

AYLESHAM CENTRE

APP/A5840/W/25/3366760

OPENING SUBMISSIONS ON BEHALF OF THE LONDON BOROUGH OF SOUTHWARK

1. The Aylesham Centre and its surrounds present a unique opportunity for a mixed use development in the heart of Peckham, which could deliver new homes to meet local needs, a new and improved retail offer to support the vitality of the town centre, and a new chapter in the placemaking of Peckham.
2. Regrettably, the proposals before this Inquiry fall well short of the aspirations for the site and would represent a significant missed opportunity if granted permission.
3. The London Borough of Southwark has proactively engaged on the development potential of this site for many years. Through the Southwark Plan 2022, site allocation policy NSP74 identifies the Aylesham Centre and the adjacent bus station for mixed use redevelopment including around 850 new homes. It provides certain clear policy steers, consistent with the wider policies of the Southwark Plan and the London Plan including to:
 - a. Provide at least the amount of retail floorspace currently on the site;
 - b. Diversify and complement the existing retail offer in Peckham town centre including suitable space to attract a range of retailers to Peckham;
 - c. Give careful consideration to important local heritage buildings and to the Rye Lane Peckham Conservation Area.

4. The provision of new housing at the site is a key part of the proposed new supply of housing in Peckham for the Southwark Plan period (850 of the 1370 homes to be delivered through Peckham allocations in the plan period).
5. The Plan sets a target of 50% of all new homes as social rented and intermediate homes, with a policy of encouraging developers to increase the provision of social rented and intermediate homes on sites beyond 35% (SP1). This ambition reflects Southwark's success in securing the delivery of affordable homes; but also the fact that they are desperately needed. The principal need for homes in Southwark is in affordable tenure types. In Peckham, that is overwhelmingly what is needed. This is reflected throughout the Southwark Plan: see the vision for Peckham in AV.14, and the clear policy intent of the housing policies: "Homes for all".
6. The proposals before this Inquiry were submitted for determination and consulted upon on the basis that the Southwark Plan's minimum affordable housing provision of 35% would be met. That was a legitimate expectation, since the proposals related to a recently adopted site allocation in a plan which had been found to be deliverable, having been subjected to viability testing.
7. However, the Appellant now advances a scheme which provides for just 12% affordable housing by habitable rooms, or 8% by units. On any view this is a much worse prospect than what was planned for and applied for. Landing a major residential scheme in the middle of one of the most deprived areas of London which barely scratches the surface of the true local housing needs is bad planning.
8. The Appellant's case is that on a straightforward assessment of viability, this scheme cannot bear the delivery of affordable housing. LBS does not dispute the mathematics of that assessment, nor deny that there are major financial challenges to the delivery of affordable housing in London. But the planning system is not simply concerned with the output of financial modelling. That is why

national and local policy recognises that viability assessments are material but not determinative. Part of the nuance is that schemes can be delivered at an assessed viability which is marginal or worse. On occasion profits must to some extent be hoped for rather than banked at the grant of permission.

9. The viability assessment here must not “wag the dog”. The site is a strategic priority and will generate very substantial change. If that is to be positive and to reflect the intent of the Southwark Plan for this site and for Peckham more widely, more must be done to meet local housing needs. Accordingly, and simply, the proposal should be rejected for failing to meet those needs.
10. The proposal also significantly fails when judged against heritage and townscape criteria.
11. The Rye Lane frontage lies within a Conservation Area and the setting of listed and locally important buildings. The frontage was once part of a continuous parade forming the landmark department store of Peckham – Jones & Higgins. The existing Aylesham Centre provided an uninspiring, but modest, intervention in that historic townscape. These proposals – in Block ABC – will do more harm. In certain views they will obscure the appreciation of the historic form of Peckham and remove the link to its emergence from village to town centre. The ability to appreciate this will be undermined by a block of scale and form which will be overbearing, intrusive, and out of character. It will physically obstruct the views between the Clock Tower and the bank end of the terrace, destroying the connection between a sequence of historic buildings. Rye Lane – a dynamic but historic shopping street – will be overshadowed by it. It will stand behind and bear over one of the oldest surviving residential buildings at 58 Peckham High Street. The landmark Clock Tower will no longer be that – in many views it will be seen against and subservient to this large block. The heritage harm is multi-faceted but best encapsulated as an overall conclusion of a moderate to high level of less than substantial harm to the significance of the Conservation Area.

12. The exclusion of the bus station from the proposals for the site is not necessarily problematic, but has been made so by the prominent and cliff-like form of Block L which lies behind it. There is no real attempt here to stitch this tall building, and thus the development as a whole, into the wider townscape. There is no transition in scale or genuine attempt to create a direct and positive relationship with the street.
13. Finally, the proposals fail to provide at least as much retail floorspace as will be lost. This undermines the vitality of the town centre, especially when the generic nature of what is proposed to come next is revealed.
14. In focusing on diversification into food and beverage, boutique fitness, and leisure uses, the Appellant has overlooked the requirement for complementarity. Peckham town centre's distinctive character is defined by its independent retailers and small businesses, many owned by non-white proprietors and selling specialist goods. This community-rooted retail base, reflective of Peckham's demographic, would not be complemented by the larger, homogenous, multiple-brand operators the Appellant seeks to attract through commercial incentives. Quite the opposite: such operators would dilute the culturally unique offer that underpins Peckham's sense of place and would erode the very diversity and authenticity that draws people to the town centre.
15. The absence of any temporary accommodation for small shops and handcart traders, the lack of a right to return for local independent operators and handcart traders, and the failure to demonstrate how the small shops floorspace requirement will be achieved, together risk the permanent displacement of businesses central to Peckham's identity. This would cause lasting harm to the vitality of the town centre, undermining the social and economic fabric that the site allocation and development plan policies are designed to protect and build upon.

16. In short, LBS says this appeal should be dismissed because of a failure to meet the needs and aspirations of Peckham:

- a. for affordable homes;
- b. for new development which builds on and celebrates rather than obscures and undermines a rich urban history expressed through its historic form and fabric;
- c. for a thriving and diverse retail core to support its town centre function.

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