

July 2024

The Aylesham Centre, Peckham

Planning Statement

Document reference: AC04

**AVISON
YOUNG**



Berkeley
Designed for life



Planning Statement

Aylesham Centre

Document ref. AC04

Berkeley Homes (Capital) Plc

July 2024

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Report title: Planning Statement

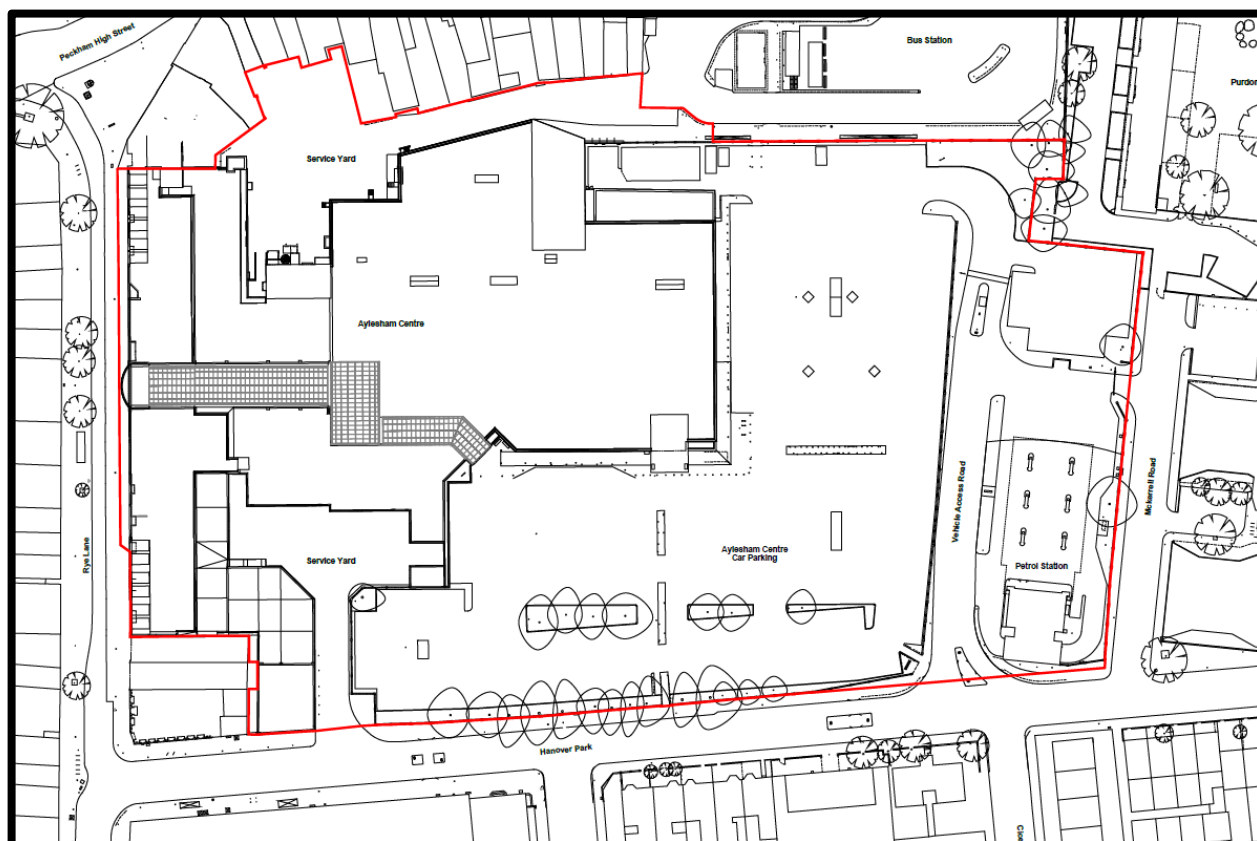
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For and on behalf of Avison Young (UK) Limited

1. Introduction

- 1.1 This Planning Statement ('Statement') has been prepared in support of a planning application ('the Application') which seeks permission for the comprehensive redevelopment of the Aylesham Centre and associated car park and petrol filling station at Hanover Park, London, SE15 5EW ('the Site') within the London Borough of Southwark ('LBS').

Figure 1.1 Site Plan (Planning Application Site Boundary Outlined in Red)



- 1.2 The Application is submitted by Avison Young ('AY') on behalf of Berkeley Homes (Capital) Plc ('the Applicant').
- 1.3 The Application seeks full planning permission for the following 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"*
- 1.4 The purpose of this Statement is to set out the planning rationale that underpins the Proposed Development and to demonstrate its acceptability in planning terms.
- 1.5 It is structured as follows:
- **Section 2** provides an overview of the process of planning for the redevelopment of the Site.
 - **Section 3** describes the Site and the surrounding area.
 - **Section 4** summarises the Site's recent planning history.

- **Section 5** describes the proposed development.
- **Section 6** explains the 'specification' of the Application.
- **Section 7** outlines the public and stakeholder consultation undertaken prior to submitting the Application.
- **Section 8** sets out details of the framework of planning policies that should form the basis for determining the Application.
- **Section 9** assesses the Proposed Development against the planning policy framework, having regard to other material considerations.
- **Section 10** sets out headline details of proposed planning obligations.
- **Section 11** concludes this Statement.

2. Context

The Plan-led Approach

- 2.1 The process of planning for the redevelopment of the Site commenced over 10-years ago, led by LBS in its capacity as Local Planning Authority (LPA).
- 2.2 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 examination by an independent planning inspector appointed by the Secretary of State to ensure its soundness.
- 2.3 LBS 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) which replaced the AAP allocation.
- 2.4 The new Southwark Plan remains up to date (for the purposes of NPPF paragraph 33). The site allocation (NSP74) 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.
- 2.5 The delivery of the requirements of the site 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 national planning policy, and the overarching purpose of the planning system which is to contribute to the achievement of sustainable development.

Delivering the Site Allocation

- 2.6 A previous landowner 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.
- 2.7 The Site was subsequently acquired by the Applicant in 2021.
- 2.8 This Planning Application seeks planning permission for development that delivers the requirements of the site allocation, including:
- 877 homes (including 35% affordable housing);
 - 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; and
 - 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.

- 2.9 The design of the Proposed Development accords with the 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.
- 2.10 As is demonstrated in this Statement, the Proposed Development 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) as well as national planning policies. Therefore, having regard to s.38(6) of the Planning and Compulsory Purchase Act (2004) and paragraph 11(c) of the National Planning Policy Framework (NPPF), the Application should be approved without delay.

Capability of the Applicant

- 2.11 The Applicant, Berkeley Homes (Capital) Plc, is the intended developer.
- 2.12 Berkeley Homes (Capital) Plc is part of the Berkeley Group, which was established in 1976. The Berkeley Group has firmly established itself as one of the largest home builders in London, specialising in brownfield regeneration, reviving underused land to create unique, sustainable and nature-rich places where communities thrive and people of all ages and background can enjoy a great quality of life.
- 2.13 The Berkeley Group has a proven track record of delivering homes across London. Some examples of current/recent developments include the following (further details can be found at www.berkeleygroup.co.uk/developments/london):
- One Tower Bridge, Southwark;
 - One Blackfriars, Southwark;
 - Chambers Wharf, Southwark;
 - Borough Triangle, Southwark;
 - Bermondsey Place, Southwark;
 - Camden Goods Yard, Camden;
 - Kidbrooke Village, Greenwich; and
 - Oval Village, Oval.
- 2.14 In 2023 the Berkeley Group delivered approximately 10% of the total number of new homes delivered in London. Its development activity has supported approximately 27,000 direct and indirect jobs (through its supply chain) over the last five years. It has also provided subsidies of approximately £560 million to deliver affordable housing and fund wider community and infrastructure benefits over this period.
- 2.15 The Applicant 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

- 2.16 It is anticipated that the development will commence in 2026 with completion around 2034.

The Significant Public Benefits

- 2.17 The delivery of the Proposed Development will achieve the aims and objectives of the development plan, and therefore the purpose of the planning system which is to contribute to the achievement of sustainable development. 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.

2.18 These public benefits will include:

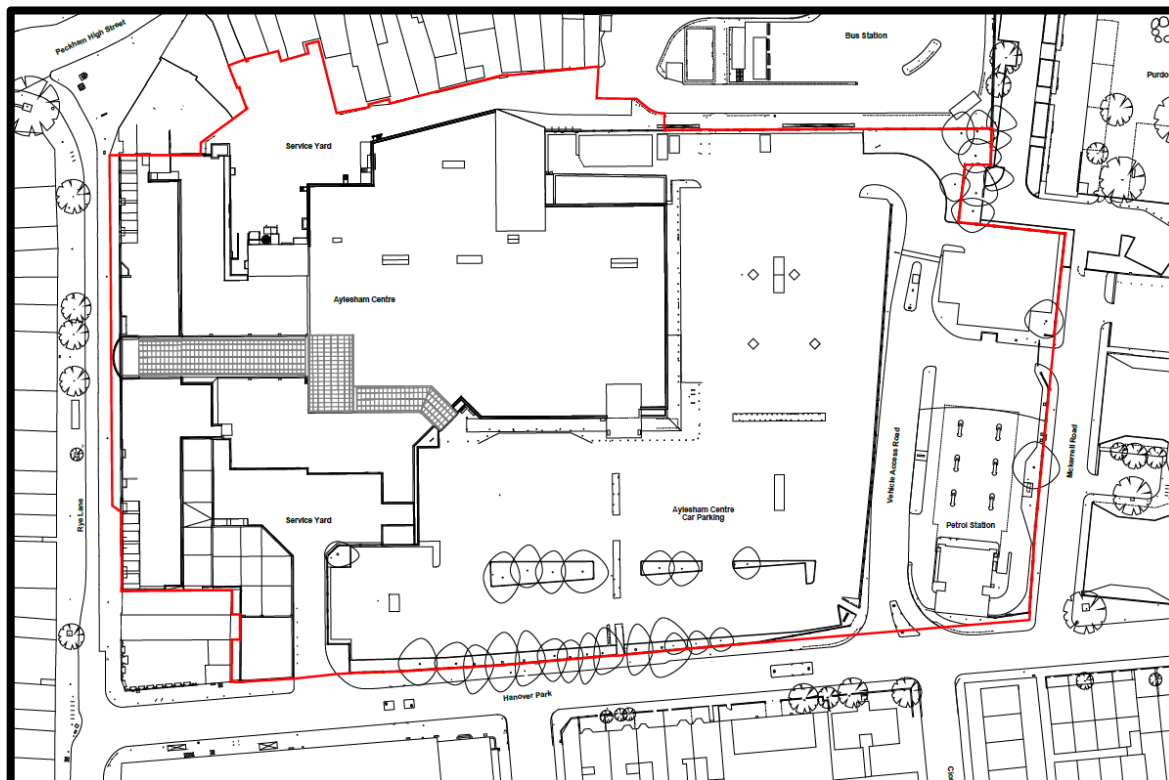
- **Place-making:** Replacement of poor-quality buildings and a surface car park with a much higher quality 'place' comprising:
 - o A series of distinctive new buildings that:
 - are designed to complement the existing character of Peckham in terms of their architecture and materials;
 - make an efficient and effective use of 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 once operational.
 - o 0.94ha 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 111.02%, an Urban Greening Factor of 0.38, and improvements to local air quality; and
 - provides improved pedestrian and cyclist connectivity.
- **Homes:** Provision of 877 new homes to meet the needs of Londoners, of which:
 - o 270 will be affordable (35% by habitable room);
 - o there will be a mix of sizes and types to meet a broad range of housing needs, including 490 (56%) which will be 2 bedrooms or larger;
 - o 10% (by habitable room) will be wheelchair accessible or adaptable;
 - o 70% 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 as a consequence of the new resident population and employees working in the new workspace by approx. £15 million annually.
- **Jobs/Training:** Creation of an estimated 271 construction stage jobs; and accommodation to support an estimated 505 to 655 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: paid internships; educational partnerships to enable young people to access higher skilled jobs; local procurement; and town centre partnerships to support local businesses.

3. The Site and Surrounding Area

The Site

- 3.1 The Site extends to 2.7ha.
- 3.2 It is located within Peckham Town Centre within the administrative area of London Borough of Southwark (LBS), the Local Planning Authority (LPA). It is bound to the north by Peckham Bus Station and the rears of buildings that front onto Peckham High Street; Mckerrell Road to the east; Hanover Park to the south; and Rye Lane to the west.

Figure 3.1 *Site Plan (Planning Application Site Boundary Outlined in Red)*



- 3.3 The Site currently accommodates the Aylesham Centre alongside an associated surface car park, service yard 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, including a supermarket operated by Morrisons. 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	Floorspace (GIA)
Supermarket	4,975.7sqm
Other Retail, Leisure, Sui Generis	5,109.2sqm
Internal Mall/Atrium	1,392sqm
Petrol Filling Station	98.0sqm
Total Existing Floorspace (including internal mall/atrium and petrol station)	11,574.9sqm*
Car Parking	353 spaces

*In accordance with the RICS Code of Measuring Practice (5th 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.

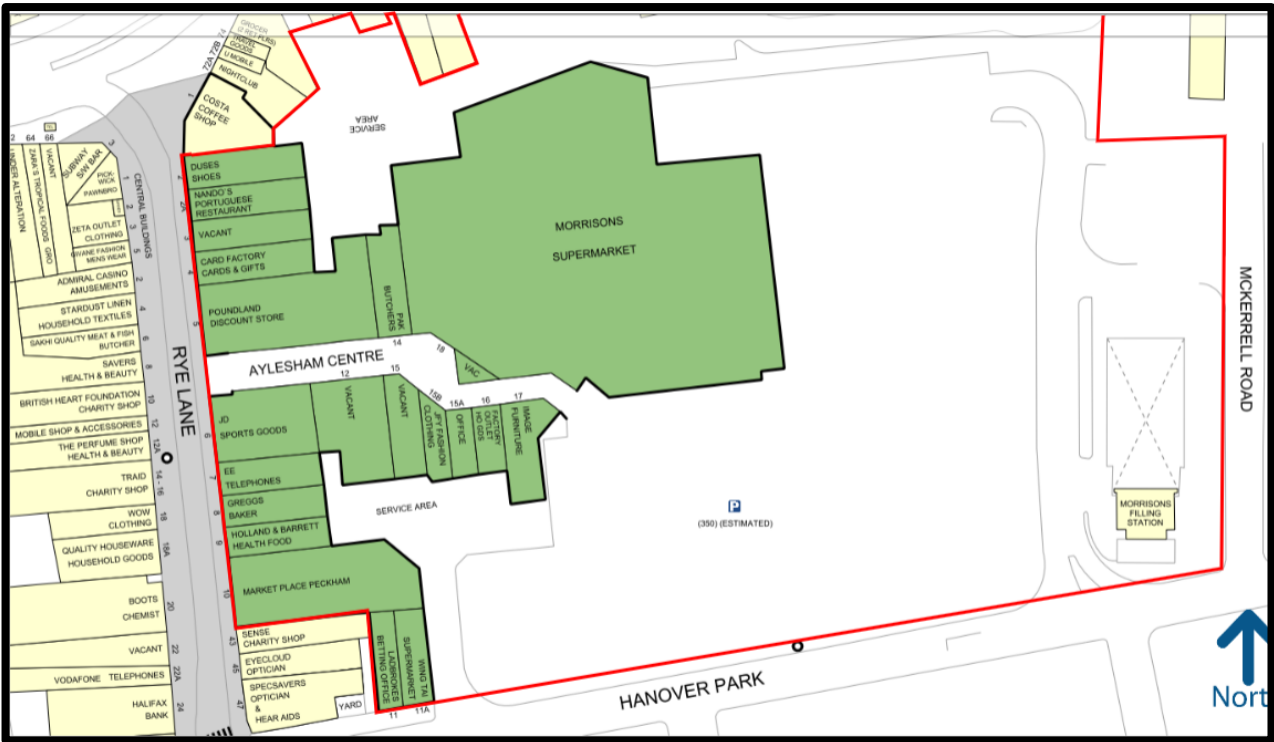
3.4 Table 3.2 and Figure 3.2 below provide details of the size and current occupier of each of the retail units:

Table 3.2: Existing Retail Unit Areas, Occupiers and Use Class

Unit No.	Occupier	Existing Use Class	GIA (sqm)
2	Duses Shoes	E(a)	169.5
2A	Nandos	E(b)	456.9
3	Vacant	E(a)	184.6
4	Cardfactory	E(a)	174.6
5	Poundland	E(a)	748.8
6	JD Sports	E(a)	610.9
7	EE	E(a)	231.9
8	Greggs	E(b)	224
9	Holland & Barrett	E(a)	232.8
10	Market Place Peckham	Sui Generis	712.4
11	Ladbrokes	Sui Generis	91.5
11A	Wing Tai	E(a)	299.9
12	Clarks	E(a)	295.9
14	Pak Butchers	E(a)	141
15	Vacant	E(a)	133
15A	Consultation Hub*	Sui Generis	68
15B	Just for You Fashion	E(a)	82.9
16	Factory Outlet	E(a)	93
17	Image	E(a)	157.6
18	Morrisons	E(a)	4,975.7
-	Morrisons Petrol Station	Sui Generis	98
Total			10,182.9

*Temporary planning permission. The use will revert to E(a) once this expires.

Figure 3.2: Location of Existing Retail Occupiers



3.5 In addition to the existing retail units, there are a number of traders who operate from hand carts within the internal mall/atrium. Table 3.3 below provides number of hand carts and occupiers.

Table 3.3 Existing Retail Hand Carts Operating within the Internal Mall/Atrium

Cart No.	Occupier
1	Ice Cream and Popcorn Vendor
2	Scented Oils and Perfumes
3	Eyebrow Threading and Waxing Services
4	African Textiles and Accessories
5	Woman's Lingerie and Accessories
6	Children's Clothes and Costume Jewels
7	Chinese Medicine's and Remedies
8	Mobile Phone Accessories and Repairs
9	African Fabric Sales, Repair and Dress Making
10	Luggage Bags and Accessories

- 3.6 The Site is broadly flat.
- 3.7 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

3.8 Vehicular access to the car park and petrol filling station is from Hanover Park. Vehicular access to the service yard is from Peckham High Street (via the bus station land).

- 3.9 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 the wider cycle infrastructure.
- 3.10 Peckham Rye Station, serving London Overground and South-eastern Rail services, is located approximately 250m to the south 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).
- 3.11 The Site has a Public Transport Accessibility Level (PTAL) rating of 6a/6b (where 1a is the lowest and 6b is the highest).

Heritage

- 3.12 The existing buildings 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 Grade II).
- 3.13 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 and south respectively. A number of other buildings within the Site's immediate vicinity are also listed at local level, this includes nos. 1-5, 12-16, 22a-24, 28 and 51-57 Rye Lane and nos. 86-88 & 98-104 Peckham High Street.
- 3.14 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

- 3.15 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.
- 3.16 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, among other locations.
- 3.17 The character of the area to the east and southeast is more residential in character.
- 3.18 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). 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.
- 3.19 Peckham Square provides the main area of public space that has some green space attached within the town centre. However, there is limited other green infrastructure. The surrounding street network, particularly Rye Lane and Peckham High Street, suffer from congestion (with associated air quality and noise issues).

- 3.20 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 Southwark Plan, including Blackpool 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.

5. The Proposed Development

Overview

- 5.1 The Proposed Development represents a significant opportunity to deliver high-quality mixed-use development which optimises the potential of this important town centre site. The Proposed Development will contribute towards the regeneration of the town centre through the creation of extensive new public realm, providing a mix of appropriate town centre uses, including new flexible retail, leisure and commercial uses, replacement supermarket (and associated car parking) and provision of new homes.

Amount and Land Uses

- 5.2 The amount of development is set out in the Development/Accommodation Schedule (document ref. AC01) which is submitted for approval (to be read in conjunction with the proposed floorplans). An overview is set out in Table 5.1 below:

Table 5.1: Proposed Amount of Development

	Amount	
	Non-residential Floorspace (GIA)	Residential
Residential (Use Class C3)	-	877 homes
Supermarket (Use Class E(a))	5,994.5sqm	-
Supermarket Car Park (Use Class E(a))	4,731.3sqm	
Workspace (Use Class E(g))	2,725.3sqm	-
Flexible Retail, Leisure, Commercial (Use Class E(a-g) and Sui Generis (Drinking Establishment))	3,800.1sqm	-
Total	17,251.2sqm	877 homes (The residential floorspace (including car parking associated with the residential development) extends to: 88,388sqm GIA)

Residential

- 5.3 The application seeks permission for 877 new homes. The proposed unit size mix is set out in Table 5.2 below. This is set out in the Development/Accommodation Schedule (document ref. AC01).

Table 5.2 Proposed Dwelling Mix

	Unit Size Mix				
	1B1P	1B2P	2 Bed (2B3P/2B4P)	3 Bed (3B5P/3B6P)	Total
Residential (Use Class C3)	90	297	314	176	877
Percentage (%) (by unit)	10%	34%	36%	20%	100%

- 5.4 The residential component will comprise a mix of market (65%), low-cost-rent (25%) and intermediate (10%) tenures (calculated by habitable room). The unit size mix broken down by tenure is set out at Table 5.3 below:

Table 5.3: Unit Size Mix by Tenure

Type	Market	Social Rent	Intermediate	Total
1B1P	90 (15%)	0 (0%)	0 (0%)	90 (10%)
1B2P	247 (41%)	31 (17%)	19 (22%)	297 (34%)
2 Bed (2B3P/2B4P)	171 (28%)	82 (44%)	61 (72%)	314 (36%)
3 Bed (3B5P/3B6P)	99 (16%)	72 (39%)	5 (6%)	176 (20%)
Total	607 (100%)	185 (100%)	85 (100%)	877 (100%)

- 5.5 Further details regarding the Social Rent and intermediate homes are provided in the Affordable Housing Statement within Section 9 of this Planning Statement. The affordable housing provision will be secured by s.106 obligation.

Non-residential Uses

Replacement Supermarket

- 5.6 The Proposed Development includes a supermarket. The intended operator is Morrisons. The floorspace composition of this is set out in Table 5.4 below:

Table 5.4 Proposed Replacement Supermarket Floorspace

Supermarket Floorspace (GIA m²)	
Front of House	2,247.9
Ancillary/Back of House	2,201.0
Service Yard	883.2
Plant	662.4
<i>Sub-Total</i>	5,994.5
Associated Floorspace (GIA m²)	
Supermarket Car Park	4,731.3
Total Supermarket Floorspace	10,725.8

Workspace (Use Class E(g))

- 5.7 The Proposed Development includes 2,725.3sqm (GIA) of workspace to be provided in Building D. Approval is sought for this to be used for Use Class E(g).
- 5.8 10% of the total proposed workspace, which includes any workspace provided as part of the flexible retail/leisure/commercial uses (see below), is to be provided as affordable workspace. Details of this are to be discussed/agreed with LBS in due course. It is anticipated that this will be secured by way of a s.106 obligation.

Flexible Retail, Leisure, Commercial (Use Class E(a-g)/Sui Generis)

- 5.9 The Proposed Development includes **3,800.1sqm (GIA)** of flexible retail, leisure and commercial floorspace to be provided in Buildings A, B, C, D, E, F, G, H, J1, K, L and N. Approval is to be sought for this to be used for any use that falls within Use Class E(a-g) and for drinking establishments (Sui Generis). This is subject to the following caps:

- A maximum 350sqm (GIA) to be used for Drinking Establishments (Sui Generis)
- A maximum 320sqm (GIA) to be used for workspace (Use Class E(g)) (this is in addition to the 2,725.3sqm (GIA) discussed above which is 'fixed').

5.10 The flexible retail, leisure and commercial floorspace is to be provided at the ground floor of Buildings A-H, J1, K, L, and N as set out in Table 5.5 below:

Table 5.5: Distribution of Flexible Retail, Leisure and Commercial Floorspace:

	GIA m ²
Building A	459.0
Building B	401.0
Building C	401.0
Building E	341.0
Building F	207.5
Building G	276.2
Building H	217.3
Building J1	125.3
Building K	1,259.4
Building L	16.2
Building N	96.2
Total	3,800.1

Buildings

5.11 The Proposed Development comprises 16 buildings ranging from 4-20 storeys in height (plus basement). The maximum height of each building is set out in Table 5.6 below.

5.12 All buildings over 18m are provided with two staircases.

Table 5.6: Building Heights

Building	Storeys	Height (metres above ground)
A	7	26.1m
B	7	25.8m
C	7	25.6m
D	6	27.1m
E	11	40.8m
F	6	22.2m
G	12	43.9m
H	9	32.5m
J1	16	55.2m
J2	6	22.6m
K	10	36.6m
L	11	37.9m
M	20	70.4m

N	13	43.4m
P	12	41.3m
Q	6	22.0m

Landscape and Public Realm

5.13 0.94ha (9,407sqm) of new publicly accessible space is proposed at ground floor level. This comprises four distinct character areas (refer to the DAS document ref. AC02) for further details:

- **Aylesham Gardens:** the landscape public realm heart of the development with an open lawn area, spill out space to F&B retail units, play area, and water jet play feature. The space has been designed for flexibility in mind in order to host a number of events throughout the year.
- **Peter Collinson Passage and Botanical Way:** the two gateways from Rye Lane into the Site. The urban orchard at Peter Collinson Passage acts as a unique urban experience where visitors can sit under flowering fruit trees, socialise, and be surrounded by local art, whilst the double height entrance at Botanical Way provides active ground floor retail units with views towards Aylesham Gardens and the supermarket.
- **Peckham Yards:** a social space for residents and members of the community, located in the northwest corner of the Site providing spill out space from the adjacent commercial units. Its built in flexibility caters for a variety of events as well making it very much of the urban character of Peckham.
- **Green links:** verdant connectors within the Site; these areas are of a street typology with lush planting and spaces for visitors to rest along their journey.

5.14 In addition to publicly accessible open space, 3,856sqm of private communal amenity space is proposed which will be accessible to residents only. This is provided at podium level of Buildings G & K and above the supermarket accessed by Buildings L, M, N, Q and P and rooftop levels of Buildings A, L, M, N, G and K. Green roofs are also proposed for at roof level of the remaining buildings.

5.15 The Proposed Development proposes a biodiversity net gain (BNG) of 111.02% and an Urban Greening Factor (UGF) of 0.38.

Access, Servicing, and Connectivity

Pedestrian Connections

5.16 The Proposed Development will provide six pedestrian connections into the Site.

- Two access points will be provided from Rye Lane.
- To the north of the Site, pedestrians will have direct access to Peckham High Street via the bus depot.
- Four access points are provided from the south of the Site along Hanover Park.

5.17 Internal pedestrian movement will be accommodated within a mix of segregated and pedestrian-priority shared spaces. Segregated routes for pedestrians are provided on the service vehicle access route which operates clockwise within the Site. Vehicle access on to this route will be bollard controlled, managed by the on-site management team.

Cycle Access

5.18 Cyclists will be able to utilise the same access routes as pedestrians, described above.

Car Parking

- 5.19 The Proposed Development includes a basement car park. This accommodates 145 car parking spaces, of which 140 are for the replacement supermarket/town centre use and 5 Blue Badge spaces are for the residential uses. Vehicular access to the car park is from Hanover Park. Pedestrian access to the residential basement car park is via secure residential cores. Public access to the supermarket basement car park is via three lifts that provide direct access to the supermarket.
- 5.20 The 140 supermarket spaces comprise:
- 124 standard spaces;
 - 8 Blue Badge (6%);
 - 8 Parent/Child; and
 - 20% will be equipped with electric vehicle chargers.
- 5.21 The 5 residential spaces will all be Blue Badge. These will be supplemented by a further 6 Blue Badge spaces provided at ground floor level within the public realm (distributed across the Site), equalling a total of 11 car parking spaces for the residential uses. It is proposed that one of the Blue Badge spaces could accommodate a car club to provide vehicle access to Blue Badge holders without the need to own a car. Refer to the DAS (document ref. AC02) for further details.

Cycle Parking

- 5.22 A total of 1,609 long-stay cycling parking spaces are proposed. The breakdown of the number of spaces per use class is provided in Table 5.7 below.

Table 5.7: Long-Stay Cycle Parking

Use	No. of spaces
Residential (Use Class C3)	1,517
Supermarket (Use Class E(a))	26
Flexible retail, leisure and commercial (Use Class E/ Sui Generis) (excl. Supermarket)	22
Workspace (Use Class E(g))	44

- 5.23 Long-stay parking will be provided as a mix of double stackers (no more than 75%), standard Sheffield stands (minimum 20%) and at least 5% Sheffield stands for oversized cycles.
- 5.24 Cycle parking will be provided through a number of centralised hubs located within Buildings C, F, G, H, J, L and Q and within the public realm.
- 5.25 A total of 256 short-stay spaces will be provided. The breakdown of the number of spaces per use class is provided in Table 5.8 below.

Table 5.8: Short Stay Cycle Parking

Use	No. of spaces
Residential (Use Class C3)	44
Supermarket (Use Class E(a))	63
Flexible retail, leisure and commercial (Use Class E/ Sui Generis) (excl. Supermarket)	142
Workspace (Use Class E(g))	7

Servicing

- 5.26 The Proposed Development includes a service yard for the replacement supermarket, accessed from Hanover Park. The other retail, leisure, commercial units and homes will be serviced via loading bays distributed across the Site, accessed via the service route that runs through the site accessed via Hanover Park.

Energy and Sustainability

- 5.27 The residential element of the Development will incorporate a fully electric Air Source Heat Pump (ASHP) system. This will help achieve a 63% on site carbon reduction over Part L 2021 requirements and a 10% improvement on building regulations.
- 5.28 The commercial elements will be fully electric, utilising both ASHP and PV panels. It is targeting a BREEAM 'Excellent' rating.

Phasing

- 5.29 A Phasing Plan (ref. ASCP-DRM-ZZ-ZZ-DGA-A-002090 rev P0) is submitted as part of the application. It is anticipated that this will be secured by a condition which allows it to be revised, subject to the approval of the Council.
- 5.30 The Proposed Development will come forward across two phases, each comprising a series of sub-phases. Phase 1 will include Buildings L, M, N, P and Q as well as the supermarket. Phase 2 will include the remaining buildings and associated landscaping and public realm.
- 5.31 The phasing strategy has been developed to enable the decant of the supermarket use and ensure that this can remain operational and trading throughout the build programme.

6. Planning Application Specification

Description of Development

- 6.1 Planning permission is sought for the following:

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.

Type/Form of Application

- 6.2 The application is submitted in detail (full planning permission).

Planning Application Package

- 6.3 The planning application 'package' comprises the relevant forms, notices and certificates alongside plans/documents for approval and other supporting information as necessary to enable the LPA to validate and determine the Application.

Details for Approval

- 6.4 The following plans/documents are submitted for approval:

- Site Location Plan*;
- Site Plan*;
- Existing and Proposed*:
 - o Block plans (including demolition plans);
 - o Floorplans;
 - o Elevations;
 - o Roof plans;
 - o Sections;
 - o Landscape plan (proposed only);
 - o Highway drawings (proposed only).
- Development/Accommodation Schedule (ref. AC01).

*Refer to Drawing Schedule.

Supporting Details

- 6.5 A comprehensive package of supporting plans and documents is submitted as part of the Application. The purpose of this is to assist in the understanding/evaluation of the details submitted for approval and to establish commitments to control implementation (where appropriate).

- 6.6 An overview of each plan/document is provided below. Each document includes details of proposed commitments. Where this is the case, these are clearly identified within the relevant document. It is anticipated that these commitments will be secured either via condition or by s.106 obligation.

- Other Drawings for Information

This comprises additional drawings that have been submitted in support of the Proposed Development. This includes a Phasing Plan (ref. ASCP-DRM-ZZ-ZZ-DGA-A-002090 rev P0).

- **Design and Access Statement (ref. AC02)**
The Design and access Statement (DAS) sets out the design rationale underpinning the Proposed Development.
- **Design and Access Statement Executive Summary (ref. AC02.1)**
This is an executive summary of the Design and Access Statement (ref. AC02) summarising key design features of the Proposed Development.
- **Planning Statement (ref. AC04)**
This document sets out the planning justification for the proposed development. The Statement includes the following:
 - o Affordable Housing Statement (Section 9(iv));
 - o Affordable Workspace Statement (Section 9(v));
 - o Draft s.106 Heads of Terms (Section 10);
 - o Design Brief (Appendix I); and
 - o Retail/Main Town Centre Use Strategy (Appendix II).
- **Business Relocation Strategy (ref. AC05)**
This is a strategy for supporting existing independent and small businesses and shops which are impacted by the Proposed Development. The Strategy has been prepared in accordance with LBS's Business Relocation Strategy further guidance.
- **Statement of Community Involvement (ref. AC14)**
This provides details of how the Applicant has informed, consulted, and involved the community in the preparation of the development proposals.
- **Early Engagement Strategy (ref. AC14.1)**
This provides details of local stakeholders relevant to the Proposed Development and the Applicant's approach to the proposed engagement strategy including a summary of how the Applicant will engage with stakeholders, including events and activities in accordance with LBS's Statement of Community Involvement and Development Consultation Charter.
- **Engagement Summary (ref. AC14.2)**
This provides an overview of the engagement that has taken place with local stakeholders before the submission of the planning application in accordance with LBS's Statement of Community Involvement and Development Consultation Charter.
- **Environmental Statement (ref. AC18)**
In accordance with the Town and Country Planning (Environmental Impact Assessment) (England & Wales) Regulations 2017, as amended, the application is one which constitutes 'EIA development'. Accordingly, this application is accompanied by an Environmental Statement (ES). A formal ES Scoping Request was submitted on behalf of the Applicant to LBS on 11 January 2024. A formal Scoping Opinion was issued on 27 March 2024 by LBS. In accordance with the Scoping Opinion, the ES covers the following topics:
 - o Air Quality;
 - o Archaeology;
 - o Climate Change;
 - o Daylight, Sunlight, Overshadowing, Light Spillage & Solar Glare;
 - o Ground Conditions and Land Contamination;
 - o Noise and Vibration;
 - o Socio-economics;
 - o Townscape, Visual Impact and Heritage;

- Traffic and Transport;
- Wind Microclimate;
- **Transport Assessment (ref. AC06)**

This assessment justifies the proposed development in transport terms and includes proposals/commitments necessary to ensure its acceptability. It is accompanied by the following appendices:

 - Travel Plan;
 - Service and Refuse Management Plan;
 - Parking Access and Management Plan; and
 - Healthy Streets Assessment.
- **Energy Statement and Overheating Assessment (ref. AC07)**

This sets out the proposed energy strategy for the Proposed Development.
- **Sustainability Statement (including BREEAM Assessment) (ref. AC08)**

This report details the sustainability credentials of the Site including a BREEAM pre-assessment for the non-residential component.
- **Basement Impact Assessment (ref. AC03)**

This assesses the impact of subterranean development at the Site.
- **Equalities Impact Assessment (ref. AC16)**

The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. Under section 149 of the act, all public bodies are required in exercising their functions to eliminate discrimination, advance equality of opportunity and foster good relations. The "protected characteristics" to which the act applies include age, race, religion, sexual orientation, disability and pregnancy. An Equalities Impact Assessment report has been submitted as part of the Application to provide information to the LPA to assist it in undertaking an Equalities Impact Assessment in conjunction with the determination of the Application.
- **Internal Daylight, Sunlight and Overshadowing Report (ref. AC17)**

This technical report assesses internal light levels within the proposed development.
- **Demolition and Construction Environmental Management Plan (ref. AC11)**

This report outlines the programme duration, construction vehicle routing, the numbers of and types of construction vehicle, Site access and egress arrangements, how construction traffic will be managed, Noise/dust/vibration management details, and temporary arrangements proposed for the highway to facilitate the works.
- **Fire Statement and Strategy (ref. AC13)**

The statement outlines the fire strategy for the development which has been informed by consultation with the London Fire Brigade. The statement provides details related to fire brigade access to the site and building in the event of a fire emergency, assesses the proposed materiality, and confirms the proposed development is designed in accordance with regulations. A Gateway One Form has been appended to this statement.
- **Operational Waste and Recycling Management Strategy (ref. AC12)**

This strategy outlines the waste and recycling strategy for the Proposed Development, including details related to the quantum of on-site waste storage requirements, and waste collection details.

- **Whole Life Carbon Assessment (ref. AC09)**
This assessment provides a true picture of a building's carbon impact on the environment in line with London Plan Policy SI 2.
- **Circular Economy Statement (ref. AC10)**
This assessment considers strategies to facilitate transition towards a circular built environment, reporting against numerical targets that will facilitate monitoring of waste and recycling.
- **Financial Viability Assessment (ref. AC15)**
This assessment includes a full viability assessment with associated justification, prepared in line with established practice and policy requirements.
- **Financial Viability Executive Summary (ref. AC15.1)**
This executive summary provides full supporting narrative to substantiate the inputs and assumptions made in the appraisal. This is a simplified version of the assessment that may aggregate costs and sales information.
- **Flood Risk Assessment (ref. AC19)**
This assessment assesses the risk of flooding associated with the application Site and the impact of the Proposed Development on this risk.
- **Health Impact Assessment (ref. AC20)**
This assessment helps to identify and optimise the health and wellbeing impacts of the Proposed Development.
- **Arboricultural Impact Assessment (incl. Tree Survey) (ref. AC21)**
Provides an appraisal of the quality of existing trees on Site and identifies protection measures to be implemented during construction and potential management measures.
- **Preliminary Ecological Appraisal (ref. AC22)**
Provides an assessment of any impacts to wildlife and biodiversity due to the proposed development.
- **Biodiversity Net Gain Report (ref. AC23)**
Describes the existing biodiversity value across the Site and how the Proposed Development will deliver biodiversity gain.
- **Drainage Impact Assessment and Foul Water Drainage Strategy (ref. AC24)**
This document outlines the existing and proposed below ground drainage strategies and SUDS opportunities.

7. Pre-application Consultation

Pre-application Meetings with Planning Authorities and Statutory Consultees

- 7.1 A series of meetings have been held with LBS Planning, Design, Conservation and Transport officers as part of a comprehensive programme of pre-application consultation. Formal discussions with officers commenced in December 2021 and have been ongoing during the duration of the pre-application period, involving 26 meetings and workshops. The feedback provided by officers has helped scope the content of this planning application and has shaped the Proposed Development.
- 7.2 As discussed in Section 2, the Southwark Plan site allocation (NSP74) provides support for the Site's redevelopment for residential (indicative capacity of 850 homes), retail, and other Main Town Centre uses including public realm/spaces including the opportunity for buildings of up to 20-storeys. As this comprises up-to-date development plan policy, the principle of the Proposed Development was agreed as being firmly established and accepted in planning terms and were therefore not considered any further as part of pre-application discussions.
- 7.3 Pre-application discussions with the Council (and statutory consultees) focussed on the detailed matters beyond the principles established by the site allocation.
- 7.4 Design was the key consideration. As part of the pre-application process, the Applicant agreed a design brief with LBS Officers in May 2023 which, when read alongside the site allocation, has formed the basis of the Proposed Development (enclosed at **Appendix I**). The Applicant consulted with the Council's Design Review Panel in March 2024. The feedback provided by the Panel has been carefully considered by the Applicant and design team and has influenced the Proposed Development. This is set out in greater detail in Section 4 of the Design and Access Statement (DAS) (document ref. AC02).
- 7.5 Other key issues covered by the Applicant's pre-application discussions with LBS included:
- The approach to managing the risk to the transport network and highway, including the servicing strategy and car free design;
 - Landscaping and public realm, including achieving a biodiversity net gain across the Site;
 - Managing amenity impacts, particularly daylight, sunlight and overshadowing;
 - Housing mix, quality and tenure;
 - The impact on the surrounding heritage assets, such as the Rye Lane Conservation Area and surrounding locally listed buildings.
- 7.6 The Applicant has also consulted with the Greater London Authority (GLA), TfL, Historic England and other consultees as part of the process of formulating the development proposals.
- 7.7 Details are set out in Table 7.1, below.

Table 7.1: Pre-application Consultation with Planning Authorities and Statutory Consultees

Consultation Event/Meeting	Date
LBS pre-application meeting	December 2021
LBS pre-application meeting	January 2022
LBS Transport pre-application meeting	March 2022
TfL pre-application meeting	March 2022
LBS Design Workshop	March 2022
LBS pre-application meeting	April 2022

GLA pre-application meeting	April 2022
LBS pre-application meeting	September 2022
LBS Technical Workshops	September 2022
GLA pre-application meeting	October 2022
LBS pre-application meeting	November 2022
LBS Technical Workshop	November 2022
LBS Design Workshop	December 2022
LBS Design Workshop	January 2023
TfL pre-application meeting	January 2023
LBS Daylight Workshop	January 2023
LBS Affordable Housing Workshop	February 2023
LBS pre-application meeting	September 2023
LBS Masterplan Principles pre-application meeting	September 2023
LBS Design Workshop	November 2023
LBS Landscape and Transport Workshop	November 2023
GLA pre-application meeting	November 2023
LBS Daylight and Sunlight Workshop	January 2024
LBS residential Quality Workshop	January 2024
GLA pre-application meeting	February 2024
LBS Rye Lane Workshop	March 2024
TfL pre-application meeting	March 2024
LBS Design Workshop	March 2024
Design Review Panel	March 2024
Historic England pre-application meeting	March 2024
LBS Design pre-application meeting	May 2024
LBS Design pre-application meeting	May 2024
LBS Design pre-application meeting	May 2024
LBS Equalities Impact Assessment pre-application meeting	May 2024
LBS Trader Support pre-application meeting	June 2024

Public Consultation

- 7.8 The Applicant's approach to pre-application public consultation has followed good practice and has accorded with the requirements of LBS's Statement of Community Involvement (SCI) and Development Consultation Charter.

Scope

- 7.9 As explained in Section 2, public consultation on proposals for the redevelopment of the Site have been ongoing for over 10 years. LBS undertook 9 rounds of public consultation between 2014 and 2021 in conjunction with the preparation of the new Southwark Plan.
- 7.10 As a consequence, the public had already been extensively consulted on the principle of redeveloping the Site 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. As firmly established acceptable planning principles, these matters were not revisited in the Applicant's public consultation activities.

7.11 As was the case with the LPA, the Applicant's pre-application public consultation primarily focussed on design. Other matters included:

- The location of different uses across the Site;
- The amount and design of green spaces; and
- Public benefits and community outreach.

Method

7.12 The Applicant's public consultation activities commenced in January 2022 and continue today on an ongoing basis and as set out in detail within the SCI (document ref. AC14) included a mix of in-person and online engagement including:

- Community-led walk and talks;
- Outreach meetings and works hops with young people;
- Community stakeholder meetings;
- Drop in consultations at Rye Lane Chapel;
- Pop-up sessions on Rye Lane; and
- Online webinars.

7.13 A **consultation hub**, opened in February 2022, was created within a vacant unit within the Aylesham Centre. This has been open and staffed 2-days a week since then to provide a 'drop-in' consultation offer as well as a venue for regular targeted stakeholder meetings. This has been increased during the May 2024 exhibition to 3-days a week.

7.14 As part of the wider public consultation the Applicant conducted five **public exhibitions** rounds between January 2022 and May 2024. The exhibitions were publicised through information leaflets, invitation letters, emails, social media and adverts in local publications which were sent to local residents, stakeholders and local ward Councillors. The event dates and times were also displayed at the Aylesham Centre in advance of the event.

7.15 A dedicated **project website** was also created to aid in the distribution of information and further engagement with the community prior to submission of the planning application. The website remains active and will be updated as part of ongoing engagement during the determination period of the planning application.

7.16 The Applicant also held a series of **targeted community forum meetings** with local businesses, focus groups, and ward councillors to discuss the emerging proposals. These meetings were also attended by LBS planning and development officers.

7.17 Further details and analysis for the extensive public consultation undertaken is contained within the accompanying Statement of Community Involvement (SCI) (document ref. AC14).

7.18 A summary table of all public consultation activities is provided below in Table 7.2.

Table 7.2: Public Engagement

Engagement Activity	Date
Letters were sent to identified inviting them to attend community pop-up sessions.	January 2022
Dedicated project website was launched.	February 2022
A newsletter was distributed to addresses including an invitation to the three community pop-up sessions.	February 2022
The project team undertook a business engagement and door knocking session in the area around the site.	10 February 2022
A survey was launched on the project website.	11 February 2022
The first consultation pop-up session took place, staffed by various members of the project team.	12 February 2022
The project team undertook a local resident door-knocking session between covering social housing in the area around the site.	15 February 2022
A further pop-up session took place outside the Consultation Hub in the Aylesham Centre, staffed by various members of the project team.	19 February 2022
The project team undertook a third door-knocking session covering the area around the Site.	1 March 2022
The consultation pop-up session took place, staffed by various members of the project team.	9 March 2022
An email was distributed to the subscribers of the Aylesham Centre mailing list, updating people on the public consultation from Early 2022 and the feedback received.	April 2022
Letters were sent to identified stakeholders to discuss the early proposals for the site, and inviting them to attend the community pop-up sessions.	11 July 2022
A flyer was distributed to surrounding addresses, advertising the three consultation drop-in events taking place on Saturday 16 July, Monday 18 July and Thursday 21 July 2022.	11 July 2022
An update blog - 'Join us at our public consultation drop-in events' was published on the project website.	11 July 2022
E-newsletters were distributed to the subscribers of the Aylesham Centre mailing list inviting them to the upcoming public consultation drop-in events.	11 July 2022
The project team undertook a local resident door-knocking session between covering the area around the site.	11 July 2022
The project team undertook a local resident door-knocking session covering the area around the site.	12 July 2022
The first public consultation drop-in event took place, staffed by various members of the project team.	16 July 2022
The second public consultation drop-in event took place, staffed by various members of the project team.	18 July 2022
An email was distributed to the subscribers of the Aylesham Centre mailing list informing them that the exhibition boards and survey from the event were available to view on the project website.	20 July 2022
The third public consultation drop-in event took place, staffed by various members of the project team.	21 July 2022
A Stage 1 Consultation Report was published on the project website and sent to subscribers of the Aylesham Centre mailing list.	October 2022
Letters were sent to identified stakeholders to discuss the evolving proposals for the site, and inviting them to attend the upcoming consultation drop-in events.	November 2022

A flyer was distributed to surrounding addresses, advertising the four consultation drop-in events taking place on Wednesday 30th November and Saturday 10th December 2022, and Saturday 7th January and Saturday 21st January 2023. The flyer also advertised the two masterplan presentations occurring on Saturday 3rd December and Saturday 7th January 2023; as well as the Consultation Online Webinar on Thursday 5th January 2023.	November 2022
Emails were distributed to the subscribers of the Aylesham Centre mailing list inviting them to the upcoming public consultation drop-in events.	November – December 2022
The project team undertook a local resident door-knocking session covering the area around the site.	28 November 2022
The first public consultation drop-in event took place, staffed by various members of the project team.	30 November 2022
The first masterplan presentation took place, staffed by various members of the project team.	3 December 2022
The second masterplan presentation took place, staffed by various members of the project team.	6 December 2022
The second public consultation drop-in event took place, staffed by various members of the project team.	10 December 2022
The first consultation online webinar took place via Teams.	5 January 2023
The project team undertook their second local resident door-knocking session covering the area around the site.	6 January 2023
The third public consultation drop-in event took place, staffed by various members of the project team.	7 January 2023
The fourth public consultation drop-in event took place, staffed by various members of the project team.	21 January 2023
An email was distributed to the subscribers of the Aylesham Centre mailing list, thanking people for their attendance at the series of consultation events, and informing them that the exhibition boards and survey from the event were available to view on the project website.	January 2023
A feedback report was published on the project website and was sent to subscribers of the Aylesham Centre mailing list.	May 2023
New Design Brief and Project Team	
A fresh dedicated project website was launched, which introduced people to the new scheme and provided contact details so that they could get in touch with the project team with any comments or questions they may have.	May-August 2023
Engagement took place with local residents and community stakeholders – including via walk and talk sessions – to seek insights on the character of Peckham and local priorities.	August – November 2023
Letters were sent via email, offering a meeting to identified stakeholders to discuss the new plans for the site, and inviting them to attend the upcoming consultation drop-in events.	November 2023
A flyer was distributed to surrounding addresses, advertising the upcoming series of consultation events. The flyer contained more information about how to contact the project team.	November 2023
An update 'Join us at our series of public consultation events' was published on the project website.	November 2023
An e-newsletter was distributed to the subscribers of the Aylesham Centre mailing list, inviting them to the upcoming public consultation drop-in events.	November 2023
The first public consultation drop-in event took place, staffed by various members of the project team.	18 November 2023
An older person tea and cake sessions was held, staffed by various members of the project team.	21 November 2023

The first consultation pop-up session took place, staffed by various members of the project team.	24 November 2023
The first public consultation drop-in event took place, staffed by various members of the project team.	25 November 2023
The second consultation pop-up session took place, staffed by various members of the project team.	28 November 2023
The project team undertook a local resident door-knocking session covering the area around the site.	5 December 2023
A feedback report was published on the project website and was sent to subscribers of the Aylesham Centre mailing list.	January 2024
A flyer was distributed to surrounding addresses, advertising the upcoming series of consultation events.	January 2024
E-newsletters were distributed to the subscribers of the Aylesham Centre mailing list, inviting them to the upcoming public consultation drop-in events.	January 2024
Social media adverts via Facebook and Instagram promoted the consultation in local postcodes.	January – February 2024
The first public consultation drop-in event took place, staffed by various members of the project team.	27 January 2024
The second public consultation drop-in event took place, staffed by various members of the project team.	30 January 2024
The third public consultation drop-in event took place, staffed by various members of the project team.	2 February 2024
The project team conducted a consultation pop-up session, staffed by various members of the project team.	9 February 2024
An older person tea and cake session was held, staffed by various members of the project team.	13 February 2024
A feedback report was published on the project website and was sent to subscribers of the Aylesham Centre mailing list.	March 2024
A flyer was distributed to surrounding addresses, advertising the upcoming series of consultation events.	April 2024
E-newsletters were distributed to the subscribers of the Aylesham Centre mailing list, inviting them to the upcoming public consultation drop-in events.	April 2024
Newspaper adverts ran in digital and print editions of Southwark News, promoting the consultation.	May 2024
Social media adverts via Facebook and Instagram promoted the consultation in local postcodes.	May 2024
The first public consultation drop-in event took place, staffed by various members of the project team.	10 May 2024
The second public consultation drop-in event took place, staffed by various members of the project team.	11 May 2024
The third public consultation drop-in event took place, staffed by various members of the project team.	16 May 2024
An older person tea and cake session was held, staffed by various members of the project team.	21 May 2024
Drop in consultation event.	25 May 2024
The project team conducted a consultation pop-up session, staffed by various members of the project team.	30 May 2024
The second Community Information Session took place in Unit 15 of the Aylesham Centre. Attendees were able to hear from the project team about key factors that had informed the sustainability and transport approach.	30 May 2024

An older person tea and cake session was held, staffed by various members of the project team.	11 June 2024
The third Community Information Session took place in Unit 15 of the Aylesham Centre. Attendees were able to hear from the project team about the consideration of equalities in the planning and engagement process, as well as the process for submission and determination of the upcoming application.	25 June 2024

How Public/Stakeholder Consultation has Influenced the Proposed Development

7.19 The feedback received throughout the pre-application consultation process has had a genuine influence over the Proposed Development. This includes the following specifics:

- Appointment of a new design team, comprising Southwark and Peckham based architectural practices;
- Reduction in maximum building heights from 27 storeys to 20 storeys;
- Reduction in the number new homes from 1,050 to 877;
- Revisions to the layout and massing of buildings;
- Increased permeability through the Site;
- Increased green space across the Site;
- Inclusion of workspace;
- The form/type of public realm;
- The use of colour within the facades; and
- Space for public art work within the development.

7.20 Refer to the Statement of Community Involvement (document ref. AC14) for further details.

8. Planning Policy Context

Policy Framework

- 8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. The development plan for the Site comprises:
- The London Plan (2021)
 - The Southwark Plan (2022)
- 8.2 Both tiers of the development plan (as set out above) should be considered up-to-date for the purposes of paragraph 33 of the National planning Policy Framework (NPPF) (2023) and Regulation 10a of the Town and Country Planning (Local Planning) Regulations (2012).
- 8.3 The Site is not located within a Neighbourhood Plan area.
- 8.4 The NPPF and associated Planning Practice Guidance (PPG) are a material consideration in the determination of planning applications.
- 8.5 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.

Site/Area Specific Policies

- 8.6 The Site is subject to the following area/site specific policies, as shown on the Southwark Plan Policies Map:
- Peckham and Nunhead Action Area (AV.14)
 - Peckham Action Area Core (AV.14)
 - Peckham Area Vision boundary (AV.14)
 - Site allocation (NSP74) (Aylesham Centre and Peckham Bus Station)

Policy Designations

- 8.7 The Site is subject to the following policy designations:
- Major Town Centre (Peckham)
 - Protected Shopping Frontage (Rye Lane and internal mall)
 - 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)
- 8.8 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)

- 86-88 Peckham High Street (Locally listed)
- The Bun House, 86 Peckham High Street (Locally listed)
- 98-104 Peckham High Street (Locally listed)

Development Management Policies

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

Decision-making Framework

- 8.10 Table 8.1, below, sets out the framework of development plan policies and associated guidance applicable to the key matters of relevance to the determination of the Application. The topics correspond with the assessment set out in the next section.

Table 8.1 Policy Framework

Topic/Policy Matter	London Plan		Southwark Plan	
	Policy	Guidance	Policy	Guidance
(i) The principle of the proposed development	- GG1 (building strong and inclusive communities) - GG2 (making the best use of land) - GG4 (delivering the homes Londoners need) - SD6 (town centres and high streets) - SD7 (town centres: development principles and development plan documents)	- Characterisation and Growth Strategy LPG (June 2023)	- ST1 (Southwark's development targets) - ST2 (Southwark's places) - AV.14 (Peckham area vision) - NSP 74 (Aylesham Centre and Peckham bus station)	
(ii) Comprehensiveness			- NSP 74 (Aylesham Centre and Peckham bus station)	
(iii) Demolition of Existing Buildings				
Heritage	- HC1 (heritage conservation and growth)		- P20 (conservation areas) - P21 (conservation of the historic environment and natural heritage)	- Heritage SPD (October 2021)
Embodied Carbon	- SI7 (reducing waste and supporting circular economy)	- Circular economy statements LPG (March 2022) - Whole life carbon LPG (March 2022)	- SP6 (climate emergency)	
(iv) Housing Matters				
Amount	- GG2 (making the best use of land) - GG4 (delivering the homes Londoners need)	- Housing SPG (March 2016)	- ST1 (Southwark's development targets) - SP1 (homes for all)	- Residential Design Standards SPD (October 2011)

	- H1 (increasing housing supply)		- AV.14 (Area Vision for Peckham) - NSP 74 (Aylesham Centre and Peckham bus station)	
Affordable Housing	- H4 (delivering affordable housing) - H5 (threshold approach to affordable housing) - H6 (affordable housing tenure)	- Affordable Housing LPG (draft May 2023) - Development Viability LPG (draft May 2023) - Affordable Housing and Viability SPG (August 2017)	- P1 (social rented and intermediate housing) - NSP 74 (Aylesham Centre and Peckham bus station)	- Affordable Housing SPD (September 2008) - Affordable Housing Draft SPD (June 2011) - Development Viability SPD (March 2016)
Unit Size Mix	- H10 (housing size mix)	- Housing SPG (March 2016)	- P2 (new family homes)	- Residential Design Standards SPD (October 2011)
Housing Quality	- D3 (optimising site capacity through the design-led approach) - D6 (housing quality and standards) - D7 (accessible housing)	- Accessible London SPG (October 2014) - Planning for Equality and Diversity in London SPG (October 2007) - Optimising Site Capacity: A Design-led Approach LPG (June 2023) - Housing Design Standards LPG (June 2023)	- P8 (wheelchair housing) - P15 (residential design)	- Residential Design Standards SPD (October 2011)
Childrens' Play	- S4 (play and informal recreation)	- Housing SPG (March 2016)	- P15 (residential design)	- Residential Design Standards SPD (October 2011)
(v) Main Town Centre Uses				
Amount and Mix of Uses	- GG5 (growing a good economy) - SD6 (main town centres and high streets) - SD7 (town centres: development principles and Development Plan Documents) - E9 (retail, markets and hot food takeaways)		- ST2 (Southwark's Places) - AV.14 Peckham Area Vision - NSP74 (Aylesham Centre and Peckham Bus Station) - P35 (town and local centres) - P37 (protected shopping frontages)	
Affordable Workspace	- E3 (affordable workspace)	- Development Viability LPG (draft May 2023)	- P31 (affordable workspace)	- Development Viability SPD (March 2016)
Small Shops			- P32 (small shops)	
Business Relocation Strategy			- P33 (business relocation)	
Active Frontages	- D3 (optimising site capacity through the design-led approach)	- Characterisation and Growth Strategy LPG (June 2023)	- D14 (design quality) - NSP 74 (Aylesham Centre and Peckham bus station)	

(vi) Design				
Approach	- D1 (London's form, character and capacity for growth) - D3 (optimising site capacity through the design-led approach) - D4 (delivering good design)	- Housing Design Standards LPG (June 2023)	- P13 (design of places) - P16 (designing out crime)	- Residential Design Standards SPD (October 2011)
Form and Layout	- D1 (London's form, character and capacity for growth) - D3 (optimising site capacity through the design-led approach) - D4 (delivering good design)	- Housing Design Standards LPG (June 2023)	- P13 (design of places) - NSP74 (Aylesham Centre and Peckham Bus Station)	- Residential Design Standards SPD (October 2011)
Tall Buildings	- D9 (tall buildings)	- Optimising Site Capacity: A Design-led Approach LPG (June 2023)	- P17 (tall buildings) - NSP74 (Aylesham Centre and Peckham Bus Station) - P17 (tall buildings) - P20 (conservation areas) - P21 (conservation and historic environment and natural heritage)	
Quality and Character	- D1 (London's form, character and capacity for growth) - D3 (optimising site capacity through the design-led approach) - D4 (delivering good design) - D8 (public realm)		- P13 (design of places) - P16 designing out crime) - NSP74 (Aylesham Centre and Peckham Bus Station)	
Experience	- D1 (London's form, character and capacity for growth) - D3 (optimising site capacity through the design-led approach) - D4 (delivering good design)	- Housing Design Standards LPG (June 2023) - Optimising Site Capacity: A Design-led Approach LPG (June 2023)	- P13 (design of places) - P14 (design quality) - P18 (efficient use of land) - NSP74 (Aylesham Centre and Peckham Bus Station)	- Residential Design Standards SPD (October 2011)
Density	- D2 (infrastructure requirements for sustainable densities) - D3 (optimising site capacity through the design-led approach)	- Optimising Site Capacity: A Design-led Approach LPG (June 2023)	- P13 (design of places) - P14 (design quality) - P18 (efficient use of land) - NSP74 (Aylesham Centre and Peckham Bus Station)	- Residential Design Standards SPD (October 2011)
Agent of Change	- D13 (agent of change)		- P66 (reducing noise pollution and	

			enhancing soundscapes) - NSP74 (Aylesham Centre and Peckham Bus Station)	
Public Realm	- D4 (delivering good design) - G7 (trees and woodlands)	- Public London Charter LPG (October 2021) - Play and Informal Recreation SPG (September 2012)	- P13 (design of place) - P61 (trees) - NSP74 (Aylesham Centre and Peckham Bus Station)	- Residential Design Standards SPD (October 2011)
Sustainability and Climate Change	- SI 2 (minimising greenhouse gas emissions)	- Be Seen Energy Monitoring LPG (September 2021) - Energy Planning Guidance (June 2022) - Circular Economy LPG (March 2022) - Whole Life Carbon LPG (March 2022) - Urban Greening Factor LPG (February 2023)	- SP2 (Southwark together)	
Safety and Security	- D4 (delivering good design)	- Housing Design Standards LPG (June 2023)	- P16 (designing out crime)	
Accessibility and Inclusive Design	- D6 (housing quality and standards) - D7 (accessible housing)	- Accessible London SPG (October 2014) - Planning for Equality and Diversity in London SPG (October 2007) - Optimising Site Capacity: A Design-led Approach LPG (June 2023) - Housing Design Standards LPG (June 2023)	- P8 (wheelchair housing) - P15 (residential design) - NSP74 (Aylesham Centre and Peckham Bus Station)	- Residential Design Standards SPD (October 2011)
(vii) Heritage	- HC1 (heritage conservation and growth)		- P13 (design of place) - P20 (conservation areas) - NSP74 (Aylesham Centre and Peckham Bus Station)	- Heritage SPD (October 2021)
(viii) Transport, Access and Servicing	- T1 (strategic approach to transport) - T2 (healthy streets) - T3 (transport capacity, connectivity and safeguarding) - T4 (assessing and mitigating transport impacts) - T5 (cycling)	- The Control of Dust and Emissions in Construction SPG (July 2014) - Sustainable Transport, Walking and Cycling (December 2022)	- P45 (healthy developments) - P49 (public transport) - P50 (highways impacts) - P52 (cycling) - P54 (car parking) - NSP74 (Aylesham Centre and Peckham Bus Station)	

	- T6 (car parking) - T7 (deliveries, servicing and construction)			
(ix) Technical, Access and Servicing				
Daylight and Sunlight, Overshadowing	- D6 (housing quality)		- P14 (design quality) - P56 (protection of amenity)	
Wind Microclimate	- D8 (public realm) - D9 (tall buildings)		- P56 (protection of amenity)	
Fire Safety	- D12 (fire safety)	- Fire Safety LPG (draft February 2022)		
Overheating	- SI4 (managing heat risk)		- P14 (design quality) - P15 (residential design)	
Basement Impact Assessment	- D10 (basement development)		- P14 (design quality) - P15 (residential design)	
Biodiversity/Ecology	- G5 (urban greening) - G6 (biodiversity and access to nature)		- SP6 (climate emergency) - P60 (biodiversity)	
Energy and Sustainability	- SI 2 (minimising greenhouse gas emissions)	- Be Seen Energy Monitoring LPG (September 2021) - Energy Planning Guidance (June 2022) - Circular Economy LPG (March 2022) - Whole Life Carbon LPG (March 2022)	- SP2 (Southwark together)	
Air Quality	- SI1 (improving air quality)	- Air Quality Positive LPG (February 2023) - Air Quality Neutral LPG (February 2023)	- P65 (improving air quality)	
Noise and Vibration	- D14 (noise)		- P56 (protection of amenity) - P66 (reducing noise pollution and enhancing soundscapes)	
Archaeology	- HC1 (heritage conservation and growth)		- P23 (archaeology)	
Ground Conditions and Land Contamination			- P64 (contaminated land and hazardous substances)	
Flood Risk Drainage	- SI12 (flood risk management) - SI13 (sustainable drainage)		- P68 (reducing flood risk)	

9. Planning Assessment

9.1 This section assesses the Proposed Development against the development plan and other material considerations. The following topics are considered:

- (i) The Principle of the Proposed Development (Residential, Retail, and other Main Town Centre Uses)
- (ii) Comprehensiveness
- (iii) Demolition of Existing Buildings
 - Heritage
 - Embodied Carbon
- (iv) Housing Matters
 - Amount
 - Affordable Housing
 - Unit Size Mix
 - Housing Quality
 - Childrens' Play
- (v) Main Town Centre Uses
 - Amount and Mix of Uses
 - Affordable Workspace
 - Small Shops
 - Business Relocation Strategy
 - Active Frontages
 - Other
- (vi) Design
 - Approach
 - Form and Layout
 - Tall Buildings
 - Quality and Character
 - Experience
 - Density
 - Agent of Change
 - Public Realm
 - Sustainability and Climate Change
 - Safety and Security
 - Accessibility and Inclusive Design
- (vii) Heritage
- (viii) Transport, Access and Servicing
- (ix) Technical and Environmental Matters
 - Daylight, Sunlight & Overshadowing
 - Wind Microclimate
 - Fire Strategy
 - Overheating
 - Basement Impact Assessment
 - Biodiversity/Ecology
 - Energy & Sustainability
 - Air Quality
 - Noise and Vibration
 - Archaeology

- Ground Conditions and Land Contamination
- Flood Risk and Drainage

(i) The Principle of the Proposed Development (Residential, Retail, and other Main Town Centre Uses)

- 9.2 The site allocation (NSP74) provides up-to-date 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 (as defined at NPPF Annex 2) including public realm/spaces and the opportunity for buildings of up to 20-storeys. The Site Allocation delivers Local Plan Policies AV14, ST1 and ST2.

Assessment

- 9.3 Planning permission is sought for the redevelopment of the Site 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.
- 9.4 This is firmly in accordance with the Site Allocation. Accordingly, the principle of the proposed development is acceptable in planning terms.

(ii) Comprehensiveness

- 9.5 Southwark Plan Site Allocation NSP74 covers the Site and adjacent the bus station land as a single allocation. There is no requirement within the allocation wording for the two sites to come forward as a single comprehensive scheme, nonetheless established planning principles of piecemeal/comprehensive development are relevant material planning considerations.
- 9.6 The requirements of the site allocation specific to the bus station land are as follows:
- Retain bus station capacity;
 - Provide new/improved north-south links (pedestrians/cyclists); and
 - Provide active frontages with retail, community or leisure uses at ground floor fronting Peckham High Street.

Assessment

- 9.7 The Proposed Development does not affect the bus station capacity (see Agent of Change and Transport sections below).
- 9.8 The Proposed Development provides new north-south pedestrian/cyclist links through the Site and includes a mechanism for improvements to be delivered on the adjacent bus station land (s.106 obligation).
- 9.9 The Proposed Development does not prejudice the ability to provide active frontages to Peckham High Street along the northern edge of the bus station land (e.g. kiosks, improved boundary treatments etc). It also does not prejudice the opportunity to deliver other components of the site allocation, such as public realm enhancements within the bus station land. However, this will be a matter for the owner of this land, can be brought forward entirely separately, and is not necessary for the Proposed Development to be acceptable.
- 9.10 Conceptual details are included in the DAS (document ref. AC02) to illustrate how the bus station land could be enhanced.

- 9.11 In summary, the planning application facilitates comprehensive redevelopment, as required by the site allocation and in line with broader sound planning principles.

(iii) Demolition of Existing Buildings

- 9.12 The site allocation supports the redevelopment of the Site, nonetheless it is silent on the matter of demolition.

Heritage

- 9.13 The existing buildings are not Listed nor locally Listed. Nonetheless, Southwark Plan Policy P20 protects the loss of buildings or structures that make a positive contribution to the historic character and appearance of a conservation area.

Assessment

- 9.14 As set out within the Environment Statement Volume 2 - Heritage and Townscape Visual Impact Assessment (HTVIA) (document ref. AC18), the existing buildings have been assessed to be of no particular design merit and are not considered to make a positive contribution to the historic character of appearance of the Rye Lane Peckham Conservation Area. This view has been confirmed by LBS planning, design and conservation officers during pre-application discussions.
- 9.15 Therefore, the demolition of the existing Aylesham Centre and petrol station is considered acceptable in heritage terms.

Embodied Carbon

- 9.16 London Plan Policy SI2 (minimising greenhouse gas emissions) seeks to reduce the life-cycle carbon emissions associated with developments.
- 9.17 Southwark Plan Policy P70 requires development to minimise carbon emissions.

Assessment

- 9.18 The existing Aylesham Centre is a 1980's steel framed building, constructed of lightweight steel and concrete. Due to the limitations of the lightweight steel structure and the structural spans of the existing retail space not aligning with residential standards, the upper levels are not suitable for residential conversion and it is not physically capable of supporting an upward extension without extensive works. As a consequence the retention of the building would restrict the capacity of the Site to accommodate new development, particularly new homes, which would conflict with the site allocation and broader policy requirements to optimise site capacity.
- 9.19 As set out within the Whole Life Cycle Carbon Emissions Statement (document ref. AC09), consideration has been given to the reuse and recycling of materials from the Site as part of the demolition and construction phases. The Proposed Development will have a total embodied carbon output of 868 kgCO₂/m² GIA over 60 years excluding sequestered carbon or 855 kgCO₂/m² when sequestered carbon is included. This is compared to the GLA benchmark of 1,200 kg CO₂e/ m² GIA and therefore complies with Policy SI2 of the London Plan and Southwark Plan Policy P70. The demolition of the existing Aylesham Centre and petrol station is therefore considered acceptable with respect to embodied carbon.

(iv) Housing Matters

Amount

- 9.20 There is a chronic shortage of housing in the UK and London is experiencing a well-documented housing crisis.
- 9.21 NPPF para 60 makes it clear that the Government's objective is to significantly boost the supply of homes and that one of the overall aims of the planning system should be to meet as much of an area's housing need as possible.
- 9.22 This principle is carried forward into London Plan Policies GG4 (delivering the homes Londoners need) and Policy H1 (increasing housing supply) that sets housing targets for each borough. The housing targets set by Policy H1/Table 4.1 seek to deliver **52,300** new homes per annum, which is significantly short of the need for **66,000** new homes per annum identified in the London-wide Strategic Housing Market Assessment (SHMA) undertaken in 2017 to inform the London Plan. Of note is that the targets are based on estimates of capacity (as identified in the London-wide Strategic Housing Land Availability Assessment (SHLAA) (2017)), as opposed to meeting the needs of Londoners in full.
- 9.23 In 2018, the Government introduced the Standard Method to calculate local housing need, to form the starting point for determining the minimum number of homes that local authorities should plan for. This is based on housing growth projections, alongside an affordability-based uplift, and an uplift for all urban areas. A review of the London Plan was undertaken by a panel of expert advisors appointed by the Secretary of State in late 2023, with a particular focus on housing delivery. Their report was published in February 2024 and includes an up-to-date estimate of London's housing need based on the Standard Method. This is stated as being around **98,822** homes per annum (**73,202** prior to the application of the urban uplift). Accordingly, the current London Plan annual new home targets (including the requirement for LBS) equate to around half of actual need.
- 9.24 Recent annual London-wide completion rates have fallen significantly short of the targets set by the London Plan, with an average completion rate of 35,061 new homes per annum over the period 2018-23. This is around one-third of the most recent assessment of the actual needs of Londoners referred to above.
- 9.25 The most recent Housing Delivery Test results were published by the Government in December 2023. The results for LBS is that in the 3-year period to April 2022 a total of 3,993 new homes were completed in the borough, set against a requirement of 6,078 (66%). Accordingly, the delivery of homes at a local (LBS) level is falling well short of targets and actual needs in line with London wide trends.
- 9.26 Recent data published by LBS¹ indicates that there are 17,704 households on the borough's housing register (as of 1 February 2024), including 4,728 in need of family sized housing (which most commonly means households with children). Of these households, **15,609 are registered within bands 3 and 4, indicating homelessness or people with moderate health issues, including 3,827 in need of family sized housing.**
- 9.27 Furthermore, as set out within the LBS Annual Lettings Plan 2024-25, dated 25 March 2024², Southwark has seen an increase in the number of homeless households approaching the council for assistance.

¹ LBS Housing Register and Allocations data 2018-2024 <https://moderngov.southwark.gov.uk/documents/s119860/Appendix%201%20-%20Housing%20register%20and%20allocations%20data%202018%20-%202024.pdf> Accessed May 2024

² LBS Annual Lettings Plan 2024-25 <https://moderngov.southwark.gov.uk/documents/s119859/Report%20Annual%20Lettings%20Plan%202024-25.pdf> Accessed May 2024

This has led to an increase in the number of households placed into temporary accommodation with 3,781 households as recorded at the 1 February 2024.

- 9.28 In May 2024, the GLA published updated data on affordable housing starts in London which identified a collapse in the pipeline supply of new affordable homes in London. Over the 12-month period to end March 2024, 2,358 new affordable homes were started in London, a 92% reduction compared to the previous 12-month period (25,658).
- 9.29 **As a consequence, there is a significant and urgent need for developers, local communities, and planning authorities to do everything they can to boost the supply of new homes of all tenures across London, including within Peckham.**
- 9.30 The planning policy response to this is clear. The capacity of sites (including site allocations) to accommodate new homes should be optimised following a design-led approach (NPPF para. 129, 135, 146; London Plan Policy GG2 and D3; and Southwark Plan Policy P18) and that planning applications that accord with an up-to-date development should be approved without delay.
- 9.31 The site allocation (NSP74) includes an indicative residential capacity which is accounted for in the development targets set by Policy ST1 (40,035 homes) and the associated area-wide capacity figure for Peckham (1,400 homes) set by Policy ST2 and the Peckham Area Vision (AV.14).

Assessment

- 9.32 In full accordance with national and development plan policies a design-led approach has been taken to optimise the capacity of the Site. This process has resulted in the Proposed Development which includes 877 homes. Refer to the DAS for further details. In our view this should be treated as being in general conformity with the Site Allocation, with the exceedance of the indicative (850) figure justified by the design-led approach and the urgent and significant need to boost housing supply discussed above.

Affordable Housing

- 9.33 London Plan Policy H4 states that the strategic target is for 50% of all new homes delivered across London to be genuinely affordable. To achieve this, major development is required to provide affordable housing in accordance with the threshold approach described under Policy H5. The Policy adds that affordable housing should be provided on Site. Off site, or cash-in-lieu contribution is only accepted in exceptional circumstances.
- 9.34 London Plan Policy H5 sets out the threshold approach to affordable housing delivery. Where the following criteria are met, applications are able to follow the Fast Track Route for the purposes of London Plan policy where a viability assessment is not required at the application stage:
- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy;
 - 2) be consistent with the relevant tenure split (see Policy H6 Affordable housing tenure);
 - 3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant; and
 - 4) demonstrate that they have taken account of the strategic 50 per cent target in Policy H4 Delivering affordable housing and have sought grant to increase the level of affordable housing.
- 9.35 The relevant threshold level for the Site is 35%. The supporting text to the Policy states that the percentage of affordable homes on a scheme should be measured in habitable rooms.

- 9.36 Policy H6 sets out the approach to affordable tenure split. It requires a minimum of 30% of affordable housing to be low-cost rented homes (as either London Affordable Rent or Social Rent), a minimum of 30% intermediate products and, the remaining 40% to be determined by the borough as low-cost rented homes. This should be calculated by unit.
- 9.37 Southwark Plan Policy P1 requires development that creates 10 or more homes to provide the maximum viable amount of social rented and intermediate housing. The minimum amount should be 35%, subject to viability. This is to comprise a minimum 25% social rented housing and minimum 10% intermediate housing (calculated by habitable rooms), which equates to a split of 71.4% social rent and 28.6% intermediate.
- 9.38 Policy P1 requires viability appraisals for all developments, unless 40% social rent/intermediate housing is proposed in line with the aforementioned tenure mix with no grant subsidy. In such instances, applications may follow the Fast Track route.

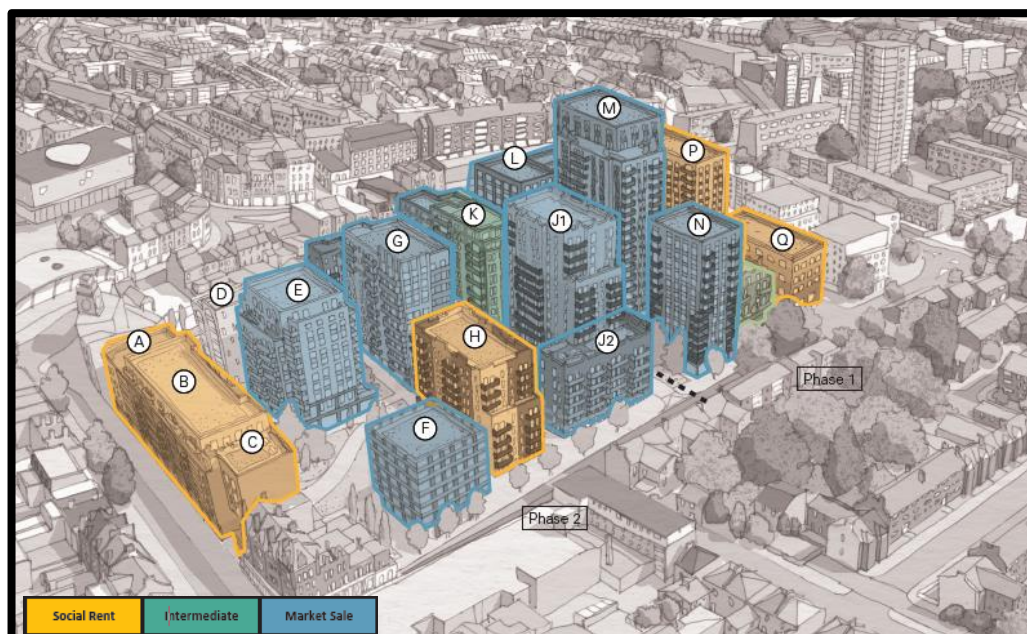
Assessment

- 9.39 The Proposed Development includes a range of tenures comprising Social Rent, intermediate and market sale. The intermediate units are to include shared ownership. Noting the requirements of the site allocation, the Applicant is and will continue to proactively engage with the Council and other relevant stakeholders (including community land trusts) with the aim of agreeing terms for the viable disposal of a number of intermediate units to a community land trust (CLT).
- 9.40 At this stage, location and quantum are still to be defined but Building Q has been identified as a potential location for the CLT units in Phase 1, however all opportunities will be reviewed once viability and deliverability is established.
- 9.41 It is proposed that the s.106 Agreement will include obligations on the Applicant to continue discussions with the Council and CLT's with the aim of securing a viable disposal of intermediate units to a CLT.
- 9.42 Details of the units mix are set out in Table 9.1 below.

Table 9.1: Unit Size Mix by Tenure

Unit Size Mix		
Tenure	Units	Habitable Rooms
Social Rent	185 (21.9%)	694 (25.5%)
Intermediate	85 (9.7%)	261 (9.6%)
Total Affordable	270 (30.8%)	955 (35%)
Market	607 (69.2%)	1,771 (65%)
Total	877	2,726

- 9.43 As illustrated in Figure 9.1 below, the affordable homes will be located across the Site. The social rented housing will be provided within self-contained Buildings, A,B,C,H,P and Q. The intermediate housing will be located alongside the market sale homes within Buildings J1, K, N, L.

Figure 9.1: Location of Affordable Housing

- 9.44 The affordable housing component comprises the maximum viable amount of Social Rent and intermediate homes. This is justified by the evidence set out in the Viability Appraisal (document ref. AC15) which is submitted with the Application. This meets the minimum requirement of 35% set by Local Plan Policy P1 and the relevant threshold level for the purposes of London Plan Policy H5.
- 9.45 25% of the proposed homes will be Social Rent and 10% intermediate (calculated by habitable room). This accords with the tenure mix requirement of Southwark Plan Policy P1. For the purposes of London Plan Policy H6, this equates to an affordable housing tenure mix of 71.4% Social Rent and 28.6% intermediate (calculated by habitable room) or 69% Social Rent and 31% intermediate (calculated by unit). There is a clear public benefit (on the basis of housing need) to justify the slight over-weighting towards Social Rent over intermediate when calculated by habitable room.
- 9.46 The s.106 Agreement will secure the Social Rent and intermediate tenure homes.
- 9.47 On the basis of the above, the Application demonstrably provides the maximum viable amount of affordable housing (satisfying Southwark Plan Policy P1) and meets the criteria for the Fast Track Approach for the purposes of London Plan Policy H5.

Unit Size Mix

- 9.48 London Plan Policy H10 requires schemes to consist of a range of unit sizes, having regard to: local evidence of need/demand; the requirement to deliver mixed and inclusive neighbourhoods; the need to deliver a range of unit types at different price points; the mix of uses in the scheme; the range of tenures; the nature and location of the site (with higher proportion of smaller units in town centre or highlight accessible locations); the aim to optimise housing potential; the ability to reduce pressure on the conversion of the existing stock; and the need for additional family housing (including the role of one/two bed units in freeing up existing family housing).
- 9.49 The Site is located within an Action Area Core, where Southwark Plan Policy P2 requires major residential developments to provide the following mix:

- A minimum of 60% of homes with two or more bedrooms;
- A minimum of 20% of family homes with three or more bedrooms;
- A maximum of 5% studios, which can only be for private housing; and
- Two bedroom homes as mix of two bedroom 3 person and two bedroom 4 person homes.

Assessment

The Proposed Development provides a mix of 1, 2 and 3 bedroom homes, as set out in Table 9.2 below: **Table 9.2 Total Unit Size Mix**

Dwelling Mix										
Land use	1B1P	1B2P	2B3P	2B4P	3B5P	3B6P	Total			
Residential (Use Class C3)	90	297	78	236	87	89	877			
Percentage (%)	10%	34%	9%	27%	10%	10%	100%			
	44%		36%		20%					

- 9.50 The above mix is broken down by tenure in Table 9.3, below. This demonstrates a range of unit sizes within both the social and intermediate tenure homes including a significant number of family sized social rented homes.

Table 9.3: Unit Size Mix by Tenure

Unit Size Mix				
Type	Market	Social Rent	Intermediate	Total
1B1P	90 (15%)	0 (0%)	0 (0%)	90 (10%)
1B2P	247 (41%)	31 (17%)	19 (22%)	297 (34%)
2 Bed (2B3P/2B4P)	171 (28%)	82 (44%)	61 (72%)	314 (36%)
3B (3B5P/3B6P)	99 (16%)	72 (39%)	5 (6%)	176 (20%)
Total	607 (100%)	185 (100%)	85 (100%)	877 (100%)

- 9.51 The Proposed Development includes 20% family homes (3 or more bedrooms), in line with Southwark Plan Policy P2.
- 9.52 56% of homes will have two or more bedrooms, which is a slight shortfall against the requirement of Southwark Plan Policy P2 (60%). Nonetheless, this accords with the principle set by London Plan Policy H10 that town centre locations such as the Site are particularly suitable for smaller homes.
- 9.53 The 1B1P units comprise a mix of fully open-plan (one main room with no separate bedroom) and semi open-plan (a separate sleeping area that is part separated from the main living area and can be easily modified to provide a fully separate room). Refer to DAS for further details. The fully open plan units accord with the definition of 'Studio' provided in the Southwark Plan. A total of 10 units that meet this definition are proposed (1% of the total number of homes), all of which are private housing, which accords with Policy P2 of the Southwark Plan.
- 9.54 Overall, the unit size mix is considered to be in general accordance with Local Plan Policy when considered in conjunction with London Plan Policy H10.

Housing Quality

- 9.55 London Plan Policies D6 to D7 (read in conjunction with the Mayor's Housing Design Standards LPG) and Southwark Plan Policy P15 set extensive policy requirements to ensure new homes are built to an appropriately high standard. Details of the Proposed Development and its compliance with these standards is set out below. It should be read in conjunction with the DAS (document ref. AC02) and the Accommodation Schedule (document ref. AC01) which provides unit-by-unit details of many of these requirements.

Accessible Housing

- 9.56 10% of homes (measured by habitable room) are designed to meet Building Regulation requirements for M4(3) 'wheelchair user dwellings'. The Social Rent units are designed to M4(3)(2)(b) standards (wheelchair accessible) while the intermediate and market units are designed to M4(3)(2)(a) (wheelchair adaptable) standards.
- 9.57 Details are included in the DAS (document ref. AC02) that demonstrate how the layout of M4(3)(2)(a) homes can be adapted in the future to meet the needs of a wheelchair user.
- 9.58 This accords fully with the requirements of London Plan Policies D5, D6 and D7 and Southwark Plan Policy P8 and P15.

Tenure Blind

- 9.59 All homes are tenure blind, with no material difference in appearance between affordable and market homes.

Cultural Requirements

- 9.60 In accordance with London Plan Policies D5 and D6, as part of the pre-application consultation activities, the Applicant has sought to identify any specific cultural requirements within the local community that would be appropriate to account for in the design of the proposed homes. To address this, the scheme provides a variety of layouts including options for open plan living alongside homes with separate living spaces (or capable of being separated via simple modification).
- 9.61 As set out within the DAS (document ref AC02) and in accordance with London Plan Policies D5 and D6 and accordance with the Mayor's Housing Design Standards LPG, where open plan living spaces are proposed within 3 bed family units, windows have been positioned so that the units can be easily modified to provided two sperate living spaces, each with an openable window. In addition to this, the 1 bed homes have been designed to be semi-open plan from the outset, with a separate sleeping area that is part separated from the main living area. This can be easily modified to provide two separate spaces each with an openable window.

Access to Indoor Facilities

- 9.62 Limited indoor shared facilities are proposed on Site as part of the Proposed Development. Approximately 204sqm (GIA) internal residential amenity space in the form of two flexible multi-purpose rooms is provided at mezzanine level of Building M access only for the residents of that building.

Internal Space Standards

- 9.63 All of the proposed homes meet or exceed the following internal space standards:
- 1-bed/1-person – 39sqm
 - 1-bed/2-person – 50sqm
 - 2-bed/3-person – 61 sqm
 - 2-bed/4-person – 70 sqm
 - 3-bed/5-person – 86 sqm
 - 3-bed/6-person – 95 sqm
- 9.64 Some homes exceed these standards (as encouraged by London Plan para 3.6.2), including M(4)(3) units.
- 9.65 All homes have a minimum ceiling height of 2.5m for at least 75% of the GIA. Areas that fall below 2.5m are typically bathrooms, hallways, and kitchen areas (to allow for ceiling level plant).
- 9.66 All homes accord with the following minimum size standards for the combined area of living, dining and kitchen spaces as set out within the GLA Housing Design Standards LPG:
- 1-bed /1-person – 21sqm
 - 1-bed/2-person – 23sqm
 - 2-bed/3-person – 25sqm
 - 2-bed/4-person – 27sqm
 - 3-bed/5-person – 29sqm
 - 3-bed/6-person – 31sqm
- 9.67 All homes have been designed to have a main sitting space of at least 3m wide (1B1P/1B2P homes) and 3.5m for all other homes.
- 9.68 1B1P homes include a sleeping area of at least 7.5sqm which is at least 2.15m wide. All other units includes a main bedroom of at least 11.5sqm area and 2.75m in width, with all other double/twin bedrooms being at least 2.55m wide.
- 9.69 All homes include built-in storage spaces.
- 9.70 Refer to the DAS (document ref. AC02) for further details which includes fully furnished internal floorplans to demonstrate that all homes are functional and fit for purpose.
- 9.71 The above aligns with the Nationally Described Space Standards (NDSS) and accords with the requirements of London Plan Policy H6 (including Table 3.1) and Southwark Plan Policy P15.

Choice and Flexibility

- 9.72 The layout of the homes follows open plan living principles, which have been designed to provide choice and flexibility for future occupants in accordance with the London Plan Policies D3 and D6. This includes the following:
- For the majority of the 3 bedroom homes, the main living area can be easily modified to provide 2 separate living spaces (i.e. a living room and a separate kitchen) each with an openable window.
 - As explained above, many of the 1B1P homes have been designed to be semi-open plan from the outset, with a separate sleeping area that is part separated from the main living area. This can be easily modified to provide two separate spaces each with an openable window.

9.73 Refer to the DAS (document ref. AC02) for further details.

Aspect

9.74 70% of the units are dual aspect.

9.75 The policy requirement to optimise site capacity combined with site specific constraints; energy efficiency, and viability considerations mean that it is impractical to provide 100% dual aspect homes on the Site.

9.76 The majority of the single aspect homes are 1B1P or 1B2P (27%), however there are some 2B3P/2B4P (3%) homes. There are no single aspect three-bedroom homes. None of the proposed single aspect units are north facing and none are exposed to high noise levels.

9.77 Refer to the DAS (document ref. AC02) and the overheating assessment contained within the Energy Strategy (document ref. AC07) which demonstrate how all homes benefit from adequate privacy; can be adequately ventilated; and how the risk of overheating had been mitigated.

Internal Light

9.78 The Internal Daylight, Sunlight and Overshadowing Report (document ref. AC17) sets out details on the internal light levels received within the Proposed Development.

9.79 Considering internal daylight, the Report assesses 726 habitable rooms (equating to 26%) across the development. It is noted that the sample comprises rooms situated at lower floor levels of each building as these are expected to experience lower light levels than habitable rooms at upper levels of the Site.

9.80 The results demonstrate an overall compliance of 67% of rooms receiving levels of internal daylight in accordance with BRE Guidance. This level of overall compliance is considered good for an urban location and is not uncommon for developments of this scale and density within an urban environment where buildings are taller and closer together and every unit is served by a private balcony space.

9.81 In large developments it is common for some rooms to not accord with the guidance due to their location within the scheme, northerly room orientation and location behind and underneath protruding balcony structures. The combined living/kitchen/dining rooms ('LKDs') that are moderately below BRE guidance generally have their access to direct skylight restricted by balconies. We consider that the balconies are an asset to the units they serve, as they provide external amenity space. On balance the moderate deviation from guidance is weighed against this benefit. In addition, it is noted that the balconies also provide shade and therefore contribute to the prevention of overheating.

9.82 Regarding internal sunlight levels, the assessment demonstrates that 57% of units will have at least one room which meets the relevant BRE guidance levels. As described above, the levels of daylight are impacted by the proposed balconies.

9.83 It is noted that the BRE guidelines recognises that it is not always possible to have units with southern orientations and where the room faces significantly north of due east or west, the criterion is unlikely to be met which is the case for a number of units within the proposed scheme.

Orientation

9.84 The main living spaces and private outdoor amenity spaces have been orientated (insofar as is practical) to make the best of views out; to benefit from direct sunlight; and to enjoy reasonable privacy. Ground floor bedrooms that face onto the street or busy communal amenity areas have been avoided.

Privacy

- 9.85 Careful consideration has been given to the separation distance between buildings and the positioning of windows and balconies as part of minimising overlooking and ensuring an adequate level of privacy for all homes. As illustrated within the DAS (document ref. AC02), the minimum distance between residential buildings is 10m. Where there are narrower separation distances between buildings, these are typically in locations with secondary views out of units, usually kitchens or second bedrooms.
- 9.86 Overall, it is considered that the scheme delivers the requirements of the Site allocation whilst considering privacy and overlooking within and out of the Proposed Development. The general design approach has sought to minimise the any overlooking or enclosure, and as a result, has maximised the opportunity to ensure policy compliant levels of amenity are provided.

Outdoor Amenity Space

- 9.87 Policy D6 of the London Plan sets London-wide standards for the provision of private outdoor amenity space. A minimum of 5sqm should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. Space must achieve a minimum depth and width of 1.5m.
- 9.88 Southwark Plan Policy P15 sets the following borough specific standards for flatted developments:
- Developments must provide 10 sqm of private amenity space for units containing three or more bedrooms. For units containing two or less bedrooms, 10 sqm of private amenity space should be provided. Where this is not possible, as much space as possible should be provided as private amenity space, and the shortfall added to the communal amenity space requirement.
 - Development must provide 50sqm of communal amenity space per residential block.
- 9.89 The Proposed Development delivers a policy compliant amount of private and communal amenity space as follows:
- All three bedroom units will have access to 10sqm private amenity space in the form of balconies/terraces.
 - 2 bed – 4 person units will have access to a minimum of 7sqm private amenity space in the form of balconies/terraces.
 - 2 bed - 3 person units will have access to a minimum of 6sqm private amenity space in the form of balconies/terraces.
 - 1 bed- 1-2 person units will have access to a minimum of 5sqm private amenity space in the form of balconies.
- 9.90 Access to private balconies/terraces will be step-free and from the main living areas. Balconies/terraces have been designed and located to optimise their useability with a balance of openness and protection appropriate for the particular characteristics of each unit.
- 9.91 A total of 7,709sqm private outdoor amenity space is provided in the form of private balconies or terraces, set against a total private amenity space requirement of 8,770sqm to satisfy Southwark Plan Policy P15. The balance (1,061sqm), which is in addition to playspace requirements, is to be provided as communal amenity space located at roof and podium levels, as follows.
- 1,699sqm at podium level above the supermarket;
 - 416 sqm at roof level of Building L;
 - 308 sqm at roof level of Building M;
 - 263 sqm at roof level of Building N;
 - 489 at podium level of Buildings G and K;

- 104 sqm at roof level of Building G;
- 208 sqm at roof level of Building K;
- 369 sqm at roof level of Building A;
- Total: 3,856sqm.

9.92 All residents within the development will have access to the communal outdoor amenity space at podium level above the supermarket, regardless of tenure. In addition to this, residents within the buildings which have communal outdoor amenity space at roof level will be able to access the respective space within the buildings in which they live (Buildings, L,M,N,G and K). The exception is for residents of Buildings A, B and C which will all be able to access the communal outdoor amenity space at roof level of Building A. The outdoor amenity space has been designed to be easily accessed from dwellings.

9.93 The podium and roof level communal amenity spaces provide opportunities for play and amenity for all residents living within the development. Alongside play provision, the podium and roof level terrace spaces will incorporate a variety of other functions that make them inclusive and accessible for all user groups. These include but are not limited to:

- Socialising, relaxation, play and exercise;
- Focus on being green, biodiversity and to provide year-round visual interest when viewed from surrounding dwellings; and
- Peaceful seating areas.

9.94 Full details related to the private and communal amenity spaces, including proposed materials and furniture, please refer to Section 6 (Landscape Strategy) of the DAS (document ref. AC02).

9.95 The above provision meets the requirements of London Plan Policy D6 and Southwark Plan P15.

Children's Play

9.96 Play areas for future residents have been calculated based on the GLA calculator for child yield and population yield. As set out in Table 9.4 below, 3,270.0sqm of play is required for the development.

Table 9.4 Playspace Requirement

Playspace Requirements		
Age Provision	Play Requirements	Playspace Proposed
Doorstep Play (0-4 year olds)	1,580.0sqm	1,610sqm
Local Play (5-11 year olds)	1,114.0sqm	1,257.0 sqm
Neighbourhood Play (12+ year olds)	576.0sqm	210.0sqm
Play Total	3,270.0sqm	3,077.0sqm

9.97 All doorstep and local play is provided at either podium level or ground floor within the public realm. As noted above, all residents within the development will have access to the doorstep and local play located at podium level above the supermarket, regardless of tenure. The provision of which exceeds the planning policy requirements. Access to the shared communal space/play space for those residents

not living within a building above the supermarket podium will be through the concierge located within the lobby of Block M.

- 9.98 Some of the neighbourhood play (12+ year old) will be accommodated on site in the form space designed for informal meeting and exercise. In line with pre-application discussions with LBS, the balance (366sqm) will be provided for via improvements to existing parks/greenspaces within 800m walking distance from the Site, namely: Bells Gardens, Warwick Gardens or Cossall Park. Funds for this will be secure via s.106 obligation.
- 9.99 For full details relating to the playspace provision, please refer to the landscape strategy within Section 6 of the DAS (document ref. AC02).

(v) Main Town Centre Uses

Amount and Mix of Uses

- 9.100 Paragraph 90 of the NPPF stipulates that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptations. Further it states planning policies should:

- a) *"define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*
- b) *define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*
- c) *retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
- d) *allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*
- e) *where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and*
- f) *recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites."*

- 9.101 The NPPF defines 'main town centre use' as:

"Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities)."

- 9.102 London Plan Policy SD6 seeks to promote and enhance the vitality and viability of London's town centres.

9.103 London Plan Policy SD7 (Part D) supports the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.

9.104 Southwark Plan Policy AV.14 states Development in Peckham should:

“Complement and improve the town centre with more large and small shops, market stalls, and entertainment, cultural, community and leisure spaces alongside new employment space for small and medium enterprises including start-ups” and

“Site allocations in the Peckham Action Area will provide around 1,400 new homes, around 22,200sqm (gross) retail, community and leisure floorspace and around 19,000sqm (gross) employment space. There are also many smaller development sites that could accommodate new homes and new employment space. Peckham Major Town Centre will deliver around 7,000sqm (net) new retail floorspace.

9.105 The Southwark Plan Policy ST2 states that within the Peckham Area Vision it is envisioned that retail, leisure and community uses (not including health or education use) floorspace provision will total 23,281sqm, which represents a net uplift of 7,139sqm. Furthermore, Policy ST2 envisions a total provision of 19,089sqm of office floorspace, which represents a net uplift of 15,378sqm.

9.106 The Site is allocated for redevelopment (NSP74), which (insofar as it is relevant to retail/town centre use matters) that redevelopment of the site must:

- Retain the supermarket use (E(a));
- Provide at least the amount of retail floorspace currently on the Site;
- 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
- 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.

9.107 Southwark Plan Policy P35 (Part 3) notes that developments must retain retail floorspace or replace retail floorspace with an alternative use that provides a service to the general public and would not harm the vitality and viability of the town centre.

9.108 Southwark Plan Policy P37 requires developments to provide active ground floor uses.

Assessment

9.109 The non-residential strategy for the Site seeks to deliver planning policy objectives, while having due regard to evidence regarding retail trends that have emerged since the London Plan/Southwark Plan were prepared; commercial advice; and feedback from the local community and other stakeholders. The objective being to ensure the proposals are deliverable and make the optimum contribution to the vitality and viability of the town centre. A Retail/Main Town Centre Use Strategy is appended to this Planning Statement at **Appendix II** and provides further details.

9.110 The flexibility that is being sought as part of this Application will ensure that the development is future proofed and able to accommodate future changes in the demand for floorspace in town centres. The scheme has been designed to provide flexibility across the development to ensure that the spaces provided are able to respond to any future changes that may take place in the town centres.

9.111 The strategy seeks to boost the vitality and viability of the town centre and to strengthen its resilience to withstand the effects of ongoing changing retail trends via the following objectives:

- **Strengthen** – the town centre’s role as a sub-regional destination as well as better meeting the day-to-day needs of local residents and the business community;

- **Enhance** – the town centre offer and user experience by providing a range of uses and spaces that benefit both daytime and evening economies and across all age groups;
- **Diversify** – and enhance the town centre offer to include a broader multi-functional range of town centre uses including retail, food & beverage, leisure, cultural and workspace;
- **Replace** – the existing supermarket in accordance with the operator's requirements to ensure that it continues to function as one of the town centre's 'anchor' stores;
- **Retain** – the overall existing retail capacity and overall amount of non-residential town centre use floorspace (while being careful to avoid any retail over provision that could lead to vacancies and detract from town centre vitality and viability);
- **Attract** – a broader range of occupiers (including multiples and independents) by offering a flexible range of unit types across varying price points, including affordable spaces;
- **Experience** – shall be improved by delivering qualitative improvements in terms of the quality of floorspace and to the overall town centre environment and public realm which will improve overall user experience and boost town centre footfall; and
- **Celebrate** – the uniqueness of Peckham and pride of its residents by providing space for businesses and organisations that represent the community and help create a sense of place.

9.112 In order to achieve this, the Proposed Development includes a total of 12,519.9 sqm GIA of retail, leisure and commercial floorspace (excluding the car park associated with the supermarket). The composition of this is set out below in Table 9.5, and compared against the existing:

Table 9.5 Existing and Proposed Non-Residential Floorspace

	Existing (GIA)	Proposed (GIA)
Supermarket (Use Class E(a))	4,975.7sqm	5,994.5sqm*
Flexible Retail, Leisure and Commercial (Use Class E(a-g)/Sui Generis)	5,109.2sqm	3,800.1sqm Subject to the following caps: - Up to 350 sqm drinking establishment (Sui Generis) - Up to 320sqm of workspace (Use Class E(g))
Internal Mall/Atrium (Use Class E(a))	1,392sqm	0
Petrol Station (Sui Generis)	98.0sqm	0
Workspace (Use Class E(g))	0	2,725.3sqm
Total Retail, Leisure and Commercial Floorspace (Use Class E/Sui Generis)	11,574.9sqm	12,519.9sqm**

* includes the associated service yard and plant

** excludes car parking associated with the supermarket

9.113 The replacement supermarket is to be provided in the eastern part of the Site. Morrisons is the intended operator, and the store has been specified to meet its specific requirements.

9.114 The 'fixed' component of the workspace is to be provided in Block D.

9.115 The flexible retail, leisure and commercial floorspace is to be provided at the ground floor of Buildings as set out in Table 9.6 below.

Table 9.6 Distribution of Flexible Retail, Leisure and Commercial Floorspace

Building	GIA m ²
Building A	459
Building B	401
Building C	401
Building E	341
Building F	207.5
Building G	276.2
Building H	217.3
Building J1	125.3
Building K	1,259.40
Building L	16.2
Building N	96.2
Total	3,800.1

9.116 The Proposed Development replaces the existing supermarket and will deliver an increase in the overall amount of Main Town Centre Use floorspace on the Site (+945sqm). The proposal allows for a range of Main Town Centre uses (beyond just retail) which is considered necessary to deliver the objectives of the site allocation and broader framework of town centre planning policies. This flexibility also responds to retail trends that have emerged since the London Plan/Southwark Plan were adopted, while also taking account of commercial advice and feedback from the public. Refer to **Appendix II** for further details.

9.117 Overall, the Main Town Centre Use element of the Proposed Development is consistent with the requirements of the site allocation (except where justified by material considerations); London Plan policies SD6 and SD7; and Southwark Plan policies AV.14, ST2, , P35, P37 and therefore considered acceptable.

Affordable Workspace

9.118 Part G of LP Policy E1 states that proposals for offices should consider providing for a range of workspaces including low-cost and affordable spaces.

9.119 Policy P31 of the Southwark Plan requires developments proposing 500sqm (GIA) or more of employment floorspace (Use Class E(g)) to deliver at least 10% affordable workspace on Site at discount market rents for at least 30 years, whilst also providing affordable workspace at a type of specification that meetings local demand and need.

Assessment

9.120 Up to 3,045sqm of workspace is proposed. 10% of this will be provided as affordable for a period of 30 years. Details are to be discussed and agreed with LBS and secured by s.106 obligation.

Small Shops

9.121 Southwark Plan Policy P32 states that Developments proposing 2,500sqm (GIA) or more of retail floorspace shall provide at least 10% of this space as small shops (defined as being 80sqm or less).

Assessment

- 9.122 As set out above, the mix of non-residential uses is purposely flexible. At this time the overall quantum and location of retail floorspace is not yet fixed. It is however intended that 10% of floorspace in retail use (excluding supermarket floorspace) comprises small shops. It is anticipated that this will be secured by condition.
- 9.123 Section 5.3 of the DAS (document ref. AC02) provides an illustrative masterplan which sets out where the small shops could be located.

Business Relocation Strategy

- 9.124 Where existing small or independent businesses or small shops may be displaced by development, a business relocation strategy must be provided in accordance with Southwark Plan Policy P33.

Assessment

- 9.125 In accordance with Southwark Plan Policy P33, a Business Relocation Strategy (document ref. AC05) has been submitted in support of this planning application.
- 9.126 There are 15 existing independent businesses operating on the Site comprising 10 hand carts within the internal mall atrium and 5 units within the Aylesham Centre. In addition to these, there is also one existing 'small shop' unit within the Aylesham Centre as defined by Southwark Plan Policy P32 that extends to less than 80sqm (GIA) which is currently occupied by the Applicant and is used as a consultation hub (Sui Generis) for this Proposed Development. This unit benefits from temporary planning permission to be used for the purposes of a consultation hub and will revert back to its previous retail use (E(a)) once the temporary planning permission (or subsequent permissions) expires.
- 9.127 The Business Relocation Strategy is a working document and demonstrates the Applicant's commitment to providing assistance to the small and independent businesses currently on Site and it is intended that the final Business Relocation Strategy will be secured by an appropriately worded obligation secured by the s.106 Agreement.
- 9.128 The Applicant has commissioned Tree Sheppard (a business engagement charity) to undertake specific targeted engagement with the existing businesses on Site in order to understand their commercial needs. Tree Sheppard is continuing to engage the businesses on Site and will do so throughout the development program. It is anticipated that discussions with the existing businesses will continue until approximately 2030, when the Applicant expects to take vacant possession of the existing atrium and retail units, in accordance with the proposed phasing strategy.
- 9.129 The needs of the existing businesses is bespoke to each existing independent trader. The Applicant has offered a range of services to existing independent businesses, including, assistance from agents to find new premises and opportunities for relocation on Site during construction as part of a 'meanwhile' temporary use and as part of the completed development. Discussions with the existing businesses will continue to draw out further specific requirements for each of the businesses.

Active Frontages

- 9.130 The Proposed Development includes active frontages throughout the Site (focussed on those areas anticipated to experience high footfall) including ground floor retail/leisure uses fronting Rye Lane, to provide a new retail 'circuit' that links Rye Lane to Peckham High Street anchored by the replacement supermarket. This accords with the requirements of Site Allocation NSP74 and Southwark Plan Policy P37.

Other

- 9.131 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 the Applicant accepts that a condition that requires the provision of public drinking fountains.

(vi) Design

- 9.132 The NPPF is clear that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning system should achieve, with good design being a key aspect of sustainable development.
- 9.133 The Government's national planning policies on design are set out in section 12 of the NPPF, which are reflected in London Plan Policies D1-D14 and P13-P26 of the Southwark Plan.

Approach

- 9.134 In accordance with London Plan Policy D3, a design-led approach has been taken to determine the most appropriate form of development that will achieve the planning policy objective of optimising the capacity of the Site.
- 9.135 The requirements and guidance set out in the site allocation has acted as the starting point for designing the scheme. This has been supplemented by the design brief agreed between the Applicant and LBS as part of pre-application discussions (refer to **Appendix I**), alongside feedback from the LBS Design Review Panel; feedback from LBS and GLA Officers via pre-application discussions; and feedback from the public. This has 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).
- 9.136 The evolution of the design of the Proposed Development, including options, is explained in detail in the DAS (document ref. AC02).

Form and Layout

- 9.137 The form and layout of the Proposed Development respond directly to London Plan and Southwark Plan requirements. The layout of the Site, including north-south, east-west and servicing routes and the One Tree Hill borough view provide the framework for the siting of the proposed buildings, which provide a coherent, legible and navigable pattern of streets and blocks.
- 9.138 The proposed form of buildings responds positively to the character of the existing built form in the surrounding area, with a range of building footprints, massing, and heights reflective of their position, function and townscape function (including interaction/integration with the immediate surroundings).
- 9.139 The Proposed Development encourages and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to the buildings, which have been aligned with people's anticipated movement patterns through the Site. The Proposed Development defines public and private environments and facilitates efficient servicing and maintenance and deliveries.

Tall Buildings

- 9.140 London Plan Policy D9 provides the strategic approach to tall buildings. Part A defines tall buildings as minimum six storeys or 18 metres from the ground to the uppermost floor. Part B sets out the framework for the location of tall buildings, noting that boroughs are expected to identify the

appropriate locations for tall buildings, which should be identified on development plan maps. Part C outlines the impacts which should be assessed as part of proposals for tall buildings; this incorporates townscape, functional, environmental and cumulative impacts.

- 9.141 The Southwark Plan identifies tall buildings as tall buildings are above 30m except where they are 25m in the Thames Special Policy Area, and also where they are significantly higher than surrounding buildings or their emerging context.
- 9.142 Southwark Plan Policy P17 identifies the locations of where tall buildings are expected, which includes Major Town Centres, Action Area Cores and specific site allocations. This includes the Site.
- 9.143 Southwark Plan Policy P17 requires tall buildings to be located at a point of landmark significance; have a height that is proportionate to the significance of the proposed location; make a positive contribution to the skyline and landscape; not cause harm to strategic views; respond to the local character and townscape; provide functional space appropriate to the height and size of the proposed building; and provide new publicly accessible space at or near the top of the building.
- 9.144 The design of tall buildings should be exemplary and should conserve or enhance the significance of designated heritage assets, making a positive contribution to the wider townscape character. Environmental impacts should also be considered throughout the design which should maximise energy efficiency and the use of sustainable materials.
- 9.145 As noted above, the application Site falls under Local Plan allocation NSP74. The site allocation supports the principle of tall buildings of up to 20 storeys, subject to consideration of impacts to neighbouring residential uses, existing character, heritage and townscape, consideration of the One Tree Hill borough view and that buildings should be suitably set back from Rye Lane to avoid potential impacts to the Rye Lane Peckham and Peckham Hill Street conservation areas.

Assessment

- 9.146 The Proposed Development comprises 16 buildings, of which nine are considered to be tall buildings, as defined by the Southwark Plan. The tallest building proposed on the Site is 20 storeys.
- 9.147 Allocation NSP74 recognises that the Site is suitable to accommodate tall buildings, up to 20 storeys. A design-led approach has been taken to the proposed massing to inform the suitable heights across the Site.
- 9.148 As set out above, London Plan Policy D9 states that proposals for tall buildings should address their visual, functional, environmental and cumulative impacts, which are set out below.

Visual Impacts

- 9.149 Townscape views of the Proposed Development from different distances (including long, mid and immediate views) have been agreed with LBS as part of the pre-application consultation process. These views have been tested and considered in the Heritage, Townscape Visual Impact Assessment prepared by the Townscape Consultancy, which forms part of the ES (document ref. AC18).
- 9.150 The proposed massing broadly follows a pattern which focuses the taller buildings towards the middle and eastern edge of the Site away from the Conservation Area boundary and towards existing taller buildings.
- 9.151 The tall buildings are not considered to adversely affect local or strategic long range views including the One Tree Hill view. The design of the buildings has been carefully considered and will make a positive contribution to the skyline and the form and proportion of the buildings have been optimised and

refined in response to feedback provided by LBS, Historic England and other key stakeholders through the pre-application process. The base of the buildings address surrounding streets with active frontages, high quality design and material are of appropriate scale for their respective context within Peckham Town Centre.

- 9.152 The architectural quality and materials is set out in detail within the DAS (document ref. AC02) and are an exemplary standard and ensure the appearance and integrity of the buildings are maintained throughout their lifespan.
- 9.153 Taken within the context of the future baseline scenario (including cumulative consented schemes), where the development is visible in the longer-range views it will sit comfortably within a number of tall elements in the middle and foreground. The effect of the Proposed Development would be minor to moderate and is not considered to be significant.
- 9.154 Within the medium-range views, such as Peckham Hill Street and Peckham Road, the Proposed Development is generally more visible, albeit the extent of development that is visible is broadly less than in the long-range views. The effect of the development in these manifestations is also generally larger as the scope of the views reduces. However, the HTVIA considers the impact on the views to range from neutral to beneficial.
- 9.155 Within the close-range views, such as Peckham Square and Rye Lane, the effect of the Proposed Development is most obvious. This enables the architectural detail and aesthetic qualities of the development to be appreciated within the immediate town centre context. In these views, the HTVIA considers the effect on the significance to be moderate to major beneficial.

Functional Impacts

- 9.156 The buildings internal and external design ensures safety of all occupants and their servicing, maintenance and management have been carefully considered by the Applicant, who have extensive experience with managing developments of this scale. Fire consultancy advice has been received, whilst servicing will be managed by the onsite estate team.
- 9.157 Entrances, access routes and ground floor uses have been arranged to ensure there is no unacceptable overcrowding or isolation. The new east-west and north-south routes through the site in addition to the significant amount of landscaping will increase permeability across and through the Site.
- 9.158 The Transport Assessment (document ref. AC06) has looked at the capacity of the transport network in the area and concludes that the Proposed Development will not lead to a detrimental impact on public transport. Long and short stay cycle parking is proposed in accordance with London Plan standards and considered acceptable by LBS Highways Officers as part of the pre-application discussions.
- 9.159 Through the delivery of flexible workspace, in addition to retail and leisure uses, the Proposed Development looks to maximise jobs and economic activity. When compared to the existing arrangements, the flexible retail, leisure and commercial uses will be better positioned to respond to changing market demands and cater to the future needs of new and current operators. The Socio-Economic chapter of the ES provides further details in regard to job generation and related benefits.

Environmental Impacts

- 9.160 The environmental conditions around the buildings have been carefully considered, as set out within the Wind Microclimate Assessment, Daylight, Sunlight and Overshadowing Assessment and Noise and Vibration Assessment and contained within the ES (document ref. AC18).

- 9.161 The Wind Microclimate Assessment concludes that with mitigation measures in place, it is anticipated that all areas of the Proposed Development will be safe and fit for the intended uses.
- 9.162 As set out within Chapter 10 of the Environmental Statement (doc ref. AC18) a detailed technical analysis has been undertaken in accordance with the BRE guidelines to establish potential impact to neighbouring daylight and sunlight amenity as a result of the Proposed Development. Neighbouring residential accommodation has been tested to establish potential changes between the existing and proposed conditions. Whilst the BRE guidelines are not planning policy, they are intended to be applied flexibly and designed to be guidelines only to inform site layout and design. Therefore, it is important to consider specific site constraints including the existing surrounding context and site conditions when assessing impact to neighbouring amenity. The low-level and partially clear existing site condition means that many neighbouring properties currently enjoy a fairly unobstructed access to daylight and sunlight over the site, which is not necessarily characteristic of a town centre urban setting. This naturally gives rise to larger proportional changes in light when the site is redeveloped and in many cases the proportional changes are greater than 20% which the BRE recommends could be noticeable. Larger and noticeable changes in amenity are not uncommon in urban settings.
- 9.163 A more appropriate and widely accepted approach to assessing the acceptability of impacts is to consider retained daylight values, i.e. the level of daylight remaining in the proposed situation, as opposed to the relative change from the existing situation. It has been agreed with LBS through pre-app discussions that a retained value of 15% VSC (the primary daylight metric) is an appropriate value to inform the scale and design of the Proposed Development due to the urban location and existing low-level site condition. Daylight consultants have worked closely with architects to ensure that the Proposed Development safeguards neighbouring amenity as far as possible, and accordingly the vast majority of neighbouring windows assessed, 700 retain at least 15% VSC (77%). On this basis, whilst noticeable effects occur, these are generally considered to be acceptable.
- 9.164 Where windows fall below this level, they are generally either obstructed by existing balconies or overhangs which exacerbate reductions caused by new massing opposite or are located close to the boundary, directly overlooking the Site and therefore solely reliant on light received over the Site. Therefore, in some cases lower retained VSC levels were somewhat unavoidable in order to balance effect on daylight and sunlight amenity and other planning considerations.
- 9.165 In terms of impact to direct sunlight to surrounding external amenity spaces, the results show that the Proposed Development will have no noticeable impact. The spaces tested will continue to appear adequately sunlit throughout the year or experience no noticeable change from their current level.
- 9.166 The Noise and Vibration Assessment proposes mitigation measures, including the use of suitably specified glazing, acoustically attenuated ventilation and appropriate thermal design to reduce impacts arising from environmental noise within an urban town centre location.

Cumulative Impacts

- 9.167 The cumulative visual, functional and environmental impacts of the proposed, consented and planned tall buildings in the area have been considered as part of the ES, in accordance with the approach agreed through the EIA Scoping process.
- 9.168 The tall buildings are of high-quality architectural design and residential quality, which seeks to conserve and enhance the setting of the Conservation Area and support the achievement of substantial public benefits. The Proposed Development maximises energy efficiency and priorities the use of sustainable material where possible.

- 9.169 It is therefore considered that the proposed building heights are acceptable. The heights of the proposed buildings have been carefully considered with regards to the visual, functional, environmental and cumulative impacts which has resulted in an optimised composition of tall buildings of the highest design and architectural quality.

Quality and Character

- 9.170 As set out within the DAS (document ref. AC02) the Proposed Development seeks to respond to the existing character of Peckham Town Centre. As further set out in Heritage, Townscape and Visual Impact Assessment contained within Volume 2 of the ES (document ref. AC18). The quality and character of the buildings have been carefully considered and will make a positive contribution to the skyline and the form and proportion of the buildings have been optimised.
- 9.171 The Proposed Development has followed three distinct design principles, which, when taken together, create a unique and distinctive development. These are:
- Connected neighbourhood;
 - Stitching into context; and
 - Distinctly Peckham.
- 9.172 These design principles have been developed through the pre-application, public consultation and wider stakeholder engagement.
- 9.173 As described under Section 5 of the DAS (document ref. AC02), defined character areas have helped to inform the masterplan layout and create distinctive spaces that are of the highest quality. Each character area provides a distinct primary use, ranging from socialising, retail functions, exercise and rest. Taken across the development, the proposal provides a space for people to enjoy, complimenting the surrounding town centre uses.
- 9.174 We consider the quality of the Proposed Development to be of an exceptional standard. This is exemplified by the focus on activating ground floor spaces whilst the upper floors remain sympathetic to the surrounding area.
- 9.175 Considering the upper plane of the development, taller elements of the buildings are designed with graded façade treatments using a range of brick tones to soften the buildings into the skyline. A range of colours are used across the Site to assist with wayfinding and to denote the character area. In addition, coloured metal balconies, distinct to each building, are providing on Site. These will help to reinforce the brick palettes and create a sense of identity to each building.

Experience

- 9.176 The Proposed Development will through the delivery of residential homes provide active surveillance throughout the Site. Buildings have been designed to create a safe, secure and inclusive community that can be enjoyed equally by all users. The base of the buildings address surrounding streets with active frontages, high quality design and materials are of appropriate scale for their respective contact within Peckham Town Centre
- 9.177 Opportunities to increase the permeability for pedestrians and cyclists through the Site have been maximised with a number of cut-throughs provided with more direct and indirect travel options available. The Site links well to the neighbouring Peckham High Street and Rye Lane with fully accessible connections available.

Density

- 9.178 NPPF Paragraph 128 requires planning policies and decisions to support development that makes efficient use of land, taking into account the identified need for housing, local market conditions and viability, the availability and capacity of infrastructure and services, the desirability for promoting regeneration and change and the importance of well-designed, attractive places.
- 9.179 NPPF Paragraph 129 states that where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decision avoid homes being built at low densities and ensure that developments make optimal use of the potential of each site.
- 9.180 London Plan Policy D2 states that density of development proposals should be linked to the provision of future infrastructure. It should also be proportionate to the Site's connectivity and accessibility by all sustainable transport modes.
- 9.181 London Plan Policy D6 requires development proposals to make the most efficient use of land and be developed at the optimum density. The optimum density of a development should result from a design-led approach to determine the capacity of the site. Particular consideration should be given to: the site context, its connectivity and accessibility by walking and cycling, and existing and planned public transport (including PTAL) and the capacity of surrounding infrastructure. The Policy goes on to state that proposed residential development that does not demonstrably optimise the housing density of the site in accordance with this policy should be refused. Supporting Paragraph 3.3.22 also states that the following measurements of density should be provided for all planning applications that include new residential units:
- Number of units per hectare;
 - Number of habitable rooms per hectare;
 - Number of bedrooms per hectare; and
 - Number of bedspaces per hectare.
- 9.182 Southwark Plan Policy P18 emphasises the efficient use of land, noting that development will be permitted where it optimises land use on the basis that increasing density is a key requirement of the sustainable use of land.

Assessment

- 9.183 As established above, a design-led approach has been taken to ensure that the Proposed Development makes the best use of the site and optimises its capacity (particularly for new homes). This is in the context of its town centre location and PTAL rating of 6a/6b. The resultant density of the Proposed Development is as follows:
- 324 units per hectare; and
 - 1,020 habitable rooms per hectare
- 9.184 By virtue of being the product of the design-led approach required by London Plan Policies D3 and D6 and Southwark Plan Policy 18, this accords with the development plan.

Agent of Change

- 9.185 The existing neighbouring bus station use is a generator of noise (from buses and passengers), vibration (from buses), and emission of pollutants (from buses). The Proposed Development will be an 'agent of change' as it will introduce residential uses (a sensitive receptor) into this existing established environment.

- 9.186 The Agent of Change principle is embedded in planning policy by London Plan Policy D13 (reference is also made in the NPPF and Planning Practice Guidance). While primarily intended to manage potential impacts from existing noise generating uses, it also applies to activities that generate other forms of nuisance.
- 9.187 The Agent of Change principle places the responsibility for mitigating impacts of existing noise/nuisance on the new noise-sensitive development being introduced. The principle seeks to protect existing and lawful noise generating operations from nuisance complaints/conflicts that may arise as a consequence of new noise-sensitive developments being introduced on the basis of incompatibility.
- 9.188 Paragraph 193 of the NPPF states that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities. Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigations before the development has been completed.
- 9.189 London Plan Policy D13 places the responsibility for mitigating impacts from existing noise and other nuisance-generation activities or uses on the proposed new noise-sensitive development. The policy requires that boroughs should ensure that planning decisions reflect the Agent of Change Principles and take account of existing noise and other nuisance generating uses in a sensitive manner when new development, particularly residential is proposed nearby. Furthermore, development should be designed to ensure that established noise and other nuisance-generating venues remain viable and can continue to grow without unreasonable restrictions being placed on them.
- 9.190 The Southwark Plan does not specifically mention the Agent of Change principle, however, Policy P66 requires developments to mitigate and manage noise by separating noise sensitive developments from major noise sources by distance, screening or internal layout, in preference to sound insulation.

Assessment

- 9.191 Noise and vibration matters have been considered as part of the EIA (document ref. AC18).
- 9.192 The vibration effects of the existing bus station use were considered as part of the formal EIA Scoping process. Vibration levels were considered to be not noticeable and therefore scoped out of the EIA.
- 9.193 The noise effects of the existing bus station use has been assessed as part of the EIA. Appropriate target internal noise levels have been proposed and are achievable using conventional mitigation measures.
- 9.194 Mitigation measures include:
- Use of suitably specified glazing;
 - Acoustically attenuated ventilation; and
 - Appropriate thermal design.
- 9.195 The principle of residential uses is established by the site allocation. With the mitigation measures outlined in the ES secured, there should be no nuisance based incompatibility with the existing bus station use. As such it is considered that the Proposed Development accords with the Agent of Change principle.

Public Realm

- 9.196 The Proposed Development includes 1.2 ha of new public realm that will be open and accessible to all. It has been designed and specified to deliver the site-specific requirements of the site allocation, while also according with London Plan Policy D8 and Southwark Plan Policy P13.

Function

- 9.197 As set out within Section 6 of the DAS (document ref. A02), 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.

Character

- 9.198 The Landscape Strategy as set out within Section 6 of the DAS (document ref. AC02) provides details on the planting, street furniture and surface materials. These materials are of good quality, fit-for-purpose, durable and sustainable. The Proposed Development seeks to provide landscaping which is appropriate to the context, including the provision and retention of street trees.

Interaction with Design of Buildings

- 9.199 The public realm has been designed to ensure spaces around buildings will enhance, respond to and adapt to the changing retail environment. The landscaped areas immediately adjacent to the buildings along key routes through the site provide spill out spaces for the people to use.

Pedestrian/Cyclist Connectivity

- 9.200 As set out within the DAS (document ref. AC02), and the Transport Assessment (document ref. AC06), the Proposed Development seeks to maximise the contribution that the public realm makes to encourage active travel, with the delivery of safe, legible and attractive spaces, including strong desire lines through the site from Rye Lane.
- 9.201 The Proposed Development will provide six pedestrian connections into the Site. Two access points will be provided from Rye Lane, one to the north of the Site and one on the south. To the north of the Site, pedestrians will have direct access to Peckham High Street via the bus depot. Four access points are provided from the south of the Site along Hanover Park.
- 9.202 Internal pedestrian movement will be accommodated within a mix of segregated and pedestrian-priority shared spaces.

Inclusivity

- 9.203 The public realm has been designed to be welcoming and inclusive for residents and visitors to the Site. The scheme provides a variety of people focused spaces that are designed to facilitate social interaction and inclusion. Adequate seating is provided in the form of benches throughout the Site and landscaped areas. As set out within Section 6 of the DAS (document ref. AC02), the Proposed public realm seeks to limit barriers for wheelchair users with level pedestrian access.

Lighting

- 9.204 As set out within the DAS (document ref. AC02) an indicative lighting strategy has been prepared that seeks to minimise intrusive lighting infrastructure and reduce light pollution. It is intended that that a detailed lighting strategy will be secured through an appropriately worded condition.

Environmental Conditions

- 9.205 As set out in detail below with respect to the consideration of the wind microclimate, wind has been considered in relation to the public realm and as concluded within Chapter 11 of the ES (document ref. AC18), with mitigation measures in place, the wind conditions at all areas of the Site and surrounds and at elevated levels are safe for use throughout the year. All the thoroughfares at the Site and surrounds are suitable for pedestrian and cyclist use throughout the year. Furthermore, all play and seating areas are suitable for the intended use.

Trees

- 9.206 London Plan Policy G7 and Southwark Plan Policy P61 note development proposals should wherever possible retain existing trees of value and if planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of benefits of the trees removed.
- 9.207 An Arboricultural Impact Assessment (AIA) (incl. Tree Survey) (document ref. AC21) is submitted in support of this planning application. The AIA outlines the likely direct and indirect arboricultural impacts of the Proposed Development along with suitable mitigation measures, as appropriate. A Tree Protection Plan is included which identifies trees to be removed and how retained trees are to be protected.
- 9.208 There are a number of Tree Preservation Orders (TPOs) along the southern edge of the Site along Hanover Park and within the north east corner of the Site adjacent to the TfL land.
- 9.209 The proposals will require the removal of 28 trees and nine stumps. The proposed landscaping offers an opportunity to replace predominantly low quality trees with high quality suitable climate-resilient species to provide the recognised benefits of large mature trees in an urban environment for future generations.

Sustainability and Climate change

- 9.210 The scheme design has been developed with sustainability principles at its heart, (as discussed further in the DAS (document ref. AC02):
1. Environmental rating methods;
 2. Energy & CO2 emissions;
 3. Climate change adaptation and floor risk;
 4. Water efficiency;
 5. Materials;
 6. Water management;
 7. Pollution management;
 8. Health & Well-being;
 9. Ecology and biodiversity; and
 10. Sustainable transport and access.
- 9.211 As set out in the Sustainability Statement (document ref. AC08) submitted in support of this planning application, the Proposed Development will seek to divert a minimum of 95% of demolition and

construction waste from landfill and a minimum 20% of the building material elements to be compromised of recycled or reused content.

Safety and Security

- 9.212 As described under Section 4 of the DAS (document ref. AC02), early pre-application engagement with the Metropolitan Police's Secure by Design Officer was sought by the design team in order to incorporate the principles of designing out crime into the Proposed Development.
- 9.213 The design of the public spaces within the development has responded to discussions received at pre-application stage. The design of public spaces has given consideration to the width of pavements and the height of adjoining landscaping in order to reduce anti-social behaviour. Where possible, public spaces benefit from passive surveillance from active uses fronting onto them. CCTV will also be incorporated throughout the development. It is anticipated that this will be secured by planning condition.
- 9.214 Internally, residential buildings will be restricted to private access. Visitors will only have access to the specific floor that they are visiting. the proposed basement also benefits from access restrictions and surveillance.

Accessibility and Inclusive Design

- 9.215 The Proposed Development has been designed in accordance with the principles of inclusive design. The needs of disabled occupants and visitors have been fully considered at this stage of the design process as set out within Section 9 of the DAS (document ref. AC02).
- 9.216 Level pedestrian access will be provided to the residential units in accordance with the Equality Act (2010) and the requirements of Part M of the Building Regulations. The proposed residential units and the landscaped public realm will enable level access and convenient movement in terms of the approach to the buildings and internal circulation.
- 9.217 10% of homes of all tenures meet Building Regulation requirements for M4(3) 'wheelchair user dwellings'. The Social Rent units are designed to M4(3)(2)(b) standards (wheelchair accessible) while the intermediate and market units are designed to M4(3)(2)(a) (wheelchair adaptable) standards.

(vii) Heritage

- 9.218 The Planning (Listed Buildings and Conservation Areas) Act 1990 describes the statutory tests which deal with proposals which relate to Conservation Area. Specifically, Section 72 of the Act which states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a Conservation Area.
- 9.219 Chapter 16 of the NPPF guides the conservation and enhancement of the historic environment.
- 9.220 Paragraph 200 requires applications which impact heritage assets to describe the significance of any heritage asset affected. The level of which should be proportionate to the asset's importance.
- 9.221 Paragraph 203 adds that in determining applications, local authorities should take account of: a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

- 9.222 When considering the impact of a proposal, paragraph 205 directs that that where a proposed development would lead to 'substantial harm' or total loss of heritage significance of a designated heritage asset, consent should be refused, '...unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss', or all of a number of specified criteria apply, including that the nature of the heritage asset prevents all reasonable uses of the site.
- 9.223 Paragraph 207 adds that where a development proposal will lead to 'less than substantial' harm to the heritage significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 9.224 Paragraph 213 acknowledges that not all elements of a Conservation Area will necessarily contribute to its significance.
- 9.225 London Plan Policy HC1 requires development proposals affecting heritage assets, and their settings, to conserve their significance by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- 9.226 Local Plan Policy P20 stipulates that development relating to Conservation Areas will only be granted where it preserves or enhances the character or appearance of Conservation Areas and their settings, taking into account their significance, views into and out of the Conservation Area and its positive characteristics identified in Conservation Area Appraisals.
- 9.227 Policy P13 requires development to ensure that the height, scale, massing and arrangement respond positively to the existing townscape, character and context. This principle is echoed by Policy P17 which requires development to respond positively to local character and townscape.

Assessment

- 9.228 The HTVIA considers the impact of the Proposed Development on a number of heritage assets within the Site's wider context, the full list of which is summarised in Section 7 of the HTVIA. The following Section of the Statement considers the statutory designated assets and key locally designated assets within the immediate locality of the Site.
- 9.229 The most western part of the Site, fronting onto Rye Lane, falls within the boundary of the Rye Lane Peckham Conservation Area. This incorporates the existing Aylesham centre frontage and proposed buildings A, B and C.
- 9.230 The HTVIA describes the historic significance of the Conservation Area as deriving from its history as a commercial hub in South London. Architecturally, the interest is derived from its eclectic and varied appearance which contributes to the vibrant and cosmopolitan character of Peckham. Rye Lane itself is defined by legible and dominant retail function and is a good example of a traditional High Street. The majority of the Site falls outside the Conservation Area, though views into and out of the Conservation Area are key to impacting the historic significance. The Arcade itself is noted in the Conservation Area appraisal as contributing negatively to the significance of the Conservation Area and suggests that future development should aim to secure 'improvements to the frontage onto Rye Lane by redevelopment of the 1980s shopping centre' and goes on to state that the Morrison's supermarket and adjacent car park sites, outside of the conservation area, 'would benefit from sensitive enhancement and redevelopment.'

- 9.231 Considering the impact of the Proposed Development, the proposal is considered to result in a small magnitude of change to the significance of the Area. The HTVIA adds that the design of the development has sought to respond to the setting of the Conservation Area, particularly where visual conjunctions are known to arise.
- 9.232 Considering the Masterplan approach and general form of the buildings within the Site, the HTVIA also recognises the design intent across the Site as a whole, but notable where the Site fronts onto Rye Lane. It describes how individual buildings have been designed to step down towards the Conservation Area, being lower towards the northwest corner. They have also been placed within the Site area to avoid, as far as possible, visible conjunctions with the locally listed tower of the Jones and Higgins building, and to provide 'edges' to the development that are in scale with the other buildings along Rye Lane.
- 9.233 Considering the architectural approach, the language and sense of variety is noted as responding to the scale, variety and enclosure of Rye Lane. The Rye Lane buildings (A, B and C) are seen to step up and away from the Jones and Higgins building to the north, providing an appropriate companion building to the former bank building to the south. This approach allows its skyline elements to continue to be appreciated. On the northern boundary of the Site, where it is located behind the non-designated and architecturally varied low scale buildings on the south side of Peckham High Street, the intention has been to layer the forms of the Proposed Development sufficiently.
- 9.234 Taking the above into account, the HTVIA considers the impact of the proposal to cause 'no harm' to the Conservation Area in NPPF terms.
- 9.235 The HTVIA also considers the impact of the development on surrounding statutory and locally listed buildings. Of particular importance is the potential impact on the neighbouring Jones and Higgins building and the former bank building. In each case, the HTVIA considers the impact to be 'neutral'.
- 9.236 Overall, the Proposed Development is therefore seen to preserve the significance of the surrounding heritage assets.

(viii) Transport, Access and Servicing

- 9.237 One of the key objectives of the NPPF is to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainably.
- 9.238 Paragraph 114 states that development proposals should ensure that:
- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
 - b) safe and suitable access to the site can be achieved for all users;
 - c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and
 - d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.
- 9.239 London Plan Policy T1 stipulates that Development Plans should facilitate the delivery of the Mayor's strategic target of 80 per cent of all trips in London to be made by foot, cycle or public transport by

2041. It also requires all development should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated.
- 9.240 Policy T2 sets out the approach to 'Healthy Streets'. It requires development proposals to demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; reduce the dominance of vehicles on London's streets whether stationary or moving; and, be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.
- 9.241 Policy T5 sets out the Mayor's approach to cycling and cycle parking. Developments should provide cycle parking at least in accordance with the minimum standards set out in the Plan.
- 9.242 Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
- 9.243 Policy T6 sets out the approach to car parking provision. The Policy restricts car parking in line with levels of existing and future public transport accessibility and connectivity.
- 9.244 Car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking ('car-lite'). The Policy requires residential development in PTAL 6 locations to be car free. Car-free development has no general parking but should still provide disabled persons parking in line with Part E of the Policy.
- 9.245 Policy T7 requires development proposals to facilitate safe, clean and efficient delivery and servicing. In achieving this, proposals should provide adequate space for servicing, storage and deliveries, with a priority for off-street servicing. On-street servicing should only be provided where off-street servicing is not possible.
- 9.246 Policy P45 of the Southwark Plan promotes healthy development which requires developments to support opportunities for active travel, such as walking and cycling. Where possible, opportunities for healthy activities should also be promoted. These principles are reinforced through Policy P51 which requires development to enhance the borough's walking network, ensuring routes are safe and designed to be inclusive.
- 9.247 Policy P53 also relates to active travel, specifically, it promotes cycle use within the borough. The Policy states that development must provide cycle parking for users and visitors.
- 9.248 In addition to providing cycle parking facilities, Policy P53 requires associated shower and change facilities to be provided for commercial cycle parking.
- 9.249 Supporting active travel modes, Policy P54 requires PTAL 6 sites to be car-free. It adds that parking permits will be restricted for residents and businesses. Policy P55 notes that the maximum level of blue badge parking should be provided. Blue badge parking should be located within close proximity to the relevant building entrance.
- 9.250 Policy P49 requires development to demonstrate that the public transport network has sufficient capacity to support any increase in the number of journeys by users of the development. The Policy adds that development must also improve accessibility to public transport and improve walking and cycling connections to public transport.

- 9.251 In managing impact on the public highway, Policy P50 supports development which minimises the demand for private car journeys and demonstrate that the road network has sufficient capacity to support any increase in the number of journeys by the users of the development. Major development sites should also incorporate delivery and servicing away from the public highway.
- 9.252 Part 6 of Policy P50 adds that development must demonstrate how the construction phase of the development can safely be accomplished through the use of the public highway and how vehicular movements will be minimised.

Assessment

- 9.253 The Site is well connected benefitting from numerous transport choices, including the London Overground, Southern, Thameslink and Southeastern services which operate from Peckham Rye Station (300m walking distance from the Site boundary) and 16 bus routes which either terminate at Peckham Bus Station (5 routes) or travel through Peckham adjacent to the Site (11).
- 9.254 A Transport Assessment (document ref. AC06) has been submitted with this planning application which assesses the impacts of the Proposed Development on the local network-wide and strategic levels, including Healthy Streets Assessment.
- 9.255 As demonstrated within the Transport Assessment (document ref. AC06), it is considered that there is sufficient capacity on the transport network to accommodate the Proposed Development, taking into consideration cumulative developments in accordance with Southwark Plan Policies P49 and P50.
- 9.256 Appended to the Transport Assessment (document ref. AC06) is a Delivery and Servicing Plan which provides further details on the commercial and residential delivery and servicing strategy. All delivery and servicing will be located on Site on a street level loop accessed from Hanover Park or within the supermarket loading bay. All commercial deliveries and servicing (refuse collection) will be scheduled through a booking system providing target delivery windows to minimise the risk of demand for loading spaces exceeding supply. It is considered that the servicing strategy accords with Policy T7 of the London Plan.

Car Parking

Residential/Flexible Retail, Leisure and Commercial Uses

- 9.257 In line with London Plan policy requirements, the residential component has been designed to be car-free and promotes/encourages sustainable transport modes. The Proposed Development includes 11 Blue Badge bays for residents and employees of the town centre (non-supermarket) uses (5 within the basement car park and 6 on street). There are ongoing discussions with LBS Highways Officers however the intent is for one or more of the on street blue badge spaces to be used to accommodate a car club to provide vehicle access to blue badge holders without the need to own a car.

Supermarket

- 9.258 As set out in Section 7 of the Retail/Main Town Centre Use Strategy located at **Appendix II** of this Planning Statement, there are certain contractual requirements with the operator of the supermarket which the Proposed Development must deliver to enable development. In particular, providing 140 car parking spaces (a reduction of 213 when compared to existing) for customers of the proposed supermarket and comprise the following:
- 124 standard spaces;
 - 8 Blue Badge (6%);
 - 8 Parent/Child; and

- 20% will be equipped with electric vehicle chargers.

Cycle Parking

- 9.259 The scheme seeks to maximise opportunities to deliver cycle parking on Site. The Proposed Development will provide London Plan Policy T5 compliant levels of cycle parking on site in accordance with the London Cycle Design Standards (LCDS). The proposed approach to maximising cycle parking across the Site has been discussed with officers during pre-application discussions and it was considered to represent the optimal approach to securing the maximum provision of cycle parking, despite not being in accordance with the more onerous Southwark Plan Policy P53 cycle parking requirements.
- 9.260 Cycle parking is located in a mix of ground and upper floor cycle stores and short stay spaces located throughout the Site close to building entrances, prioritising town centre uses and helping to creating active frontages. Upper floor stores are proposed to be accessed by two lifts, sized to reflect LCDS minimum standards. Refer to Section 15 of the Transport Assessment (document ref. AC06) for further details on location of cycle stores.
- 9.261 Table 9.7 and 9.8 provide breakdowns of long and short stay cycle parking spaces based on use.

Table 9.7 Long stay cycle parking provision based on proposed use

Use	No. of spaces
Residential (Use Class C3)	1,517
Supermarket (Use Class E(a))	26
Flexible retail, leisure and commercial (Use Class E/Sui Generis) (exl. Supermarket)	22
Workspace (Use Class E(g))	44
Total	1,609

Table 9.8 Long stay cycle parking provision based on proposed use

Use	No. of spaces
Residential (Use Class C3)	44
Supermarket (Use Class E(a))	63
Flexible retail, leisure and commercial (Use Class E/Sui Generis) (exl. Supermarket)	142
Workspace (Use Class E(g))	7
Total	256

- 9.262 Cycle parking will be provided as a mix of double stackers (no more than 75%), standard Sheffield stands (minimum (20%) and at least 5% Sheffield stands for oversized cycles.

(ix) Technical and Environmental Matters

Daylight, Sunlight & Overshadowing

- 9.263 Paragraph 129(c) of the NPPF states that local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit

making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).

- 9.264 London Plan Policy D6 highlights that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- 9.265 Policy P56 states that development should not be permitted when it causes an unacceptable loss of amenity to present or future occupiers or users. Amenity considerations that will be taken into account include daylight and sunlight.

Assessment

- 9.266 As set out within Chapter 10 of the Environmental Statement (doc ref. AC18) a detailed technical analysis has been undertaken in accordance with the BRE guidelines to establish potential impact to neighbouring daylight and sunlight amenity as a result of the Proposed Development. Neighbouring residential accommodation has been tested to establish potential changes between the existing and proposed conditions. Whilst the BRE guidelines are not planning policy, they are intended to be applied flexibly and designed to be guidelines only to inform site layout and design. Therefore, it is important to consider specific site constraints including the existing surrounding context and site conditions when assessing impact to neighbouring amenity. The low-level and partially clear existing site condition means that many neighbouring properties currently enjoy a fairly unobstructed access to daylight and sunlight over the site, which is not necessarily characteristic of a town centre urban setting. This naturally gives rise to larger proportional changes in light when the site is redeveloped and in many cases the proportional changes are greater than 20% which the BRE recommends could be noticeable. Larger and noticeable changes in amenity are not uncommon in urban settings.
- 9.267 A more appropriate and widely accepted approach to assessing the acceptability of impacts is to consider retained daylight values, i.e. the level of daylight remaining in the proposed situation, as opposed to the relative change from the existing situation. It has been agreed with LBS through pre-app discussions that a retained value of 15% VSC (the primary daylight metric) is an appropriate value to inform the scale and design of the Proposed Development due to the urban location and existing low-level site condition. Daylight consultants have worked closely with architects to ensure that the Proposed Development safeguards neighbouring amenity as far as possible, and accordingly the vast majority of neighbouring windows assessed, 700 retain at least 15% VSC (77%). On this basis, whilst noticeable effects occur, these are generally considered to be acceptable.
- 9.268 Where windows fall below this level, they are generally either obstructed by existing balconies or overhangs which exacerbate reductions caused by new massing opposite or are located close to the boundary, directly overlooking the Site and therefore solely reliant on light received over the Site. Therefore, in some cases lower retained VSC levels were somewhat unavoidable in order to balance effect on daylight and sunlight amenity and other planning considerations.
- 9.269 In terms of impact to direct sunlight to surrounding external amenity spaces, the results show that the Proposed Development will have no noticeable impact. The spaces tested will continue to appear adequately sunlit throughout the year or experience no noticeable change from their current level.

Wind Microclimate

- 9.270 London Plan Policy D8 states development should take into consideration microclimate considerations including wind for the purposes of people in the public realm. Similarly, Policy D9 states environmental impacts of tall buildings (18m or more) should be assessed including wind. This should be carefully considered to ensure that comfort and enjoyment of open spaces is not compromised. Supporting

paragraph 3.3.8 emphasises the importance in creating comfortable pedestrian environments with regard to matters including wind.

Assessment

- 9.271 The wind microclimate conditions within and adjacent to the Site have been carefully considered, as set out in Chapter 11 of the Environmental Statement (document ref. AC18). A wind tunnel test has been undertaken to assess the wind microclimate in and around the Proposed Development.
- 9.272 The results of the modelling demonstrate that the ground level wind conditions are safe for pedestrians and cyclists throughout the year.
- 9.273 At elevated levels the majority of locations are safe for pedestrian use throughout the year, however two residential balconies exceed the safety criteria. Mitigation measures in the form of 1.1m balustrades are proposed and with the additional mitigation measures place, it is anticipated these areas will be safe and fit for intended uses.
- 9.274 With the exception of 2 locations within the Proposed Development, the wind microclimate outside entrances is suitable for the intended use throughout the year. The two locations which exceed the comfort assessment represent a marginal exceedance and with the inclusion of further local landscaping within this area, it is anticipated they will be suitable for the intended use.
- 9.275 Similarly where comfort conditions are exceeded at ground floor amenity space, podium and terrace areas, it is considered that the proposed landscaping will suitably mitigate these comfort conditions during the summer season and these spaces will be suitable for the intended uses.
- 9.276 Where residential balconies exceed comfort conditions, mitigation measures have been proposed in the form of balustrades and side screens and with these mitigation measures in place it is anticipated they will be suitable for the intended uses.
- 9.277 It is anticipated the further mitigation measures can be secured through appropriately worded landscape and detailed materials condition and requirement for wind tunnel testing post consent. It is therefore considered that with the appropriate mitigation measures in place, the Proposed Development will not give rise to adverse wind microclimate conditions and therefore complies with the relevant planning policy.

Fire Strategy

- 9.278 London Plan Policy D12(a) sets out that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety. They should also ensure that they:
- 1) identify suitably positioned unobstructed outside space:
 - a) for fire appliances to be positioned on
 - b) appropriate for use as an evacuation assembly point
 - 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
 - 3) are constructed in an appropriate way to minimise the risk of fire spread
 - 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
 - 5) develop a robust strategy for evacuation which can be periodically updated published, and which all building users can have confidence in

- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

9.279 The Draft Fire Safety LPG (February 2022) states that to demonstrate development proposals can achieve the highest standards of fire safety, non-major applications should be accompanied by a planning Fire Safety Strategy. Non-major development should also demonstrate compliance with London Plan Policy D12 (a).

Assessment

- 9.280 The Proposed Development includes a number of key features to ensure that it complies with the most up-to-date Building Regulations for fire safety and policy requirements. The details of the fire strategy for the Site are outlined below.
- 9.281 All buildings over 18m in height are provided with two escape stairs. In addition, Building Q, which does not exceed this height threshold is also provided with a second stair, although this is for management purposes. Enclosed corridors to either side of the staircase are to be vented via a mechanical smoke shaft and an automatic opening vent will be provided at the head of each staircase to provide make-up air to the system.
- 9.282 Buildings which between 11m-18m in height will achieve 60 minutes fire resistance. Buildings over 18m in height will achieve 90 minutes. Finally, all buildings over 30m in height will achieve 120 minutes.
- 9.283 All residential buildings over 11m will benefit from sprinklers.
- 9.284 Residential buildings which exceed 18m with a floor area of over 900sqm will also be provided with two firefighting shafts. Buildings without 900sqm floor area will only include a single firefighting lift shaft.
- 9.285 Building M, which is over 50m is provided with a wet riser within the firefighting shaft.
- 9.286 Buildings F, J2 and Q do not require a firefighting shaft, however, dry risers will be provided in these buildings to satisfy the hose laying distances. For all other blocks, they will also be provided with dry risers in the firefighting shafts.
- 9.287 Based upon the above proposals it is considered that adequate measures are provided to meet the functional requirements of the Building Regulations and all the relevant legislation and requirements of London Plan Policy D12 and D5(B5).

Overheating

- 9.288 London Plan Policy SI 4 requires development proposals to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure. This should be demonstrated through an energy strategy which will reduce the potential for overheating and reliance on air conditioning systems. The following hierarchy should be followed:
- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
 - 2) minimise internal heat generation through energy efficient design;
 - 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
 - 4) provide passive ventilation;
 - 5) provide mechanical ventilation; and
 - 6) provide active cooling systems.

- 9.289 Southwark Policy P14 requires sustainable design to reduce energy consumption and ensure the avoidance of internal overheating.
- 9.290 Policy P15 requires development to demonstrate how overheating and ventilation will be mitigated where it is not possible to provide dual aspect dwellings.

Assessment

- 9.291 As outlined in the Energy Strategy (document ref. AC07) and in accordance with London Plan Policy SI 4 and Southwark Plan Policies P14 and 15, the cooling hierarchy has been followed in order to reduce the demand for active cooling. This includes considering minimising internal heat generation through energy efficient design; reducing the amount of heat entering the buildings during summer; use of thermal mass and high ceilings to manage heat within the buildings; passive ventilation; and mechanical ventilation.
- 9.292 A balanced approach has been adopted to manage the acoustic, ventilation and overheating requirements of the residential buildings, given the surrounding constraints of the Site and background noise levels. In order to achieve Part O 2021 compliance for overheating, there is limited reliance on openable windows which will be supplemented with high efficiency mechanical ventilation with heat recovery (MVHR).

Basement Impact Assessment

- 9.293 London Plan Policy D10 requires boroughs to address the negative impacts of large scale basement development.
- 9.294 In response, Southwark Policy 14 requires development to provide a basement that does not have adverse archaeological, amenity or environmental impacts.

Assessment

- 9.295 A Basement Impact Assessment (BIA) (document ref. AC03) is submitted in support of this planning application and concludes that the proposed basement will not have an impact on groundwater flooding risk, surface water and flooding.
- 9.296 A preliminary ground movement assessment and building damage assessment has also been carried out as part of the BIA demonstrating that the building can be constructed without generating significant risk to adjacent properties.
- 9.297 Overall the BIA concludes that the impacts of the Proposed Development comply with London Plan Policy D10 and Southwark Plan Policy P14 and P68.

Biodiversity/Ecology

- 9.298 Under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021), from February 2024 all developments in England for 10 or more homes must deliver a biodiversity net gain of 10%, meaning that the development will result in more or better quality natural habitat than there was before development.
- 9.299 Chapter 15 of the NPPF describes the Government's approach to conserving and enhancing the natural environment. Paragraph 180 states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. Paragraph 186 goes on to add that opportunities to improve biodiversity in and around developments

should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

- 9.300 London Plan Policy G6 states that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- 9.301 Southwark Plan Policy P60 requires development to contribute to net gains in biodiversity through enhancing the nature conservation value of conservation value of Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs), designated ancient woodland, populations of protected species and priority habitats/species identified in the United Kingdom, London or identified and monitored in the latest adopted Southwark Nature Action Plan
- 9.302 London Plan Policy G5 requires major residential development to achieve a 0.4 Urban Greening Factor (UGF) score.

Assessment

- 9.303 A Preliminary Ecological Appraisal (document ref. AC22) is submitted in support of this planning application. The Preliminary Ecological Appraisal notes the following:
- The desk-based study identified nine non-statutory designated sites within 1 km of the Site.
 - No evidence of bats was recorded during the external assessment of the existing buildings and trees and it is concluded that the Site offers limited commuting and foraging opportunities for bats and the highly urban context of the Site and high levels of disturbance from lighting as well as sparse vegetation allows for negligible opportunities for commuting and foraging bats.
 - No sightings of black redstarts have been recorded within 1km of the Site in the last 10 years and the Site provides negligible potential for nesting black restart and/or peregrine falcon.
- 9.304 Multiple enhancement measures have been suggested to boost biodiversity, as set out within the Landscape Strategy appended to the DAS (document ref. AC02) including intensive planting comprising a range of native grasses and flowering plants that provide habitat for birds and invertebrates.
- 9.305 A Biodiversity Net Gain Assessment (document ref. AC23) has been prepared to quantify the overall effects of the Proposed Development on biodiversity. It demonstrates that the Proposed Development is predicted to result in a net gain of 111.02% for area-based habitat units.
- 9.306 As set out within Section 6 of the DAS (document ref AC02), the Proposed landscaping scheme has been tested against the GLA's Urban Greening Factor index and achieves a score of 0.38, which is just below the target score of 0.40 for residential developments, which is due to the significant constraints of the Site including on site servicing, playspace, cycle parking requirements as well as limitations associated with the Site's town centre location.

Energy & Sustainability

- 9.307 Section 14 of the NPPF identifies the role that planning plays in helping shape places to meet the challenge of climate change. This includes avoiding increased vulnerability to the range of impacts arising from climate change, helping to reduce greenhouse gas emissions and helping to increase the use and supply of renewable and low carbon energy and heat.
- 9.308 Paragraph 159 states that new development should be planned for in ways that:

- a) avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure; and
- b) can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

9.309 Policy SI 2 requires development to be net zero carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- 4) be seen: monitor, verify and report on energy performance.

9.310 The Policy goes on to state that major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided.

9.311 London Plan Policy SI 2 also requires that development proposals referable to the Mayor should calculate whole lifecycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

9.312 The London Plan also requires all developments to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions and that on-site carbon dioxide emission reductions will be provided through the use of on-site renewable energy generation where feasible, including green infrastructure including roofs and walls (London Plan Policies SI 4, SI 5, and SI 6).

9.313 Policy SI7 of the London Plan supports reducing waste and supporting the circular economy to support resource efficiency.

9.314 Southwark Policy P69 requires non-residential development over 500sq.m to achieve at BREEAM rating of 'Excellent'. The Policy adds that development must Reduce the risk of overheating, taking into account climate change predictions over the life time of the building, in accordance with prioritised measures set out in the following cooling hierarchy:

- 1) Reduce the amount of heat entering a building through the orientation, shading, albedo, fenestration, insulation and green roofs and walls; then
- 2) Minimise internal heat generation through energy efficient design; then
- 3) Manage the heat within the building through exposed internal thermal mass and high ceilings; then
- 4) Passive ventilation; then
- 5) Mechanical ventilation; then
- 6) Active cooling systems (ensuring they are the lowest carbon options).

- 9.315 Policy P70 states that development must minimise carbon emissions on site in accordance with the Mayor's energy hierarchy.

Assessment

- 9.316 The Energy Strategy (document ref. AC07) demonstrates that through the adoption of best practice energy reduction measures, the Proposed Development will achieve a 63% on-site CO₂ reduction over Part L 2021 for the residential floorspace and 36% on-site CO₂ reduction over Part L 2021 for the non-residential floorspace. In accordance with London Plan Policy S12 and SP Policy P70, the shortfall in carbon emissions to meet net-zero will be met with an off-site payment in-lieu.
- 9.317 A Sustainability Statement (document ref. AC08) has also been submitted with the planning application. The Sustainability Statement identifies and responds to sustainability policy before outlining the measures undertaken to achieve BREEAM 'Excellent' rating for the proposed non-residential uses. The statement concludes that the Proposed Development complies with London Plan and Southwark sustainability policies.
- 9.318 The Whole Life Cycle Carbon Emissions Assessment (document ref. AC09) demonstrates that the embodied carbon of the scheme for stages A1-A5 is 558 kgCO₂/m². The embodied carbon of the scheme for stages B-C (excluding B6 and B7) is 310 kgCO₂/m², therefore the Proposed Development performs significantly better than the GLA baseline benchmark and only slightly outside the aspirational benchmark range for Stages A1-A5 and B-C.
- 9.319 As set out in the Circular Economy Statement and associated technical pro-formas (document ref. AC10), the Proposed Development will seek to minimise waste during construction and operation as required under London Plan Policy S17. This includes diverting a minimum of 95% demolition and construction waste from landfill, a target of 65% (residential and 75% (commercial) recycling for municipal waste by 2030 and target of 22% of the materials to be reused or recycled.

Air Quality

- 9.320 Paragraph 192 of the NPPF states that planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement.
- 9.321 Policy SI1 of the London Plan requires development proposal to not lead to further deterioration of existing poor air quality, and should not create any new areas that exceed air quality limits. Development should not create unacceptable risk or high levels of exposure to poor air quality. On that basis, the London Plan requires development proposal to be at least Air Quality Neutral.
- 9.322 Southwark Policy P65 requires development to achieve or exceed air quality neutrality standards and Address the impacts of poor air quality on building occupiers and public realm users by reducing exposure to and mitigating the effects of poor air quality.

Assessment

- 9.323 As set out within Chapter 8 of the ES (document ref. AC18) the proposed Development will have a negligible impact over and above the baseline air quality in the local area.
- 9.324 The Proposed Development will be provided with heat and hot water via air source heat pumps (ASHP) and water source heat pumps (WSHP), supplemented with PVs. As such, there will be no associated

pollutant emissions and no direction building emissions. The Proposed Development is therefore better than air quality neutral in terms of building emissions.

- 9.325 On this basis it is considered that the Proposed Development positively accords with Development Plan requirements, namely London Plan Policy SI1 and Southwark Plan Policy P65.

Noise and Vibration

- 9.326 London Plan Policy D14 requires development to reduce, manage and mitigate noise to improve health and quality of life.
- 9.327 Southwark Plan Policy 56 also states that development should not be permitted when it cause unacceptable loss of amenity to present or future occupiers or users, including impacts of smell, noise, vibration, lighting and other nuisances.
- 9.328 Policy P66 reiterates these principals, requiring development to mitigate and manage noise by separating noise sensitive development from major noise sources by distance, screening or internal layout, in preference to sound insulation.

Assessment

- 9.329 The environmental noise impact upon the Proposed Development has been assessed in the context of national and local planning policies.
- 9.330 As set out within Chapter 9 (Noise and Vibration) of the ES (document ref. AC18), appropriate target internal noise levels are proposed, which are achieved using suitably specified glazing, acoustically attenuated ventilation and appropriate thermal design to reduce external environmental noise.
- 9.331 Subject to the above mitigation measures, the ES concludes that the Proposed Development is suitable for its intended uses in terms of noise.

Archaeology

- 9.332 London Plan Policy HC1 part D requires development proposals to identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.
- 9.333 Southwark Plan Policy P23 states that development must conserve the archaeological resources commensurate to its significance.

Assessment

- 9.334 The Site is located within the Tier 2 Peckham Village Archaeological Priority Area. ES Chapter 12 (Archaeology) (document ref. AC18) reports the findings of an assessment of the likely significant effects on archaeology and historic landscapes as a result of the Proposed Development.
- 9.335 There is moderate potential for prehistoric, Roman and medieval agricultural remains and a high potential for post-medieval remains on Site. Archaeological monitoring of future geotechnical investigations will take place as agreed with LBS's Archaeological Advisor. The geotechnical investigations will clarify levels of truncation and the depth of deposit survival and will be undertaken in accordance with a Written Scheme of Investigation (WSI) which is included at ES Volume 3 Appendix Archaeology – Annex 2.

- 9.336 The requirement for any further archaeological investigations will be secured by LBS by way of an appropriately worded condition.

Ground Conditions and Land Contamination

- 9.337 Southwark Plan Policy P64 states that developments will be permitted where it mitigates any contaminated land within a site; where there is an adverse impact on environment, proposals will not be permitted.

Assessment

- 9.338 Ground Conditions and Land Contamination have been assessed and are set out within Chapter 13 of the ES (document ref. AC18).
- 9.339 The Site is considered to be similar to many previously developed brownfield sites in the London area. Typical urban contaminants were identified in the made ground and the potential for hydrocarbons to be present given the existing petrol station and car park.
- 9.340 Chapter 13 of the ES concludes that a Remediation Strategy is completed to ensure that the contaminants identified are appropriately managed prior to redevelopment of the Site and would be secured by an appropriately worded condition.

Flood Risk and Drainage

- 9.341 NPPF paragraph 165 states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).
- 9.342 London Plan Policy SI13 sets out the requirement for developments to utilise sustainable drainage systems (SuDS) and aim to achieve greenfield run-off rates, which surface water runoff is managed as close to its source as possible. As far as practicably possible, drainage should be designed in ways that deliver other policy objectives of the Plan such as water use efficiency, water quality, biodiversity and recreation.
- 9.343 Southwark Policy P68 seems to reduce flood risk. Development must therefore not increase flood risk on site by designing it to be resilient. Major development reduces surface water run-off to greenfield run-off rates. This must be through the application of water sensitive urban design and Sustainable Urban Drainage Systems (SUDS) in accordance with the following drainage hierarchy:
- 1) Store rainwater for later use; then
 - 2) Use infiltration techniques; then
 - 3) Attenuate rainwater in ponds or open water features for gradual release; then
 - 4) Discharge rainwater direct to a watercourse; then
 - 5) Discharge rainwater to a surface water sewer/drain; then
 - 6) Discharge rainwater to the combined sewer; and
 - 7) Hard surfacing of any gardens is permeable.

Assessment

- 9.344 A Flood Risk Assessment (document ref. AC19) has been submitted in support of this planning application. The entire Site is located within Flood Zone 1 (low risk), and therefore has little or no flood risk from rivers and/or the sea. The closest land within Flood Zone 2 (medium risk) is located approximately 320m to the north at an elevation approximately 4m lower than the sit, therefore it is considered the Site will remain within Flood Zone 1 for its operational lifetime.

- 9.345 The Flood Risk Assessment concludes that the Proposed Development will be safe and would not increase flood risk elsewhere.
- 9.346 A Drainage Impact Assessment (incl. SuDS Proforma) (document ref. AC24) has also been submitted in support of this planning application.
- 9.347 The surface water drainage strategy proposes to make use of existing connections to the Thames Water combined public sewer system surrounding Rye Lane and Peckham High Street.
- 9.348 In accordance with London and Southwark Plans, the greenfield run-off will be restricted to 6.3 l/s split between two outfalls to the west and north-west of the Site. To achieve run-off restrictions green/blue roof and below ground geocellular storage are the proposed primary attenuation measures. Rain gardens/bioretention systems, permeable paving and ground infiltration are being explored as secondary drainage management measures.
- 9.349 The proposed peak foul water flow rates have been submitted to Thames Water who have confirmed that their network has capacity for the Proposed Development peak discharge rate.
- 9.350 The Proposed Flood Risk and Drainage Strategy, therefore fully accords with London Plan Policy SI13 and Southwark Plan P68.

10. Planning Obligations and Community Infrastructure Levy

- 10.1 In accordance with Section 106 of the Town and Country Planning Act 1990 (as amended), the Applicant proposes to enter into a Section 106 legal agreement with LBS to secure planning obligations as necessary to make the Proposed Development acceptable (in accordance with NPPF paragraphs 54-56). Paragraph 56 further confirms planning obligations must meet the following three test, including:
- a) 'necessary to make the development acceptable in planning terms';
 - b) Directly related to the development; and
 - c) Fairly and reasonably related in scale and kind to the development'.
- 10.2 London Plan DF1 provides the strategic framework within which London Boroughs may set policies relating to planning obligations, infrastructure and planning decisions. The draft Heads of Terms have been considered in relation to LBS's Section 106 Planning Obligations and Community Infrastructure Levy SPD (updated 2020) and discussed with officers as part of the pre-app discussions.
- 10.3 Discussions relating to the Section 106 Agreement will continue with LBS during the determination period of the planning application but at this stage it is anticipated to include the following obligations:
- Archaeology payment;
 - Affordable housing (including monitoring costs);
 - Affordable workspace;
 - Business Relocation Strategy;
 - Carbon offset payment;
 - Car Club (including Car Club Membership);
 - Financial contribution towards off-site provision of children's playspace (age 12+);
 - Employment and enterprise (construction and operation stage jobs and training);
 - Off-site public realm enhancements;
 - Local transport infrastructure improvements; and
 - Wayfinding.
- 10.4 In addition to s.106 planning obligations, the Proposed Development will be subject to both Mayoral CIL and LBS CIL.
- 10.5 Mayor CIL2 was adopted and came in effect on 1 April 2019. It is charged on all residential, office, retail and hotel developments across London. LBS is located within Band 2. The latest Mayoral Annual CIL Rate Summary (2024) sets out the charging rates for all planning permissions granted in 2024 as £69.27 (indexed from a base rate of £60 at 1st April 2019).
- 10.6 LBS introduced its own CIL Charging Schedule in December 2017. The Site falls within LBS's CIL Charging Zone 3. The relevant rates (2024 CIL Rate Summary) are £54 per sqm for residential, £136 per sqm for retail (A1-A5 & Sui Generis akin to retail). There is a zero charge for office use.
- 10.7 The Proposed supermarket car park (4,731 sqm) will be Town Centre Car Parking which is made available to all visitors to the town centre as defined in the CIL Charging Schedule and therefore is considered to be non-chargeable for borough CIL.
- 10.8 For the purpose of CIL, this application is a phased development and it is anticipated that details of phasing will be conditioned.

11. Summary and Conclusion

- 11.1 The process of planning for the redevelopment of the Site commenced over 10-years ago, initially led by LBS in its capacity as Local Planning Authority (LPA) and then more recently by the Applicant in the preparation of this Application. This process has involved extensive public and stakeholder consultation and scrutiny by Planning Inspectors appointed by the Secretary of State to independently examine the development plan policies against which the Application will be determined (including the site allocation).
- 11.2 Planning permission is sought for the following:
- “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”.
- 11.3 The principle of the Proposed Development is firmly established by the Southwark Plan. This provides site-specific development plan policy support 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.
- 11.4 The delivery of the requirements of the site 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 national planning policy, and the overarching purpose of the planning system which is to contribute to the achievement of sustainable development.
- 11.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the Development Plan unless other material consideration indicate otherwise. For the reasons set out in this statement, the Proposed Development is clearly in accordance the Development Plan affecting the Site to include delivering the specific requirements of site allocation ref. NSP74, and there are no obvious material considerations as to why a decision should be made other than in accordance with the development plan. Therefore, in accordance with the presumption in favour of sustainable development set out in paragraph 11 of the NPPF, the Application should be approved without delay.
- 11.6 The granting of planning permission will enable the aims and objectives of the development plan to be achieved, which will in turn deliver the overarching purpose of the planning system which is to contribute to the achievement of sustainable development. 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.
- 11.7 These public benefits will include:
- **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 complement the existing character of Peckham in terms of their architecture and materials;
 - make an efficient and effective use of 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 once operational.
- 0.94ha 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 111.02%, an Urban Greening Factor of 0.38, and improvements to local air quality; and
 - provides improved pedestrian and cyclist connectivity.
- **Homes:** Provision of 877 new homes to meet the needs of Londoners, of which:
 - 270 will be affordable (35% by habitable room);
 - there will be a mix of sizes and types to meet a broad range of housing needs, including 490 (56%) which will be family sized (2 bedrooms or larger);
 - 10% will be wheelchair accessible or adaptable;
 - 70% will be dual aspect; and
 - 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:
 - securing a major supermarket operator (Morrisons) for the long term (including the ability to continue trading during the construction stage);
 - 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;
 - providing workspace suitable for a range of office, workshop, and studio occupiers (including affordable workspace); and
 - increasing town centre expenditure levels as a consequence of the new resident population and employees working in the new workspace by approx. £15 million annually.
- **Jobs/Training:** Creation of an estimated 271 construction stage jobs; and accommodation to support an estimated 505 to 655 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: paid internships; educational partnerships to enable young people to access higher skilled jobs; local procurement; and town centre partnerships to support local businesses.

Appendix I

May 2023 Aylesham Centre Design Brief

AYLESHAM CENTRE REDEVELOPMENT

DESIGN BRIEF



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OUR STATEMENT

Berkeley has been engaging with LB Southwark, GLA and the local community since January 2022, and have had several pre-application advice meetings with Southwark Officers and three structured rounds of community consultation.

This brief has been prepared in response to the comments recieved to date and sets out the vision and expectations to the design team for a proposal that considers the local needs and aspirations for the site.



THE LOCATION

The Aylesham Centre is a 2.71ha (6.75 acres) town centre site which currently comprises a shopping arcade, Morrisons supermarket, petrol filling station and surface level car park. The site is located within the London Borough of Southwark and is bounded to the north by Peckham High Street, to the east by Rye Lane, and to the south by Hanover Park.

The site is allocated (NSP71) within the Southwark Plan 2022 for residential led mixed use development. The site allocation includes the neighbouring bus stand, but this does not form part of Berkeley's ownership or proposed planning application.

[Link: Southwark Plan 2022 - Southwark Council](#)



OUR VISION

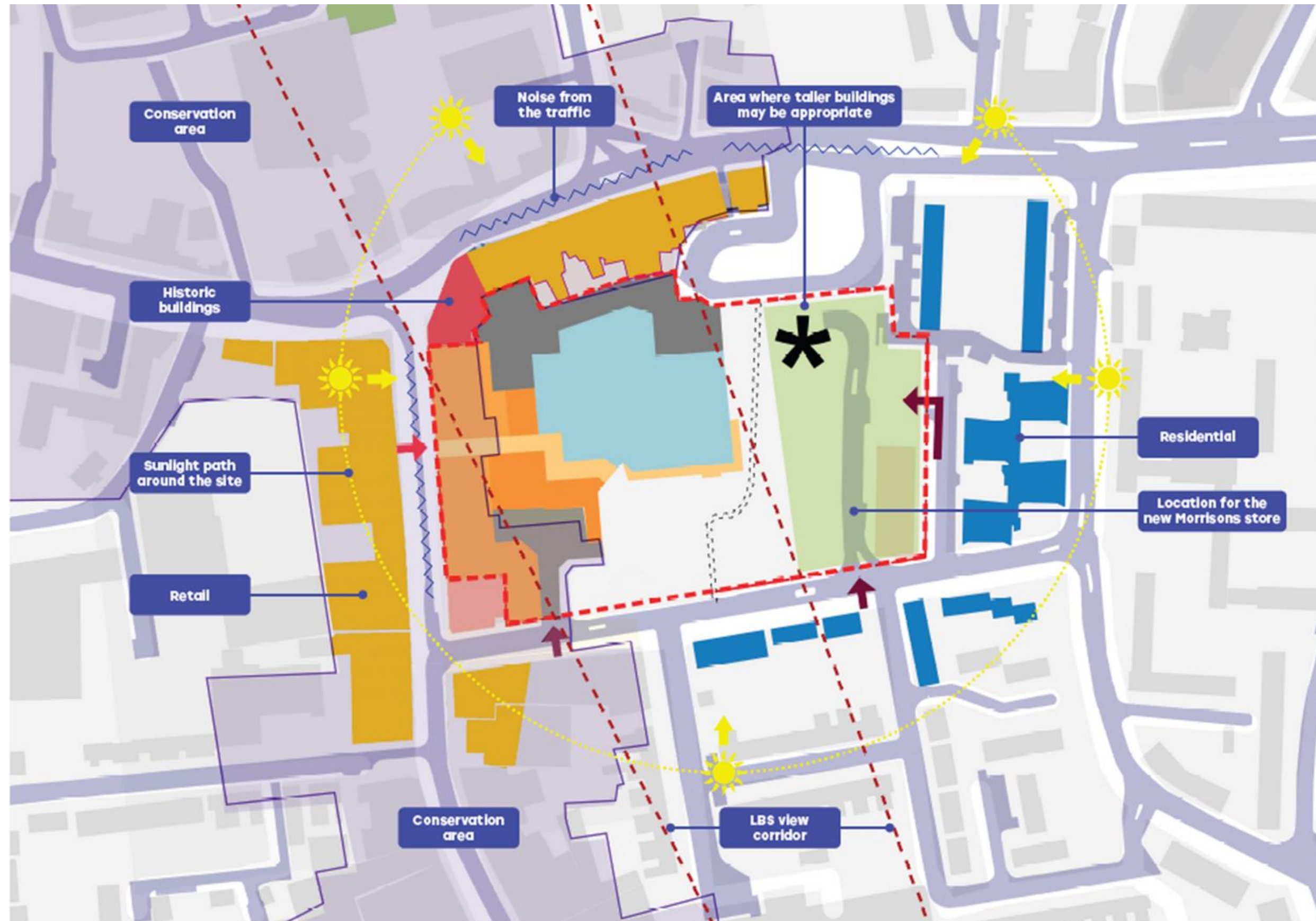
Looking at the site afresh, our ambition is to develop an iconic and transformative sustainable, mixed-use development from the ground up. Our ambition is to create a new vibrant quarter of the town centre that represents Peckham's unique identity as a diverse and inclusive community and builds on its strengths as a lively destination.

The development will focus on creating a series of meaningful new public spaces and character areas where new complementary retail, leisure, cultural and creative uses will be able to thrive. We envision utilising a contextual yet inspiring design approach, which delivers a step-change in architectural quality and compliments the unique identity and character of the town centre. Alongside this, the introduction of new quality homes and jobs for Peckham will ensure that a long-term sustainable future for the community is achieved.

Our starting point is the Southwark Plan and we will continue to engage with the community to develop a proposal that considers the needs, desires and ambitions of local residents, businesses and stakeholders. The results of which will create a sustainable new quarter in the community; the overall legacy of which will benefit the town centre for generations to come.



THE OPPORTUNITIES & CONSTRAINTS

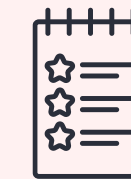
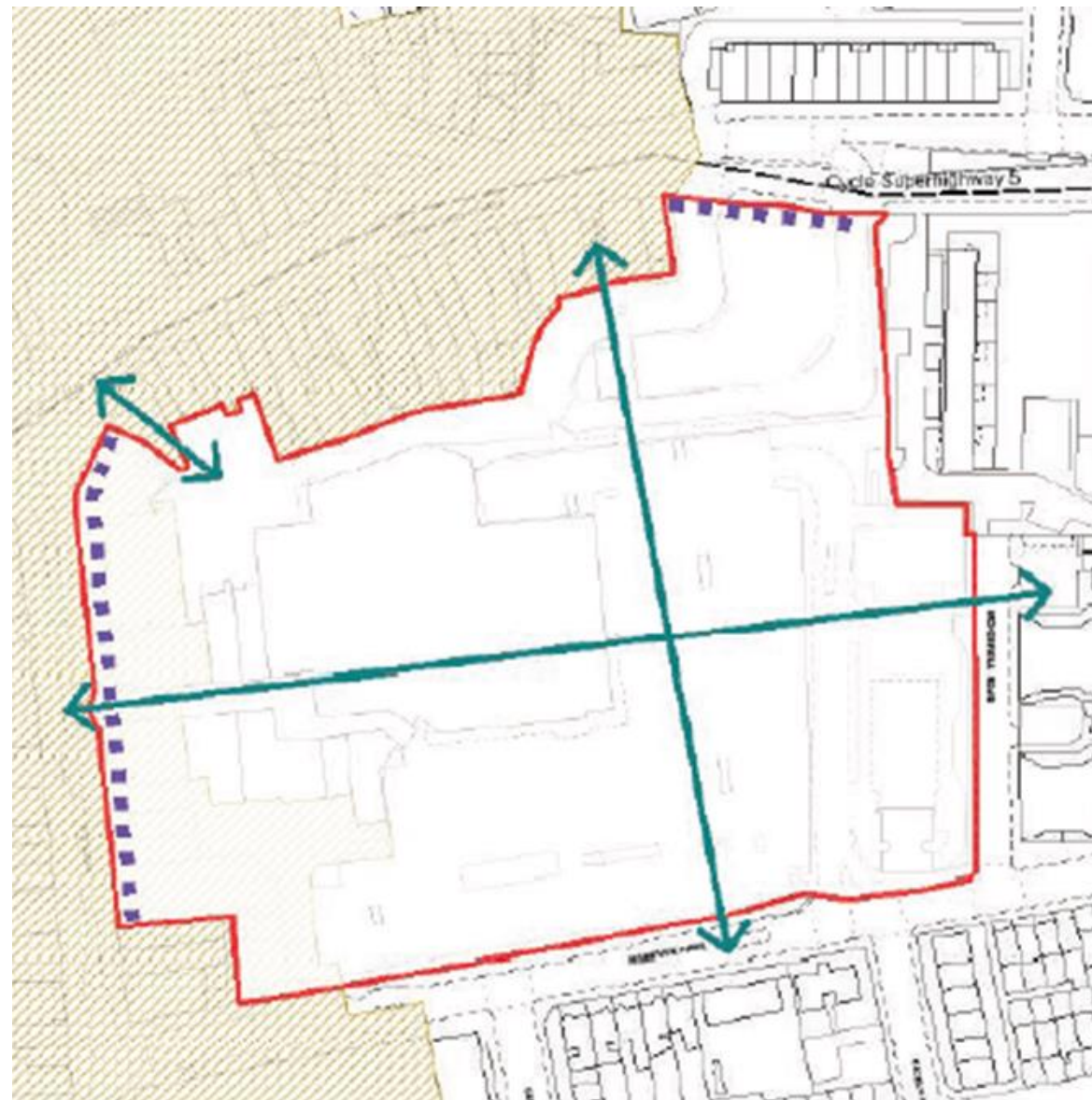


THE SOUTHWARK PLAN SITE ALLOCATION



Key Aspects

- Indicative site capacity: 850 homes
- Retention of the supermarket use
- Re-provision of retail floorspace
- Enhanced public realm and civic space
- North/South and East/West green links
- Active frontages along Rye Lane
- Range of retail shop sizes
- New intermediate affordable housing through a Community Land Trust



Design Guidance

- Consider neighbouring residential and heritage assets
- Active frontages throughout
- Enhance Rye Lane frontages
- Maximise links across the site
- Heights up to 20 storeys
- Height should be directed to the east of the site to minimise impact on views

OUR OBJECTIVES

● Fully Detailed Application

For the redevelopment of the shopping arcade, supermarket, petrol station and car park

● Indicatively 850 New Homes

Optimise the site to meet the borough's housing, social and economic needs

● Affordable Housing

35% affordable housing by habitable room, with 25% social rented and 10% intermediate housing

● Community Land Trust

Explore the delivery of Community Land Trust housing as part of the intermediate housing

● Sustainable Location

Make best use of an underdeveloped site within a sustainable town centre location

● Public Realm

Provide inclusive, vibrant and thriving public realm with new high quality public open spaces.

● Complimentary Uses

Complement the existing local retail offer by anchoring Rye Lane as a destination

● Sustainability

Provide new energy efficient and low carbon homes

● Characterful Design

Layout, building design and typology should reflect Peckham's character where possible

● Pedestrian Movement

Consider pedestrian access across the bus stand and improving the boundary conditions

● Southwark Plan 2022

Deliver the site allocation aspirations for homes, jobs and public realm as a minimum

● LB Southwark Advice

Have regard to Southwark's pre-application letter dated 15 November 2022

● Permeability

East/west and north/south permeable routes through the site

● Two Buildings of 20+ Storeys

Noting this may require the delivery of additional local benefits and justification in terms of townscape and heritage.

KEY CONSIDERATIONS

● **Rear of Peckham High Street**

Buildings to the rear of Peckham High Street should be no more than 8 or 10 storeys

● **McKerrell Road**

Buildings on McKerrell Road should be no more than 7 storeys

● **Dual Aspect Homes**

Majority of homes should be dual aspect

● **Permeability**

Routes should focus footfall on key retail areas including new workspace to the rear of Peckham High Street

● **Rye Lane Conservation Area**

Buildings on Rye Lane should be no more than 7 storeys with the 7th storey set back

● **Relationship to Neighbouring Buildings**

Buildings adjacent to the clock tower should be no more than 4 storeys and no more than 5 storeys adjacent to 43-47 Rye Lane

● **Views of the Clock Tower**

Clear sky behind the turret of the clock tower when viewed from 46-52 Peckham High Street

● **Local Context**

Careful consideration should be given to the local context

● **Basement**

Basement should be limited to below the new supermarket

● **Local Designers**

Collaborate with local architects for the design of specific areas within the masterplan

● **Regularised and efficient buildings, including:**

- 80% Gross to Net area efficiency
- Wall to floor ratio no more than 0.55
- 60:40 masonry to glass ratio for facades
- A mix of built in and bolt on balconies
- Brick for buildings 20 storeys and below
- Punch hole aluminium windows and doors
- Limited articulation to roof line with exception of Rye Lane

RESIDENTIAL REQUIREMENTS



New Homes

Approx. 700,000sqft of new affordable and market value homes



Basement

Basement should be limited to below the new supermarket



Cycle Parking

Cycle parking should comply with Southwark Plan standards



Wheelchair Accessible

10% of homes by habitable room should be wheelchair accessible



Family Homes

Range of home sizes including min. 20% family homes with three or more bedrooms



Block Design Principles

Average 8 homes per core and comply with all fire safety mandates



Private Amenity

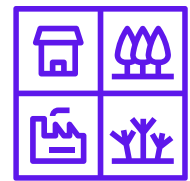
Balconies should be a mix of built in and bolt on (i.e. not inset)



Parking

No residential parking with the exception of blue badge parking

NON-RESIDENTIAL REQUIREMENTS



Land Uses

Approx. 10,500sqm GIA total non-residential floorspace, including:

- New Morrisons food store
- Mix of town centre non-residential uses – e.g. leisure, workspace, F&B – in a range of unit sizes
- Dedicated workspace building
- “Peckham Yard” workspace to the rear of Peckham High Street
- Explore opportunities for new links from Peckham High Street into the yard space



Vision

Leisure uses within the heart of the masterplan

Large format units along Rye Lane suitable for high street chains

Buildings on Rye Lane should be designed as separate buildings within a terrace

Configuration should allow spaces for interim uses and interim business relocation where possible

Peckham type workspace uses should be considered i.e. studios, small offices and co-working

10% of retail floorspace should comprise small retail units of 80m² or less



Morrisons

Min. 48,000sqft GIA new store

Min. 24,000sqft of retail sales area

140 car parking spaces with EVCPs and a customer collection area

Dedicated service yard

PROPOSED PHASING

Phase 1

Allow Morrisons to continue trading throughout construction by building a new store on the site of the petrol station and car park.

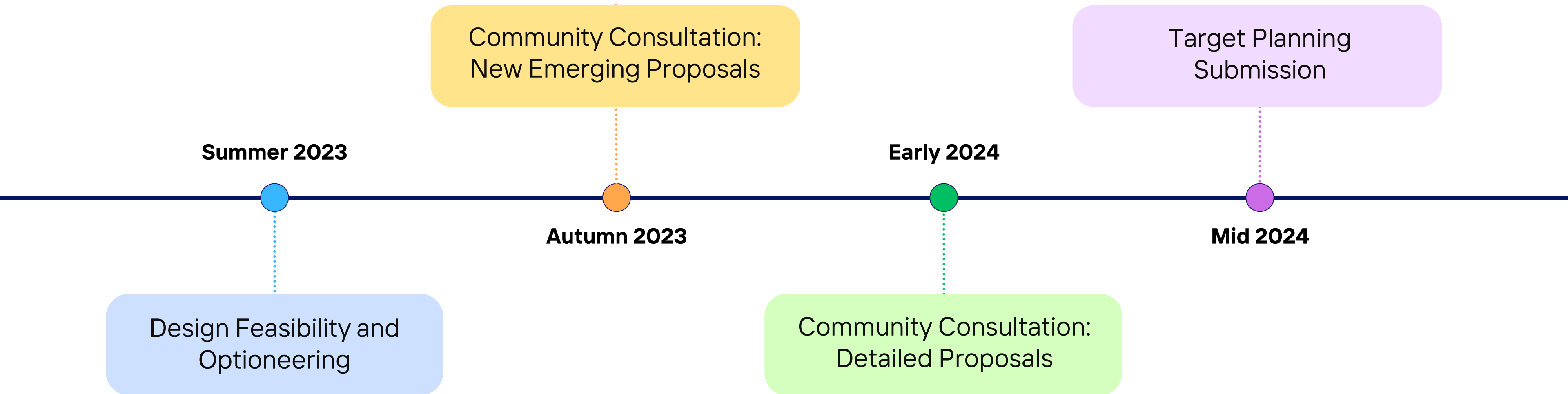


Phase 2

Redevelop the remaining site in a timely and efficient sequence that considers vacancy, business relocation and interim uses.



NEXT STEPS



Appendix II

Retail/Main Town Centre Use Strategy

Aylesham Centre

Retail/Main Town Centre Use Strategy

1. Introduction

1.1 The purpose of this Report is to set out the proposed strategy to satisfy retail and main town centre use policy matters for the Aylesham Centre masterplan.

1.2 The Report is structured as follows:

- **Section 2** provides factual information about the existing site (including the quantum of existing retail floorspace);
- **Section 3** summarises relevant planning policy context (NPPF, London Plan, Southwark Plan);
- **Section 4** considers the findings of the evidence base that informed the retail/town centre policies in the London Plan and new Southwark Plan;
- **Section 5** provides an overview of national retail/town centre trends;
- **Section 6** sets out the headlines of commercial advice (2022) regarding the retail/town centre use components of the masterplan (the full report is appended);
- **Section 7** outlines the specific requirements of Morrisons (the operator of the existing and proposed replacement supermarket); and
- **Section 8** sets out the proposed strategy.

1.3 The following are attached as appendices:

- **Appendix I** – Measurement Report (Michael Gallie & Partners – April 2022)
- **Appendix II** – Stage 1 Report (CF Commercial – 25 May 2022)
- **Appendix III** – Update Report (CF Commercial – 20 March 2024)

2. The Site

- 2.1 The Site accommodates the Aylesham Centre alongside an associated surface car park (353 spaces), service yard, and petrol filling station.

Layout

- 2.2 The Aylesham Centre comprises 11 retail units fronting on to Rye Lane with additional eight retail units within a covered mall, including a supermarket operated by Morrisons. It extends across two floors. The ground floor comprises floorspace in use as Class E(a) retail, Class E(b) food and drink, or other Sui Generis commercial uses (eg. betting shop and Market Place). The first floor is ancillary to the ground floor units (e.g. back of house, storage etc).
- 2.3 A site plan showing the redline boundary of the Site and the composition of the existing Aylesham Centre (in terms of its sub-division) is shown below in **Figure 2.1** (source: Goad and Avison Young May 2024).

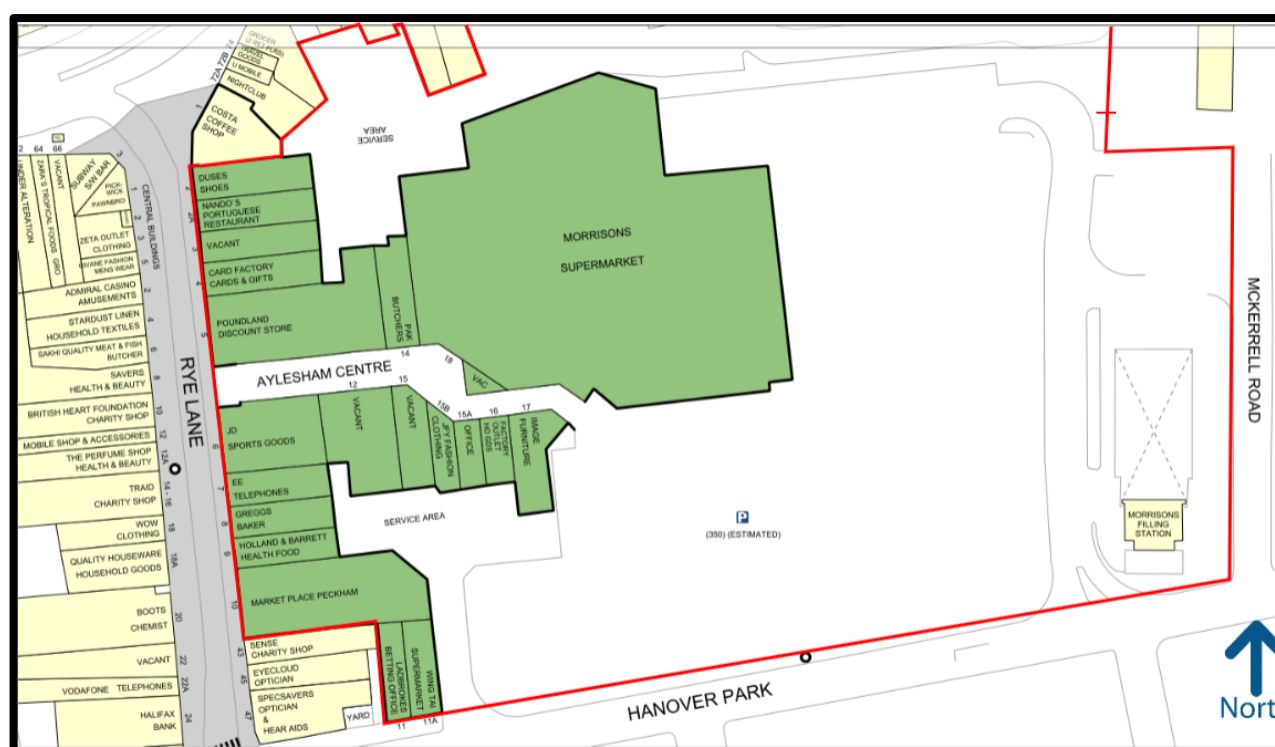


Figure 2.1 - Site Plan

Existing Floorspace (Uses and Occupiers)

- 2.4 As per *Planning for Town Centres: Practice guidance on need, impact and the sequential approach* (Dec. 2009), the National Retail Planning Forum (NRPf) defines '**Net Sales Area**' as follows:

The area within the walls of the shop or store to which the public has access or from which sales are made, including display areas, fitting rooms, checkouts, the area in front of checkouts, serving counters and the area behind used by serving staff, areas occupied by retail concessionaires, customer services areas, and internal lobbies in which goods are displayed; but not including cafes and customer toilets.

- 2.5 For food stores, an alternative definition of '**Net Retail Sales Area**' has been put forward by the Competition Commission and is supported by the majority of major food store operators. This is as follows:

The sales area within a building (i.e. all internal areas accessible to the customer), but excluding checkouts, lobbies, concessions, restaurants, customer toilets and walkways behind the checkouts.

- 2.6 For retail planning purposes, the main consideration is to ensure that comparisons of floorspace are on a like for like basis. For the purposes of our assessment, we have utilised the NRPF definition.
- 2.7 A full Measurement Survey of the existing site has been undertaken by Michael Gallie & Partners which is included at **Appendix I**. This includes Net Internal Area (NIA), Gross Internal Area (GIA) and Net Sales Area (NSA) figures. The figures presented do not include the existing petrol station floorspace or the internal atrium mall floorspace as it is not considered to be retail sales area. Also, the existing basement is not utilised and has headroom of less than 1.5m, therefore has also been excluded within the existing area calculations in accordance with the RICS Code of Measuring Practice (5th Edition). The results of this survey are set out in Table 2.1, below, and summarised as follows:
- Total NIA: **9,546.5sqm**
 - Total GIA: **10,084.9sqm (of which 8,532.1sqm is in use class E(a))**
 - Total NSA: **6,088.2sqm (of which 5,200.8sqm is in use class E(a))**

Table 2.1 - Existing NIA, GIA and NSA (sqm)

Unit No.	Occupier	Use Class	Ground Floor			First Floor		
			NIA	GIA	NSA	NIA	GIA	NSA
2	Duses Shoes	E(a)	164.4	169.5	105.4	0	0	0
2A	Nandos	E(b)	287.6	305.2	201.6	111.5	151.7	0
3	Vacant	E(a)	87.3	92	88	75.4	92.6	0
4	Cardfactory	E(a)	70.3	80	70.4	75.1	94.6	0
5	Poundland	E(a)	541	556.5	507.2	175.8	192.3	0
6	JD Sports	E(a)	301.4	312	293.9	282.1	298.9	0
7	EE	E(a)	132.2	137.8	75.9	75	94.1	0
8	Greggs	E(b)	119.5	131.6	65.8	74.3	92.4	0
9	Holland & Barrett	E(a)	125.3	136.7	115.6	80.2	96.1	0
10	Market Place Peckham	SG	511.5	519.6	519.6	169.1	192.8	0
11	Ladbrokes	SG	86.8	91.5	56.6	0	0	0
11A	Wing Tai	E(a)	125.4	127.8	105.1	165.8	172.1	0
12	Clarks	E(a)	287.5	295.9	182.3	0	0	0
14	Pak Butchers	E(a)	135.4	141	104.8	0	0	0
15	Vacant	E(a)	125.7	133	86.5	0	0	0
15A	Consultation Hub*	SG	60.3	68	43.8	0	0	0
15B	Just For You Fashion	E(a)	79.2	82.9	49.9	0	0	0
16	Factory Outlet	E(a)	90.7	93	73.2	0	0	0
17	Image	E(a)	153.7	157.6	112.1	0	0	0
18	Morrisons	E(a)	4561.4	4711	3230.5	215.6	264.7	0
TOTAL			8046.6	8342.6	6088.2	1499.9	1742.3	0
						9546.5	10084.9	6088.2

*Temporary planning permission. The use will revert to E(a) once this expires.

- 2.8 In addition to the existing retail units, there are ten traders who operate from hand carts within the internal mall/atrium. Table 3.3 below provides number of hand carts and occupiers.

Table 2.2 Existing Retail Hand Carts Operating within the Internal Mall/Atrium

Cart No.	Occupier
1	Ice Cream and Popcorn Vendor
2	Scented Oils and Perfumes
3	Eye brow Threading and Waxing Services
4	African Textiles and Accessories
5	Woman's Lingerie and Accessories
6	Children's Clothes and Costume Jewels
7	Chinese Medicine's and Remedies
8	Mobile Phone Accessories and Repairs
9	African Fabric Sales, Repair and Dress Making
10	Luggage Bags and Accessories

Primary Retail Frontage

- 2.9 Based on utilising Southwark’s online mapping tool and OS map data, we have estimated that the total length of retail frontage along Rye Lane and within the mall totals **271m** as shown below in Figure 2.2:

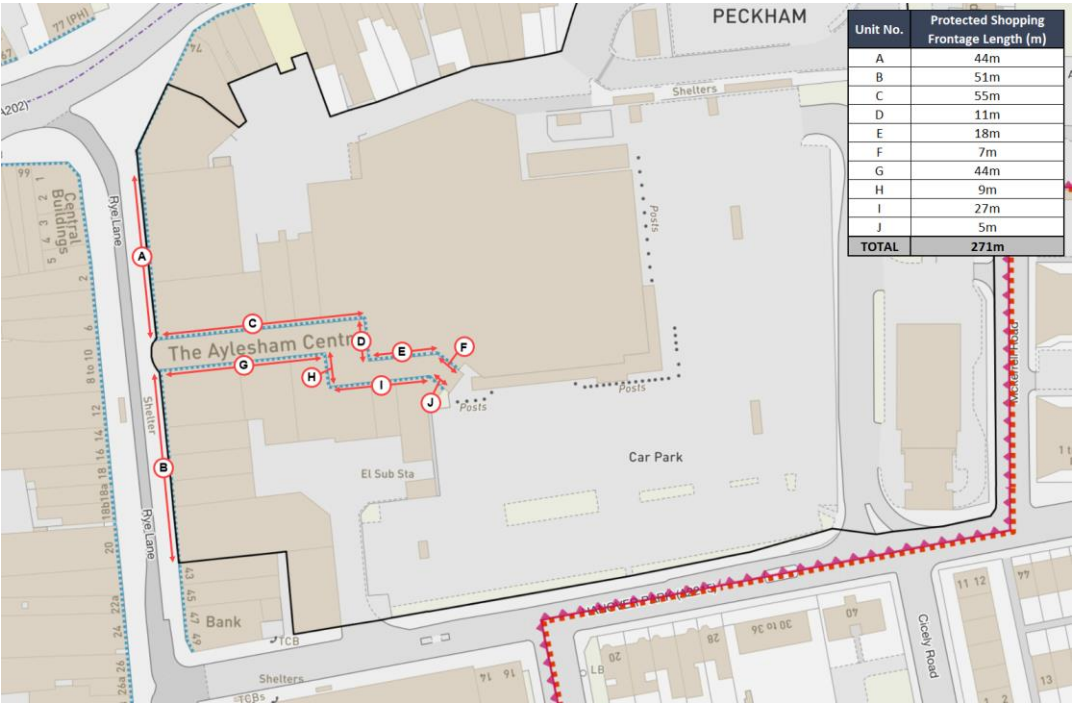


Figure 2.2 – Existing Primary Retail Frontage

Small Shops

- 2.10 As demonstrated by Table 2.1, there is only one existing unit that extends to less than 80sqm (GIA) (the Southwark Plan definition of a Small Shop). This is currently occupied by the Applicant and is used as a consultation hub (Sui Generis use) via a temporary planning permission. The use will revert to retail (E(a)) once this expires.

- 2.11 In addition to the existing small retail unit referenced above, there is also ten traders, as set out in table 2.2, operating from hand carts within the internal mall atrium.

3. Planning Policy Framework

National Planning Policy Framework (2023)

- 3.1 At the heart of the NPPF is a presumption in favour of sustainable development. **Paragraph 8** details that sustainable development has three overarching objectives, economic, social and environmental, which are interdependent and mutually supportive of one another.
- 3.2 **Paragraph 20** requires that for plan-making Local Authorities should set out strategic policies that set out an overall strategy for the pattern, scale and quality of places, and make sufficient provision for amongst other things sufficient retail provision.
- 3.3 **Paragraph 90** stipulates that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptations. Further it states planning policies should:
- a) *“define a network and hierarchy of town centres and promote their long-term vitality and viability – by allowing them to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing) and reflects their distinctive characters;*
 - b) *define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations, as part of a positive strategy for the future of each centre;*
 - c) *retain and enhance existing markets and, where appropriate, re-introduce or create new ones;*
 - d) *allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed, looking at least ten years ahead. Meeting anticipated needs for retail, leisure, office and other main town centre uses over this period should not be compromised by limited site availability, so town centre boundaries should be kept under review where necessary;*
 - e) *where suitable and viable town centre sites are not available for main town centre uses, allocate appropriate edge of centre sites that are well connected to the town centre. If sufficient edge of centre sites cannot be identified, policies should explain how identified needs can be met in other accessible locations that are well connected to the town centre; and*
 - f) *recognise that residential development often plays an important role in ensuring the vitality of centres and encourage residential development on appropriate sites.”*

- 3.4 The NPPF defines ‘main town centre uses’ as:

“Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).”

London Plan (2021)

- 3.5 The London Plan includes a number of relevant policies in relation to retail planning and town centres, including **Policy SD6** (Town centres and high streets), **Policy SD7** (Town centres: development principles and Development Plan Documents), and **Policy E9** (Retail, markets, and hot food takeaways).
- 3.6 The relevant parts of Policy SD6 states:

“Part A 1): The vitality and viability of London’s varied town centres should be promoted and enhanced by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners, including main town centre uses, night-time economy, civic, community, social and residential uses.

Part B: The adaptation and diversification of town centres should be supported in response to the challenges and opportunities presented by multi-channel shopping and changes in technology and consumer behaviour, including improved management of servicing and deliveries.

Part F: The management of vibrant daytime, evening and night-time activities should be promoted to enhance town centre vitality and viability, having regard to the role of individual centres in the night-time economy (see Figure 7.6 and Table A1.1) and supporting the development of cultural uses and activity.

Part I: The varied role of London’s high streets should be supported and enhanced.

Part J: The provision of social infrastructure should be enhanced, particularly where it is necessary to support identified need from town centre and local residents, and facilities should be located in places that maximise footfall to surrounding town centre uses.

Part K: Safety and security should be improved, and active street frontages should be secured in new development, including where there are ground floor residential frontages.”

3.7 Part D of Policy SD7 states:

“Development proposals should:

- 1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment;*
- 2) ensure that commercial space is appropriately located having regard to Part A and B above, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing;*
- 3) support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents; and*
- 4) support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.”*

3.8 Part C of Policy E9 states:

“Development Plans and development proposals should:

- 1) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres;*
- 2) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel;*
- 3) provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping;*
- 4) identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with town centre Policy SD7 Town centres: development principles and Development Plan Documents;*
- 5) support London’s markets in their full variety, including street markets, covered markets, specialist and farmers’ markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres and the Central Activities Zone [...]; and*

- 6) [...] manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:
- a. town centre vitality, viability and diversity;
 - b. sustainability and accessibility;
 - c. place-making or local identity;
 - d. community safety or security; and
 - e. mental and physical health and wellbeing."

LB Southwark Plan (2022)

Strategic Policy

- 3.9 As a starting point, Southwark Plan Policy AV.14 (Peckham Area Vision) references that Peckham from a town centre/retail perspective is:

"A lively town centre providing a range of daytime and night time activities on Rye Lane including a library, a leisure centre, cinema, market traders and many independent retailers which specialise in West African goods."

- 3.10 Policy AV.14 further states that "Development in Peckham should:

Complement and improve the town centre with more large and small shops, market stalls, and entertainment, cultural, community and leisure spaces alongside new employment space for small and medium enterprises including start-ups" and

"Site allocations in the Peckham Action Area will provide around 1,400 new homes, around 22,200sqm (gross) retail, community and leisure floorspace and around 19,000sqm (gross) employment space. There are also many smaller development sites that could accommodate new homes and new employment space. Peckham Major Town Centre will deliver around 7,000sqm (net) new retail floorspace."

- 3.11 Policy ST2 (Southwark's Places) sets out the spatial strategy for the borough. Supporting Table A states that within the Peckham Area Vision area, it is envisioned that retail, leisure and community uses (not including health or education use) floorspace provision will total 23,281sqm, which represents a net uplift of 7,139sqm. Furthermore, Policy ST2 envisions a total provision of 19,089sqm of office floorspace, which represents a net uplift of 15,378sqm.

Policy Designations

- 3.12 The Aylesham Centre is subject to the following relevant policy designations:
- Major Town Centre (Peckham);
 - Protected Shopping Frontage (along Rye Lane and within Aylesham Centre);
 - Peckham and Nunhead Action Area; and
 - Peckham Action Area Core.

Site Allocation

- 3.13 The Site is allocated for development, reference NSP74 (Aylesham Centre and Peckham Bus Station), which states (insofar as is relevant to retail/town centre use matters) that:

"Redevelopment of the site must:

- Retain the supermarket use (E(a));
- Provide at least the amount of retail floorspace currently on the site;
- 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

- *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;*

Development Management Policies

- 3.14 Policy P35 (Town and Local Centres) Part 1 states development must:
1. *“Ensure main town centre uses including markets, community, civic, leisure and cultural uses are located in town centres and local centres; and*
 2. *Be of a scale and nature that is appropriate to the role and catchment of the centre; and*
 3. *Retain retail floorspace or replace retail floorspace with an alternative use that provides a service to the general public, and would not harm the vitality and viability of the centre; and*
 4. *Not harm the amenity of surrounding occupiers or result in a concentration of uses that harms the vitality, viability and economic growth of the centre; and*
 5. *Provide an active use at ground floor in locations with high footfall; and*
 6. *For large schemes for main town centre uses that are 1,000 sqm (gross GIA) or more provide free public toilets, public drinking fountains and public seating. Public toilets may be provided either on or off site and not reserved for customer use only.”*
- 3.15 The supporting text notes that the Council seeks to ensure town centres remain lively and interesting places where each centre’s unique identity creates a strong sense of place for residents and visitors alike. Further, town centres should be the main focus for new town centre uses and that LBS will encourage a diverse night-time economy with a range of appropriate activities throughout the evening and night-time. Further reference is made that the aim of the Council is to expand shopping space in its major town centres, including Peckham town centre.
- 3.16 Policy P37 (**Protected Shopping Frontages**) states that development must:
- “Provide active ground floor uses which provide a service to the general public, that would not harm the vitality and viability of the shopping frontage.”*
- 3.17 The supporting text notes that the Council consider shopping to be the main reason for visiting the borough’s town centres and there it is considered important to maintain high proportions of shops and prevent changes of use that may erode the quality and variety of the borough’s main shopping parades.
- 3.18 The supporting text also notes that secondary frontages are considered appropriate locations for a greater diversity of activities and services and that maintaining a healthy balance of uses in these shopping frontages is considered vital to protect the V&V of town centres.
- 3.19 Lastly, Policy P32 (**Small Shops**) states:
1. *Development must retain small shops where existing small shops are at risk of displacement from a development. There should be full consideration of the feasibility of providing affordable and suitable space for existing occupiers in the completed development. Replacement shops should be like for like in terms of floorspace or bespoke to suit the requirements of the business, including provision of storage and servicing space.*
 2. *Developments proposing 2,500 sqm GIA or more of retail space shall provide at least 10% of this space as small shops.*
 3. *Small shops (Use Class E(a) and F.2(a)) will be secured through the implementation of conditions and/or planning obligations which will restrict change of use within Use Class E.*
- 3.20 As explained in Section 2, there is only one existing unit that meets the definition of Small Shop, which is occupied by the Applicant and used as a consultation hub pursuant to a temporary planning permission. Accordingly, the development will not affect any existing Small Shops.

- 3.21 The supporting text further stipulates that the intention of the policy is to maximise diversity and consumer choice by providing a range of unit sizes which are suited to a range of occupiers. Small shops are also considered to contribute to reflect the character and diversity of the local population – as well as ensure a diversity of trade and support independent businesses.

4. Evidence

The Mayor's Economic Development Strategy for London (2018)

- 4.1 The Mayor's approach is to create a fairer, more inclusive and sustainable city by creating the conditions for 'Good Growth'. The strategy sets out how this is achieved through: helping to ensure London has the workspace for businesses, the supporting transport, social and wider infrastructure, a high-quality natural environment, affordable housing and the skills that the economy needs to grow sustainably and productively.
- 4.2 Section 4, *Creating the Conditions for Growth*, states that this will require the creation of an environment where entrepreneurship and innovation can flourish, where people continue to develop their skills, where London remains open to talent, and businesses can operate more efficiently.
- 4.3 A key element in creating the conditions for growth will be the provision of space for business and work. A key part of such spaces are successful town centres and high streets. The strategy supports the adaption of London's town centres, new forms of retail needing to emerge, supplemented by the introduction of a wider range of food and leisure, affordable workspace, housing, and civic functions.
- 4.4 The Mayor seeks to ensure the success of town centre and high streets by: promoting their inclusive and diverse role, working with boroughs and other stakeholders, supporting communities to develop an understanding of their town centres and high streets, targeting Mayoral and LEAP funds to stimulate local economic activity, preventing the loss of viable office space, working with BIDs, managing intensification, improving public transport and the public realm, encouraging healthier catering commitments, and ensuring places foster social integration.

High Streets & Town Centres Adaptive Strategies, Mayor of London (2019)

- 4.5 This guidance has been prepared by the Mayor in order to help to support the implementation of ambitious, innovative and fresh strategies so that high streets and town centres not only adapt and survive but thrive.
- 4.6 The document notes at page 21 that:
- "Clearly high streets are about much more than retail. High Streets for All recognises that London's high streets serve a wide range of Londoners in multiple and inclusive ways. They are highly social, diverse and accessible spaces. As such, they have a crucial role in supporting social, economic and environmental benefits across London's neighbourhoods."*
- 4.7 The following opportunities for high streets are identified (page 37):
- Maximise opportunities for social interaction, cultural and authentic experiences by planning, designing, managing and curating high streets and town centres.
 - Improve high streets for walking and cycling, which is shown to dramatically increase the number of people sitting and socialising.
 - Through management, actively promote environmental issues, such as reuse and waste-reduction, as well as the high street's contribution to these initiatives and to sustainable lifestyles generally.

- Support society's need and desire for convenience in the high street offer.
- Promote high streets as places for leisure, entertainment and non-retail experiences.
- Plan and design for the 24 hr economy – remember to “Think Night”.
- Promote digital interaction with the high street and its businesses or establishments.
- Promote social media sharing of experiences related to the high street #myhighstreet.
- Support, through planning policy, a vibrant mix of uses.
- Support, through the planning process, flexibility for meanwhile, nested and ancillary uses.

Southwark Economic Wellbeing Strategy 2017-2022: A Partnership for Local Growth

- 4.8 Southwark Council's Economic Wellbeing Strategy sets out the council's efforts to support local economic growth. The strategy is made up of four key pillars: 1) Employment and skills, 2) Business, 3) Thriving town centres and high streets, and 4) Financial wellbeing.
- 4.9 The *Thriving town centres and high streets* section recognises that successful town centres depend on a range of components. In response to a changing retail sector, high streets should support the provision of a diverse and dynamic offer with a range of business, adaptable and affordable employment space. Planning policy and regeneration activity will play a key role in protecting and promoting employment uses. This growth is envisioned to be enabled by public and active transport connectivity, alongside digital infrastructure.

New Southwark Plan – Background Paper: Retail and Town Centre Uses (Dec. 2019)

Peckham Baseline Position

- 4.10 The Retail and Town Centre Uses background paper was prepared by the Council in support of the new Southwark Plan to justify the Council's approach to its retail and town centre policies. The background paper collates the findings of the **Southwark Retail Study** (19th June 2015) and the **Southwark Retail Study Old Kent Road Update** (23rd April 2018).
- 4.11 The study notes that Peckham town centre has a 'Lower' market position score based on the retailers present and the centre's relative position along the retail spectrum running from discount to luxury.
- 4.12 Peckham is also considered a 'third tier' centre, on par with centres such as Brixton, Waterloo and Streatham, which suggests it may have a limited comparison retail offer when compared with Central London, Croydon and Bromley (higher order centres).
- 4.13 Based on 2014 data referenced within the *Southwark Retail Strategy (2015)*, Peckham Town Centre had the following existing retail provision:

Table 4.1 – Existing Retail Provision (Peckham Town Centre)

Centre	No. Shop Units	Convenience Floorspace (sqm gross)	Comparison Floorspace (sqm gross)	Food and Beverage (sqm gross)
Peckham Major Centre	384	22,280	27,270	7,080

- 4.14 Peckham town centre is the largest shopping and commercial centre in Southwark, in terms of number of outlets and the amount of retail floorspace and is recognised within both London Plan and the New Southwark Plan as a major town centre in the town centre network.

- 4.15 Peckham's key roles include convenience shopping, comparison shopping, services, entertainment and community facilities. In particular, Peckham has a large number of small independent convenience retailers located throughout the centre. The centre also accommodates a significant number of market stalls located along Rye Lane, Atwell Road, Blenheim Grove, Choumert Road and Highshore Road.
- 4.16 The diversity of uses present in Peckham town centre in terms of the number of units is set out in the table below and are compared against the national average – note we have updated this table to include the most recent GOAD data which was surveyed on the 25th September 2023:

Table 4.2 – Existing Retail Provision (Peckham Town Centre)

Type of Unit	Units 2009 ¹	Units 2013 ²	Units 2022 ³	Units 2023 ⁴	% of Total No. of Units	
					2023 Peckham %	2023 UK Average %
Comparison Retail	123	131	117	115	29.87	33.54
Convenience Retail	82	81	69	71	18.44	10.16
Service	144	135	143	145	37.66	40.80
Vacant	34	37	50	54	14.03	15.50
Total	383	384	379	385	100	100

- 4.17 Based on the above data, we note the total number of retail units has remained consistent since 2009, whilst at the same time vacancies have increased. Proportionally, convenience retailers located in and around the Peckham town centre are significantly higher than the UK average, particularly in relation to convenience food stores, whereas comparison retail provision is considerably lower.

Southwark/Peckham Retail Strategy (2019)

- 4.18 Southwark's strategy as detailed within the Background Paper highlights the following aspirations:
- **Improve the retail offer** in existing centres and to encourage all new major development for shopping and leisure uses to be located in the town centres as set out in the retail hierarchy.
 - Population growth in Peckham is projected to increase from 649,726 in 2011 up to 840,494 residents by 2031. This would generate surplus expenditure to support an additional 16,303sqm net (21,739sqm gross) of comparison floorspace and 1,954sqm net (2,791sqm gross) of convenience sales floorspace.
 - Seek to support an increase in the comparison and convenience goods floorspace throughout the borough and particularly within Peckham and other town centres. To assist, the Southwark Plan anticipates the redevelopment of key shopping centres in the three Major Town Centres, including the Aylesham Centre.
 - Peckham is considered to have some scope to provide a **limited additional amount of retail** development primarily within sites that will be allocated through the NSP site allocations. The Site Allocation (NSP74) requires only the reprovision of the existing retail offer at the Site.

¹ Source: 2009 GVA Retail Study

² Source: Experian GOAD 2013

³ Source: Experian GOAD 2022

⁴ Source: Experian GOAD 2024

- The continued vitality and viability of Southwark's centres and shopping parades is considered to depend, in part, on the range and critical mass of retail services on offer being maintained.
- Support main town centre uses to ensure town centre viability and vitality, through the provision of a **diverse range of shop units, key social infrastructure, employment opportunities, leisure, arts and cultural uses, a thriving night-time economy and affordable space for small and independent businesses.**

Town Centre Regeneration (HoC Research Briefing) (Dec 2021)

- 4.19 Recognising the importance that town centres contribute to the heart of communities, and against the backdrop that many town centres across the country have been struggling (even prior to the Covid 19 pandemic or Russia/Ukraine conflict) – the House of Commons released the Town Centre Regeneration (Dec. 2021) briefing paper outlining observed trends and challenges facing town centres across Great Britain.
- 4.20 The report highlights the following:
- At the end of 2020, c.14% of high street retail and leisure properties were vacant in Great Britain, whereas in London this figure was approximately 10%. The CV-19 pandemic further exacerbated challenges facing high streets and town centres. High energy costs have put many independent high street businesses further at risk of closure. Although many differing opinions are shared on what the post-pandemic impacts will be on high streets and town centres, Central Government has recognised the need for providing support, and have sited that supporting high streets following the pandemic will form a key part of its 'levelling up' agenda.
 - Initiatives to support high streets have therefore sought to recognise changing patterns of use and support resilience and diversification. This often means a move towards 'multifunctional' town centres with, for example, community and leisure offerings in addition to traditional retail.
 - Looking at trends in retail moving forward, the report references the February 2019 Government published *High Streets and Town Centres 2030* report which identified online shopping as the main structural change to people's shopping habits that has caused the 'decline of the high street'. They also pointed out four systematic issues preventing high streets from successfully adapting:
 - o Too much retail space, both within high streets and in terms of the size of individual shops;
 - o Fragmented ownership, preventing a cohesive response;
 - o High fixed costs of business rates and rent; and
 - o High and inflexible taxation (not affecting online retail in the same way).
 - The Covid-19 pandemic is considered to have accelerated the trend towards online shopping that had already been underway in previous years. This is borne out in the data, which shows online sales have been above 25% of all retail sales since April 2020, up from c. 20% levels pre-pandemic. Notwithstanding, there has also been some evidence showing that there may be an emergence of more localised shopping habits based on trends that emerged during the pandemic, with more independent and leisure stores faring better than many chain businesses.
 - Working from home trends will also continue to potentially change shopping habits of consumers moving forward. In January 2021 KPMG published analysis based on longer term home working and continued online sales. Their report concluded that high streets could lose 20-40% of their retail offerings. Their recommendation was that high streets become multipurpose to adapt, i.e. retail in addition to other services, such as leisure, cultural, education, healthcare, reformed office space and improved transport hubs. This was also recognised by the High Streets Task Force and other commentators who noted other trends may also become more prevalent in the future, citing the growing trend in some larger chain brands experimenting with neighbourhood shop

formats within larger retail premises, such as John Lewis click and collect in Waitrose's or Sainsbury's and Argos' hybrid retailing format.

Build Back Better High Streets Report (2021)

- 4.21 In July 2021, the Ministry of Housing, Communities & Local Government published the *Build Back Better High Streets* report. The strategy seeks to play to the strength of the high street as a place with its own unique character, culture and heritage to offer a physical, social experience of togetherness that's not available online. The focus is to give high streets much greater flexibility to adapt and succeed and is designed to spur private sector investment in historically underinvested areas.
- 4.22 By utilising several successful case studies from across the county, the strategy seeks to capture the vision and highlight the successes where government support has been utilised to support town centres. Additionally, it outlines the innovations that have been generated over the pandemic and provide an outline on how regulatory flexibility will enable high streets to retain (or become) the hives of economic and social activity that communities expect.
- 4.23 The creation of more vibrant, mixed-use communities is recognised as a way forward; delivering more accessible, liveable, walkable places. The strategy strongly encourages more housing around high streets and a key priority is for high streets to become clean, green, mixed-use spaces in which people not only want to shop but also live, work, and relax. The ministry's vision to support high streets/town centres focusses on five key priorities:
- Breathing new life into empty buildings;
 - Supporting high street businesses;
 - Improving the public realm;
 - Creating safe and clean spaces; and
 - Celebrating pride in local communities.
- 4.24 The overall strategy has and will continue to be Informed by the recommendations of the Urban Centre Recovery Task Force alongside the High Streets Task Force. It is expected that Councils, businesses, and community groups use the funding and tools set out in the document to help high streets to adapt.
- 4.25 The strategy outlines that the change in how high streets, particularly retail spaces, should not be underestimated. Empty shops can be changed into much needed homes, into space for new food & beverage spaces, or spaces that can deliver high quality public services.
- 4.26 From a regulatory perspective, the strategy considers that the planning system is at the heart of effective placemaking and that it is on high streets where the flexibility the government has ensured the planning system provides is most important in order to support a diverse mix of activity and businesses moving forward.
- 4.27 To address this, the government has introduced significant flexibilities to the planning system, including the introducing the ability for commercial, retail and certain leisure businesses to change use without needing planning permission, through the recently established Use Class E.
- 4.28 The strategy also reflects on the importance of heritage preservation in supporting high streets and town centres, as studies have shown heritage preservation and management can increase the attractiveness and uniqueness of high streets, and has been shown to increase footfall, reduce vacancies and increase the overall movement of businesses into an area.
- 4.29 Lastly, the strategy places an emphasis on the importance of good design in creating sustainable high streets. The planning system is considered to provide a framework for local areas to design popular, pretty and sustainable high streets, which are attractive places to live, work and meet

5. Commercial Advice

5.1 CF Commercial were appointed by the Applicant to provide commercial advice at the outset of the master planning process to ensure that the strategy for retail and other main town centre uses was deliverable. The full report is provided at **Appendix II**, whilst an updated report, dated March 2024 providing an updated demand assessment is provided at **Appendix III**. A summary of the key points is provided below:

Strategic Trends Effecting Town Centres & Peckham

5.2 The May 2022 CF Commercial report references issues that are being observed both nationally and within Peckham town centre which could affect town centre vitality and viability, which includes:

- Rapid rising inflation and the cost of living crisis could impact on consumer spending, retailers' trading performance and tenant demand.
- Home working during the Covid pandemic and a shift to flexible working has resulted in greater use of local shopping facilities, particularly convenience and service.
- UK demand for high streets, driven by independents, is greater than shopping centres⁵. This is due to factors including service charges, restrictive trading hours, landlord's tenant mix criteria, accessibility/parking, etc, that can apply in shopping centres.
- UK top growth categories in 2021 were F&B, service, and convenience⁶. F&B, in particular, should form an important part of the tenant mix strategy for Aylesham.
- Service and convenience are a core part of Peckham's tenant mix. Convenience retail remains stable with the branded operators all actively expanding, supported by the growth in last-mile fulfilment operators in urban areas.
- Voids in Peckham town centre are focussed on secondary locations, which suggests there is greater demand for the retail core and emerging locations where unique/distinct occupiers are clustering.
- There has been greater demand for retail/leisure space from independents than multiples in 2021⁷. There is a strong culture of independent retail/F&B in Peckham's high street locations.
- Continued focus on affordability from occupiers - require longer rent-free periods, enhanced fit-out, lease flexibility, and turnover rents, compared to pre-pandemic levels.
- There is an established demand for studios, workshops and creative offices in Peckham that support its vitality and could form a more significant part of the town centre's tenant mix.
- A recreational and experiential leisure offer increasingly forms part of tenant mix strategy in retail settings to support F&B uses and increase dwell time. This trend and the lack of contemporary leisure uses in Peckham suggests there is the opportunity to curate a compelling leisure offer within the Proposed Development.

⁵ Source: The Local Data Company

⁶ *ibid*

⁷ *ibid*

Current and Projected Future Characteristics of Peckham Town Centre

- 5.3 The CF Commercial report highlights a number of current and proposed town centre projects and characteristics that will mutually benefit from the Aylesham Centre redevelopment, including:
- Peckham has an important arts and leisure and cultural sector; it is a creative and stimulating place to live, work, visit and learn. There is an opportunity for the town centre leisure offer to improve and grow to satisfy demand from the growing visitor economy – which the Aylesham Centre can support and help facilitate.
 - There are significant site allocations within the TC suitable for regeneration (incl. NSP74: Aylesham Centre, NSP75: Blackpool Road Business Park, NSP76: Land between the railway arches (east of Rye Lane), and NSP77: Copeland Industrial Park). Collectively, these regeneration projects will improve the amenity value of the town centre and will underpin future town centre vitality and viability. To be successful town centre contributors, such regeneration schemes should:
 - Improve the quality of employment space;
 - Support small businesses;
 - Provide space for retail, leisure and cultural uses;
 - Conserve and enhance heritage assets;
 - Improve connectivity; and
 - Improve public realm and community spaces.
 - Planning permission (ref. 22/AP/1006) has been granted for the regeneration of Peckham Rye Station Square and associated public realm improvements will assist in creating new retail, F&B, and workspace as well as a public square, making it a much more welcoming place for station users including pedestrian traffic to and from the Aylesham Centre.
 - Improvements to the northern part of the town centre supported by the regeneration of Peckham Square and the Aylesham Centre.
 - The proposed Peckham Coal Line public realm corridor will link the town centre with the retail/F&B facilities at Queens Road, improving connectivity for pedestrians and cyclists whilst bringing railway arches back into use, and creating spaces for creative industries.
 - The town centre attracts unique and distinctive independent retail/F&B, these businesses cluster in secondary locations, e.g. Peckham Levels and the southern end of Rye Lane, due to lower occupational costs.
- 5.4 The report includes a town centre health check, and based on CF Commercial's up-to-date analysis, they have identified a number of under-represented occupier types within Peckham town centre, which includes:
- **Specialist retail** – particularly convenience and service-oriented retail and independent specialist offerings such as health and beauty retail.
 - **Food & Beverage** – there is high demand for new F&B offerings within Peckham, particularly towards the northern end of the town centre.
 - **Fitness** – There are limited fitness offerings in the town centre, it is considered there would be demand for an additional branded operator as well as additional fitness studios, e.g. yoga, spinning, Pilates, etc.
 - **Leisure** – Current undersupply. Town centre could support a family-oriented leisure offer, which could include competitive social activities, or a boutique cinema.
 - **Other** – educational and healthcare uses.

6. Supermarket Operator Requirements

- 6.1 The proposed supermarket has been designed in coordination with the existing supermarket operator: Morrison's. In designing the space, Morrisons have provided the following requirements:
- 48,000sqft (4,459 sqm) Store, including a minimum 24,000sqft (2,229sqm) Sales Floor Area;
 - 140 car parking spaces, this includes:
 - 8 wheelchair (6%);
 - 8 family spaces (6%);
 - 22 EVCP (20%).
 - Car park management to be in line with existing arrangement. 2hrs free parking moving to paid parking after. Town centre car park use to still be allowed (i.e. not restricted to Morrisons customers);
 - Dedicated service yard suitable to accommodate 18.55m HGV vehicle. All Morrisons servicing and delivery will take place via dedicated service yard; and
 - 3 x 26 person lifts from basement to store.

7. Proposed Retail/Main Town Centre Use Strategy

- 7.1 The retail/main town centre use strategy for the site seeks to deliver planning policy objectives, while having due regard to evidence regarding retail trends that have emerged since the London Plan/Southwark Plan were prepared, and commercial advice. The objective being to ensure the proposals are deliverable and make the optimum contribution to the vitality and viability of the town centre.
- 7.2 The strategy seeks to boost the vitality and viability of the town centre and to strengthen its resilience to withstand the effects of ongoing changing retail trends via the following objectives:
- **Strengthen** – the town centre’s role as a sub-regional destination as well as better meeting the day-to-day needs of local residents and the business community;
 - **Enhance** – the town centre offer and user experience by providing a range of uses and spaces that benefit both daytime and evening economies and across all age groups;
 - **Diversify** – and enhance the town centre offer to include a broader multi-functional range of town centre uses including retail, food & beverage, leisure, cultural and workspace;
 - **Replace** – the existing supermarket in accordance with the operator’s requirements to ensure that it continues to function as one of the town centre’s ‘anchor’ stores;
 - **Retain** – the overall existing retail capacity and overall amount of non-residential town centre use floorspace (while being careful to avoid any retail over provision that could lead to vacancies and detract from town centre vitality and viability);
 - **Attract** – a broader range of occupiers (including multiples and independents) by offering a flexible range of unit types across varying price points, including affordable spaces;
 - **Experience** – shall be improved by delivering qualitative improvements in terms of the quality of floorspace and to the overall town centre environment and public realm which will improve overall user experience and boost town centre footfall; and
 - **Celebrate** – the uniqueness of Peckham and pride of its residents by providing space for businesses and organisations that represent the community and help create a sense of place.
- 7.3 In order to achieve this, the following is proposed:
- A total of **10,974.3sqm GIA** of retail, leisure and commercial floorspace (use class E) (excluding basement car park, plant and service yard – 17,251.2sqm, including basement car park, plant and service yard), comprising:
 - o A replacement supermarket (use class E(a)), comprising:
 - 5,994.5sqm GIA (excluding basement car park);
 - 10,725.8sqm GIA (including associated car park);
 - 2,480.4sqm net sales area;
 - o A minimum 2,725.3sqm of workspace (use class E(g)); and
 - o 3,800.1sqm of flexible retail, leisure, and commercial floorspace (use class E).
- 7.4 For ease of reference, the proposed is compared against the existing in Table 8.1, below:

Table 8.1 – Retail, Leisure and Commercial Floorspace – Existing Compared to Proposed

	Existing (GIA)	Proposed (GIA)
Supermarket (Use Class E(a))	4,975.7sqm	4,448.9sqm 10,725.8sqm (including associated car park, plant and service yard)
Flexible Retail, Leisure and Commercial (Use Class E(a -g) / Sui Generis)	5,109.2sqm	3,800.1sqm Subject to the following caps: - Up to 350sqm drinking establishments (Sui Generis) - UP to 320sqm of workspace (Use Class E(g)).
Workspace (Use Class E(g))	0	2,725.3sqm
Total Retail, Leisure and Commercial Floorspace (Use Class E/Sui Generis)	10,084.9 sqm	10,974.3sqm (17,251.2sqm including associated service yard and car park)

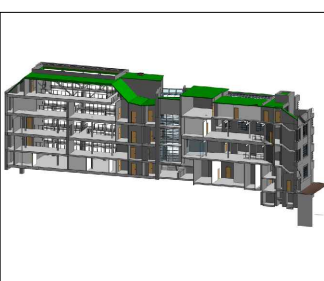
- 7.5 The existing figures presented within Table 8.1 above do not include the floorspace associated with the existing petrol station or the internal atrium/mall. Similarly, the proposed figures do not include the floorspace associated with the internal service yard, plant and car parking associated with the supermarket. This is in order to allow like-for-like comparison between the existing and proposed floorspace.
- 7.6 The Proposed Development also includes the following:
- Provision of active frontages throughout the Site (focussed on those areas anticipated to experience high footfall) including ground floor retail/leisure uses fronting Rye Lane, to provide a new retail 'circuit' that links Rye Lane to the High Street anchored by the replacement supermarket;
 - Provision of a range of unit sizes suitable for a range of occupiers (including small shops of less than 80sqm GIA);
 - A proportion of the workspace (use class E(g)) to be provided as affordable workspace;
 - A relocation strategy to support existing small and independent businesses that will be displaced by the development;
 - Provision of publicly accessible toilets (within Morrisons); and
 - Provision of public drinking fountains and public seating.
- 7.7 Lastly, we note that the increase in the population of the town centre (via the provision of new homes) will increase the expenditure capacity of the town centre catchment population by around £10.3m, further boosting town centre vitality and viability (based on the current Experian expenditure data⁸ for the locality of £11,757 per household and 877 homes). Furthermore, the proposed development will generate c. £1.5m in annual business rates for the Council and deliver c. 370 FTE jobs from the non-residential uses.
- 7.8 Based on the above set of retail and main town centre use provision, we consider the proposed approach to be in accordance with national, regional and local planning policy, including the site allocation.

⁸ Source: Experian, *Location Analyst Raw Data Extract – Postal Sector SE15 5* (Date 17.05.2024)

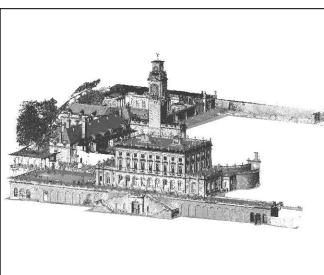


Appendix I

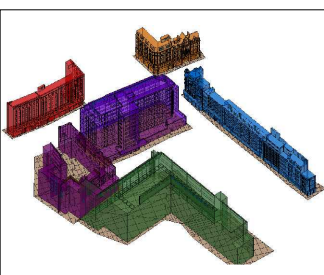
Measurement Report (Michael Gallie & Partners – April 2022)



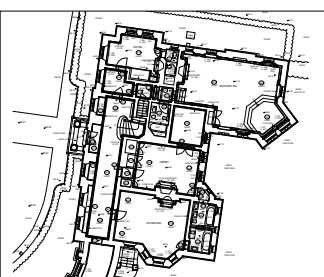
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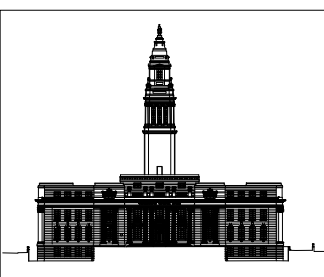
Laser Scanning



Rights of Light



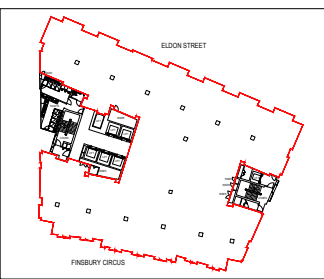
Floor Plans



Elevations



Sections



Lease Plans

Measurement Report

Aylesham Centre

Peckham

London SE15 5EW

April 7, 2022

10042-06



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Michael Gallie & Partners

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AYLESHAM CENTRE

PECKHAM, LONDON S15 5EW

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Practice Profile

Michael Gallie & Partners were formed during the early 1960's, developing from an existing architectural practice. Although we provide the full range of services in land & measured building survey, our origin in architecture has given us a singular understanding of architectural, as-built and measured building survey.

Our clients include leading Architects, Developers, Institutions and Contractors, and we work throughout the U.K., with occasional overseas projects. Survey projects range from simple area measurement to complex 3D modelling which are provided in all major digital formats.

Reliable and informative data is an essential requirement for planning with existing buildings. As the only professional survey practice specialising in measured building surveys for over 50 years it should be recognised that our knowledge and expertise in this area is unique.

Building Area Calculations are completed using the latest methods and technologies combined with years of expertise, resulting in independent and accurate information that can be used by all parties.

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Method Statement

Michael Gallie & Partners completed the Net Internal Area measurements in the week commencing **14th MARCH 2022** in accordance with the guidelines described in the current edition of the **Royal Institute of Chartered Surveyors (RICS) Code of Measuring Practice** (Sixth Edition)

The building was measured to enable the calculation of the floor areas for the building. The measurements were carried out using a combination of laser measuring devices. All measurements were recorded and the resulting geometrical data was plotted directly into AutoCAD.

The areas were calculated by plotting, within the CAD system, a contained polyline defining each area in accordance with the **RICS Code of Measuring Practice** (Sixth Edition).

The CAD database is then interrogated for the calculated area. The attached Reference Plan is directly produced from the CAD system providing visual verification of all defined areas.

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Duty of Care Statement

We confirm that as Chartered Geomatic Surveyors, instructed in this matter to act as Measurement Surveyors, by the parties to measure the internal area of Level GROUND & Level 01 on the site of [AYLESHAM CENTRE, LONDON SE15 5EW](#).

We have used all reasonable endeavours to exercise and indeed will continue to exercise all reasonable skill, care and diligence in the performance of our duties in relation to the above premises, contained in this measurement report.

We also confirm that in all respects we have acted in accordance with the guidelines described in the current edition of the **Royal Institute of Chartered Surveyors (RICS) Code of Measuring Practice** (Sixth Edition).

Furthermore, we have endeavoured to carry out our instructions in a totally objective and impartial manner and indeed, will continue to discharge any further instructions we may have in relation to this matter in the same way.

This duty of care is intended for [Berkeley Homes](#). The duty of care has the potential for two number further named clients on this report.

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General Notes

For clarification of the defined areas please refer to the following pages, which contain diagrams of Floor Level GROUND, Floor Level 01 & Floor Level Basement of the site of [AYLESHAM CENTRE, LONDON SE15 5EW](#), showing the Internal Areas.

The diagrams are not produced to scale and should not be used for any other purpose.

Revisions

Date

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AYLESHAM CENTRE

PECKHAM, LONDON S15 5EW

Document Number 10042-06/Apr-22

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GROUND FLOOR NET INTERNAL AREA SUMMARY - COMP 6TH EDITION

OVERALL FLOOR AREAS				INCLUDED AREAS			EXCLUDED AREAS		
NAME	USE	AREA		USE	AREA		USE	AREA	
		sq m	sq ft		sq m	sq ft		sq m	sq ft
UNIT 1	Costa Coffee	180.8	1,946						
UNIT 2	Duses	164.4	1,770						
UNIT 2A	Nandos	287.6	3,096						
UNIT 3	Specsavers	87.3	940						
UNIT 4	Cardfactory	70.3	757						
UNIT 5	Poundland	541.0	5,823						
UNIT 6	JD	301.4	3,244	Empty Display Area	14.3	153			
UNIT 7	EE	132.2	1,423						
UNIT 8	Greggs	119.5	1,287						
UNIT 9	Holland & Barrett	125.3	1,348						
UNIT 10	The Mall Peckham	511.5	5,506						
UNIT 11	Ladbrokes	86.8	934						
UNIT 11A	Wing Tai	125.4	1,350						
UNIT 12	Vacant	287.5	3,095						
UNIT 14	Pak	135.4	1,457						
UNIT 15	Vacant	125.7	1,353						
UNIT 15A	Just For You	79.2	852						
UNIT 15B	Vacant	60.3	649						
UNIT 16	Factory Outlet	90.7	977						
UNIT 17	Image	153.7	1,654						
UNIT 18	Morrisons	4,561.4	49,099						
OVERALL TOTAL		8,227.3	88,559						

© Headroom - Restricted Headroom area of less than 1.5 metres above finished floor level

Table to be read in conjunction with associated floor area diagrams

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GROUND FLOOR GROSS INTERNAL AREA SUMMARY - COMP 6TH EDITION

OVERALL FLOOR AREAS				INCLUDED AREAS			EXCLUDED AREAS		
NAME	USE	AREA		USE	AREA		USE	AREA	
		sq m	sq ft		sq m	sq ft		sq m	sq ft
UNIT 1	Costa Coffee	192.5	2,072						
UNIT 2	Duses	169.5	1825						
UNIT 2A	Nandos	305.2	3,286						
UNIT 3	Specsavers	92.0	991						
UNIT 4	Cardfactory	80.0	862						
UNIT 5	Poundland	556.5	5,990						
UNIT 6	JD	312.0	3,358						
UNIT 7	EE	137.8	1,483						
UNIT 8	Greggs	131.6	1416						
UNIT 9	Holland & Barrett	136.7	1,471						
UNIT 10	The Mall Peckham	519.6	5,593						
UNIT 11	Ladbrokes	91.5	985						
UNIT 11A	Wing Tai	127.8	1,376						
UNIT 12	Vacant	295.9	3,185						
UNIT 14	Pak	141.0	1,518						
UNIT 15	Vacant	133.0	1,432						
UNIT 15A	Just For You	82.9	892						
UNIT 15B	Vacant	68.0	732						
UNIT 16	Factory Outlet	93.0	1,002						
UNIT 17	Image	157.6	1,696						
UNIT 18	Morrisons	4,711.0	50,708						
OVERALL TOTAL		8,535.1	91,870						

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1ST FLOOR NET INTERNAL AREA SUMMARY - COMP 6TH EDITION									
OVERALL FLOOR AREAS				INCLUDED AREAS			EXCLUDED AREAS		
NAME	USE	AREA		USE	AREA		USE	AREA	
		sq m	sq ft		sq m	sq ft		sq m	sq ft
UNIT 1	Costa Coffee	0.0	0						
UNIT 2	Duses	0.0	0						
UNIT 2A	Nandos	111.5	1,200						
UNIT 3	Specsavers	75.4	812						
UNIT 4	Cardfactory	75.1	808						
UNIT 5	Poundland	175.8	1,893						
UNIT 6	JD	282.1	3,037						
UNIT 7	EE	75.0	807						
UNIT 8	Greggs	74.3	800						
UNIT 9	Holland & Barrett	80.2	863						
UNIT 10	The Mall Peckham	169.1	1,820						
UNIT 11	Ladbrokes	0.0	0						
UNIT 11A	Wing Tai	165.8	1,785						
UNIT 12	Vacant	0.0	0						
UNIT 14	Pak	0.0	0						
UNIT 15	Vacant	0.0	0						
UNIT 15A	Just For You	0.0	0						
UNIT 15B	Vacant	0.0	0						
UNIT 16	Factory Outlet	0.0	0						
UNIT 17	Image	0.0	0						
UNIT 18	Morrisons	215.6	2,320						
OVERALL TOTAL		1,499.9	16,144						

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1ST FLOOR GROSS INTERNAL AREA SUMMARY - COMP 6TH EDITION									
OVERALL FLOOR AREAS				INCLUDED AREAS			EXCLUDED AREAS		
NAME	USE	AREA		USE	AREA		USE	AREA	
		sq m	sq ft		sq m	sq ft		sq m	sq ft
UNIT 1	Costa Coffee	0.0	0						
UNIT 2	Duses	0.0	0						
UNIT 2A	Nandos	151.7	1,633						
UNIT 3	Specsavers	92.6	997						
UNIT 4	Cardfactory	94.6	1,019						
UNIT 5	Poundland	192.3	2,069						
UNIT 6	JD	298.9	3,218						
UNIT 7	EE	94.1	1,012						
UNIT 8	Greggs	92.4	994						
UNIT 9	Holland & Barrett	96.1	1,034						
UNIT 10	The Mall Peckham	192.8	2,075						
UNIT 11	Ladbrokes	0.0	0						
UNIT 11A	Wing Tai	172.1	1,852						
UNIT 12	Vacant	0.0	0						
UNIT 14	Pak	0.0	0						
UNIT 15	Vacant	0.0	0						
UNIT 15A	Just For You	0.0	0						
UNIT 15B	Vacant	0.0	0						
UNIT 16	Factory Outlet	0.0	0						
UNIT 17	Image	0.0	0						
UNIT 18	Morrisons	264.7	2,849						
OVERALL TOTAL		1,742.3	18,753						

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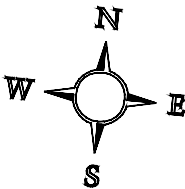
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NIA



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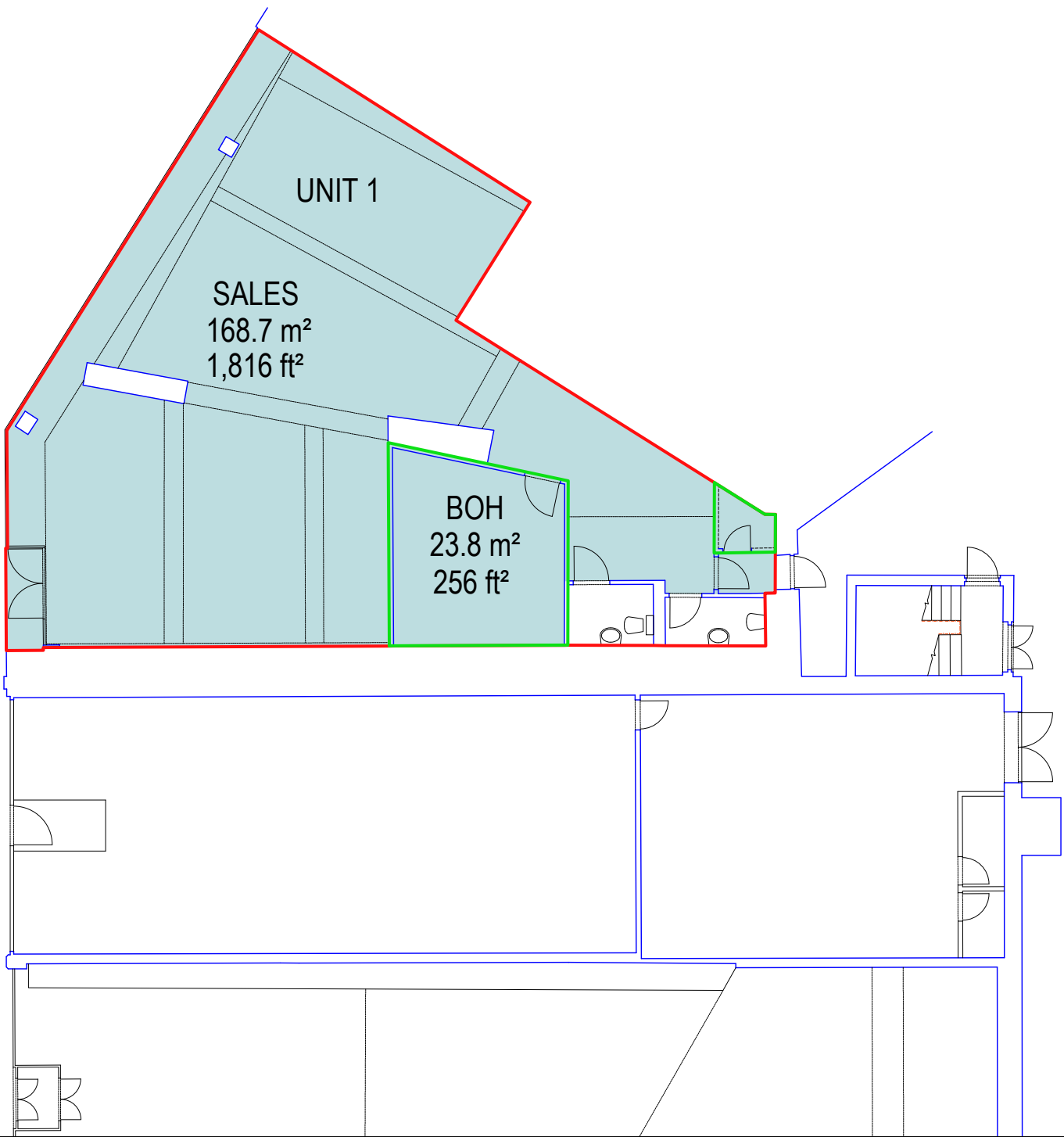
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**Level GROUND
Net Internal Area Plan**

NIA	180.8 sq m	1,946 sq ft
GIA	192.5 sq m	2,072 sq ft

INCLUDING

SALES FLOOR	168.7 sq m	1,816 sq ft
BOH	23.8 sq m	256 sq ft



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Notes:
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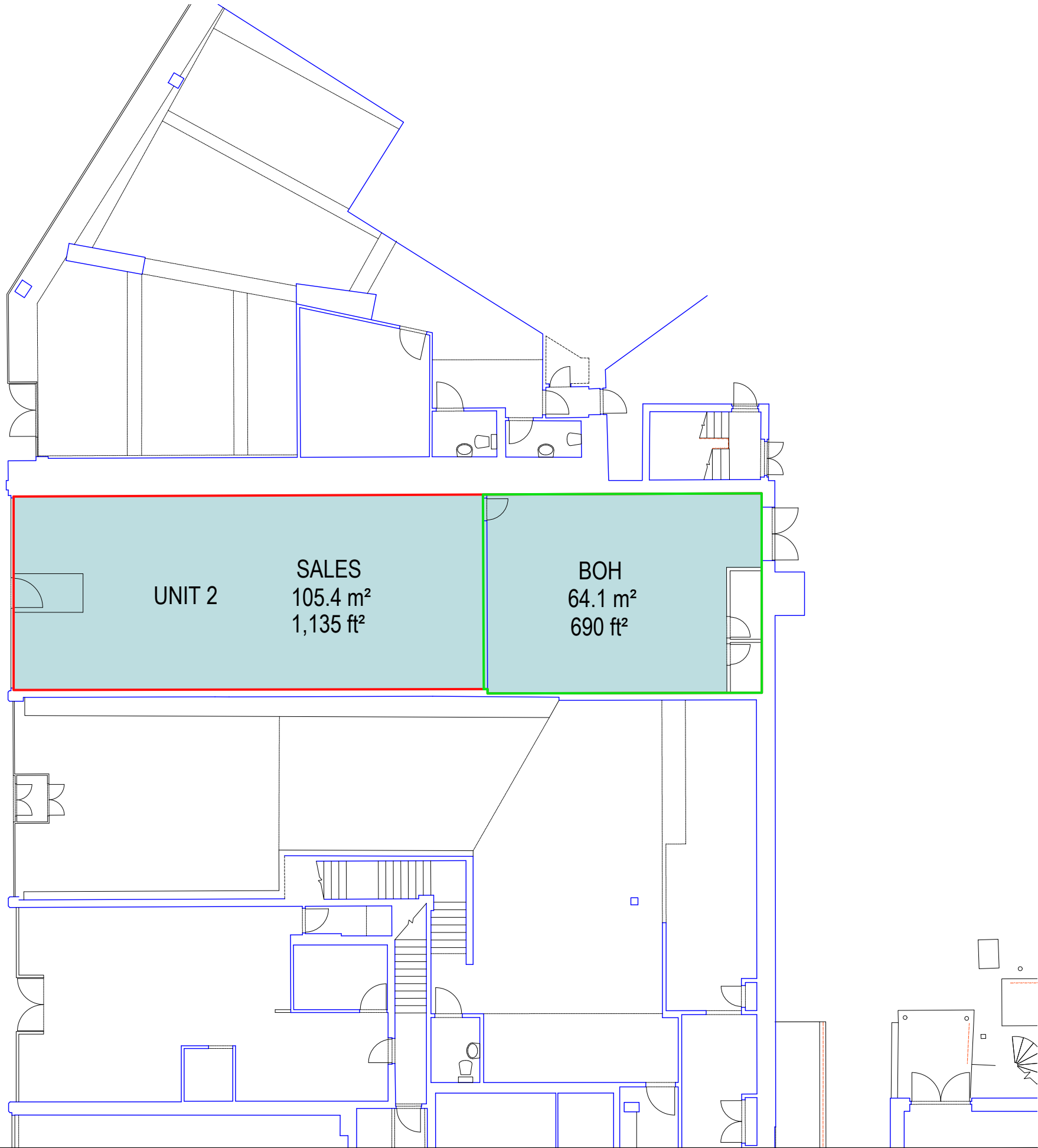
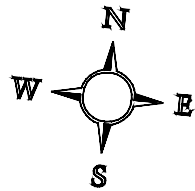
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AYLESHAM CENTRE
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Level GROUND
Net Internal Area Plan

NIA	164.4 sq m	1,770 sq ft
GIA	169.5 sq m	1,825 sq ft

INCLUDING

SALES FLOOR	105.4 sq m	1,135 sq ft
BOH	64.1 sq m	690 sq ft

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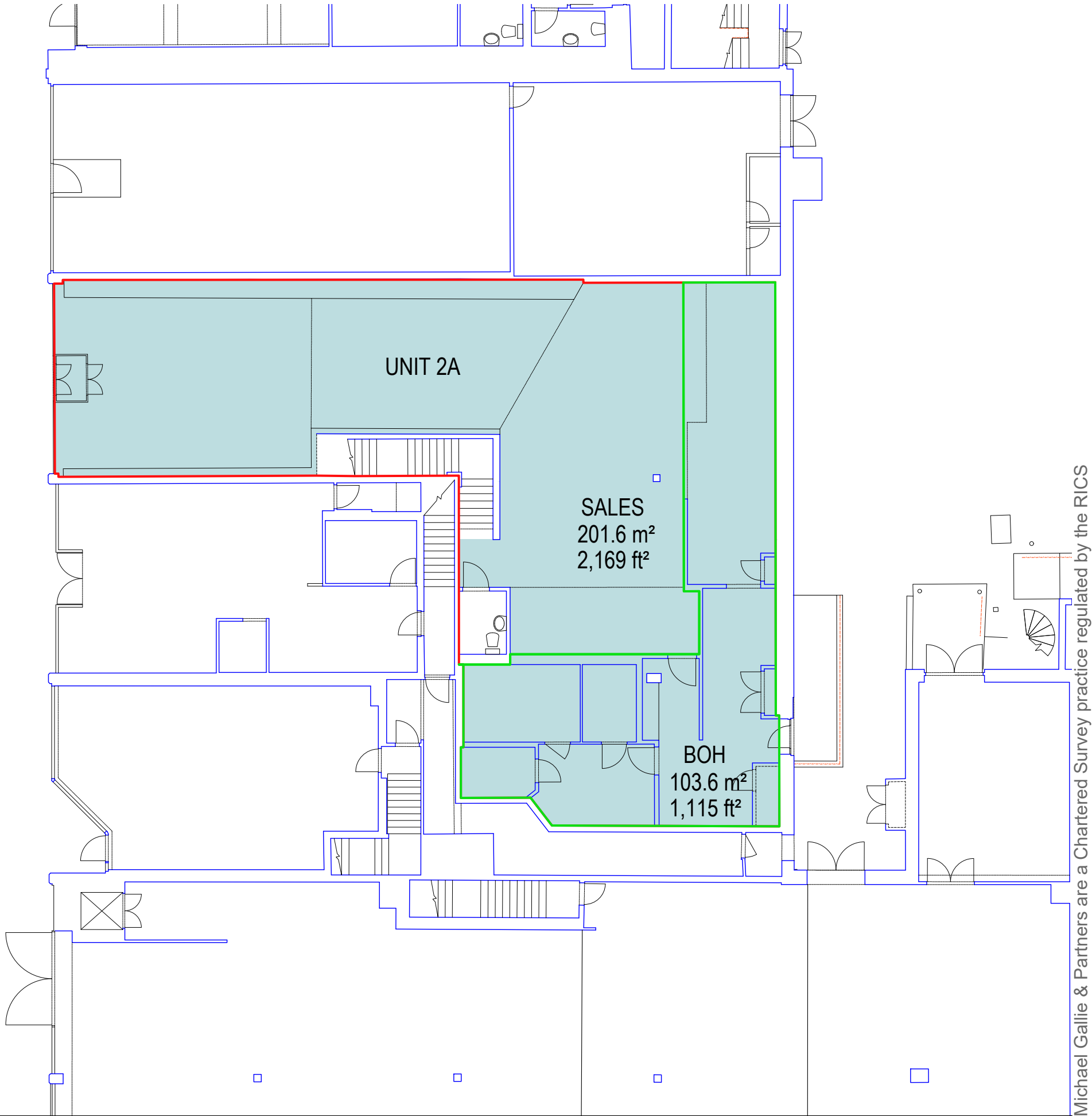
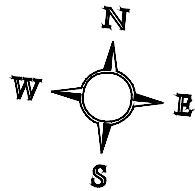
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AYLESHAM CENTRE
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Level GROUND
Net Internal Area Plan

NIA	287.6 sq m	3,096 sq ft
GIA	305.2 sq m	3,286 sq ft

INCLUDING

SALES FLOOR	201.6 sq m	2,169 sq ft
BOH	103.6 sq m	1,115 sq ft

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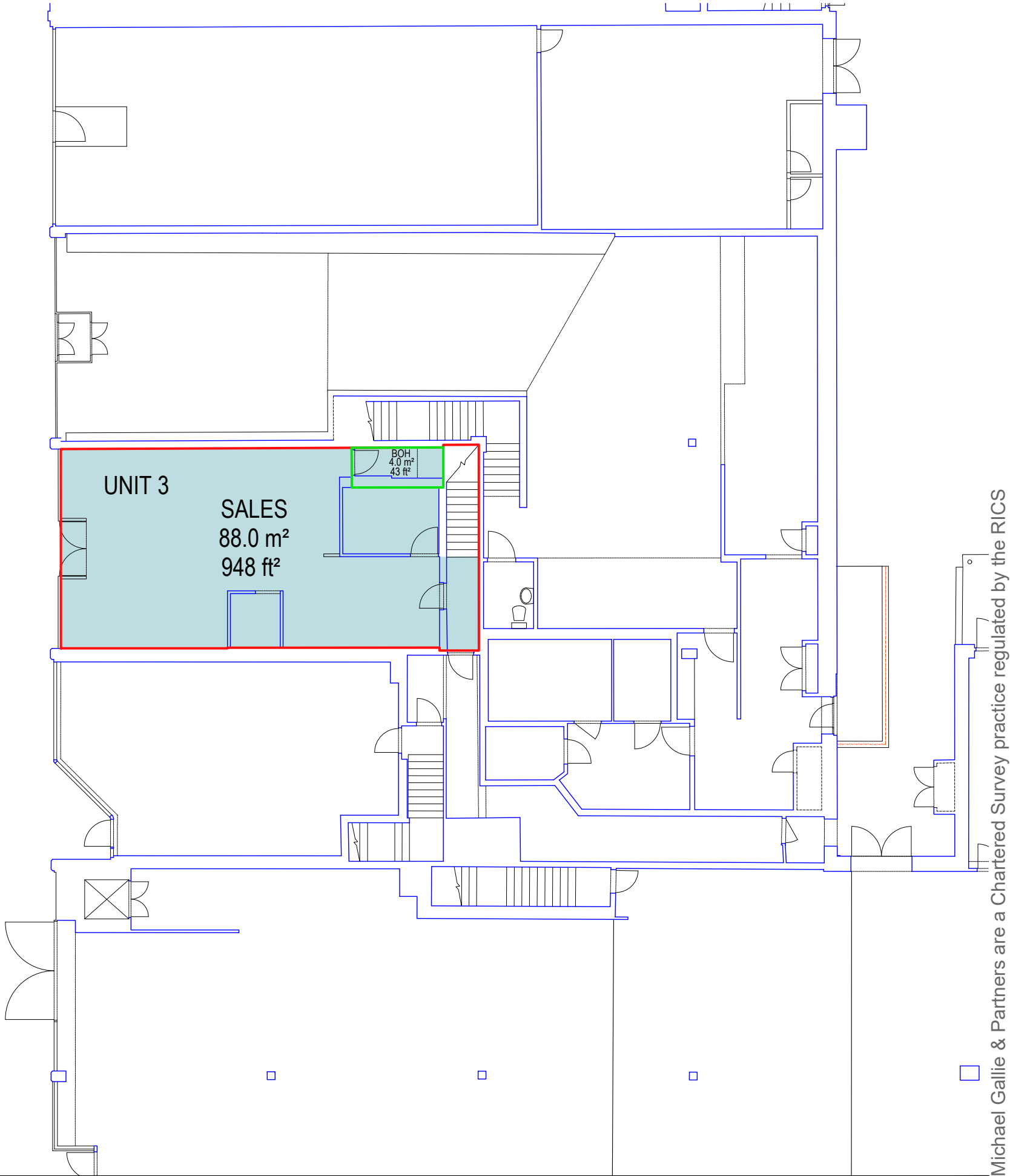
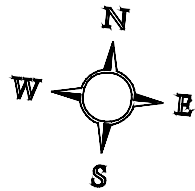
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Level GROUND Net Internal Area Plan

NIA	87.3 sq m	940 sq ft
GIA	92.0 sq m	991 sq ft

INCLUDING

SALES FLOOR	88.0 sq m	948 sq ft
BOH	4.0 sq m	43 sq ft

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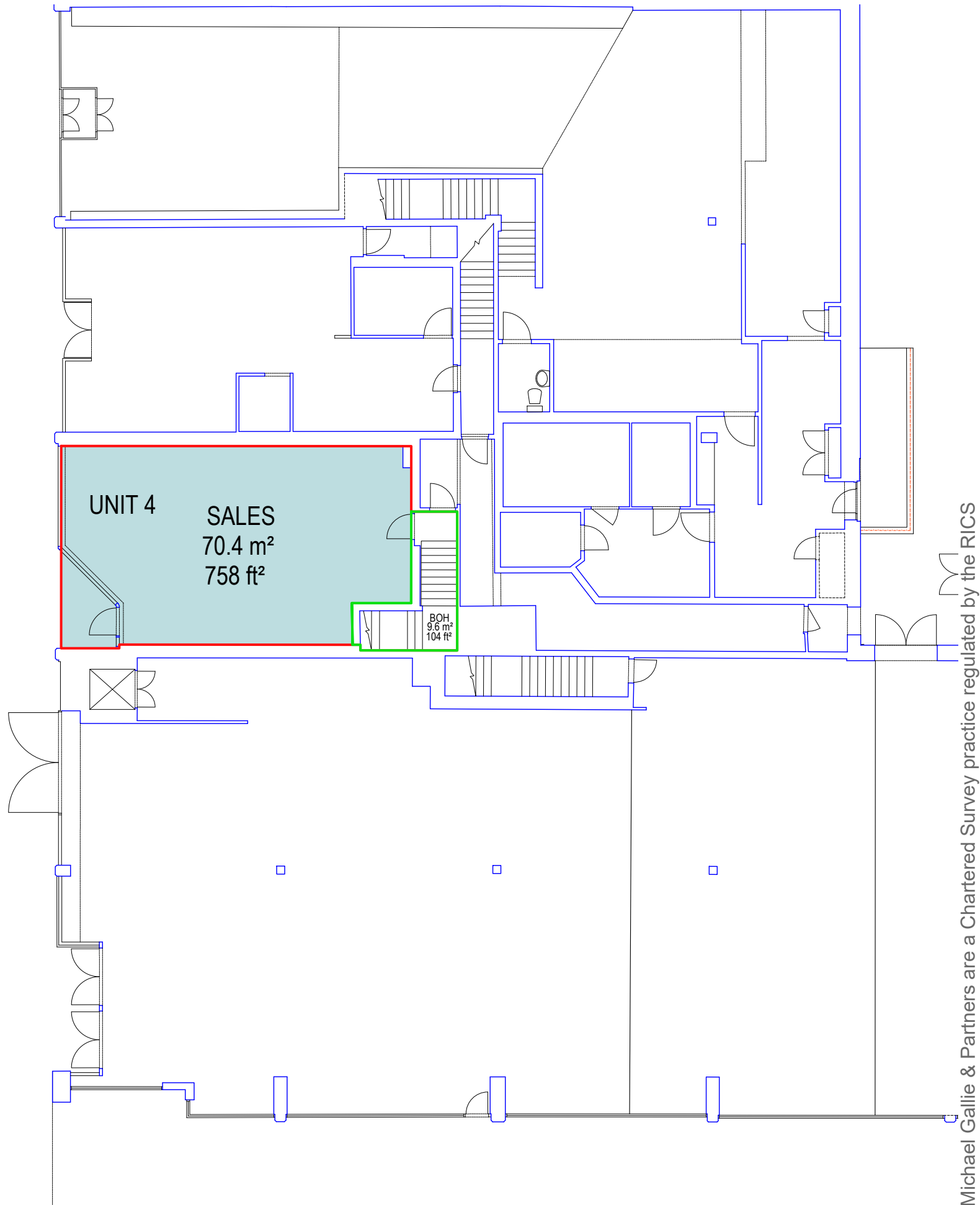
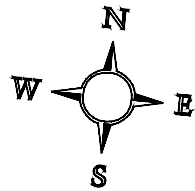
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AYLESHAM CENTRE

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Level GROUND Net Internal Area Plan

 NIA	70.3 sq m	757 sq ft
 GIA	80.0 sq m	862 sq ft

INCLUDING

SALES FLOOR	70.4 sq m	758 sq ft
BOH	9.6 sq m	104 sq ft

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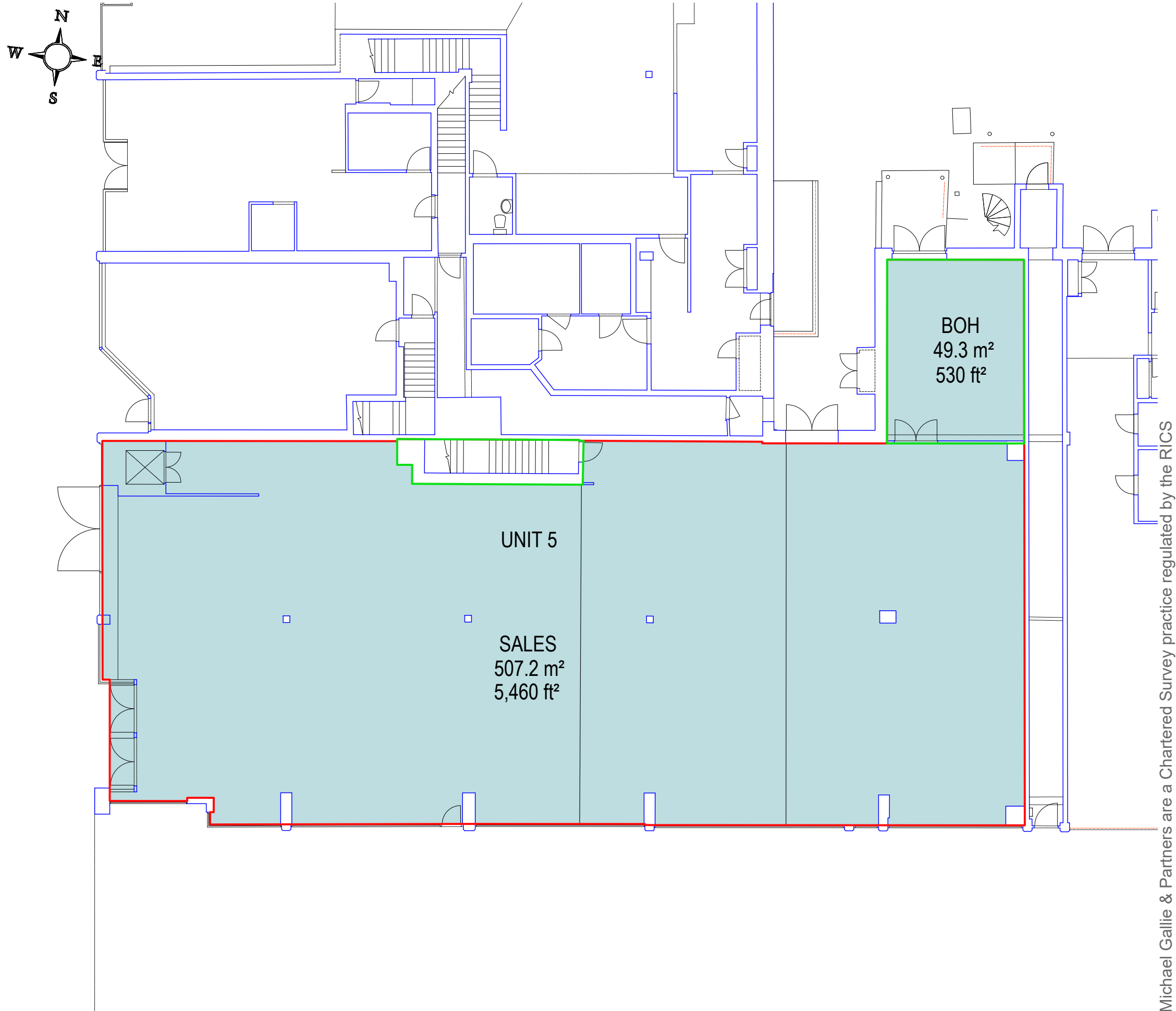
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AYLESHAM CENTRE
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Level GROUND
Net Internal Area Plan

NIA	541.0 sq m	5,823 sq ft
GIA	556.5 sq m	5,990 sq ft

INCLUDING		
SALES FLOOR	507.2 sq m	5,460 sq ft
BOH	49.3 sq m	530 sq ft

UNIT 5

SALES
507.2 m²
5,460 ft²

BOH
49.3 m²
530 ft²

Condition of Site:
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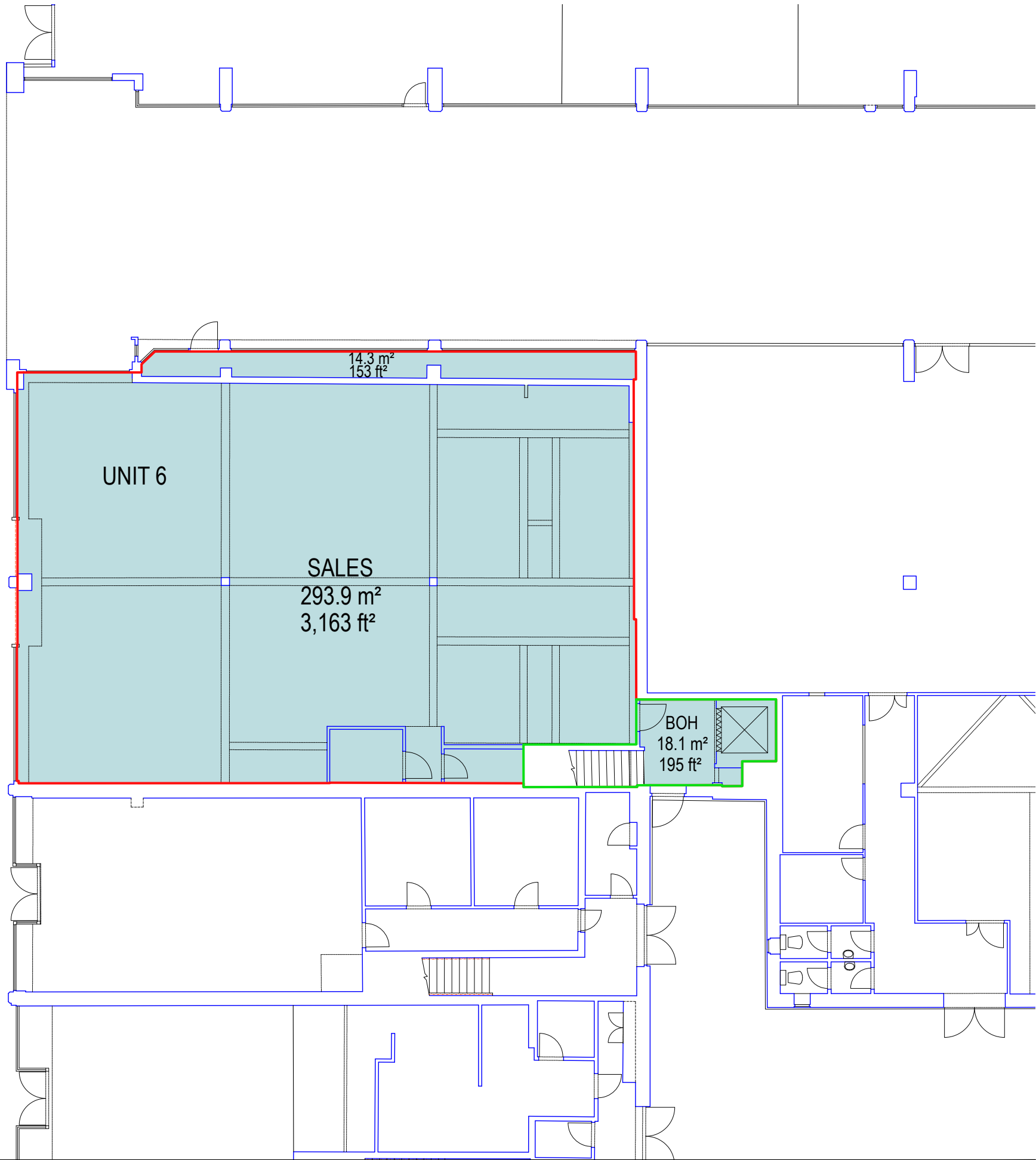
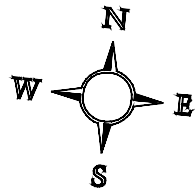
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AYLESHAM CENTRE
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Level GROUND
Net Internal Area Plan

NIA	301.4 sq m	3,244 sq ft
INCLUDED		
EMPTY DISPLAY AREA	14.3 sq m	153 sq ft
GIA	312.0 sq m	3,358 sq ft
INCLUDING		
SALES FLOOR	293.9 sq m	3,163 sq ft
BOH	18.1 sq m	195 sq ft

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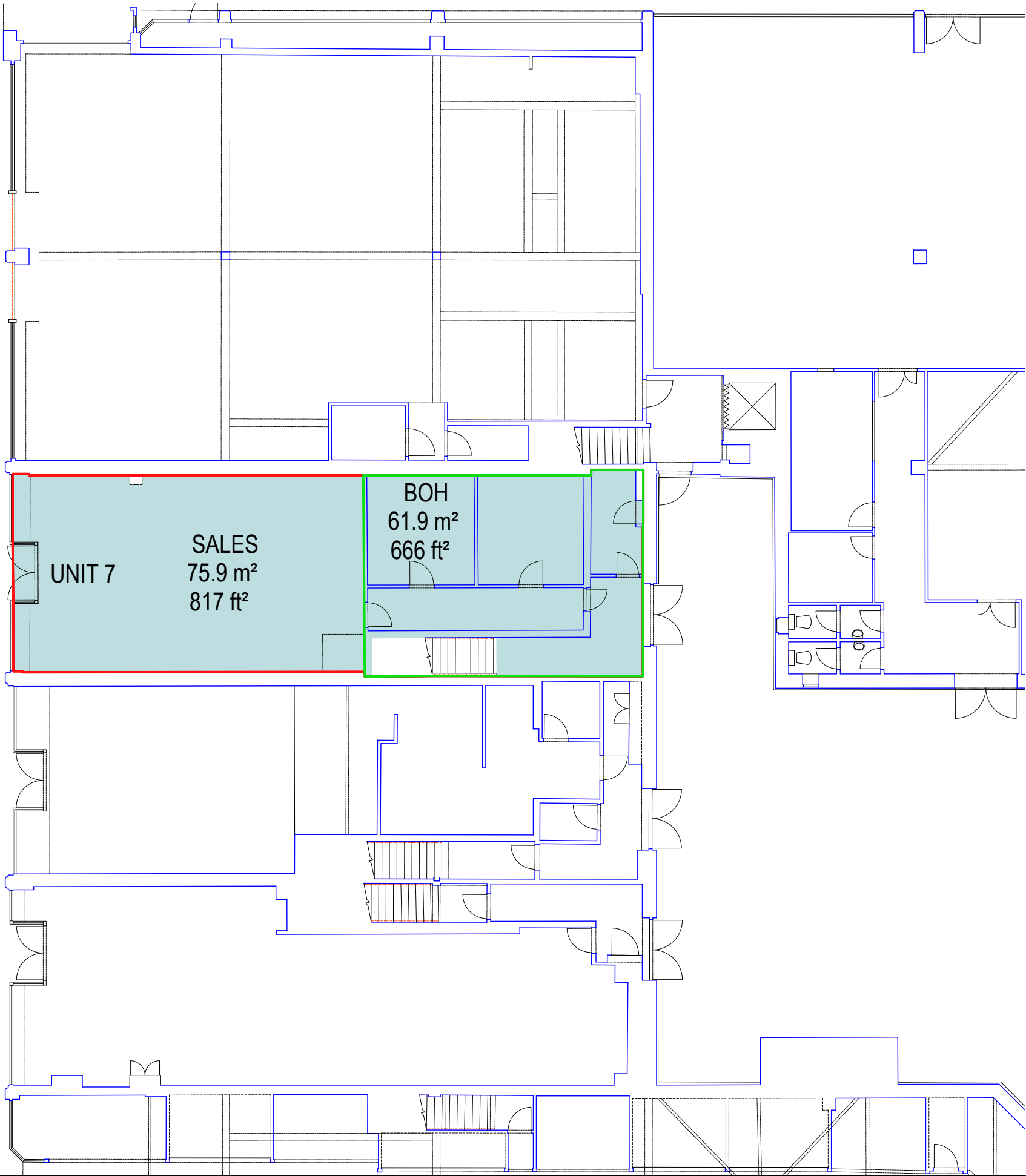
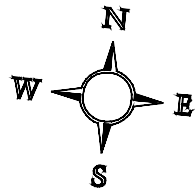
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Level GROUND
Net Internal Area Plan

NIA	132.2 sq m	1,423 sq ft
GIA	137.8 sq m	1,483 sq ft

INCLUDING

SALES FLOOR	75.9 sq m	817 sq ft
BOH	61.9 sq m	666 sq ft

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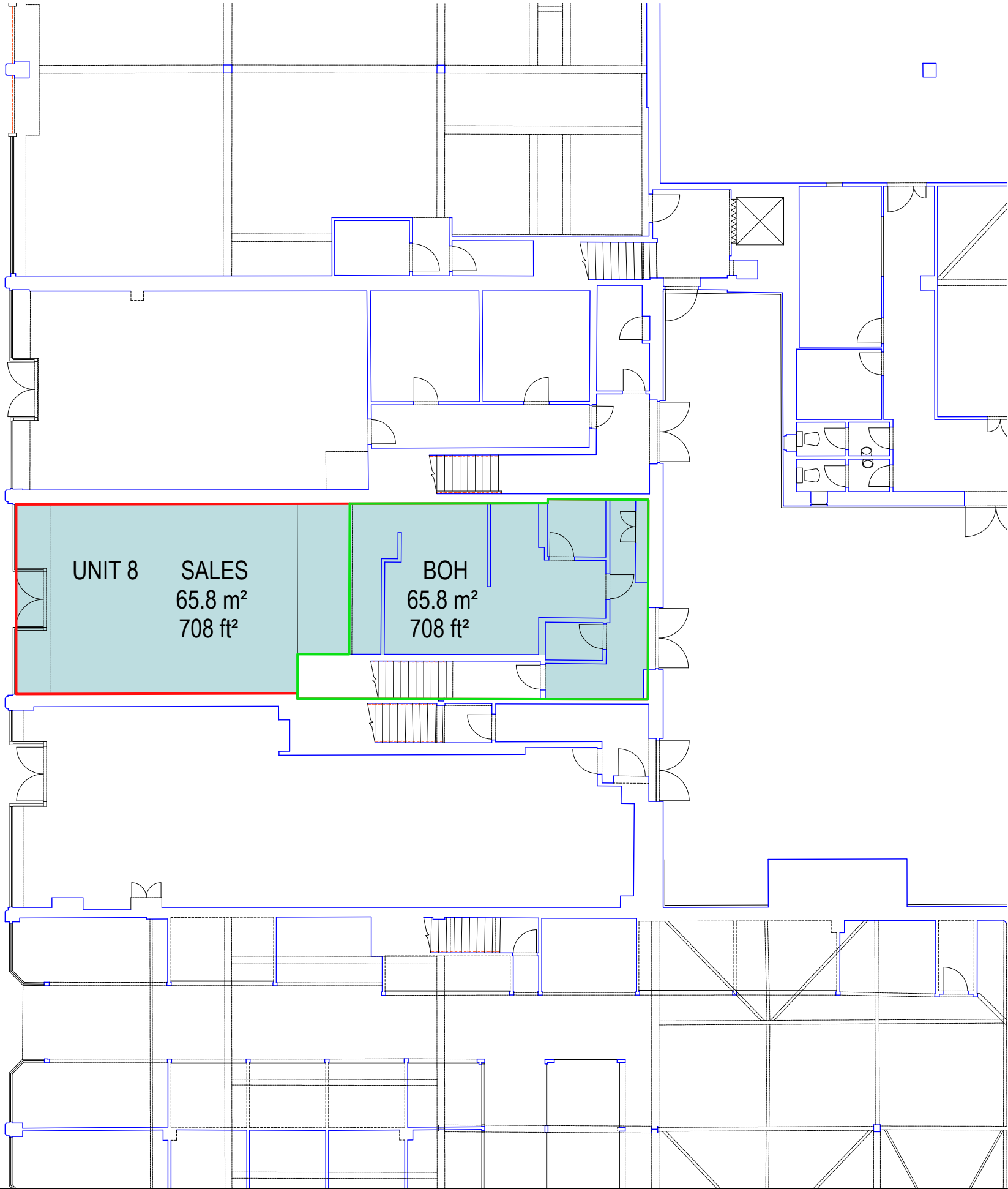
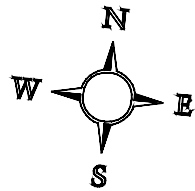
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Level GROUND
Net Internal Area Plan

NIA	119.5 sq m	1,287 sq ft
GIA	131.6 sq m	1,416 sq ft

INCLUDING

SALES FLOOR	65.8 sq m	708 sq ft
BOH	65.8 sq m	708 sq ft

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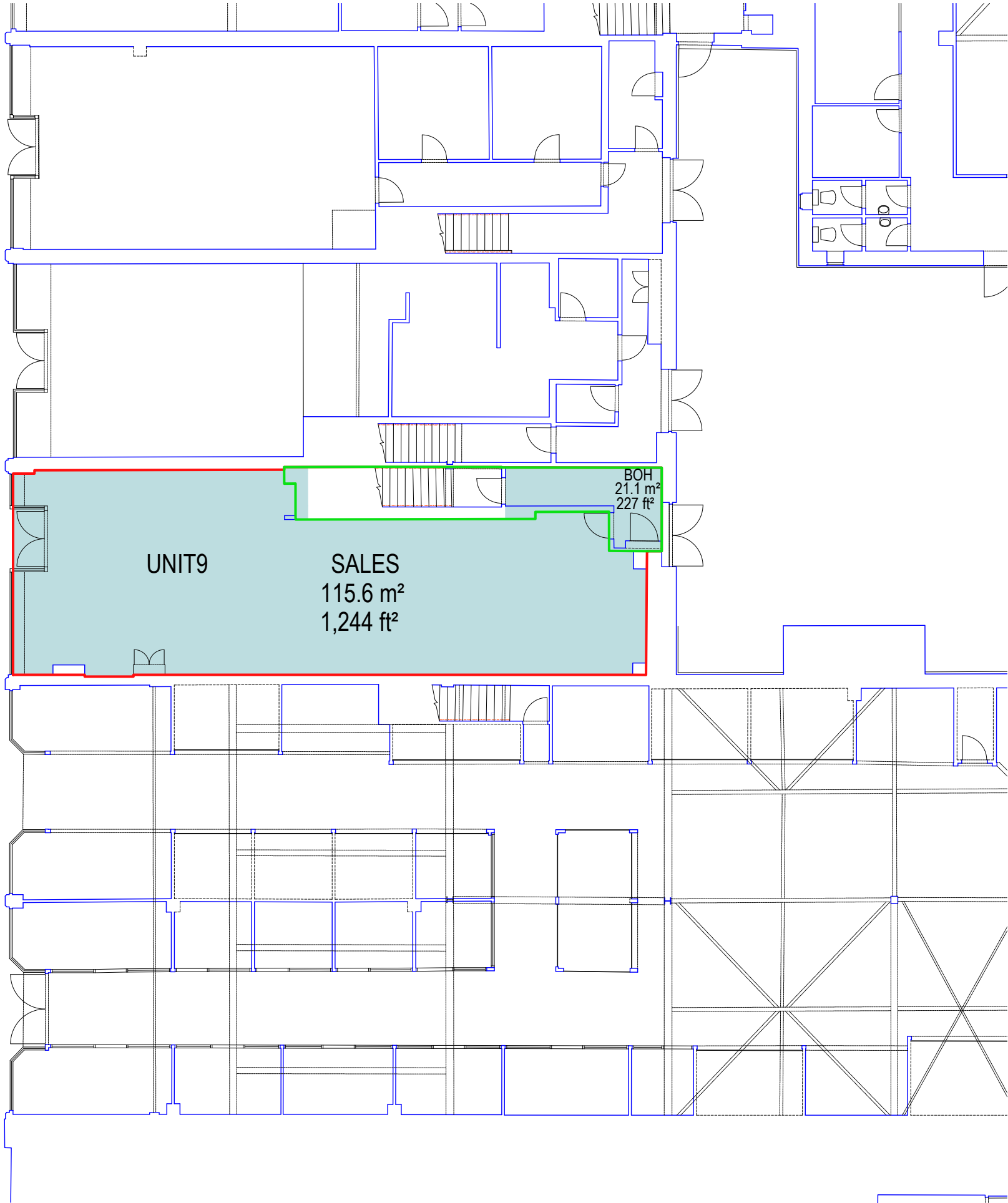
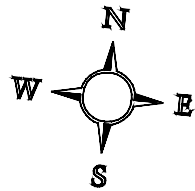
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Level GROUND
Net Internal Area Plan

NIA	125.3 sq m	1,348 sq ft
GIA	136.7 sq m	1,471 sq ft

INCLUDING

SALES FLOOR	115.6sq m	1,244 sq ft
BOH	21.1 sq m	227 sq ft

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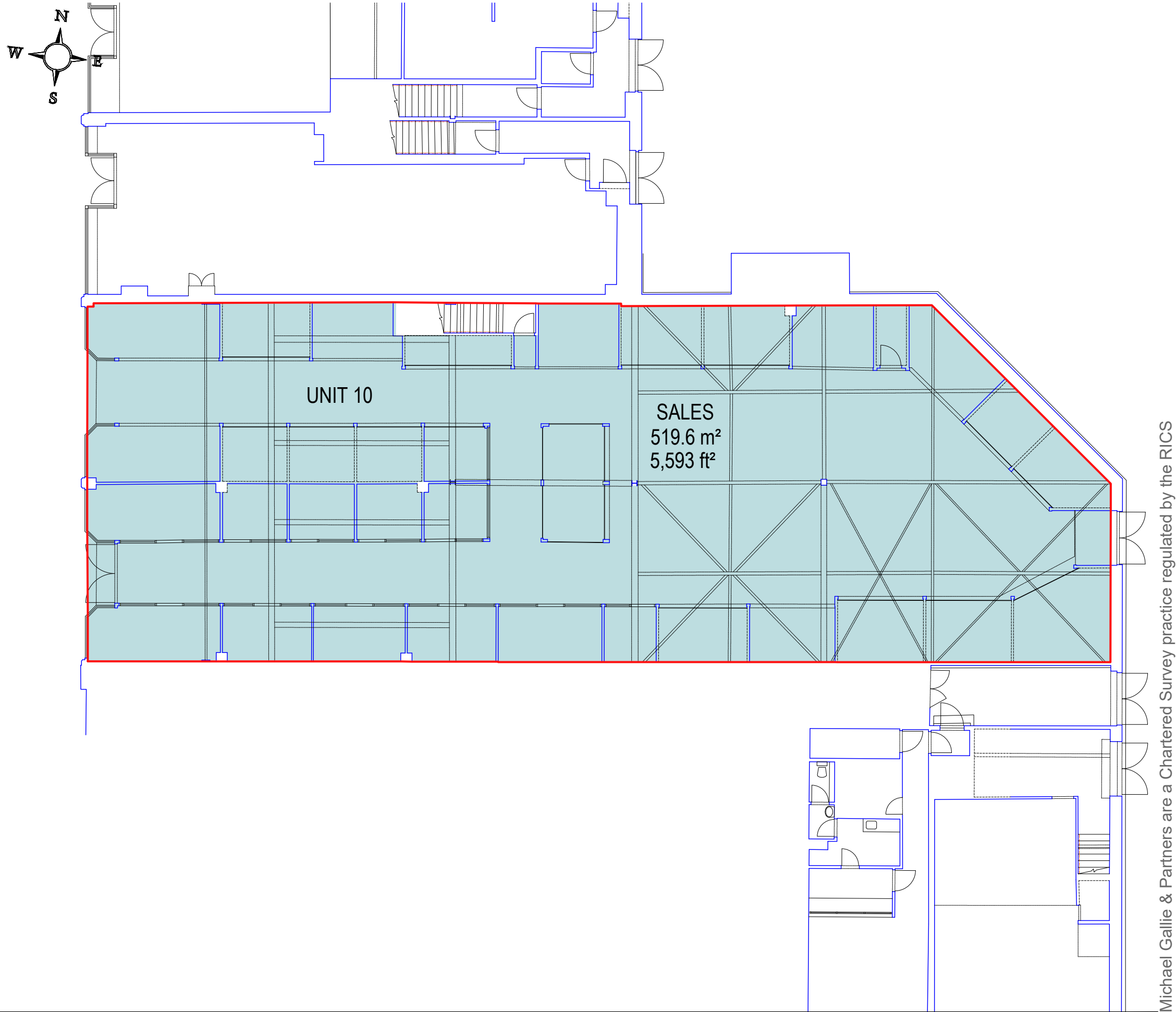
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AYLESHAM CENTRE
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Level GROUND
Net Internal Area Plan

NIA	511.5 sq m	5,506 sq ft
GIA	519.6 sq m	5,593 sq ft

INCLUDING		
SALES FLOOR	519.6 sq m	5,593 sq ft
BOH	0 sq m	0 sq ft

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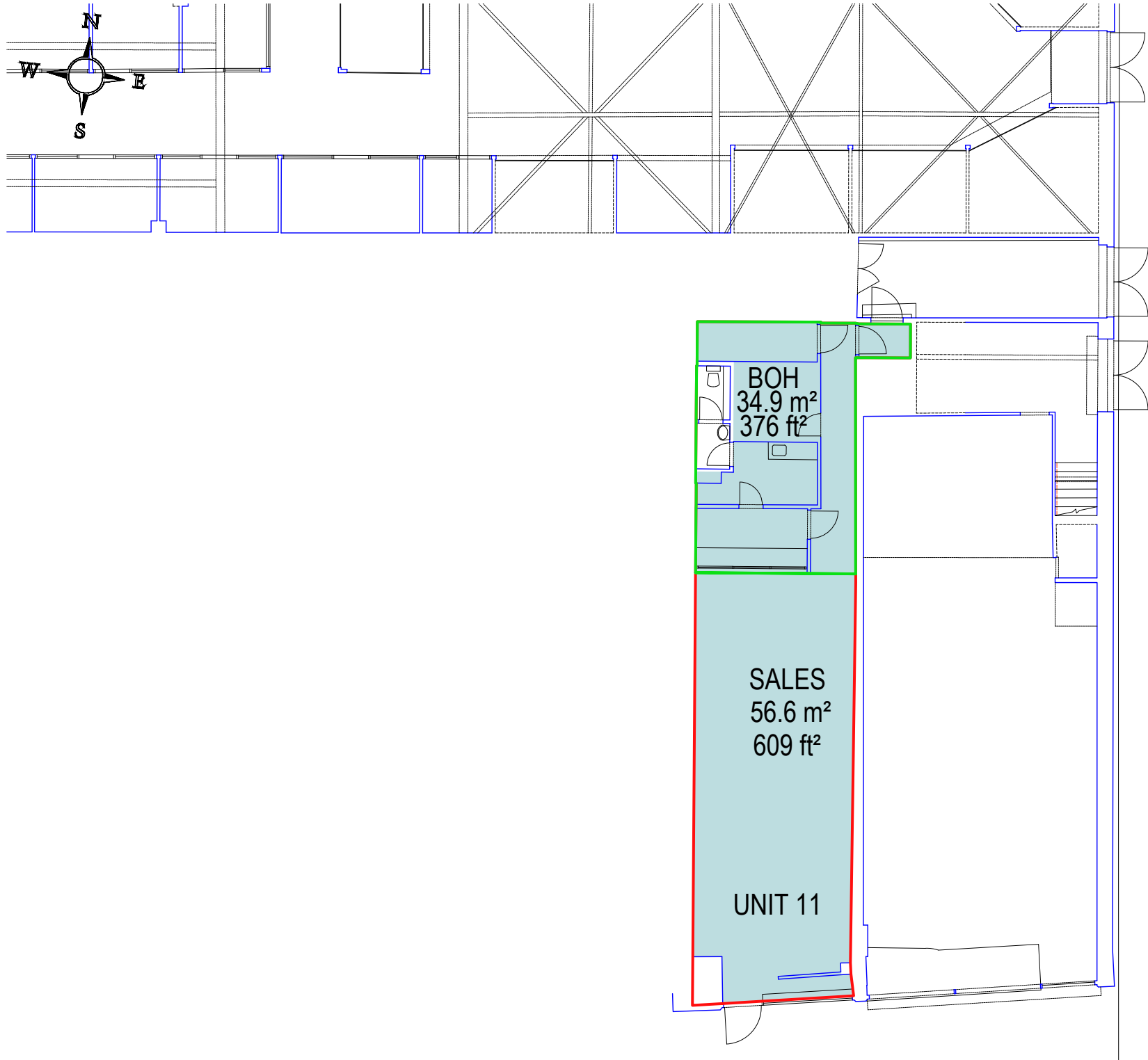
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AYLESHAM CENTRE

PECKHAM, LONDON SE15 5EW

**Level GROUND
Net Internal Area Plan**

NIA	86.8 sq m	934 sq ft
GIA	91.5 sq m	985 sq ft

INCLUDING

SALES FLOOR	56.6 sq m	609 sq ft
BOH	34.9 sq m	376 sq ft

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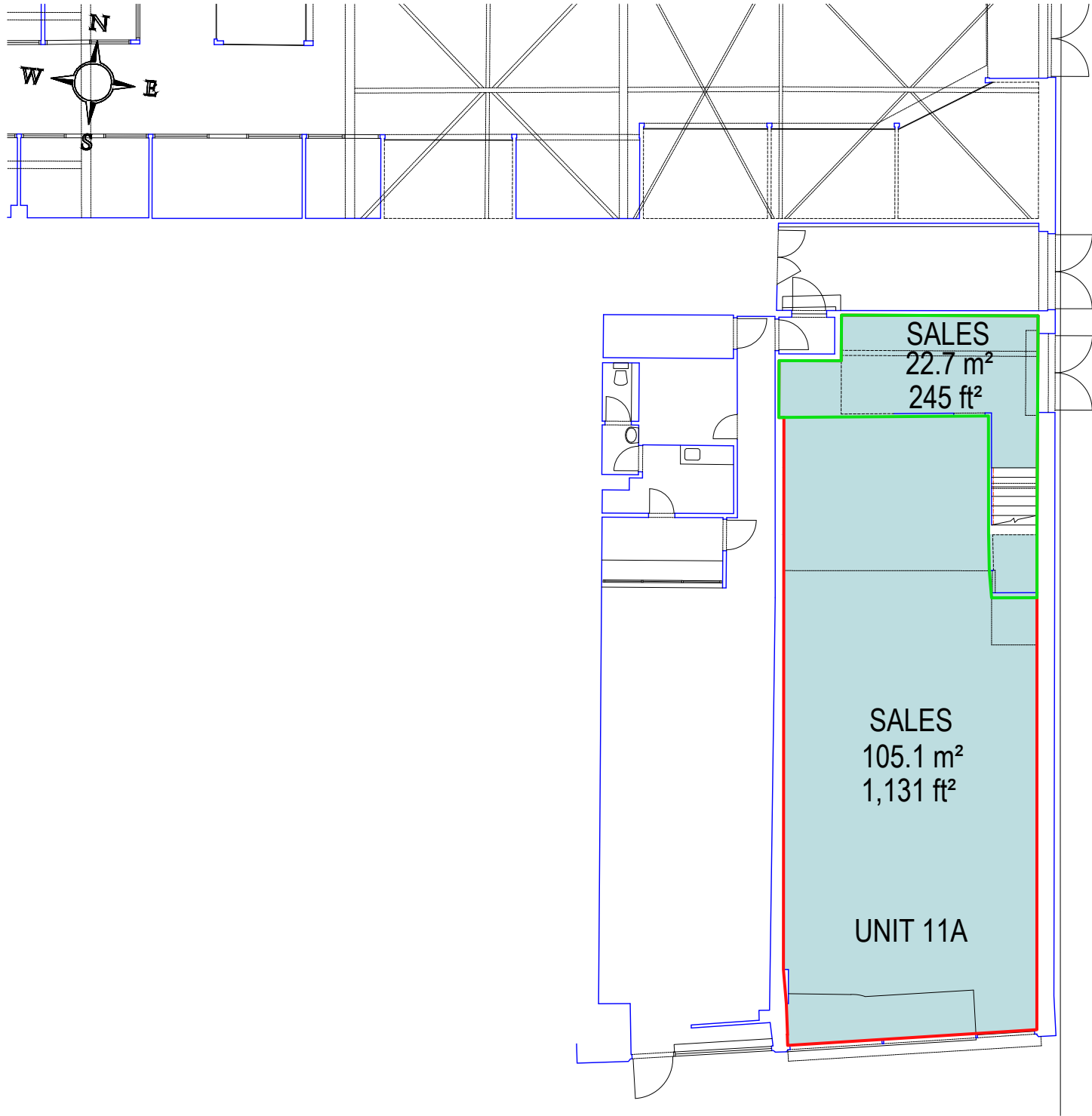
Date:

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AYLESHAM CENTRE
PECKHAM, LONDON SE15 5EW

Level GROUND
Net Internal Area Plan

NIA	125.4 sq m	1,350 sq ft
GIA	127.8 sq m	1,376 sq ft

INCLUDING

SALES FLOOR	105.1sq m	1,131 sq ft
BOH	22.7 sq m	245 sq ft

Michael Gallie & Partners are a Chartered Survey practice regulated by the RICS

Condition of Site:
OCCUPIED

Notes:
The drawing indicates the extent of the quoted areas and is produced to an accuracy suitable for standard presentation scale
The Net Internal Area plan has been scaled for graphical representation purposes and is diagrammatic.
The drawing is archived in AutoCAD DWG digital format.

Revisions:
A -
B -
C -
D -
E -
Date:

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