4,731.3sqm (GIA)
    - o Workspace (Use Class E(g)): 2,725.3sqm (GIA)
    - o Flexible Retail, Leisure, Commercial (Use Class E(a-g) and Drinking Establishment (Sui Generis) 3,812.7sqm (GIA)
  - 1.02ha of new public realm, including green space
  - Associated works.
- 6.2 The development is intended to be delivered in two phases, each comprising a series of sub-phases.
- 6.3 Drawings as necessary to provide an overview of the Proposed Development are enclosed at Appendix C (Summary Design and Access Statement).
- 6.4 The Appellant will include a presentation as part of its evidence which will explain the Proposed Development in detail. This will be supported with evidence regarding architecture, landscape, townscape, heritage, transport and environmental/technical matters as necessary to fully explain and justify the proposed design and to allow a judgement to be reached on the non-substantiveness of any harm that the Proposed Development might have with respect to heritage assets and other receptors.



## 7. Procedural Matters

### **Application Specification**

- 7.1 The Application is submitted in full/detailed form.
- 7.2 A final schedule of plans/documents for which approval is sought (accounting for the amendments to the application made in December 2024) and an associated schedule of supporting information is enclosed at Appendix D. A schedule of correspondence with the Council and other relevant parties (including the submission of further details, responses to queries/clarifications etc) as relevant to the consideration of the Appeal is enclosed at Appendix E.

### **Documents**

- 7.3 A schedule of documents that the Appellant will refer to at the inquiry is provided at Appendix F.

### **Environmental Impact Assessment (EIA) Regulations**

- 7.4 An Environmental Statement has been submitted as part of the Application pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This has been prepared in accordance with the outcome of a formal scoping exercise with the Council.

### **Conditions**

- 7.5 No substantive discussions have yet taken place between the Appellant and the Council regarding conditions. The Appellant intends to seek to prepare and agree a schedule of conditions with the Council as part of the SOCG.

### **S.106 Agreement**

- 7.6 Initial heads of terms for the proposed planning obligations were submitted at the Application stage. Updated heads of terms are enclosed at Appendix G.
- 7.7 Initial discussions between the Appellant and the Council regarding planning obligations have commenced, including the preparation of an initial draft of the s.106 agreement. The Appellant will seek to agree a final draft s.106 agreement with the Council ahead of the start of the inquiry.

## 8. Consultation

### Appellant-led Pre-Application Consultation

- 8.1 The Application has been informed by an extensive programme of pre-application consultation with LBS and other consultees including the Greater London Authority (GLA), Transport for London (TFL), Historic England and the LBS Design Review Panel.
- 8.2 The Appellant will provide details in evidence of how feedback received from the local community, LPA Officers, and other consultees has influenced the Proposed Development.

#### Local Planning Authority

- 8.3 A total of 24 pre-application meetings were held with LBS over the period December 2021 to June 2024.
- 8.4 Discussions with LBS Officers focussed on the detailed matters beyond the principles established by the site allocation, particularly design. This included extensive optioneering (particularly with regards to scale, bulk/massing and layout). LBS Officer advice was recorded in the form of pre-application meeting minutes agreed between the Appellant and the Council.
- 8.5 Following a period of over a year of pre-application discussions, the Appellant agreed to the LPA's request to replace the original architect with a new design team. This led to significant project delay with the design process having to re-start. LPA Officers attended the Architect interviews which led to the appointment of DRMM as the project's new lead architect.
- 8.6 Alongside this, the Appellant agreed a 'design brief' with LPA Officers in May 2023 which, when read alongside the site allocation, formed the basis of the brief to the new architect. It is this jointly-agreed brief which underpins the design of the Proposed Development.
- 8.7 The draft proposals were presented to the LBS Design Review Panel in February 2024.

#### GLA

- 8.8 4 pre-application meetings were held with the GLA (as Strategic Planning Authority). Officers were supportive of the principle of residential-led mixed use redevelopment of the site. The main issues discussed were as follows:
- Land uses.
  - Affordable housing
  - Urban design
  - Heritage
  - Sustainability
  - Transport.

#### Public

- 8.9 The Proposed Development has also been informed by an extensive programme of Appellant consultation with the local community extending over a period dating back to 2021. This has included 5 'rounds' of public exhibitions; community forum meetings; workshops; a project website; and a staffed 'consultation hub' within one of the retail units open throughout this period.
- 8.10 The Appellant's engagement strategy was informed by consultation with LBS Officers, in line with the Council's Statement of Community Involvement (SCI) and Development Consultation Charter (DCC)).

## LBS-led Application Consultation (Post-Submission)

- 8.11 The Council consulted the public, internal consultees and statutory consultees following the validation of the Application (September 2024) and then ‘re-consulted’ following the submission of December 2024 amendments to the Application.

### LBS Officers

- 8.12 At the time of preparing this Statement, comments from internal consultees (Officers within LBS) were as follows:

- **Townscape and Design** – The Council’s Design and Heritage Officer has commented on the Application. A summary of the comments regarding townscape and design is that the overall masterplan is heading towards compliance with the NSP74 site designation; there is a good level of permeability and legibility, and the massing is appropriately distributed across the site. There are clear areas of activity and a variety of spaces that would complement the existing townscape of Peckham and add vibrancy and interest to a complex and mature existing townscape. In detail, there are areas of concern and some harm identified which need addressing, but the general principles are acceptable and would be heading towards compliance with relevant local plan policies. The areas of concern (harm) identified are summarised as follows:
  - o The reliance on green landscape areas in the areas where there will also be service access.
  - o Recommends that further efforts are made to ‘reinforce’ spaces and character areas, specifically: ‘Peckham Yards’; the interface with Mckerrell Road; the rear of Blocks A and B; and to the north of the Block L.
  - o Concern regarding the articulation of the massing of Blocks M and L, particularly the massing of the east-west section of Block L (where a reduction in height of 2-storeys is encouraged). Block M would benefit from a more slender profile.
  - o Encourages a general shoulder height to the street frontage of Blocks F, H, J and N with taller elements set behind, and comments on balcony style.
  - o Concern over the vertical stripes of Block P and its dark colours.
  - o Further articulation to the ground floor maisonettes and balconies.
  - o Raise the ground floor height of Block F.
  - o The south elevation to Block D requires more articulation.
  - o The architectural composition of Block E (querying whether the height should increase).
  - o The height of Blocks A, B and C rising sheer on the frontage of Rye Lane with limited set back is a concern. The upper parts of this building lack flair and articulation. The ground floor to the rear of the building could be improved.
  - o Further work required to the ground floor experience of Blocks D, K, L, Q and P.

The Appellant has responded to the above comments (additional evidence/justification of the proposals), and it is anticipated that some (potentially all) of the areas of concern will be resolved prior to the inquiry.
- **Heritage** – The Council’s Design and Heritage Officer has also commented on the impact of the Proposed Development on heritage assets.
  - o Rye Lane Conservation Area – The western part of the Site is located within the Rye Lane Conservation Area. The Officer has advised that the proposed massing of Blocks A, B, and C will have less than substantial harm (medium to high level) on the Conservation Area;
  - o Listed Buildings – The Site is located within the setting of the Rye Lane Baptist Chapel and 58 Peckham High Street (both Grade II Listed). The Officer has advised that the Proposed Development would preserve their significance (no harm).
  - o Locally Listed Buildings – The Site is located within the setting of numerous locally listed buildings. The Officer has advised that the Proposed Development will preserve their significance (no harm).

- Peckham Hill Street Conservation Area – The significance of the conservation area will be preserved (no harm).
- Holly Grove Conservation Area – The Proposed Development will not impact the conservation area in a negative manner (no harm).

The Appellant has responded to the comments regarding the matter of harm to the Rye Lane Peckham conservation area, noting that the existing Aylesham Centre is identified in the Council's Conservation Area Appraisal as being a negative element in the conservation area.

- **Planning Policy** – Comments made regarding housing; supermarket and retail re-provision; commercial/workspace; the proposed Business Relocation Strategy; public toilets and water fountains; the Statement of Community Involvement; Engagement Summary; Equalities Impact Assessment; energy and climate change (including the Whole Life Cycle Carbon and Circular Economy Assessments). The Appellant has responded and it is anticipated that any outstanding matters will be resolved prior to the Inquiry.
- **Planning Policy (Energy)** – Officers have raised queries regarding the Energy Statement submitted with the Application. The Appellant has responded and it is anticipated that any outstanding matters will be resolved prior to the Inquiry.
- **Archaeology** – The Council's Archaeologist is satisfied that unresolved issues relating to archaeology can be dealt with via condition.
- **Building Control** – No comments.
- **CCTV** – The Council's CCTV Officer has advised that that Proposed Development will impact the Council's existing CCTV network and its potential future expansion. The Officer has advised that this can be resolved via an appropriate planning obligation.
- **Drainage** – The Council's Drainage Officer has confirmed no objections, subject to appropriate conditions.
- **Ecology** – The Council's Ecologist has raised queries regarding the Biodiversity Net Gain assessment submitted with the Application. The Appellant has responded and it is anticipated that any outstanding matters will be resolved prior to the Inquiry.
- **Environmental Protection** – No objection, subject to conditions.
- **Flood Risk Management and Urban Drainage** – It is understood that there are no outstanding concerns, subject to appropriate conditions.
- **Highways** – The Borough Highways team has requested a section 278 agreement to secure works to the adopted highway. The intention is that this will be secured via the s.106 agreement.
- **Public Health** – Made comments and recommendations but no objections.
- **Transport (Policy)** – Comments raised regarding the Transport Assessment submitted as part of the Application with regards to travel demand; active travel; mitigation measures; cycle parking; car parking; access and servicing; and Peckham Bus Station. The Appellant has responded and it is anticipated that any outstanding matters will be resolved prior to the Inquiry.
- **Local Economy** – The Borough's Local Economy Officer is supportive of the Application including with respect to local plan policy requirements regarding affordable workspace; small shops; and business relocation. This is subject to appropriate planning obligations.

- **Network Developments** – Comments raised on the Demolition and Construction Environmental Management Plan. The Appellant has responded to this and it is anticipated that any outstanding matters will be resolved prior to the Inquiry.
- **Urban Forester** – The Borough's Urban Forester raised queries regarding the proposed landscape scheme and Urban Greening Factor calculations submitted as part of the Application. The Appellant has responded and it is anticipated that any outstanding matters will be resolved prior to the Inquiry.
- **Waste Management Team** – Queries raised regarding the proposed waste management strategy. The Appellant has responded and it is anticipated that any outstanding matters will be resolved prior to the Inquiry.

#### Independent Consultants (Acting for LBS)

8.13 LBS has appointed external consultants to provide independent expert advice to the Council on specific matters. The advice at the time of preparing this Statement is as follows:

- **Affordable Housing Viability** – The Council has appointed BPS (Chartered Surveyors) to review the Financial Viability Assessment and Addendum submitted as part of the Application. BPS is not in agreement with the Appellant on some assumptions made within the submitted financial viability assessment, nonetheless concludes that the Proposed Development is in a deficit position and therefore cannot viably contribute towards additional affordable housing over and above that proposed. Moreover, it agrees that nil affordable housing can viably be provided. The conclusions of the review are intended to inform the terms of the affordable housing obligations (including review mechanisms) secured in the s.106 agreement.
- **Environmental Impact Assessment (EIA)** – The Council has appointed Land Use Consultants (LUC) to undertake a critical review of the Environmental Statement submitted as part of the Application. It has raised queries that the Applicant has responded to (through clarifications and further explanation). LUC has subsequently confirmed that its queries are resolved. LBS Officers have confirmed that the Council has no outstanding EIA related queries and has sufficient information to assess the Application.

#### GLA

8.14 The GLA issued its Stage 1 Report on 21<sup>st</sup> October 2024. An updated version has not been issued following the submission of amendments to the Application in December 2024. The strategic issues raised comprised:

- **Land Use Principles:** Support for the principle of mixed-use residential-led development. Defers to the LPA to confirm if the quantum of residential units is acceptable.
- **Affordable housing:** Subject to acceptable affordable tenures; the proposals may be eligible to follow the Fast Track Route. [Note that the affordable housing provision was revised as part of the December 2024 amendments to the Application].
- **Urban design and heritage:** No strategic concerns raised to the principle of tall buildings on the site. Refinements to the layout and architecture should be considered. A very low to middle level of less than substantial harm is caused to heritage assets which must be outweighed by the benefits of the proposal.
- **Transport:** Pedestrian and cycle conflicts with bus station operations must be addressed. Further information and refinements to Healthy Streets, car and cycle parking, delivery and servicing, construction logistics, and Travel Plans are required.
- Other issues on sustainable development and environmental issues also require resolution.

- 8.15 The GLA's viability team has raised separate comments/queries regarding the Financial Viability Assessment and Addendum and the conclusions of the review undertaken by BPS. This has questioned whether the assessment should have considered the impact of growth and inflation, and challenged some of the inputs and assumptions adopted in the assessment. The Appellant has responded to the GLA on each of the matters raised and will be seeking to resolve any outstanding matters prior to the inquiry.

#### Statutory Consultees

- 8.16 At the time of preparing this Statement, comments from statutory consultees were as follows:

- **Historic England** – Historic England has advised that in its view some harm to the (Rye Lane) Conservation Area will result from the overall scale and distribution of buildings across the Site (particularly Blocks A, B and C). The response advises that the harm should be considered in the context of NPPF paragraph 208 (December 2023 version), which the Appellant has interpreted as suggesting that it considers the harm to be less than substantial.
- **Transport for London (TFL)** – TFL has raised queries regarding a broad range of transport related matters, including issues associated with Peckham Bus Station. Key issues raised included: public transport impact; Healthy Streets; noise and air quality; trip generation; delivery and servicing strategy; car parking; cycle parking; and the Travel Plan. The Appellant has been working with TFL to resolve these queries over the course of the Application determination period. At the time of preparing this Statement, TFL had not issued its updated (final) written feedback on the Application, nonetheless it is anticipated that any outstanding issues will be resolved prior to the inquiry including through the provision of appropriate conditions and s.106 obligations.
- **Environment Agency** – No objections.
- **Health and Safety Executive** – No objections.
- **London Fire and Emergency Planning Authority** – No response.
- **London Underground** – No comment.
- **Metropolitan Police Service** – No objections, subject to appropriate conditions regarding Secure by Design.
- **National Grid UK Transmission** – No response.
- **Natural England** – No objection.
- **Network Rail** – Request for financial contributions towards providing enhanced step free access and public realm works at Peckham Rye Station. The Appellant intends to discuss this with LBS as part of the preparation of the draft s.106 agreement ahead of the inquiry.
- **NHS Healthy Urban Development Unit** – Request for a financial contribution towards primary health care (capital works). The Appellant intends to discuss this with LBS as part of the preparation of the draft s.106 agreement ahead of the inquiry.
- **Thames Water** – No objection subject to conditions.
- **UK Power Networks** – No objections.

Neighbouring Local Authorities

- 8.17 London Boroughs of Bromley, Lambeth and Lewisham have all confirmed that they have no objections.

Other Consultees

- 8.18 At the time of preparing this Statement, comments from external consultees (outside of LBS) were as follows:
- **TV/Radio** – Arqiva (who is responsible for providing the BBC, ITV and the majority of the UK's radio transmission network and is responsible for ensuring the integrity of re-broadcast links) has considered whether the Proposed Development will have an adverse effect on its operations and has concluded that it has no objection.

Public

- 8.19 The Council consulted the public on the Application following its validation in September 2024 then re-consulted following the submission of the amendments to the Application submitted in December 2024.
- 8.20 There is significant public interest in the Application. At the time of preparing this Statement, approximately 2,500 public representations had been submitted to the Council. 2,432 comprised objections, 53 in support, and 15 neutral. The main issues raised are as follows (listed in order of number of comments):
- Affordable housing
  - Impact on community/local businesses
  - Building height
  - Design (including conservation/heritage)
  - Overshadowing
  - Loss of views
  - Type of housing
  - Affordable/small business provision.
  - Transport
- 8.21 Updated details on the above will be provided as part of evidence presented at the inquiry.



## 9. The Appellant's Case

### The Grounds of the Appeal

- 9.1 The Appeal is submitted on the grounds of non-determination of the Application.
- 9.2 The Appellant considers there to be significant common ground between the Appellant and the Council, and that the principal unresolved matters relate to design and heritage. Affordable housing and transport have been key matters of discussion since the submission of the Application, however at the time of submitting the appeal, the Appellant considers that these are largely resolved (and will be fully resolved prior to the inquiry). A draft SOCG (to be agreed between the Appellant and the Council) is submitted with this Appeal.
- 9.3 In advance of the SOCG being agreed, and for the purposes of completeness, the Appellant's overarching planning case is set out in this section.
- 9.4 The Appellant considers the main relevant matters to be as follows:
- The principle of development;
  - Comprehensiveness;
  - Demolition of existing buildings;
  - Housing matters (including amount, affordable housing, mix, density and quality);
  - Main Town Centre uses (including amount and mix);
  - Design and heritage;
  - Transport; and
  - Environmental and technical matters.
- 9.5 These matters are considered in turn below:
- (i) Overview**
- 9.6 The Proposed Development is firmly aligned with UK Government policy to boost the supply of housing and deliver economic growth. This is a priority of national significance which is driving the ongoing reforms to the planning system.
- 9.7 Paragraph 11(d) of the recently updated NPPF (December 2024) is clear: development proposals that accord with an up-to-date development plan should be approved without delay. The Appellant will present evidence at the Inquiry that demonstrates that the Application accords with the development plan (which is up to date) and therefore the Council should have approved the Application prior to the agreed determination deadline of January 2025.
- 9.8 The delivery of the Proposed Development will achieve the aims and objectives of the development plan and national planning policy, and therefore the purpose of the planning system which is to contribute to the achievement of sustainable development. It is also firmly aligned with the Government's ongoing reform of the planning system and its focus on boosting housing supply.
- 9.9 The delivery of public policy in this way ensures that the development will generate substantial positive benefits and social value to the public, particularly existing and future residents of Peckham and LBS. Details of the substantial public benefits that the Proposed Development will generate are set out in section 10 of this Statement. These benefits are a material consideration in any planning balance judgement and weigh heavily in favour of the Application.



**(ii) The Principle of Development**

- 9.10 The Appellant will demonstrate that the principle of redeveloping the Site is acceptable on the basis of it being allocated for development in an up-to-date Local Plan (site allocation ref. NSP74), in the context of the broader framework of strategic national, London Plan and Local Plan policies which support the principle of redeveloping suitable, under-utilised, highly accessible, previously developed land to meet identified needs.
- 9.11 Specific reference will be made to NPPF para 125(c) which requires substantial weight to be given to the value of using such land to meet housing and other needs (as proposed). Evidence will be presented to demonstrate that the Proposed Development will not cause substantial harm and therefore should be allowed in accordance with paragraph 125(c).
- 9.12 The Appellant will demonstrate that the proposed uses and amount of each use is acceptable in land uses terms on the basis of the development plan, having regard to other material considerations including evidence of need and deliverability.

**(iii) Comprehensiveness**

- 9.13 The Allocation covers the Site and the adjacent bus station land. There is no requirement within the allocation wording for the entirety of the Allocation land to come forward as a single scheme. The Appellant will refer to the Design and Access Statement, Transport Assessment and Environmental Statement to demonstrate that the Proposed Development does not prejudice the opportunity to bring forward the bus station land for development in the future in a manner that accords with the Allocation. This will be a matter for the owner of this land; it can be brought forward entirely separately; and is not necessary for the Proposed Development to be acceptable.

**(iv) Demolition of Existing Buildings**

- 9.14 The existing buildings are not Listed nor 'locally listed'. The Appellant will refer to evidence at the inquiry that demonstrates that they are of no particular design merit nor do they make a positive contribution to the significance of the Rye Lane Peckham Conservation Area. The Council's Conservation Area Appraisal refers to the existing buildings as being '*negative elements*' of the conservation which have an '*indifferent character which does little to enhance the conservation area*', and '*contribute poorly to the character and appearance of the area*'.
- 9.15 The Appellant will refer to evidence that demonstrates that the existing buildings are not suitable for reuse in a manner that would deliver the requirements of the Allocation, and therefore demolition is necessary to deliver the requirements of the Local Plan. It will refer to evidence of how the reuse of the buildings and materials was explored.
- 9.16 Therefore, the demolition of the existing buildings is considered acceptable in heritage and embodied carbon terms.

**(v) Housing Matters****Housing****The Principle**

- 9.17 The Allocation requires the provision of new homes on the Site, therefore the principle of new homes is acceptable.

Amount

- 9.18 There is a need to optimise the capacity of the Site for new homes in order to satisfy strategic national, London Plan and Local Plan policies which seek to significantly boost the supply of homes. The Appellant will refer to the following to demonstrate the scale of the need for new homes and to demonstrate that substantial weight should be given to the public benefits of meeting this need:
- The housing requirements set by London Plan Policy H1/Table 4.1, which fall short of the assessed need for new homes. Reference will also be made to the 'new' standard method for calculating London's housing needs which identifies a much higher level of need than currently planned for in the London Plan.
  - The specific role that the Site plays in meeting the borough's housing requirement, with reference to Local Plan strategic policies and the LBS Housing Trajectory.
  - Completion rates, which have fallen significantly short of the London Plan housing requirement within LBS and across London over recent years (including with reference to the Government's Housing Delivery Test).
  - Data on new housing starts, which identifies a collapse in the pipeline supply of new affordable homes in London.
  - The number of homeless households and households on the borough's Housing Register, including the financial cost to the Council of providing temporary accommodation.
- 9.19 The Appellant will also consider in evidence the housing related public dis-benefits of not allowing the Appeal.
- 9.20 The Appellant will demonstrate that a design led approach has been taken to optimise the capacity of the Site for new homes in accordance with London Plan Policy D3, and that the Proposed Development will not cause substantial harm (including with respect to the environment and in ensuring safe and healthy living conditions) having regard to NPPF para. 125(c).
- 9.21 The outcome of this approach is a scheme which will provide 867 new homes, which is broadly in line with the indicative 850 home capacity referred to in the Allocation (noting that this is not a maximum and can therefore be exceeded).
- 9.22 The Appellant considers the delivery of 867 homes to be a substantial public benefit.

Affordable Housing

- 9.23 The Proposed Development includes a range of tenures as follows (% in brackets are by habitable room, as per the requirements of the Local Plan (does not sum due to rounding):
- Social Rent (8.6%)
  - Intermediate (3.5%)
  - Market (88%)
- 9.24 The balance between Social Rent and Intermediate tenures broadly follows the proportions set by Local Plan Policy P1 and London Plan H6, albeit with a slight proportionate over-provision of social rented units which is considered to be a benefit (the proposed affordable housing tenure mix is 71.2% Social Rent and 28.8% Intermediate).
- 9.25 The Application is following the Viability Tested route to determine the acceptable overall level of affordable housing, for the purposes of London Plan Policy H5 and Local Plan Policy P1.

- 9.26 The Appellant will refer to the Financial Viability Assessment and Addendum submitted as part of the Application; the findings of the independent review of this by BPS; and the consultation response from the GLA's Viability team at the inquiry as evidence to demonstrate that the amount of affordable housing proposed is significantly in excess of the maximum level that could reasonably be required to satisfy Policies H5/P1 (which the viability evidence indicates is nil). The Appellant considers this to be a very substantial public benefit in the context of the significant need to boost the supply of affordable housing in London.
- 9.27 The Appellant is fully committed to increasing the level of affordable housing should development viability improve to the point where the Proposed Development is not in a deficit position. Viability reviews are proposed as s.106 obligations as the mechanism to test and secure this. This secures the opportunity to deliver additional public benefits should the viability position improve.
- 9.28 All of the Social Rent units are to be provided in Phase 1 and the Intermediate tenures in Phase 2. The front loading of the Social Rent units is a further significant public benefit in the context of the urgent need to boost the provision of Social Rent housing in London.
- 9.29 It is proposed that the s.106 agreement will also include obligations on the Applicant to continue discussions with the Council and Community Land Trusts (CLT) with the aim of securing a viable disposal of a proportion of any additional intermediate units provided following a viability review to a CLT, in order to meet the requirement of the Allocation.
- 9.30 Further details are set out in the s.106 heads of terms at Appendix G.

#### Unit Size/Type Mix

- 9.31 The Proposed Development provides a mix of 1, 2, and 3 bedroom homes. 20% will have 3 or more bedrooms; 61% will have 2 or more bedrooms; and 1% (market only) will be studios. This accords with the requirements of London Plan Policy H10 and Local Plan Policy P2.

#### Quality

- 9.32 The Appellant will refer to the Design and Access Statement and technical assessment work at the inquiry to demonstrate that London Plan and Local Plan policy requirements relevant to housing quality are satisfied. This includes requirements relating to: accessible housing; flexibility and choice (having regard to cultural requirements); tenure blind; internal space standards; dual aspect; internal light levels; orientation; privacy; private and communal outdoor amenity space; access to indoor shared facilities; and children's playspace.

#### **(vi) Main Town Centre Uses**

##### Amount and Mix of Main Town Centre Uses

- 9.33 The Proposed Development includes a total of 12,518.7sqm of non-residential floorspace (excluding the car parking associated with the supermarket). This includes a supermarket; workspace (use class E(g)); and flexible retail, leisure, and commercial uses (use class E(a-g) and sui generis (drinking establishments)). The Site is located within a Major Town Centre and is partly within the Primary Shopping Area. The proposed land uses are all supported by the Allocation and/or strategic policies for town centres and Main Town Centre uses set out in national, London Plan and Local Plan policies.
- 9.34 Retaining the supermarket use is a requirement of the Allocation. The size and specification of the supermarket has been set by Morrisons, the intended operator. The size of the supermarket is similar to the existing store ensuring that it will function in a similar manner (including the number of lines

and ability to undertake a ‘main food’ shop), noting that the site allocation does not specify a minimum or maximum size for the replacement supermarket.

- 9.35 The Proposed Development will deliver an increase in the overall amount of main town centre use floorspace on the Site. However, it deviates from the Allocation requirement to specifically provide at least the amount of retail floorspace currently on the site. The Appellant will refer to evidence provided as part of the Planning Statement and Planning Statement Addendum to justify providing a broader and more flexible range of main town centre uses than is currently on the Site as being a more effective way to deliver the objectives of the Allocation (including to diversify and complement the existing retail offer in the town centre). This approach was discussed with LBS Officers as part of pre-application consultation who expressed support. The blend of uses is complemented by a range of unit sizes suitable to attract a variety of retailers and other operators of Main Town Centre uses to Peckham as required by the Allocation.
- 9.36 In accordance with the Allocation, active frontages (retail and/or other Main Town Centre uses) are provided along Rye Lane, as well as along the main pedestrian routes through the Site.
- 9.37 The retail and other main town centre uses are in accordance with an up-to-date development plan and therefore neither impact nor sequential site assessments are required (for the purposes of NPPF paras 91-95 and corresponding London Plan/Local Plan policies).
- 9.38 Overall, the Main Town Centre Use element of the Proposed Development is consistent with the requirements of the Allocation (except where justified by material considerations); London Plan policies SD6 and SD7; and Southwark Plan policies AV.14, ST2, P35, and P37.

#### Affordable Workspace

- 9.39 10% of the proposed workspace (use class E(g)) will be provided as ‘affordable’ in accordance with Local Plan Policy P31. This is intended to be secured by way of planning obligation.

#### Small Shops

- 9.40 10% of floorspace in retail use (excluding the supermarket) will be provided in the form of ‘small shops’ (defined in the Local Plan as being 80sqm or less), in accordance with Local Plan Policy P32. It is anticipated that this will be secured by way of condition.

#### Business Relocation Strategy

- 9.41 There are 16 existing Small or Independent Businesses operating on the Site comprising 10 hand carts within the internal mall atrium and 6 units within the Aylesham Centre. The Appellant is committed to providing assistance to these businesses who will be displaced by the Proposed Development in accordance with Local Plan Policy P33. The Appellant will refer to the Business Relocation Strategy that has been submitted as part of the Application. It is intended that a final version of this will be secured by way of a planning obligation.

#### Other

- 9.42 In accordance with Southwark Plan Policy P35 (town and local centres), the replacement supermarket includes publicly accessible toilets; the proposed landscape scheme includes a variety of public seating options and a condition to secure the provision of public drinking fountains is proposed.

**(vii) Design and Heritage**Design

- 9.43 The design ambition is to bring forward a unique scheme that reflects the character of Peckham, while being deliverable.
- 9.44 The Proposed Development has been designed by dRMM Ltd (as lead architect), together with Downen Farmer Architects Ltd; Feix & Merlin Ltd; Jas Bhalla Works Ltd; and Nimtim Architects Ltd who have been responsible for the design of individual buildings (A, B, C, G and F). All five architectural practices were based in LBS at the time of submitting the Application, the majority in/around Peckham. The purpose being to bring a range of distinctive architectural styles and approaches to the scheme that are informed by a deep appreciation of the character of the local area in terms of the built environment and the local community.
- 9.45 The requirements and guidance set out in the site allocation have acted as the starting point for designing the scheme. This has been supplemented by a 'design brief' agreed between the Applicant and LBS as part of pre-application discussions.
- 9.46 The detail has subsequently been informed by feedback from LBS and GLA Officers (via pre-application meetings) and input/feedback from the public. It has also been informed by the iterative findings of survey and assessment work covering local character, heritage, views, and technical/environmental matters (including daylight/sunlight, microclimate, energy, and sustainability among others).
- 9.47 A full explanation of the key considerations that have informed and shaped the design will be given in evidence. This evidence will demonstrate that the design of the Proposed Development (in terms of its scale, layout, appearance, landscaping, and access) is of an outstanding standard that will provide a distinctive new place that complements the existing character of Peckham; provide high quality new homes and commercial accommodation; and will not cause substantial harm to the surrounding environment or existing living conditions.
- 9.48 The Appellant will refer to the Design and Access Statement; Transport Assessment; Environmental Statement (including the Townscape Heritage and Visual Impact Assessment); pre-application meeting notes; the 'design brief' agreed with LBS; feedback from the DRP; consultation responses; and other evidence to demonstrate that the design accords with the requirements and guidance set out in the Allocation alongside the broader framework of design policies and guidance set out in the NPPF, PPG, London Plan and Local Plan. This will include making reference to the following key points:
- A **design-led approach** to optimise the capacity of the Site has been followed in line with London Plan Policy D3, which aims to make the best use of this previously developed highly accessible site (in line with Section 11 of the NPPF) without causing substantial harm to the surroundings.
  - The **form and layout** of the development has been structured to provide a coherent, legible, and navigable pattern of streets, spaces and blocks.
  - The principle of **tall buildings** on the Site is supported by the Allocation alongside London Plan Policy D9 and Local Plan Policy P17. Careful consideration has been given to massing, which includes numerous tall buildings, to ensure it complements the existing townscape character. A maximum building height of 20-storeys is observed in accordance with the Allocation guidance. Reference will be made at the inquiry to evidence that considers the visual, functional, environmental and cumulative impacts of the proposed tall buildings as required by London Plan

Policy D9, and which will demonstrate that they will make a positive contribution to wider character.

- The distribution of the **massing** focusses the tallest buildings to the eastern part of the Site, away from the Rye Lane Conservation Area, and to ensure that the borough **view** of St Paul's Cathedral from One Tree Hill is not interrupted. Views to the City, while interrupted, remain possible from the rooftop of the Bussey Building (noting that this is not a protected view). The Appellant considers the proposal to represent the best practicable distribution of massing that minimises impacts to views and surrounding receptors, while delivering the requirements of the site allocation.
- Opportunities to increase the permeability for pedestrians and cyclists through the Site have been maximised. This includes the provision of **new north-south and east-west green links** for pedestrians and cyclists through the Site. The Appellant will make reference at the inquiry to illustrative details of how these connections could be extended beyond the planning application site boundary to the north and east, with delivery secured by way of a planning obligation.
- The **architectural character of buildings and spaces** has been considered together, following a clear set of design principles aimed at delivering a place of unique and distinctive character that complements the surrounding context.
- The Proposed Development will provide 1.2ha of new high quality **public realm** and civic space that will be open and accessible to all. Careful consideration has been given to ensuring the appropriateness of the proportions of streets and spaces, balancing function with character. Active ground floor uses are proposed throughout the Proposed Development to ensure that the proposed buildings appropriately engage with the streets and spaces and promote activity. The proposed public realm has been designed to facilitate safe and efficient movement through the Site, whilst providing areas for residents and the public to congregate or relax throughout the day, evening and night. The 'green' focus of much of the proposed public realm is intended to address existing deficiencies, including those identified through public consultation. It has been specified to be functional, durable, and inclusive. The design has been informed by micro-climate and overshadowing assessments to ensure suitability for the intended purpose.
- The scheme has been designed to ensure that the capacity of the adjacent **bus station** is retained and that its operations are not prejudiced under agent of change principles (having regard to London Plan Policy D13).
- The scheme has been designed to minimise its contribution to **climate change** and be resilient to the effects of climate change.

### Heritage

- 9.49 The Site is allocated for development in the Local Plan, accordingly the principle of change to the Rye Lane Conservation Area and to the setting of other designated heritage assets is established. Any reasonable implementation of the site Allocation will affect views, character, appearance, and the way in which people will 'experience' these heritage assets.
- 9.50 The Appellant will present evidence (including with reference to the Council's Conservation Area Appraisal) which demonstrate that the existing development has a negative effect on the significance of the Conservation Area. Therefore, as a matter of principle, its replacement is a positive step in heritage terms.



- 9.51 The Appellant will refer to the Townscape Heritage and Visual Impact Assessment (The Townscape Consultancy), statutory consultee responses, and other evidence to demonstrate that careful consideration has been given throughout the design process to the objective of preserving the significance of the Rye Lane Conservation Area and the settings of other designated heritage assets.
- 9.52 The evidence will demonstrate that the Proposed Development will not harm the significance of the Conservation Area as a whole (noting that the Conservation Area extends over an area much wider than just the western part of the site and therefore is unaffected by the Proposed Development) and will preserve the setting of other designated heritage assets.
- 9.53 Notwithstanding this, the Appellant acknowledges that LBS and GLA have advised that in their view the Proposed Development is likely to give rise to less than substantial harm to the significance of the Rye Lane Conservation Area (a view that the Appellant understands is shared by Historic England). If the Inspector was minded to agree with these views then any such harm would need to be balanced against the significant and substantive public benefits of the Proposed Development (as set out in the following section). This balanced judgement should account for the substantial weight that should be given to the value of using suitable brownfield land within settlements for homes and other identified needs as required by NPPF para. 125(c).
- 9.54 It is noted that the LBS Archaeologist does not object to the Proposed Development, subject to appropriate conditions.

#### **(viii) Transport**

- 9.55 The Appellant will refer to evidence to demonstrate that extensive discussions have taken place with LBS Officers, GLA and TFL with regards to transport matters prior to, and following, the submission of the Application.
- 9.56 It will present evidence (as set out in the Transport Assessment (TA) and supplementary information) to demonstrate how the proposed development is acceptable, having regard to relevant national, London Plan and Local Plan policies. Key matters include:
- **Design** – The Appellant will refer to the DAS to demonstrate that the Proposed Development has been designed to create a safe and secure layout that minimises conflicts between vehicles, cyclists and pedestrians with new north-south and east-west routes through the site that prioritise active travel. It will also highlight how public safety (including perceived safety), specifically including for women and girls, has been considered in the design alongside broader Healthy Street considerations.
  - **Pedestrian and Cycle Connectivity** – The Appellant will refer to the TA and subsequent correspondence with TFL/LBS in evidence which outline proposals for improved pedestrian connectivity on land adjacent the Site owned by LBS and TFL (including on the bus station land). It is anticipated that these works will be secured via s.106 obligation (including with reference to a s.278 agreement).
  - **Bus Station Capacity** – The Appellant will refer to the TA, DAS and correspondence with TFL to demonstrate that the Proposed Development will not affect the capacity of the bus station. It will also demonstrate that the increase in pedestrian/cyclist traffic across the bus station land that may be generated by the Proposed Development will not impose safety or operational risks. It will refer to the Planning Statement, Planning Statement Addendum and ES as evidence to demonstrate that the Proposed Development will not generate Agent of Change issues that could prejudice the future operation of the bus station. Whilst not necessary to make the proposed

development acceptable, the Appellant has proposed a s.106 obligation to deliver upgrade works to the bus station in line with a scheme to be agreed with LBS in consultation with TFL.

- **Public Transport** – The Site has a PTAL rating of 6a/6b (excellent) and future residents/visitors will have access to high frequency bus and rail services. The Appellant will refer to the TA and correspondence with TFL which concludes that the Proposed Development will not result in a perceptible change to prevailing demand for bus services, in the context of the extremely high number of bus services that serve the Site. Accordingly, there is no need to increase bus service capacity to meet the additional demand generated by the development. Notwithstanding this, the Appellant is willing to enter into a s.106 obligation to upgrade existing bus stop facilities around the Site.
- **Cycle Parking** – The Proposed Development provides cycle parking in line with the requirements of London Plan Policy T5. This does not fully accord with the more onerous requirements of Local Plan Policy P53. The Appellant will refer to correspondence with LBS Officers and TFL to confirm their agreement to this approach. A condition to secure provision of a location for dockless hired cycles within the Site is accepted.
- **Car Parking (Supermarket)** – The Proposed Development includes a 140 space car park to serve the replacement supermarket. It is acknowledged that this exceeds London Plan/Local Plan policy requirements for car-free development. However, this is a requirement of the supermarket operator in order to make the site available for development (and is a reduction of 213 spaces compared to the existing 353 space car park). Use of the car park will not be restricted to supermarket shoppers, it will be open to all, as is the case with the existing car park. A Car Parking Management Plan is proposed to be secured by condition. The provision of electric vehicle charging points is proposed to be secured by condition. The Appellant will refer to consultation responses from LBS, TFL and GLA to confirm points that are accepted and where any residual concerns remain.
- **Car Parking (Residential and Other Non-residential Uses)** – In line with London Plan and Local Plan policy requirements, the remainder of the development is car free with the exception of 11 blue badge bays for residents. At 1.25% this is below the 3% sought by London Plan policy – the Appellant will refer to the TA and correspondence with TFL as evidence to justify this. Residents will not be able to apply for Controlled Parking Zone permits (to be secured by planning obligation).
- **Highway Impact** – The Proposed Development will reduce the number of vehicle trips generated by the Site compared to the existing (principally due to the reduction in the number of car parking spaces). Accordingly, the Proposed Development will have a positive effect on highway capacity.
- **Travel Plan** – A Framework Travel Plan has been submitted with the Application to maximise the uptake of sustainable travel modes. It is anticipated that this will be secured via s.106 obligation to embed healthy travel and to monitor demand.
- **Servicing and Deliveries** – The Appellant will refer to the TA and DAS which demonstrate how the servicing needs of the development have been designed-in. The Appellant proposes that a Servicing and Delivery Management Plan is secured by way of s.106 obligation.

9.57 At the point in time that this Statement was prepared, the Appellant continued to be engaged in negotiations with TFL and LBS with regards to the scope of any further necessary off-site transport related upgrades that may be necessary for the development to be acceptable, and which would be secured by planning obligations. It is anticipated that these negotiations will be concluded prior to the inquiry.



- 9.58 Conditions are proposed to secure a Servicing and Delivery Management Plan; Construction Logistics Plan; and Parking Design and Management Plan. Conditions are also proposed to secure the commitments set out in the Construction Environmental Management Plan submitted with the Application.

**(ix) Environmental and Technical Matters**

Environmental Impact Assessment (EIA)

- 9.59 The Appellant will refer to the Environmental Statement (ES), ES Addendum and other reports submitted as part of the Application as evidence to demonstrate that the likely environmental and technical impacts of the Proposed Development have been robustly identified, considered as part of the design process, and assessed. Adverse impacts have been minimised and mitigated where necessary. The EIA has been undertaken in accordance with the Appellant's EIA Scoping Report and the Council's EIA Scoping Opinion which will be referred to in evidence.
- 9.60 The Appellant will acknowledge that the EIA indicates that there will likely be both adverse and beneficial temporary, mainly short term, local environmental effects during the construction stage, as would typically be expected of any large urban regeneration redevelopment. These include
- **Socio-economics; Air Quality; Daylight, Sunlight and Overshadowing; and Climate Change and Greenhouse Gases** – No significant environmental effects.
  - **Traffic and Transport** – Severance of communities, and non-motorised user delay (adverse).
  - **Noise and vibration** – Demolition and construction noise (adverse).
  - **Archaeology** – Removal of any assets (adverse).
  - **Ground Conditions and Land Contamination** – Remobilisation of contaminant pathways (beneficial).
  - **Wind Microclimate** – Wind conditions windier than targeted for intended use (adverse).
  - **Built heritage; and Townscape** – Changes to townscape character as a result of demolition and construction (adverse).
  - **Visual Impact** – Changes to views as a result of the visible demolition and construction of the Proposed Development (adverse).
- 9.61 The Appellant will demonstrate that the completed development will likely have both beneficial and adverse environmental effects. These mainly comprise long term/permanent local effects, as follows:
- **Noise and Vibration; Air Quality; Archaeology; Ground Conditions and Land Contamination; Climate Change and Greenhouse Gases; and Built Heritage** – No significant environmental effects.
  - **Socio-economics** – Delivery of 867 new homes (beneficial).
  - **Traffic and Transport** – Severance of communities; and non-motorised user amenity and fear and intimidation (beneficial).
  - **Daylight, Sunlight and Overshadowing** – Reduction in daylight and sunlight amenity to existing homes (adverse).

- **Wind Microclimate** – Wind conditions windier than targeted for intended use (comfort) (adverse).
- **Townscape** – Changes to townscape character (beneficial).
- **Visual Impact** – Changes to views experienced by visual receptors (beneficial, neutral, and adverse).

- 9.62 The ES includes details of mitigation measures that the Appellant anticipates will be secured by condition to ensure that likely adverse effects are minimised insofar as is practicable.
- 9.63 The Appellant will refer to the report from LUC (the Council's independent advisors) who have confirmed that they consider the Appellant's ES to be robust. It will also refer to consultation responses from statutory consultees and from within the Council as necessary to reinforce this.
- 9.64 While acknowledging that the Proposed Development will have some adverse environmental effects, the Appellant will demonstrate that such effects are unavoidable and necessary in order to deliver the requirements of the Allocation and have been minimised and mitigated as far as is reasonably practicable. It will conclude that the identified adverse effects affect limited areas, are not unreasonable in the context of the significant public benefits that the scheme will generate and that, overall, the Proposed Development will not cause substantial harm to the environment or existing living conditions.

#### Other Environmental and Technical Matters

- 9.65 The Appellant will demonstrate at the inquiry with reference to evidence submitted as part of the Application alongside LBS and consultee responses that the Proposed Development is acceptable in planning policy terms with regards to other technical matters. Of note is the following:
- **Fire Strategy** – The Proposed Development has been designed to comply with the most up to date Building Regulations and associated planning policies regarding fire safety. The Health and Safety Executive has confirmed that it is content with the fire safety design to the extent that it affects land use planning, and does not object to the Application.
  - **Internal Daylight/Sunlight** – The Appellant will refer to the submitted Internal Daylight, Sunlight and Overshadowing Report, Addendum, and further information subsequently submitted to the Council. This will demonstrate that the Proposed Development will enjoy acceptable levels of internal light and sunlight to external spaces, as reasonable for a high density urban development having regard to relevant guidance and good practice.
  - **Ecology/Biodiversity** – The Appellant will refer to the Preliminary Ecological Appraisal submitted as part of the Application as evidence to demonstrate that the Site has limited existing ecological value (for example there is no evidence of protected species on the Site). It will refer to the Biodiversity Net Gain Assessment and DAS (submitted as part of the Application) as evidence to demonstrate how a Biodiversity Net Gain of 111% is intended to be achieved as part of the Proposed Development alongside an Urban Greening Factor (UGF) of 0.38. The Appellant will demonstrate why the London Plan policy expectation of an UGF of 0.40 is not feasible on the Site.
  - **Energy** – The Appellant will refer to the submitted Energy Strategy at the inquiry to demonstrate how the Proposed Development will be net zero carbon, in line with London Plan Policy SI2 and corresponding Local Plan Policies. It will refer to the Sustainability Statement to demonstrate how non-residential accommodation has been designed to achieve a BREEAM Excellent rating in occupation. It will also refer to the submitted Circular Economy Statement and Whole Lifecycle Carbon Emissions Statement to demonstrate how associated London Plan/Local Plan policies are

satisfied. Reference will also be made to consultation responses from the GLA Energy Team and corresponding LBS Officers to confirm their acceptability of the Application.

- **Over-heating** – The Proposed Development has been designed following the ‘Cooling Hierarchy’ design principles established by London Plan Policy SI4 and Local Plan Policies P14 and P15 which aim to minimise the risk of over-heating while avoiding reliance on active cooling where possible. The Appellant will refer to the Energy Strategy and DAS submitted as part of the Application, alongside consultation responses from the GLA and LBS Officers as evidence to demonstrate the acceptability of the Proposed Development.
- **Flood Risk and Drainage** – The Appellant will refer to the submitted Flood Risk Assessment and Drainage Impact Assessment as well as consultation responses from Thames Water and LBS Officers to demonstrate the acceptability of the Proposed Development with regards to flood risk and drainage matters.

## 10. Public Benefits

10.1 The delivery of the Proposed Development will achieve the aims and objectives of the development plan and national planning policy, and therefore the purpose of the planning system which is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner. The delivery of public policy in this way ensures that the development will generate substantial positive benefits and social value to the public, particularly existing and future residents of Peckham and LBS.

10.2 These public benefits will include:

- **Brownfield Land:** Substantial weight should be given to the value of reusing this suitable brownfield site for homes and to meet other identified needs.
- **Place-making:** Replacement of poor-quality buildings and a surface car park with a much higher quality 'place' comprising:
  - o A series of distinctive new buildings that:
    - are designed to be authentic and complement the existing character of Peckham in terms of their architecture and materials;
    - make an efficient and effective use of brownfield land in a highly accessible location;
    - are constructed using materials recycled from the existing demolished buildings (where possible); and
    - are specified to be net zero carbon.
  - o 1.02ha of new public realm which:
    - is intended to be accessible to all and welcoming to all;
    - includes a range of areas for sitting/relaxing, areas for children to play, and spaces for events, which engage with active uses at the ground floors of the buildings;
    - incorporates significant 'greening' including street trees and lawns (complemented by green roofs), which will contribute to the achievement of a bio-diversity net gain of 106%, an Urban Greening Factor of 0.38, and improvements to local air quality; and
    - provides improved pedestrian and cyclist connectivity.
- **Homes:** Provision of 867 new homes to meet the needs of Londoners, of which:
  - o A minimum of 77 will be affordable (12% by habitable room). This is significantly in excess of what could reasonably be required to satisfy development plan policies and therefore should be treated as a very significant benefit.
  - o The delivery of all Social Rent (50) affordable homes will be front-loaded and provided within Phase 1.
  - o There is potential for a proportion of any additional intermediate homes to be provided through a Community Land Trust (secured via planning obligation).
  - o There will be a mix of sizes and types to meet a broad range of housing needs, including 523 (60%) which will be 2 bedrooms or larger;
  - o 10% (by habitable room) will be wheelchair accessible or adaptable;
  - o 72% will be dual aspect; and
  - o All will be tenure blind; energy efficient; fire safe; have access to private and communal outdoor amenity space; have access to children's playspaces; meet minimum size standards; receive good levels of daylight/ sunlight; and will provide residents with appropriate privacy.

- **Town Centre Vitality and Viability:** Boost Peckham Town Centre by:
  - o Securing a major supermarket operator (Morrisons) for the long term, in a new high quality designed store (including the ability to continue trading during the construction stage);
  - o Providing new fit-for-purpose units for a range of retailers and leisure operators (including smaller units) to complement the existing businesses, and which are sufficiently flexible to adapt to changes in future occupier demand.
  - o Providing workspace suitable for a range of office, workshop, and studio occupiers; and
  - o Increasing town centre expenditure levels by approximately £13m annually as a consequence of the new resident population and employees working in the new workspace.
- **Jobs/Training:** Creation of an estimated 271 construction stage jobs; and accommodation to support an estimated 510 to 660 operational stage jobs, which is an increase in the context of the existing employment (410-550). In addition to this, the Applicant have committed to provide skills and training opportunities that benefit the local community, including: apprenticeships; paid internships; educational partnerships to enable young people to access higher skilled jobs; local procurement; and town centre partnerships to support local businesses.

## 11. Conclusions

11.1 The Appeal is submitted on the grounds of non-determination of the Application by the Council.

11.2 A summary of the Appellant's case is as follows:

- The Proposed Development is firmly aligned with UK Government policy to boost the supply of housing and deliver economic growth.
- The Proposed Development aligns with the development plan as a whole (which is up to date). There are no material considerations that indicate that the appeal should be determined other than in accordance with the development plan.
- Paragraph 11(c) of the NPPF is clear: development proposals that accord with an up-to-date development plan should be approved without delay.
- The delivery of the Proposed Development will generate very substantial public benefits which outweigh the limited (non-substantial) harm likely to arise. These benefits are a material consideration in any planning balance judgement and weigh heavily in favour of the Application.

## **Appendix A**

### **Site Plan**

NOT FOR CONSTRUCTION



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Mayfield House  
136-148 Kewley Street  
London SE1 2TU UK  
+44 (0)20 7803 8777  
mail@dmmstudio.com  
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TITLE  
PLAN - EXISTING - GROUND FLOOR

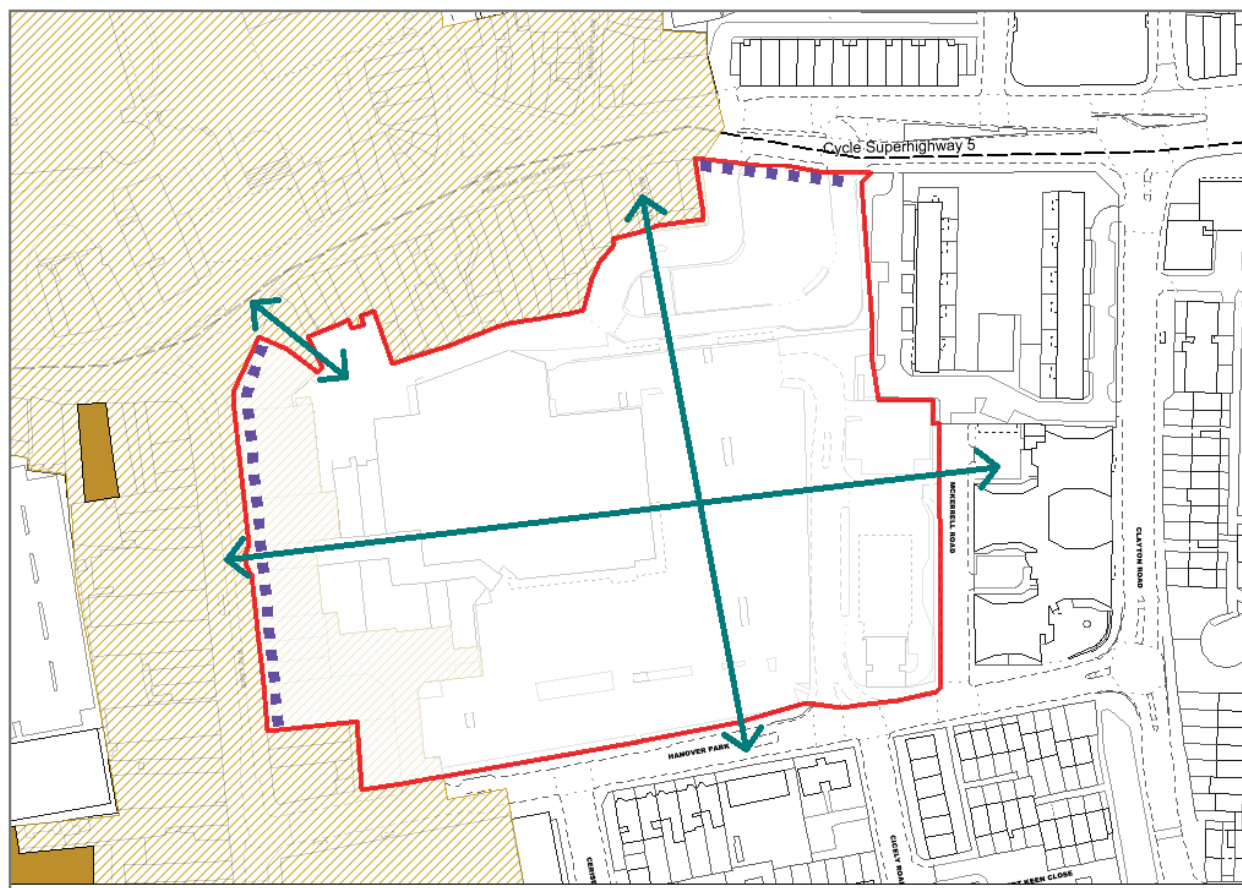
PROJECT STATUS	SCALE	SIZE
PLANNING	1 : 500	A1
DRAWING NO	REVISION	
ASCP-DRM-ZZ-00-DGA-A- 001040	P0	



## **Appendix B**

### **Southwark Plan extract – Site Allocation ref. NSP74**

## NSP74: Aylesham Centre and Peckham Bus Station



- |   |   |
|---|---|
| <span style="border: 2px solid red; padding: 2px;"> </span> Site Boundary   | <span style="color: green;">→</span> Improved connectivity for pedestrians and cyclists   |
| <span style="background-color: yellow; border: 1px solid black; padding: 2px;"> </span> Conservation Area                     | <span style="background-color: green; border: 1px solid black; padding: 2px;"> </span> Open Spaces                                    |
| <span style="background-color: yellow; border: 1px solid black; padding: 2px;"> </span> Grade I Listed Building               | <span style="background-color: purple; border: 1px solid black; padding: 2px;"> </span> Buildings of architectural and historic merit |
| <span style="background-color: brown; border: 1px solid black; padding: 2px;"> </span> Grade II Listed Building               | <span style="background-color: orange; border: 1px solid black; padding: 2px;"> </span> Buildings of townscape merit                  |
| <span style="background-color: pink; border: 1px solid black; padding: 2px;"> </span> Grade II* Listed Building               | <span style="background-color: lightpink; border: 1px solid black; padding: 2px;"> </span> Locally Significant Industrial Sites       |
| <span style="border-bottom: 2px dashed purple; display: inline-block; width: 20px;"> </span> Opportunity for Active Frontages | <span style="background-color: lightblue; border: 1px solid black; padding: 2px;"> </span> Strategic Protected Industrial Land        |
| <span style="border-bottom: 2px dashed black; display: inline-block; width: 20px;"> </span> Cycleways                         | <span style="border: 1px dashed black; padding: 2px;"> </span> New Public Open Space  |

Site Area	<ul style="list-style-type: none"><li>• 31,330m<sup>2</sup></li></ul>	
Existing uses (GEA)	<ul style="list-style-type: none"><li>• Retail (including supermarket use) – 11,420m<sup>2</sup></li><li>• Bus station (sui generis) – 3,700m<sup>2</sup></li></ul>	
Indicative residential capacity	<ul style="list-style-type: none"><li>• 850 homes</li></ul>	
Site requirements	<p>Redevelopment of the site must:</p> <ul style="list-style-type: none"><li>• Retain the supermarket use (E(a)); and</li><li>• Provide at least the amount of retail floorspace currently on the site;</li><li>• Retain bus station capacity; and</li><li>• Provide enhanced public realm and civic space; and</li><li>• Provide new north-south and east-west green links; and</li><li>• Provide active frontages with retail, community or leisure uses (as defined in the glossary) at ground floor facing Rye Lane and Peckham High Street; and</li><li>• Diversify and complement the existing retail offer in the town centre, with new opportunities for a range of shop sizes, including suitable space to attract a variety of retailers to Peckham; and</li><li>• Provide new homes (C3); and</li><li>• Provide new intermediate affordable housing through a community land trust.</li></ul> <p>Redevelopment of the site may:</p> <ul style="list-style-type: none"><li>• Accommodate meanwhile uses on the car park.</li></ul>	
Design and Accessibility Guidance	Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.	
	Redevelopment or refurbishment of the site should introduce active frontages throughout the site, and retain and enhance frontages to Rye Lane, taking Rye Lane Peckham conservation area into consideration. Currently there is poor access to Peckham High Street and Queens Road due to the location of the bus station. Redevelopment should maximise opportunities to improve links across the site, provide new civic space and connect to the existing road and public realm layout, while retaining bus station capacity.	
The site location		
Approach to Tall Buildings		Comprehensive mixed-use redevelopment of the site could include 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. The site is within the setting of Rye Lane Peckham and Peckham Hill Street conversation areas, so any taller development should be set back from the Rye Lane shopping frontage, towards the eastern end of site, to mitigate its impact. Development massing should be directed to the east of the site to minimise impact on the view to the City from the Bussey Building rooftop. In any case a 20 storey height restriction on development proposals should be observed. Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.

Impacts Listed Buildings or undesignated heritage assets	The site is within the setting of Grade II listed Rye Lane Chapel and a group of listed buildings on Highshore Road. The site is also within the setting of a number of important unlisted buildings on Peckham High Street and Rye Lane, including Jones and Higgins Clock Tower and 43-49 Rye Lane.
Impacts a Conservation Area	The site falls partially within the Rye Lane Peckham Conservation Area.
Impacts a distinctive Borough View or London View Management Framework View (LVMF)	The site lies within the Borough View of St Paul's Cathedral from One Tree Hill.
Impacts an Archaeological Priority Area	Tier 2 APA designation. The site is located in APA4 - Peckham Village. Archaeological investigations have taken place on this site and revealed multi-phase archaeological deposits (predominantly prehistoric in date).
Impacts a Scheduled Ancient Monument	No
Is in close proximity to the River Thames	No
Is in a Town Centre	Peckham Major Town Centre
Is in an Opportunity Area or Action Area	The site lies within the Peckham and Nunhead Action Area.
Is in the Central Activity Zone (CAZ)	No
Can provide Low Line walking routes	No
Impacts a designated open space	No

**Appendix C**  
**Summary Design and Access Statement**



December 2024

**The Aylesham Centre, Peckham**

**Design and Access Statement  
Updated Executive Summary**

Document reference: AC02.1A





# Introduction

The Aylesham Centre presents a unique opportunity to transform the existing shopping centre, creating a new mixed-use neighbourhood in the heart of Peckham. The proposals are brought forward by Berkeley Homes (Capital) Plc. to provide a new supermarket on behalf of Morrisons, and much needed new homes in the London Borough of Southwark (LBS). The proposal seeks to establish a new neighbourhood in the heart of Peckham and will set a standard of high quality development in the borough.

This Updated Executive Summary has been prepared to account for changes to the planning application submitted to the London Borough of Southwark on 15 July 2024 (LBS ref. 24/AP/2074). The purpose of these amendments is to address comments received from statutory consultees, London Borough of Southwark Planning and Design Officers and the wider public since submission.

This document demonstrates that the Proposed Development will continue to deliver an exemplar mixed use development within Peckham Town Centre, incorporating a wide variety of residential, retail, leisure and commercial experiences, with quality public realm informed by the social, physical, historic and economic character of Peckham.

The key updates since the application submitted in July include:

- a reduction from 877 to 867 homes;
- minor amendments to the commercial area distribution;
- a reduction of affordable housing to 77 homes (12% by habitable room);
- change to the overall unit mix balance (fewer 1-bed homes, over 60% 2/3/4-bed homes).

Note there has been no change to building heights and overall massing, or to the footprint of the buildings; the overall façade design principles, balcony style and type, materials and colours, are also unchanged.



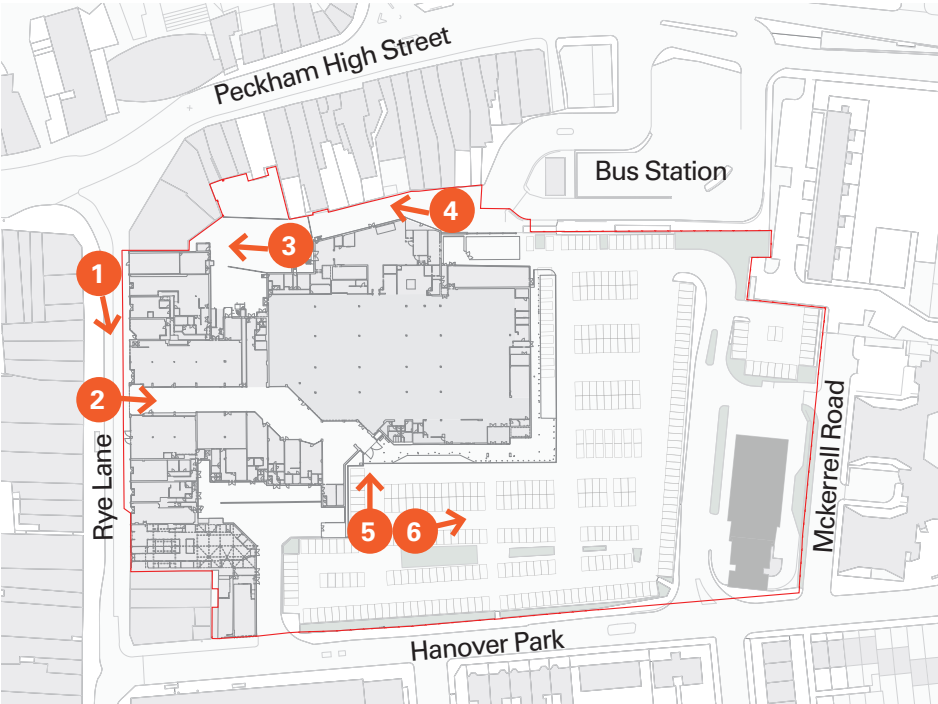
View of the Proposed Development looking north towards the city



# Existing site

Located in the centre of LBS, the Aylesham Centre site is positioned in the commercial and cultural heart of Peckham. The site is in Rye Lane ward, approximately 250m north-east of Peckham Rye railway station.

The Aylesham Centre is a 2.7ha town centre site which currently comprises a shopping arcade, Morrisons supermarket, petrol filling station and surface level car park. It is bounded to the north by Peckham High Street, to the east by Mckerrell Road, to the west by Rye Lane and to the south by Hanover Park.



Key Plan





# Summary of the Proposed Development

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

In total, the proposal will deliver:

- Redevelopment of previously developed brownfield site
- A mixed-used development comprising of several distinct architectural buildings ranging from 4 to 20 storeys in height
- 867 residential homes
- 12% affordable housing (calculated by habitable room)
- A replacement Morrisons superstore
- A broad range of new flexible retail, leisure, commercial and workspace, units totalling an area of 3,813m<sup>2</sup>
- A six storey non residential building containing 2,725m<sup>2</sup> workspace floorspace
- 140 parking spaces for the new Morrisons supermarket
- 11 residential blue-badge parking spaces
- 1,614 long stay cycle spaces and 257 short stay cycle spaces
- Extensive publicly accessible landscaped grounds
- New pedestrian and cycle routes through the site to improve connectivity



Aerial view looking South towards the Proposed Development



# Summary of public benefits

The Proposed Development first and foremost establishes a new residential and mixed-use quarter in the heart of Peckham. The exciting and attractive design offers an authentic and comprehensive response to town and streetscape. A new Morrisons store and additional flexible retail, leisure and commercial spaces will enhance the existing commercial activity of the town centre.

The Proposed Development presents a generous spirit with buildings, landscape design and distinct character areas, providing much needed new and affordable homes, high quality green spaces, reinforcing a sense of legibility for all to enjoy.



# Non-residential strategy

The development includes 2,725.3 m<sup>2</sup> (GIA) of workspace within a Dedicated Use Class E(g) building, located on the Peckham Yards character area, to the north of the application site.

The development includes a **4,443.6 m<sup>2</sup>** (GIA) replacement supermarket, (Use Class E(a)).

The proposal also includes 3,812.7 m<sup>2</sup> (GIA) of flexible retail, leisure and commercial floorspace. Approval for any use that falls within Use Class E(a-g) and for drinking establishments (Sui Generis) is to be sought and is subject to the following limitations:

- Maximum 350 m<sup>2</sup> (GIA) to be used for drinking establishments (Sui Generis)
- Maximum 320 m<sup>2</sup> (GIA) to be used for workspace (Use Class E(g)), in addition to the 2,725.3m<sup>2</sup> (GIA) dedicated workspace building

▶ Entrance (level access)

Workspace - Use Class E(g)  
2,725.3 m<sup>2</sup> (GIA)

Flexible retail, leisure, commercial - Use Class E(a-g)/Sui Generis  
3,812.7 m<sup>2</sup> (GIA)

Supermarket - Use Class E(a)  
4,443.6 m<sup>2</sup> (GIA) excluding service yard and basement car park

Commercial cycle stores





# Residential strategy

## Phase 1 - 375 homes

141	(37.6%) one-bedroom homes
149	(39.7%) two-bedroom homes
68	(18.2%) three-bedroom homes
17	(4.5%) four-bedroom homes

## Phase 2 - 492 homes

202	(41.1%) one-bedroom homes
202	(41.1%) two-bedroom homes
88	(17.8%) three-bedroom homes

## Total - 867 homes

343	(39.5%) one-bedroom homes
351	(40.5%) two-bedroom homes
156	(18.0%) three-bedroom homes
17	(2.0%) four-bedroom homes

The Proposed Development will have a mix of typologies that includes mansion blocks, maisonettes, gallery access buildings and point building. At ground floor there are maisonettes which have private access from the street.

10% of homes will be wheelchair accessible homes in line with policy, distributed throughout the development, spread over several dwelling types.

72% of the dwellings will enjoy dual or triple aspect

- One-bedroom home
- Two-bedroom home
- Three-bedroom home
- Four-bedroom home
- Workspace - Use Class E(g)








# Tenure distribution

The proposed development will provide 12% Affordable housing (by habitable room), made up of 9% social rent and 3% intermediate homes.

- Building P is a fully social rent building.
- Buildings A, B, C contain a mix of intermediate and market sale homes.
- Buildings E, F, G, K, L, J1, J2, M, N and Q are fully market sale buildings.



-  Social Rent Tenure
-  Intermediate Tenure
-  Market Sale Tenure



# Building form

The design approach involves a layering of building heights, with taller buildings located towards the central eastern end of the site to minimise impact on the Rye Lane Peckham and Peckham Hill Street Conservation Areas.

## 1 Layering

The design of the form was largely driven by its relationship to key locally important townscape views and heritage assets. Analysis of the site's edge conditions and a selection of key considered views informed the layering and distribution of height across the masterplan to ensure that the proposed scheme would be well integrated into the heart of Peckham and its wider context. Taller aspects of the masterplan are located in the eastern and central part of the site to avoid impacting on key townscape views and neighbouring properties.

## 2 Orientation

Point buildings and mansion block buildings are primarily oriented along a north-south axis, parallel to Rye Lane, in order to establish a sense of permeability and create view corridors from north and south of the site. Low-rise typologies and gallery access buildings have been oriented along a west-east axis, parallel to Peckham High Street, Rye Lane and Hanover Park, to provide dual aspect homes facing north and south.

## 2 Breaks between buildings

Informed by daylight/sunlight assessments, and to prevent a sense of enclosure and improve views of the sky from within the masterplan, distances between buildings and adjacent streets are generous, and achieve a minimum of 10 metres, further mitigating possibilities of overlooking and overshadowing.

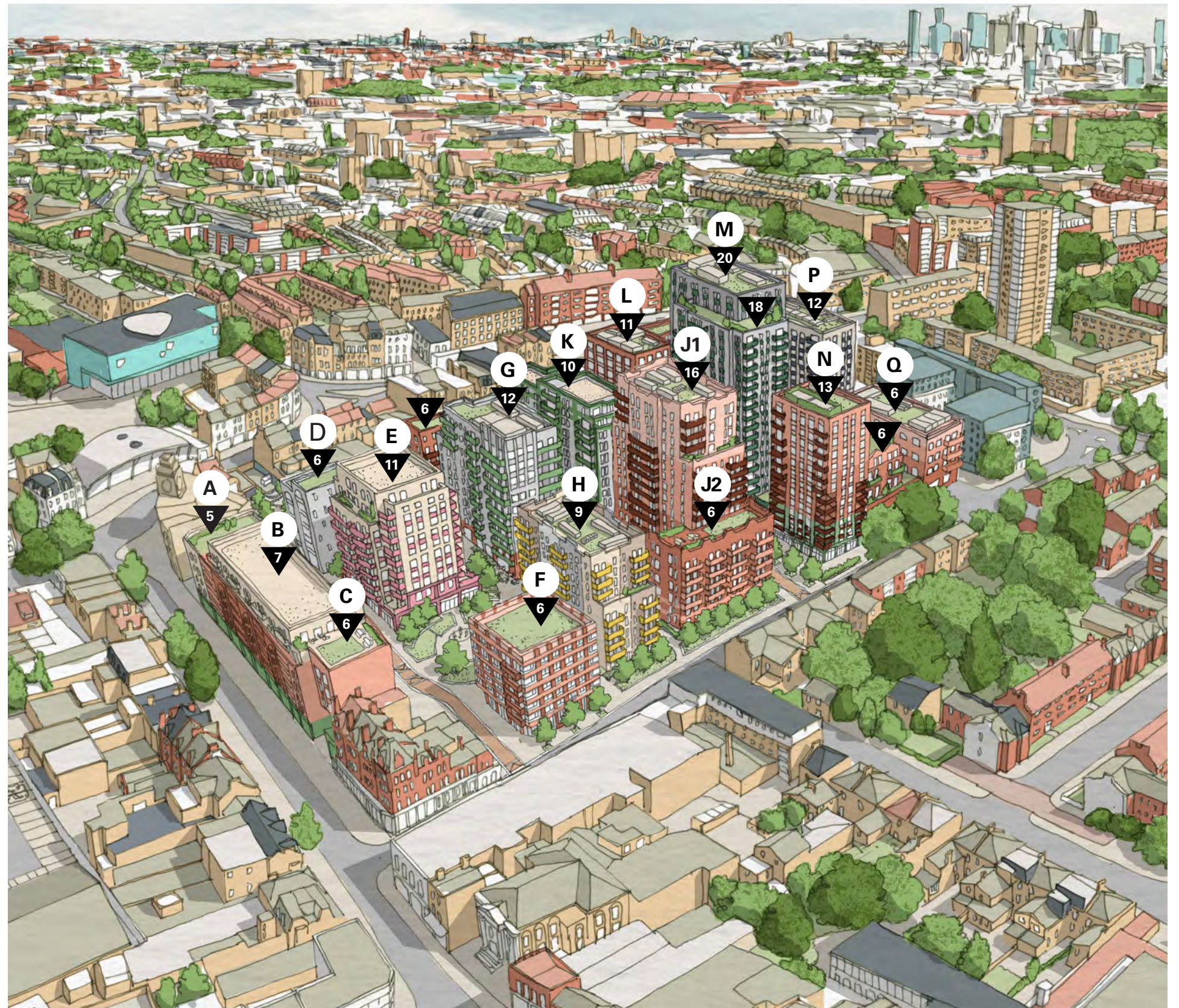


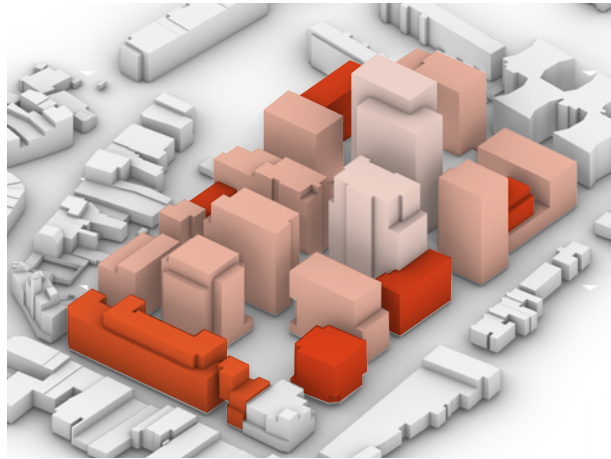
Diagram showing massing heights within the Proposed Development



# Design approach

## Layered approach

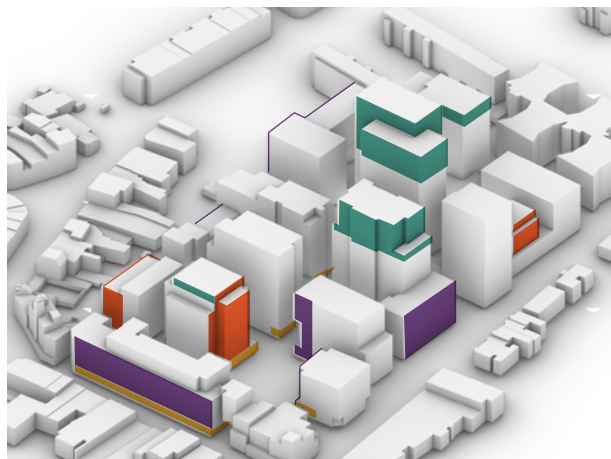
A layered approach to building heights and colour seeks to reduce the visual impact and perception of mass from the pedestrian realm and from afar. Buildings rise and fade in colour as they get further from Rye Lane.



- Foreground: low rise, eye-catching, perimeter buildings
- Mid-ground: mid rise, framing, stand alone buildings
- Background: high rise, offering accents of character

## Visual mitigation

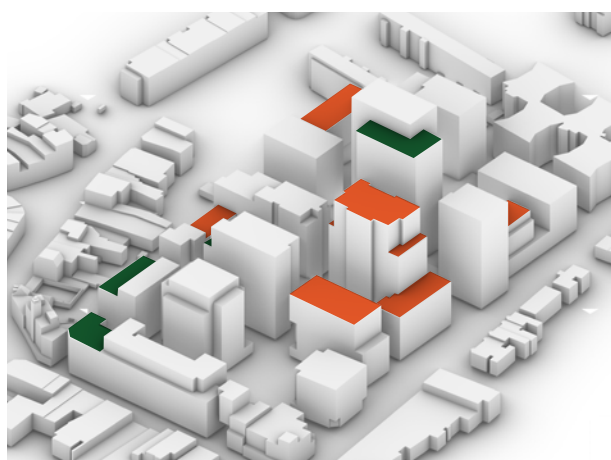
The Proposed Development identifies key facades and responds appropriately to contextual parameters such as existing residences, proposed areas of public landscaping and commercial provision.



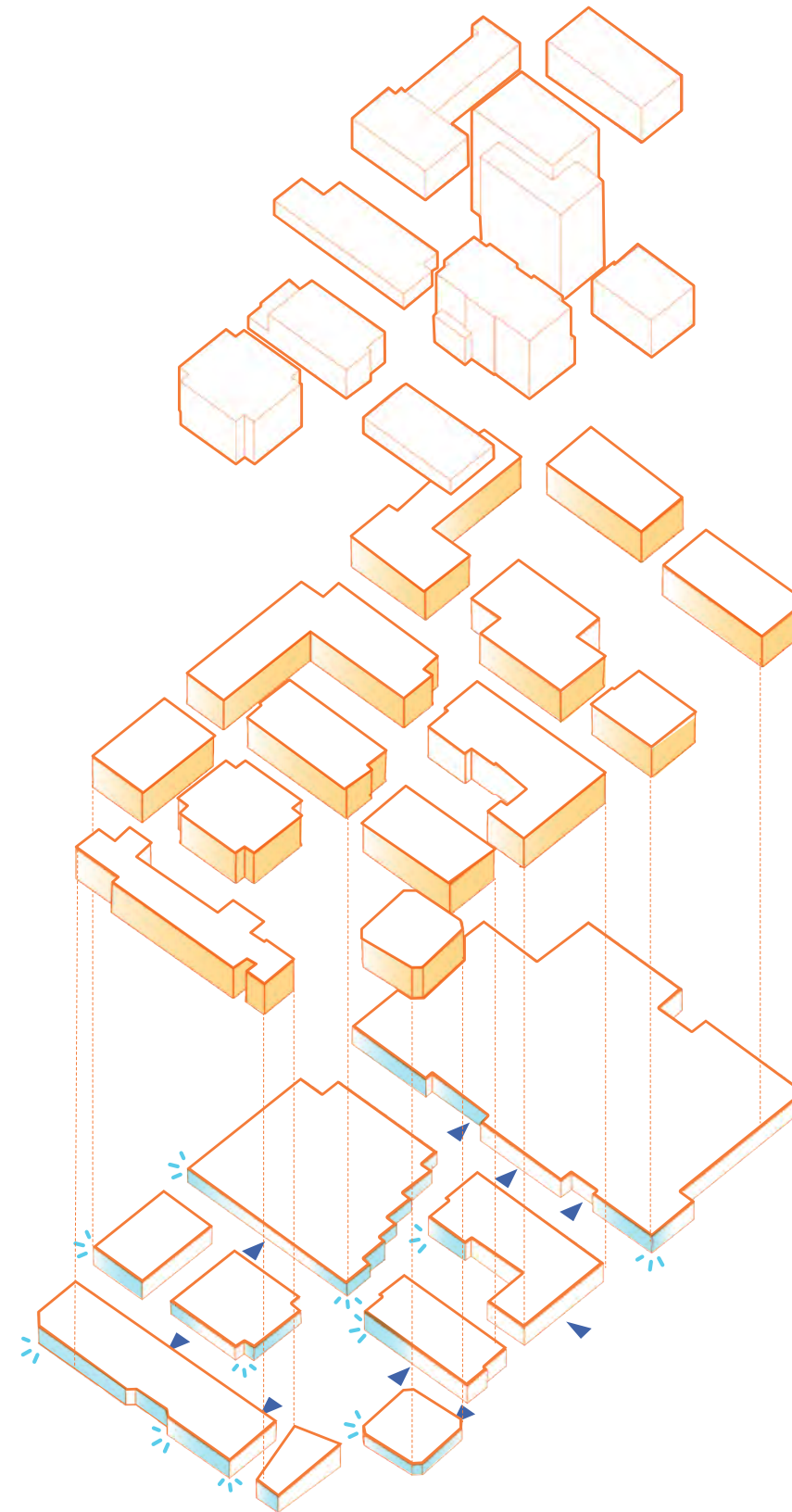
- Height visible on approach
- Ground floor retail frontages
- Important feature facades
- Key public frontages

## Parapet articulation

Select buildings have been identified as areas where parapet articulation would most benefit and contribute to the existing eclecticism of Peckham's built environment.



- Buildings with articulated parapets and roof gardens
- Buildings with roof gardens



## Neighbourhood views

- Parapet lines, vertical gradients and taller elements positioned to the east and centre of the site, away from Rye Lane, responding to long townscape views (immediate and surrounding context)

## Residential quality

- Unique expression to residential lobbies improves way finding across the site
- Facade articulation and balcony placements are informed by environmental considerations

## Pedestrian experience

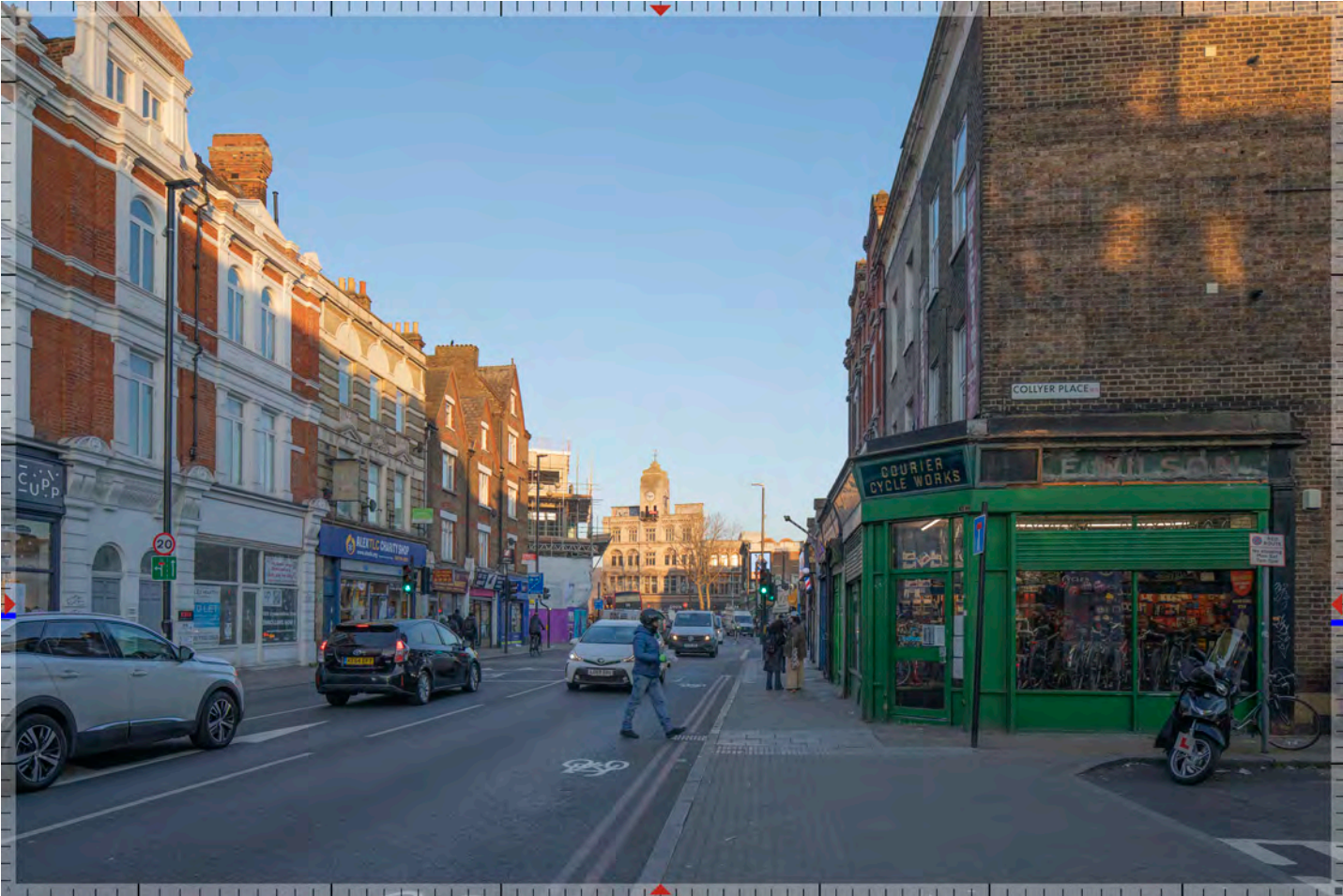
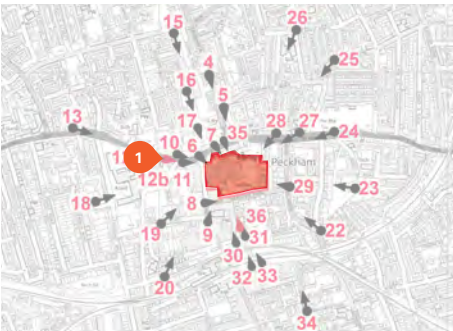
- Building entrances and openings respond to the context to maximise resident privacy
- Setback entrances contrast and highlight shared and private access to residential buildings
- Accentuated plinths define key frontages and express the public realm as accessible to all



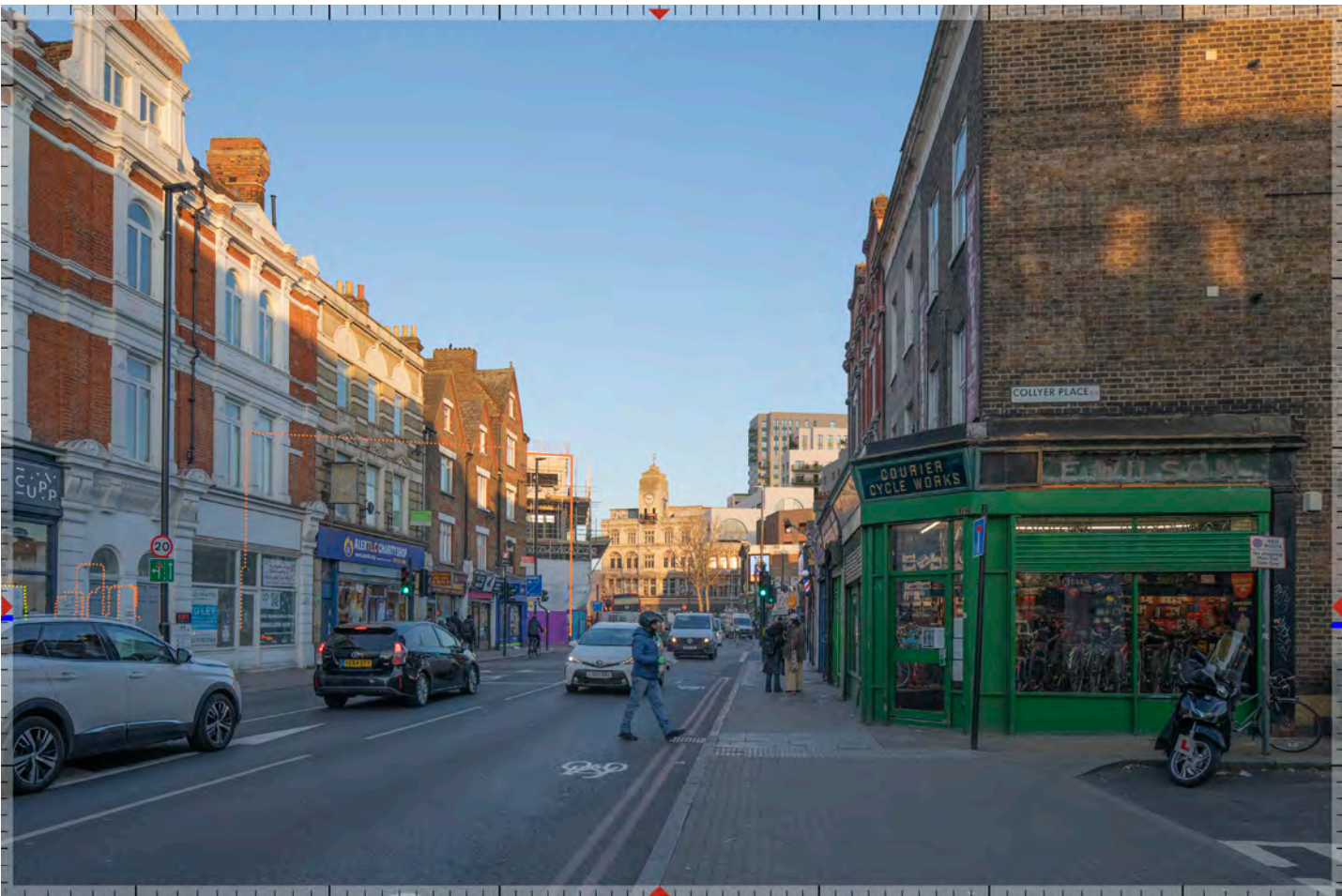
# Townscape view 1

Peckham High Street looking east towards Jones & Higgins clock tower

Key Plan



Existing



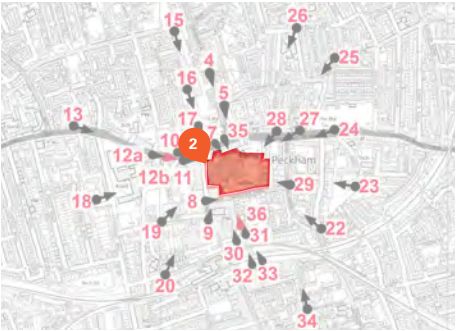
Proposed



# Townscape view 2

Peckham High Street looking south along Rye Lane

Key Plan



Existing



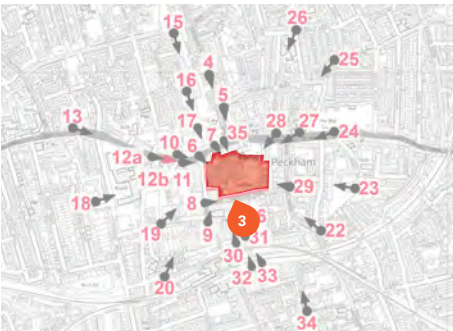
Proposed



# Townscape view 3

Cerise Road looking north towards Hanover Park

Key Plan



Existing



Proposed



# Townscape view 4

Peckham Hill Street looking south towards Peckham High Street

Key plan



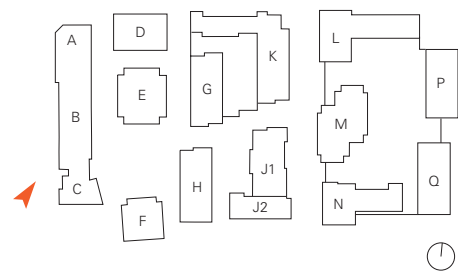
Existing



Proposed

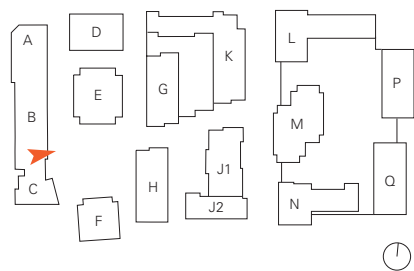


Key plan



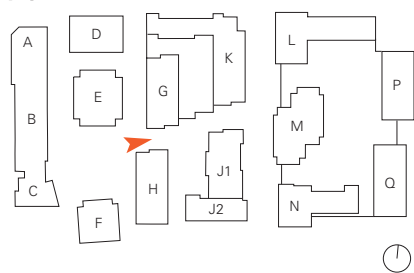


Key plan



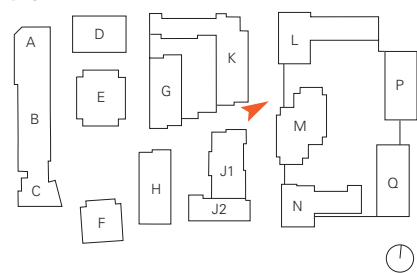


Key plan





Key plan





**Appendix D**  
**Final schedule of plans/documents**



**Planning Application Reference 24/AP/2074**

Final Schedule of Plans/Documents

## 1. Plans/Documents for Approval

### (i) Site Location Plan

Title	Original Drawing Reference	Amendment 1	Amendment 2
Site Location Plan – Existing	ASCP-DRM-ZZ-ZZ-DGA-A-001000 P0	-	-

### (ii) Existing Plans

Title	Original Drawing Reference	Amendment 1	Amendment 2
Site Plan – Existing	ASCP-DRM-ZZ-ZZ-DGA-A-001010 P0	-	-
Plan-Existing – Ground Floor	ASCP-DRM-ZZ-00-DGA-A-001040 P0	-	-
Plan-Existing-L01	ASCP-DRM-ZZ-01-DGA-A-001041 P0	-	-
Plan-Existing-Basement Level	ASCP-DRM-ZZ-BS-DGA-A-001043 P0	-	-
Elevations – Existing Site	ASCP-DRM-ZZ-ZZ-DGA-A-001060 P0	-	-

### (iii) Demolition Plan

Title	Original Drawing Reference	Amendment 1	Amendment 2
Demolition Plan	ASCP-DRM-ZZ-ZZ-DGA-A-001050 P0	-	-

### (iv) Phasing Plan

Title	Original Drawing Reference	Amendment 1	Amendment 2
Phasing Plan	ASCP-DRM-ZZ-ZZ-DGA-A-002090 P0	ASCP-DRM-ZZ-ZZ-DGA-A-002090 P01	-

### (v) Development Accommodation Schedule

Title	Original Reference	Amendment 1	Amendment 2
Development Accommodation Schedule	AC01	AC01A	AC01B

(vi) **Sitewide Plans**

<b>Title</b>	<b>Original Drawing Reference</b>	<b>Amendment 1</b>	<b>Amendment 2</b>
Plan-Sitewide-Ground Floor	<del>ASCP-DRM-ZZ-00-DGA-A-002050 P0</del>	<b>ASCP-DRM-ZZ-00-DGA-A-002050 P01</b>	-
Plan-Sitewide-Level 01	<del>ASCP-DRM-ZZ-01-DGA-A-002051 P0</del>	<del>ASCP-DRM-ZZ-01-DGA-A-002051 P01</del>	-
Plan-Sitewide-Level 02	<del>ASCP-DRM-ZZ-02-DGA-A-002052 P0</del>	<del>ASCP-DRM-ZZ-02-DGA-A-002052 P01</del>	<b>ASCP-DRM-ZZ-02-DGA-A-002052 P02</b>
Plan-Sitewide-Level 03	<del>ASCP-DRM-ZZ-03-DGA-A-002053 P0</del>	<b>ASCP-DRM-ZZ-03-DGA-A-002053 P01</b>	-
Plan-Sitewide-Level 04	<del>ASCP-DRM-ZZ-04-DGA-A-002054 P0</del>	<b>ASCP-DRM-ZZ-04-DGA-A-002054 P01</b>	-
Plan-Sitewide-Level 05	<del>ASCP-DRM-ZZ-05-DGA-A-002055 P0</del>	<del>ASCP-DRM-ZZ-05-DGA-A-002055 P01</del>	<b>ASCP-DRM-ZZ-05-DGA-A-002055 P02</b>
Plan-Sitewide-Level 06	<del>ASCP-DRM-ZZ-06-DGA-A-002056 P0</del>	<del>ASCP-DRM-ZZ-06-DGA-A-002056 P01</del>	<b>ASCP-DRM-ZZ-06-DGA-A-002056 P02</b>
Plan-Sitewide-Level 07	<del>ASCP-DRM-ZZ-07-DGA-A-002057 P0</del>	<del>ASCP-DRM-ZZ-07-DGA-A-002057 P01</del>	<b>ASCP-DRM-ZZ-07-DGA-A-002057 P02</b>
Plan-Sitewide-Level 08	<del>ASCP-DRM-ZZ-08-DGA-A-002058 P0</del>	<del>ASCP-DRM-ZZ-08-DGA-A-002058 P01</del>	<b>ASCP-DRM-ZZ-08-DGA-A-002058 P02</b>
Plan-Sitewide-Level 09	<del>ASCP-DRM-ZZ-09-DGA-A-002059 P0</del>	<del>ASCP-DRM-ZZ-09-DGA-A-002059 P01</del>	<b>ASCP-DRM-ZZ-09-DGA-A-002059 P02</b>
Plan-Sitewide-Level 10	<del>ASCP-DRM-ZZ-10-DGA-A-002060 P0</del>	<del>ASCP-DRM-ZZ-10-DGA-A-002060 P01</del>	<b>ASCP-DRM-ZZ-10-DGA-A-002060 P02</b>
Plan-Sitewide-Level 11	<del>ASCP-DRM-ZZ-11-DGA-A-002061 P0</del>	<del>ASCP-DRM-ZZ-11-DGA-A-002061 P01</del>	<b>ASCP-DRM-ZZ-11-DGA-A-002061 P02</b>
Plan-Sitewide-Level 12	<del>ASCP-DRM-ZZ-12-DGA-A-002062 P0</del>	<b>ASCP-DRM-ZZ-12-DGA-A-002062 P01</b>	-
Plan-Sitewide-Level 13	<del>ASCP-DRM-ZZ-13-DGA-A-002063 P0</del>	<b>ASCP-DRM-ZZ-13-DGA-A-002063 P01</b>	-
Plan-Sitewide-Level 14	<del>ASCP-DRM-ZZ-14-DGA-A-002064 P0</del>	<b>ASCP-DRM-ZZ-14-DGA-A-002064 P01</b>	-
Plan-Sitewide-Level 15	<del>ASCP-DRM-ZZ-15-DGA-A-002065 P0</del>	<b>ASCP-DRM-ZZ-15-DGA-A-002065 P01</b>	-
Plan-Sitewide-Level 16	<del>ASCP-DRM-ZZ-16-DGA-A-002066 P0</del>	<b>ASCP-DRM-ZZ-16-DGA-A-002066 P01</b>	-
Plan-Sitewide-Level 17	<del>ASCP-DRM-ZZ-17-DGA-A-002067 P0</del>	<b>ASCP-DRM-ZZ-17-DGA-A-002067 P01</b>	-
Plan-Sitewide-Level 18	<del>ASCP-DRM-ZZ-18-DGA-A-002068 P0</del>	<b>ASCP-DRM-ZZ-18-DGA-A-002068 P01</b>	-
Plan-Sitewide-Level 19	<del>ASCP-DRM-ZZ-19-DGA-A-002069 P0</del>	<b>ASCP-DRM-ZZ-19-DGA-A-002069 P01</b>	-
Plan-Sitewide-Roof Level	<del>ASCP-DRM-ZZ-RF-DGA-A-002070 P0</del>	<b>ASCP-DRM-ZZ-RF-DGA-A-002070 P01</b>	
Plan-Sitewide-Basement Level	<del>ASCP-DRM-ZZ-BS-DGA-A-002080 P0</del>	<b>ASCP-DRM-ZZ-BS-DGA-A-002080 P01</b>	
Plan-Sitewide-Upper Ground Floor	<del>ASCP-DRM-ZZ-00-DGA-A-002081 P0</del>	<b>ASCP-DRM-ZZ-00-DGA-A-002081 P01</b>	

Plan-Sitewide-Mezzanine	<del>ASCP-DRM-ZZ-00-DGA-A-002082-P0</del>	<b>ASCP-DRM-ZZ-00-DGA-A-002082 P01</b>	-
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**(vii) General Arrangement Plans**

<b>Title</b>	<b>Original Drawing Reference</b>	<b>Amendment 1</b>	<b>Amendment 2</b>
GA Plan-Building ABC - Ground Floor- L01	<del>ASCP-DRM-AX-ZZ-DGA-A-002100-P0</del>	<b>ASCP-DRM-AX-ZZ-DGA-A-002100 P01</b>	-
GA Plan- Building ABC-L02-L03	<del>ASCP-DRM-AX-ZZ-DGA-A-002101-P0</del>	<b>ASCP-DRM-AX-ZZ-DGA-A-002101 P01</b>	-
GA Plan-Building ABC-L04-L05	<del>ASCP-DRM-AX-ZZ-DGA-A-002102-P0</del>	<b>ASCP-DRM-AX-ZZ-DGA-A-002102 P01</b>	-
GA Plan-Building ABC-L06-Roof	<del>ASCP-DRM-AX-ZZ-DGA-A-002103-P0</del>	<b>ASCP-DRM-AX-ZZ-DGA-A-002103 P01</b>	-
GA Plan-Building D-Ground Floor-L03	<del>ASCP-DRM-AD-ZZ-DGA-A-002125-P0</del>	<b>ASCP-DRM-AD-ZZ-DGA-A-002125 P01</b>	-
GA Plan-Building D-L04-Roof	<del>ASCP-DRM-AD-ZZ-DGA-A-002126-P0</del>	<b>ASCP-DRM-AD-ZZ-DGA-A-002126 P01</b>	-
GA Plan-Building E-Ground Floor-L08	<del>ASCP-DRM-AE-ZZ-DGA-A-002150-P0</del>	<b>ASCP-DRM-AE-ZZ-DGA-A-002150 P01</b>	-
GA Plan-Building E-L09-Roof	<del>ASCP-DRM-AE-ZZ-DGA-A-002151-P0</del>	<del>ASCP-DRM-AE-ZZ-DGA-A-002151-P01</del>	<b>ASCP-DRM-AE-ZZ-DGA-A-002151 P02</b>
GA Plan-Building F-All Levels	<del>ASCP-DRM-AF-ZZ-DGA-A-002175-P0</del>	<b>ASCP-DRM-AF-ZZ-DGA-A-002175 P01</b>	-
GA Plan-Building GK-Ground Floor-01	<del>ASCP-DRM-PX-ZZ-DGA-A-002200-P0</del>	<b>ASCP-DRM-PX-ZZ-DGA-A-002200 P01</b>	-
GA Plan-Building GK-L02-L04	<del>ASCP-DRM-PX-ZZ-DGA-A-002201-P0</del>	<b>ASCP-DRM-PX-ZZ-DGA-A-002201 P01</b>	-
GA Plan-Building GK-L05-L06	<del>ASCP-DRM-PX-ZZ-DGA-A-002202-P0</del>	<b>ASCP-DRM-PX-ZZ-DGA-A-002202 P01</b>	-
GA Plan-Building GK-L07-L08	<del>ASCP-DRM-PX-ZZ-DGA-A-002203-P0</del>	<b>ASCP-DRM-PX-ZZ-DGA-A-002203 P01</b>	-
GA Plan-Building GK-L09-L11	<del>ASCP-DRM-PX-ZZ-DGA-A-002204-P0</del>	<b>ASCP-DRM-PX-ZZ-DGA-A-002204 P01</b>	-
GA Plan-Building GK-Roof	<del>ASCP-DRM-PX-ZZ-DGA-A-002205-P0</del>	<b>ASCP-DRM-PX-ZZ-DGA-A-002205 P01</b>	-
GA Plan-Building H-Ground Floor-L04	<del>ASCP-DRM-PH-ZZ-DGA-A-002225-P0</del>	<b>ASCP-DRM-PH-ZZ-DGA-A-002225 P01</b>	-
GA Plan-Building H-L05-Roof-	<del>ASCP-DRM-PH-ZZ-DGA-A-002226-P0</del>	<b>ASCP-DRM-PH-ZZ-DGA-A-002226 P01</b>	-
GA Plan-Building J-Ground-L05	<del>ASCP-DRM-PJ-ZZ-DGA-A-002250-P0</del>	<b>ASCP-DRM-PJ-ZZ-DGA-A-002250 P01</b>	-
GA Plan-Building J-L06-L12	<del>ASCP-DRM-PJ-ZZ-DGA-A-002251-P0</del>	<b>ASCP-DRM-PJ-ZZ-DGA-A-002251 P01</b>	-
GA Plan-Building J-L13-Roof	<del>ASCP-DRM-PJ-ZZ-DGA-A-002252-P0</del>	<b>ASCP-DRM-PJ-ZZ-DGA-A-002252 P01</b>	-
GA Plan-Building L-Ground Floor-L01	<del>ASCP-DRM-ML-ZZ-DGA-A-002275-P0</del>	<b>ASCP-DRM-ML-ZZ-DGA-A-002275 P01</b>	

GA Plan-Building L-L02-Roof	<del>ASCP-DRM-ML-ZZ-DGA-A-002276 P0</del>	<b>ASCP-DRM-ML-ZZ-DGA-A-002276 P01</b>	
GA Plan-Building M-Ground Floor-L06	<del>ASCP-DRM-MM-ZZ-DGA-A-002300 P0</del>	<b>ASCP-DRM-MM-ZZ-DGA-A-002300 P01</b>	
GA Plan-Building M-L07-L15	<del>ASCP-DRM-MM-ZZ-DGA-A-002301 P0</del>	<b>ASCP-DRM-MM-ZZ-DGA-A-002301 P01</b>	-
GA Plan-Building M-L16-Roof	<del>ASCP-DRM-MM-ZZ-DGA-A-002302 P0</del>	<b>ASCP-DRM-MM-ZZ-DGA-A-002302 P01</b>	
GA Plan-Building N-Ground Floor-L03	<del>ASCP-DRM-MN-ZZ-DGA-A-002325 P0</del>	<b>ASCP-DRM-MN-ZZ-DGA-A-002325 P01</b>	
GA Plan-Building N-L04-Roof	<del>ASCP-DRM-MN-ZZ-DGA-A-002326 P0</del>	<b>ASCP-DRM-MN-ZZ-DGA-A-002326 P01</b>	
GA Plan-Building P-Basement-Upper Ground Floor	<del>ASCP-DRM-MP-ZZ-DGA-A-002350 P0</del>	<b>ASCP-DRM-MP-ZZ-DGA-A-002350 P01</b>	
GA Plan-Building P-L01-L06	<del>ASCP-DRM-MP-ZZ-DGA-A-002351 P0</del>	<b>ASCP-DRM-MP-ZZ-DGA-A-002351 P01</b>	
GA Plan-Building P-L07-Roof	<del>ASCP-DRM-MP-ZZ-DGA-A-002352 P0</del>	<b>ASCP-DRM-MP-ZZ-DGA-A-002352 P01</b>	
GA Plan-Building Q-Ground Floor-L01	<del>ASCP-DRM-MQ-ZZ-DGA-A-002375 P0</del>	<b>ASCP-DRM-MQ-ZZ-DGA-A-002375 P01</b>	
GA Plan-Building Q-L02-Roof	<del>ASCP-DRM-MQ-ZZ-DGA-A-002376 P0</del>	<b>ASCP-DRM-MQ-ZZ-DGA-A-002376 P01</b>	
Combined Plans-Building LMNPQ and Morrisons-Basement-Ground Floor	<del>ASCP-DRM-MR-ZZ-DGA-A-002400 P0</del>	<b>ASCP-DRM-MR-ZZ-DGA-A-002400 P01</b>	
Combined Plans-Building LMNPQ and Morrisons-L01	<del>ASCP-DRM-MR-ZZ-DGA-A-002501 P0</del>	<b>ASCP-DRM-MR-ZZ-DGA-A-002501 P01</b>	

**(viii) Sections**

<b>Title</b>	<b>Original Drawing Reference</b>	<b>Amendment 1</b>	<b>Amendment 2</b>
Sections-Sitewide-East West-01	<del>ASCP-DRM-ZZ-ZZ-DSC-A-003000 P0</del>	<b>ASCP-DRM-ZZ-ZZ-DSC-A-003000 P01</b>	-
Sections-Sitewide-North South-01	<del>ASCP-DRM-ZZ-ZZ-DSC-A-003020 P0</del>	<b>ASCP-DRM-ZZ-ZZ-DSC-A-003020 P01</b>	-
Sections-Building-ABC-01	<del>ASCP-DRM-AX-ZZ-DSC-A-003400 P0</del>	<b>ASCP-DRM-AX-ZZ-DSC-A-003400 P01</b>	-
Sections-Building-D-01	<del>ASCP-DRM-AD-ZZ-DSC-A-003410 P0</del>	<b>ASCP-DRM-AD-ZZ-DSC-A-003410 P01</b>	-
Sections-Building-E-01	<del>ASCP-DRM-AE-ZZ-DSC-A-003420 P0</del>	<b>ASCP-DRM-AE-ZZ-DSC-A-003420 P01</b>	-
Sections-Building-F-01	<del>ASCP-DRM-AF-ZZ-DSC-A-003430 P0</del>	<b>ASCP-DRM-AF-ZZ-DSC-A-003430 P01</b>	-
Sections-Building-G-01	<del>ASCP-DRM-PG-ZZ-DSC-A-003440 P0</del>	<b>ASCP-DRM-PG-ZZ-DSC-A-003440 P01</b>	-

Sections-Building-H-01	<del>ASCP-DRM-PH-ZZ-DSC-A-003450-P0</del>	<b>ASCP-DRM-PH-ZZ-DSC-A-003450 P01</b>	-
Sections-Building-K-01	<del>ASCP-DRM-PK-ZZ-DSC-A-003460-P0</del>	<b>ASCP-DRM-PK-ZZ-DSC-A-003460 P01</b>	-
Sections-Building-J-01	<del>ASCP-DRM-PJ-ZZ-DSC-A-003470-P0</del>	<b>ASCP-DRM-PJ-ZZ-DSC-A-003470 P01</b>	-
Sections-Building-L-01	<del>ASCP-DRM-ML-ZZ-DSC-A-003480-P0</del>	<b>ASCP-DRM-ML-ZZ-DSC-A-003480 P01</b>	-
Sections-Building-M-01	<del>ASCP-DRM-MM-ZZ-DSC-A-003490-P0</del>	<b>ASCP-DRM-MM-ZZ-DSC-A-003490 P01</b>	-
Sections-Building-N-01	<del>ASCP-DRM-MN-ZZ-DSC-A-003500-P0</del>	<b>ASCP-DRM-MN-ZZ-DSC-A-003500 P01</b>	-
Sections-Building-P-01	<del>ASCP-DRM-MP-ZZ-DSC-A-003510-P0</del>	<b>ASCP-DRM-MP-ZZ-DSC-A-003510 P01</b>	-
Sections-Building-Q-01	<del>ASCP-DRM-AQ-ZZ-DSC-A-003520-P0</del>	<b>ASCP-DRM-AQ-ZZ-DSC-A-003520 P01</b>	-

**(ix) Elevations**

<b>Title</b>	<b>Original Drawing Reference</b>	<b>Amendment 1</b>	<b>Amendment 2</b>
Elevations-Sitewide-01	<del>ASCP-DRM-ZZ-ZZ-DGA-A-004000-P0</del>	<b>ASCP-DRM-ZZ-ZZ-DGA-A-004000 P01</b>	-
Elevations-Sitewide-02	<del>ASCP-DRM-ZZ-ZZ-DGA-A-004001-P0</del>	<b>ASCP-DRM-ZZ-ZZ-DGA-A-004001 P01</b>	-
Elevations-Sitewide-03	<del>ASCP-DRM-ZZ-ZZ-DGA-A-004002-P0</del>	<b>ASCP-DRM-ZZ-ZZ-DGA-A-004002 P01</b>	-
Elevations-Sitewide-04	<del>ASCP-DRM-ZZ-ZZ-DGA-A-004003-P0</del>	<b>ASCP-DRM-ZZ-ZZ-DGA-A-004003 P01</b>	-
Elevations-Sitewide-05	<del>ASCP-DRM-ZZ-ZZ-DGA-A-004005-P0</del>	<b>ASCP-DRM-ZZ-ZZ-DGA-A-004005 P01</b>	-
Elevations-Building ABC-01	<del>ASCP-DRM-AX-ZZ-DGA-A-004400-P0</del>	<b>ASCP-DRM-AX-ZZ-DGA-A-004400 P01</b>	-
Elevations-Building D-01	<del>ASCP-DRM-AD-ZZ-DGA-A-004410-P0</del>	<b>ASCP-DRM-AD-ZZ-DGA-A-004410 P01</b>	-
Elevations-Building E-01	<del>ASCP-DRM-AE-ZZ-DGA-A-004420-P0</del>	<b>ASCP-DRM-AE-ZZ-DGA-A-004420 P01</b>	-
Elevations-Building F-01	<del>ASCP-DRM-AF-ZZ-DGA-A-004430-P0</del>	<b>ASCP-DRM-AF-ZZ-DGA-A-004430 P01</b>	-
Elevations-Building J-01	<del>ASCP-DRM-PJ-ZZ-DGA-A-004440-P0</del>	<b>ASCP-DRM-PJ-ZZ-DGA-A-004440 P01</b>	-
Elevations-Building J-02	<del>ASCP-DRM-PJ-ZZ-DGA-A-004441-P0</del>	<b>ASCP-DRM-PJ-ZZ-DGA-A-004441 P01</b>	-
Elevations-Building H-01	<del>ASCP-DRM-PH-ZZ-DGA-A-004442-P0</del>	<b>ASCP-DRM-PH-ZZ-DGA-A-004442 P01</b>	-
Elevations-Building GK-01	<del>ASCP-DRM-PX-ZZ-DGA-A-004450-P0</del>	<b>ASCP-DRM-PX-ZZ-DGA-A-004450 P01</b>	-
Elevations-Building G-01	<del>ASCP-DRM-PG-ZZ-DGA-A-004454-P0</del>	<b>ASCP-DRM-PG-ZZ-DGA-A-004454 P01</b>	-

Elevations-Building K-01	<del>ASCP-DRM-PK-ZZ-DGA-A-004455 P0</del>	<b>ASCP-DRM-PK-ZZ-DGA-A-004455 P01</b>	-
Elevations-Building L-01	<del>ASCP-DRM-ML-ZZ-DGA-A-004460 P0</del>	<b>ASCP-DRM-ML-ZZ-DGA-A-004460 P01</b>	-
Elevations-Building M-01	<del>ASCP-DRM-MM-ZZ-DGA-A-004470 P0</del>	<b>ASCP-DRM-MM-ZZ-DGA-A-004470 P01</b>	-
Elevations-Building M-02	<del>ASCP-DRM-MM-ZZ-DGA-A-004471 P0</del>	<b>ASCP-DRM-MM-ZZ-DGA-A-004471 P01</b>	-
Elevations-Building N-01	<del>ASCP-DRM-MN-ZZ-DGA-A-004480 P0</del>	<b>ASCP-DRM-MN-ZZ-DGA-A-004480 P01</b>	-
Elevations-Building P-01	<del>ASCP-DRM-MP-ZZ-DGA-A-004490 P0</del>	<b>ASCP-DRM-MP-ZZ-DGA-A-004490 P01</b>	-
Elevations-Building Q-01	<del>ASCP-DRM-MQ-ZZ-DGA-A-004500 P0</del>	<b>ASCP-DRM-MQ-ZZ-DGA-A-004500 P01</b>	-
Elevations-Morrisons-01	<del>ASCP-DRM-MR-ZZ-DGA-A-004510 P0</del>	<b>ASCP-DRM-MR-ZZ-DGA-A-004510 P01</b>	-

**(x) Landscape Plans**

<b>Title</b>	<b>Original Drawing Reference</b>	<b>Amendment 1</b>	<b>Amendment 2</b>
Ground Floor General Arrangement Plan	<del>P21673-00-001-GIL-0100 P01</del>	<b>P21673-00-001-GIL-0100 P02</b>	-
Ground Floor General Arrangement Plan Sheet 1 of 2	<del>P21673-00-001-GIL-0101 P01</del>	<b>P21673-00-001-GIL-0101 P02</b>	-
Ground Floor General Arrangement Plan Sheet 2 of 2	<del>P21673-00-001-GIL-0102 P01</del>	<b>P21673-00-001-GIL-0102 P02</b>	-
Upper Levels General Arrangement Plan	<del>P21673-00-001-GIL-0110 P01</del>	<b>P21673-00-001-GIL-0110 P02</b>	-
General Arrangement Plan Sheet 1 of 2	<del>P21673-00-001-GIL-0111 P01</del>	<b>P21673-00-001-GIL-0111 P02</b>	-
General Arrangement Plan Sheet 2 of 2	<del>P21673-00-001-GIL-0112 P01</del>	<b>P21673-00-001-GIL-0112 P02</b>	-
Ground Floor Softworks Plan Sheet 1 of 2	<del>P21673-00-001-GIL-0120 P01</del>	<b>P21673-00-001-GIL-0120 P02</b>	-
Ground Floor Softworks Plan Sheet 2 of 2	<del>P21673-00-001-GIL-0121 P01</del>	<b>P21673-00-001-GIL-0121 P02</b>	-
Upper Levels Softworks Plan Sheet 1 of 2	<del>P21673-00-001-GIL-0130 P01</del>	<b>P21673-00-001-GIL-0130 P02</b>	-
Upper Levels Softworks Plan Sheet 2 of 2	<del>P21673-00-001-GIL-0131 P01</del>	<b>P21673-00-001-GIL-0131 P02</b>	-
Tree Pit and Trench Plan		<b>P21673-00-001-GIL-0140 P02</b>	-
Typical Planting Cross Sections	<del>P21673-00-001-GIL-0400 P01</del>	<b>P21673-00-001-GIL-0400 P02</b>	-
Typical Tree Pits	<del>P21673-00-001-GIL-0401 P01</del>	<b>P21673-00-001-GIL-0401 P02</b>	-
Planting Schedule Stage 2	<b>P21673-00-001-GIL-0500</b>		

(xi) Transport Drawings

Title	Original Drawing Reference	Amendment 1	Amendment 2
Hanover Park Illustrative Design	<b>285344-SK-088-1 rev A</b>	-	-
Peckham Bus Bus Station Design Option 2	<b>285344-SK-086-1 rev A</b>	-	-



## 2. Supporting Plans/Documents

Title	Original Reference	Addendum/ Update 1	Addendum/ Update 2	Addendum/ Update 3
Design and Access Statement	<del>AC02</del>	<b>AC02A</b>		
Design and Access Statement Executive Summary	<del>AC02.1</del>	<b>AC02.1A</b>		
Basement Impact Assessment	<b>AC03</b>			
Planning Statement	<b>AC04</b>	<b>AC04A (addendum 01)</b>	<b>AC04B (addendum 02)</b>	
Business Relocation Strategy	<b>AC05</b>	<b>AC05A (addendum)</b>		
Transport Assessment Addendum	<b>AC06</b>	<b>AC06A (addendum)</b>		
Energy Statement and Overheating Assessment	<del>AC07</del>	<del>AC07A</del>	<del>AC07B</del>	<b>AC07C</b>
Sustainability Statement	<del>AC08</del>	<b>AC08A</b>		
Whole Life Cycle Carbon Assessment	<del>AC09</del>	<b>AC09A</b>		
Whole Life Cycle Carbon Assessment Template	<del>AC09</del>	<b>AC09A</b>		
Circular Economy Statement	<del>AC10</del>	<del>AC10A</del>	<b>AC10B</b>	
Circular Economy Template	<del>AC10</del>	<del>AC10A</del>	<b>AC10B</b>	
Demolition and Construction Environment Management Plan	<b>AC11</b>	<b>AC11A (addendum)</b>		
Operational Waste and Recycling Strategy	<del>AC12</del>	<b>AC12A</b>		
Fire Statement and Strategy	<del>AC13</del>	<b>AC13A</b>		
Statement of Community Involvement	<b>AC14</b>	<b>AC14 (addendum)</b>		
Early Engagement Strategy	<b>AC14.1</b>			
Engagement Summary	<b>AC14.2</b>	<b>AC14.2A (addendum)</b>		
Financial Viability Assessment	<b>AC15</b>	<b>AC15A (addendum)</b>		
Financial Viability Assessment Executive Summary	<del>AC15.1</del>	<b>AC15.1A</b>		
Equalities Impact Assessment	<del>AC16</del>	<b>AC16A</b>		
Internal Daylight Sunlight and Overshadowing Assessment	<b>AC17</b>	<b>AC17A (addendum)</b>	<b>Additional Internal Daylight</b>	

			<b>Addendum, 29 April 2025</b>	
Environmental Statement (Volumes 1,2,3 and NTS)	<b>AC18</b>	<b>AC18A (addendum)</b>		
Flood Risk Assessment	<del>AC19</del>	<b>AC19A</b>		
Health Impact Assessment	<b>AC20</b>	<b>AC20A (addendum)</b>		
Arboricultural Impact assessment	<del>AC21</del>	<del>AC21A</del>	<b>AC21B</b>	
Preliminary Ecological Appraisal	<del>AC22</del>	<b>AC22A</b>		
Biodiversity Net Gain Report	<del>AC23</del>	<del>AC23A</del>	<b>AC23B</b>	
Biodiversity Net Gain Calculation	<del>AC23</del>	<b>AC23A</b>		
Drainage Impact Assessment and Foul Water Drainage Strategy	<del>AC24</del>	<b>AC24A</b>		
Erratum	<b>AC25</b>			
Updated Ecology BREEAM Assessment Report	<b>TRI035</b>			
Bus Station Active Travel Scheme	<b>February 2025</b>			
Hanover Park Illustrative Design	<b>285344-SK-088-1 rev A</b>			
Peckham Bus Bus Station Design Option 2	<b>285344-SK-086-1 rev A</b>			

**20<sup>th</sup> May 2025.**

## **Appendix E**

### **Schedule of correspondence with the Council and other relevant parties**

## 10. Local Planning Authority Correspondence

### Aylesham Centre

#### **Minutes of Pre-Application Meetings Between London Borough of Southwark (LBS) and the Appellant**

- Pre-App Kick Off – 14 December 2021
- Pre-App 1 – 26 January 2022
- Transport Workshop – 04 March 2022
- LBS Design Workshop – 08 March 2022
- Pre-App 2 – 12 April 2022
- Pre-App 3 – 7 September 2022
- Technical Workshop – 27 September 2022
- Pre-App 4 – 02 November 2022
- LBS Pre-app Response Letter -15 November 2022
- Design Workshop – 21 December 2022
- Design Workshop – 11 January 2023
- Daylight Workshop – 25 January 2023
- Affordable Housing Meeting – 8 February 2023
- Pre-App Kick Off (New Design Team)– 26 September 2023
- Masterplan Layout Principles – 03 October 2023
- Height, Scale and Massing – 01 November 2023
- Landscape and Transport – 29 November 2023
- Daylight and Sunlight Workshop – 16 January 2024
- Residential Quality, Mix and Massing – 31 January 2024
- Rye Lane Workshop – 21 February 2024
- Façade and Public Realm – 28 February 2024
- Final Design Workshop – 01 May 2024
- Final Design Pre-App (part 1) – 08 May 2024
- Final Design Pre-App (part 2) – 15 May 2024
- EqIA Meeting – 29 May 2024
- Section 106 Meeting (Trader Support) – 12 June 2024

#### **Minutes of Pre-Application Meetings Between the Appellant and Others (excluding TfL)**

- GLA Pre-App – Response Dated 27 May 2022 (meeting on 28 April 2022)
- GLA Pre-App – Response Dated 3 November 2022 (meeting on 4 October 2022)
- GLA Pre-App – Response Dated 12 December 2023 (meeting on 16 November 2023)
- GLA Pre-App – Response Dated 13 March 2024 (meeting on 16 February 2024)
- LBS Design Review Panel – 12 March 2024
- Historic England Pre-App – 22 April 2024

### **July 2024 Statutory Consultee Responses**

- Arqiva Comments dated 12 February 2025
- Environmental Agency Comments received 11 September 2024
- GLA Stage 1 Report dated 22 October 2024
  - o GLA Circular Economy Memo
  - o GLA Energy Memo
  - o GLA Air Quality Memo
  - o GLA WLC Memo
  - o GLA Green Infrastructure Memo
- Historic England and TfL Underground Comments – Email from Matt Redman dated 26 September 2024
- HSE Comments dated 1 October 2024
- London Borough of Lambeth Comments dated 3 October 2024
- London Borough of Lewisham Comments dated 1 October 2024
- Metropolitan Police Comments dated 10 October 2024
- Natural England Comments dated 30 September 2024
- NHS HUDU Comments dated 5 November 2025
- Thames Water Comments dated 18 September 2024
- UKPN Comments dated 6 September 2024

### **Correspondence From Internal Officers at LBS July 2024 Submission**

- Southwark Archaeology, Southwark Urban Forester and Southwark Network Development – Email from Matt Redman dated 4 September 2024
- Southwark CCTV Comments received 27 September 2024
- Ecology Comments dated 4 October 2024
- Drainage Response – Email from Mark Knibbs to Matt Redman dated 11 October 2024
- Southwark Environment Protection Team received 23 October 2024
- Southwark Local Economy Team Comments dated 1 October 2024
- Southwark Planning Policy Comments received 11 October 2024
- Southwark Waste Comments dated 4 October 2024

### **Independent Consultants Acting for LBS July 2024 Submission**

- BPS Independent Viability Review 22 October 2024
- LUC Review of Environmental Statement Draft Review Report dated 11 October 2024

### **December 2024 Statutory Consultee Correspondence**

- Environment Agency Comments dated 14 February 2025
- GLA Viability Comments dated 26 March 2025
- GLA Viability Comments – Email from Zeb McInnes dated 24 April 2025
  - o incl. Aylesham – Growth Appraisal Summary 23.04.2025 attachment
- Historic England Comments dated 14 February 2025
- HSE Comments dated 4 March 2025
- London Borough of Lambeth Comments dated 10 March 2025
- London Borough of Bromley Comments 3 April 2025
- London Underground Comments – Email from Mehmet Kani dated 27 February 2025
- Metropolitan Police Comments dated 14 February 2025
- NATS Safeguarding Comments email received 13 February 2025
- Natural England Comments – email from Matt Redman dated 27 February 2025

- Network Rail Comments – email received 11 February 2025
- NHS HUDU Comments – email from Matt Redman dated 13 March 2025
- Thames Water Comments – email from Matt Redman dated 27 February 2025

#### **Correspondence From Internal Officers at LBS December 2024 Submission**

- Southwark Archaeology Comments – email from Matt Redman dated 8 April 2025.
- Southwark CCTV Comments received 11 March 2025
- Southwark Design Comments received 26 March 2025
- Southwark Drainage Comments – email from Matt Redman dated 19 March 2025
- Southwark Ecology Comments – email from Matt Redman dated 29 April 2025
- Southwark CIL Comments – Email from Matt Redman dated 12 March 2025
- Southwark Local Economy Team Comments dated 12 March 2025
- Southwark Network Development Comments – dated 12 March 2025
- Southwark Policy Energy Comments – email from Matt Redman dated 27 March 2025
- Southwark Public Health Comments – received 25 March 2025
- Southwark Urban Forester Comments – email from Matt Redman dated 14 March 2025

#### **Independent Consultants Acting for LBS December 2024 Submission**

- BPS Independent Viability Review dated 10 February 2025
- BPS Independent Viability Review dated 8 April 2025
- LUC Review of the Environmental Statement Draft Final Review Report dated March 2025

#### **Other Correspondence**

- Aylesham Centre PPA – 16 January 2024
- EIA Scoping Report – January 2024
- EIA Scoping Opinion – 24 March 2024
- Weekly Email Correspondence between Avison Young and LBS re Planning Catch Up Minutes
- Email from Victoria Lewis to Tom Matheou dated 17 April 2025 re Confirmation of no outstanding LUC Points
- Petroleum License Response – 23 April 2025
- Email from Mark Knibbs to Victoria Lewis re. Notification of Appeal 02.05.2025
- Aylesham Centre Pre-notification of appeal letter issued to LBS on 02.05.2025

#### **Transport Correspondence**

- Aylesham Centre Transport Assessment Scoping Report – November 2022
- TfL Pre-App Response - 23 December 2022
- TfL Pre-app Follow Up Response - 23 April 2024
- TfL Bus Workshop Response - 21 June 2024
- Southwark Transport Officer Comments dated 4 October 2024
- Aylesham Centre – TfL Comment to the Council
- Aylesham Centre – TfL Response to Arup Note dated Dec 2024
- Email from Brendan Weaver to Alex Weir dated 05 February 2025 re TfL Further comment
- Email from Brendan Weaver to Alex Weir dated 19 February 2025 re TfL Further Comment
- Email from Alex Weir to Brendan Weaver dated 3 April 2025 re. Aylesham Centre Peckham Bus Station Route
- Southwark Highways Comments dated 16 January 2025
- Email from Matt Redman dated 18 March 2025 with Southwark Transport Comments
- Response to LB Southwark Transport Comments – April 2025 (ref. 285344-00)
- Response to TfL Comments (received 22/04/2025) dated April 2025

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- |   |
|---|
| <ul style="list-style-type: none"><li>- Email from Rob Davis to Brendan Weaver dated 2 May 2025 re. Aylesham Centre Transport Comments</li><li>- Email from Brendan Weaver to Alex Weir dated 9 May re. Aylesham Centre Peckham Bus Station Route</li></ul> |
|---|

**Avison Young**

**May 2025**

**Appendix F**  
**Schedule of documents to be referred to at the inquiry**



## Documents to be Referred to at the Inquiry

### **1. Planning Policy Documents**

National Planning Policy Framework (NPPF), December 2024

Planning Practice Guidance

Southwark Plan, 2022 (including Policies Map)

London Borough of Southwark Supplementary Planning Documents:

- Heritage (2021)
- Residential Design Standards (2011)
- Affordable Housing (2008)
- Development Viability (2016)
- S106 Planning Obligations and Community Infrastructure Levy (2020 Update)
- Draft Affordable Housing (2024)
- Draft Section 106 and Community Infrastructure Levy (2024)
- Draft Climate and Environment (2024)

Peckham and Nunhead Area Action Plan (2014)

New Southwark Plan Inspectors' Report, November 2021

Southwark Authority Monitoring Report 2023/24

Southwark Statement of Community Involvement (2022), including draft amendments (2024)

London Plan, 2021

Towards a New London Plan, May 2025

London Plan Supplementary Planning Guidance:

- Accessible London (2014)
- Planning for Equality and Diversity in London (2007)
- Affordable Housing and Viability (2017)
- Housing SPG (2016)
- Play and Informal Recreation (2012)
- Social Infrastructure (2015)
- London View Management Framework (2012)

London Plan Guidance:

- Characterisation and Growth Strategy (2023)
- Optimising Site Capacity: A Design Led Approach (2023)
- Housing Design Standards (2023)
- Public London Charter (2021)

- 
- Draft Fire Safety (2022)
  - Draft Affordable Housing (2023)
  - Draft Development Viability LPG (2023)
  - Urban Greening Factor (2023)
  - Air Quality Positive (2023)
  - Air Quality Neutral (2023)
  - Be Seen Energy Monitoring (2021)
  - Circular Economy Statements (2022)
  - Energy Planning Guidance (2022)
  - Whole Life Carbon (2022)
  - Sustainable Transport, Walking and Cycling (2022)

#### London Plan Practice Notes

- Accelerating Housing Delivery Planning and Housing Practice Note, 2024

## **2. Other Published Documents**

Statement from the Deputy Prime Minister for Housing, Communities and Local Government, 31/07/24

Letter from the Deputy Prime Minister for Housing, Communities and Local Government, 31/07/24

MHCLG Housing Delivery Test Results, December 2024

National Design Guide (2019)

Rye Lane Peckham Conservation Area Appraisal, LBS

RICS Professional Standard, Assessing Planning Viability under the NPPF 2019 for England

RICS Professional Standard Financial Viability in Planning Conduct & Reporting, Sept 2019

South East London Housing Partnership Wheelchair Homes Design Guidelines, 2009

Technical Housing Standards - Nationally described space standard, 2016

Site layout planning for daylight and sunlight: a guide to good practice, BRE, BR 209, 2022

Healthy Streets for London TFL and Mayor of London 2017

Historic England: Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets, December 2017

Historic England: Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment, March 2015.

Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage assets, October 2019,

**May 2025.**

**Appendix G**  
**S.106 Heads of Terms**

## **Draft S.106 Heads of Terms**

### Affordable Housing:

- 12% affordable Housing (by habitable room) to be provided, comprising 50 Social Rent and 27 Intermediate units
- Social Rent units to be provided in Phase 1
- Affordable Housing Review Mechanism.
- Affordable Housing Monitoring Costs.

### Affordable Workspace:

- Provision of 10% of the workspace to be affordable for a period of 30 years.

### Business Relocation Strategy:

- For affected independent or small businesses.

### Small Shops:

- Provision of 10% of the retail floorspace (excluding supermarket floorspace) to be provided for small shops.

### CCTV:

- A contribution towards mitigating CCTV impacts and additional cameras in the area.

### Carbon Offset Payment:

- A carbon offset payment:

### Financial Contribution Towards Off-site Child Playspace Provision (age 12+):

- Financial contribution to pay for improvements to local playground.

### Transport

- Local transport infrastructure improvements
- Public realm works to the Bus Station land
- Car club
- Wayfinding

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### Employment and Enterprise

- Construction and Operational Stage Jobs and Training
- Local Procurement

**May 2025.**



# Contact details

## Enquiries

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