

24/AP/2074

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 . Additional information to describe the proposals: New buildings ranging from 4 to 20-storeys in height (max. 78.4m AOD) 877 new homes 17,251.2sqm of commercial floorspace as follows: Supermarket (Use Class E(a)) 5,994.5sqm (GIA) Supermarket Car Park (Use Class E(a)) 4,731.3sqm (GIA) Workspace (Use Class E(g)) 2,725.3sqm (GIA) Flexible Retail, Leisure, Commercial (Use Class E(a-g) and Drinking Establishment (Sui Generis) 3,800.1sqm (GIA) This application is accompanied by an Environmental Statement (ES) submitted pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended). Electronic copies of the Environmental Statement and Non-Technical Summary are available free of charge and can be provided via a downloadable file provided by email. Printed copies of the Environmental Statement (Volumes 1, 2 and 3) and Non-Technical Summary would incur a printing and postage charge. For further details please contact hello@triumenv.co.uk with reference in email header of Environmental Statement Request Aylesham Centre or Telephone 0203 887 7118.

The Aylesham Centre, Rye Lane, London, Southwark, SE15 5EW

Overview

This application (24/AP/2074) is located in:

- *Peckham Area Vision*
- *Peckham Major Town Centre*
- *Peckham Action Area Core*
- *Peckham and Nunhead Action Area*
- *Hot food takeaway secondary school exclusion zone*
- *Hot food takeaway secondary school exclusion zone*
- *NSP74 Aylesham Centre and Peckham Bus Station*

<i>Requirements of Site Allocation NSP74</i>	<i>Proposed</i>
Site Area: 31,330m2 Existing uses (GEA): Retail –11,420 m2, Bus station – 3,700m2 Indicative residential capacity: 850 homes	877 Homes Flexible Retail, Leisure and Commercial (Use Class E(a -g) / Sui Generis) - 3,800.1m2 Supermarket – 4,429m2
<i>Redevelopment must:</i>	
<ul style="list-style-type: none"> Retain the supermarket use (E(a)) Provide at least the amount of retail floorspace currently on the site 	4,459 sq) Store, including a minimum 2,229sqm Sales Floor Area
<ul style="list-style-type: none"> Retain bus station capacity 	Retained
<ul style="list-style-type: none"> Provide enhanced public realm and civic space 	Defer to design colleagues.
<ul style="list-style-type: none"> Provide new north-south and east-west green links 	Defer to design colleagues.
<ul style="list-style-type: none"> Provide active frontages with retail, community or leisure uses (as defined in the glossary) at ground floor facing Rye Lane and Peckham High Street 	Active frontages provided. Permission seeks a flexibility of uses and therefore does not provide any certainty about the use or that the requirements of the site allocation are being met.

<ul style="list-style-type: none"> 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 	Does not demonstrate some important principles, including how this proposal ensures retail floorspace is retained or how future retail developments do not harm the vitality and viability of the town centres or planned investments in centre. It does not indicate how it will attract a variety of retailers to Peckham.
<ul style="list-style-type: none"> Provide new homes (C3) 	877 homes
<ul style="list-style-type: none"> Provide new intermediate affordable housing through a community land trust. 	No information has been provided to demonstrate how this will be secured and delivered in practice.
<i>Redevelopment may</i>	<i>Proposed</i>
<ul style="list-style-type: none"> Accommodate meanwhile uses on the car park. 	No information available.

Housing

877 homes are proposed which exceeds the indicative site capacity of NSP74: Aylesham Centre and Bus station (for which the indicative residential capacity is 850 homes). Provided all other matters are satisfactory addressed, including those raised below, the contribution that this site would make to the housing supply is welcomed.

Table 9.1 of the Planning Statement states the affordable provision to be 35% as calculated by habitable rooms which is the measurement required by P1. However, the intermediate figures have been be rounded up (from 9.6%) which the Southwark policy does not allow (Table 1, policy P1). Southwark Policy P1 requires a **minimum** of 10% intermediate homes to be provided onsite. Only in exceptional circumstances will offsite or a PIL be accepted. Given the scale of this scheme, onsite provision is expected.

Policy P1 states that viability evidence must be supplied at full application stage to justify this level of provision given that this scheme is not fast track liable. Deliverability must also be demonstrated. The allocation also requires the provision of new intermediate housing through a Community Land Trust, a requirement of NSP 74. Mention has been made of the Community Land Trust and it has been acknowledged that conversations are ongoing. However, no information has been provided to demonstrate how this will be secured and delivered in practice. This must be provided in further detail.

The housing mix has been amended to increase the proportion of 20% family homes as is required by P2 which is a welcome amendment to ensure the needs of family homes.

Commercial/Employment

The applicant should refer to and address the requirements set out under the following Southwark Plan (2022) policies:

- NSP74 – Aylesham Centre and Peckham Bus station
- P31 – Affordable workspace
- P30 – Office and business development
- P32 – Small Shops
- P33 – Business Relocation
- P38 – Protected Shopfronts

Site Allocation Requirements

Policy NSP74 sets out the site allocation requirements. For economy and business, the main points are;

- Retain the supermarket use (E(a))
- Provide at least the amount of retail floorspace as that which is currently on the site;
- 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;
- The site allocation requirements aim to retain or re-provide the supermarket floorspace in addition to the existing retail floorspace on site.

Supermarket and Retail re-provision

- The proposed development includes the demolition and redevelopment of the supermarket, proposing a 48,000sqft (4,459 sqm) Store. The documents submitted in support of this state that this would be a minimum 24,000sqft (2,229sqm) Sales Floor Area, retaining the use of the supermarket as required by the site allocation. Further information regarding the reprovion of sales floor area is required to determine whether this level of provision is sufficient to sustain the catchment area that it currently serves and support the designation of Peckham as a major town centre. The design of the supermarket must consider the opportunities for active frontages and the public realm aspirations as is required by the detailed guidance as set out in the site allocation.
- The permission seeks a flexibility of uses. This does not provide any certainty about the use or that the requirements of the site allocation are being met, particularly as the allocation requires the reprovion of the existing amount of retail. At present, the information provided does not satisfy the requirement of the allocation cannot be made. This is also important to ascertain the sqm of affordable workspace and small shop floorspace required by Policy P35 and P39.
- A retail strategy is included in appendix II of the planning statement. However, it does not demonstrate some important principles, including how this proposal ensures retail floorspace is retained or how future retail developments do not harm the vitality and viability of the town centres. It does not indicate how it will attract a variety of retailers to Peckham which is a requirement of NSP 74 and the area vision for Peckham, which includes the need to diversify and complement the existing retail offer in the town centre and attract a range of retailers of varying sizes. A retail statement should address this, in accordance with the requirements of policy P32 and P35. should include a small shops strategy identifying the 10% small shops required on site and an affordable retail statement.
- An affordable workspace strategy should address the requirements of policy P31.

Commercial/workspace

- The application proposes Flexible Retail, Leisure and Commercial (Use Class E(a -g) / Sui Generis) 3,800.1sqm and which the planning statement says is subject to the following caps: - Up to 350sqm drinking establishments (Sui Generis) - Up to 320sqm of workspace (Use Class E(g)). The current breakdown does not allow officers to determine whether the policy requirement for affordable workspace or small shop requirements has been met.
- Specifically, P32 states that developments proposing 2,500 sqm GIA or more of retail space shall provide at least 10% of this space as small shops.

- Policy NSP 74 states that development must retain the same sq m of retail floorspace which, including the supermarket use, is currently 11,420m². The information submitted shows that the retail requirements have not been met as per NSP74. The scheme delivers 3,800.1 sqm of flexible retail not as part of the supermarket. The requirement for reprovision of the retail floorspace is 6,444.3 sqm, of which the applicant has met 3,800.1 sqm. This is 11,420 sqm (total retail plus supermarket) – 4975.7 (supermarket) = 6,444.3 sqm. Therefore, the required retail reprovision is 6,444.3 sqm excluding the supermarket of which the 3,800.1 sqm falls short of. This also does not consider the flexible uses proposed, which does not provide any certainty that the proposed floorspace would be retail.
- Policy P31 concerns the provision of affordable workspace, required by NSP 74. The applicant must provide marketing strategy for the use and occupation of the employment space to be delivered to demonstrate how it will meet current market demand.
- 10% of employment generating floorspace must be affordable and secured in the legal agreement, in accordance with P31. Further requirements on the local market rent discount, any rent-free periods, service charges etc is required and should be detailed in the Affordable Workspace Strategy. Further requirements of the Affordable Workspace Strategy are found [here](#).
- As above, further clarification on the quantum of employment floorspaces proposed will be required to calculate 10% affordable workspace (P31) and the affordable retail of P35.
- Planning conditions will be required to (safeguard) at least the floorspace required by the site allocation.

Business Relocation Strategy

- Policy P33 sets out the need for a business relocation strategy required where businesses are being displaced. A strategy has been provided although it does not currently provide for a strategy as is required of the guidance on business relocation strategy and is not sufficiently specific. Please refer to the [Business relocation requirements here](#). If small shops are displaced a retail strategy is also required.

Guidance requires at a minimum of the strategy:

- Existing amount of non-residential floorspace (GIA) separated by use class, including vacant units and yards. This should include any floorspace demolished
 - Schedule of existing businesses operating on the site including business sector, estimated number of employees and lease terms
 - Proposed levels of non-residential floorspace (GIA) and yard space, separated by use class, business sector and estimated number of employees
 - Details of engagement with existing businesses on site regarding re-provision of premises or relocation options
 - Details of engagement with the council, local agents, businesses, business associations and workspace providers to secure occupiers for new employment space
- It is recognised that discussions may still be ongoing at this stage. Nonetheless a business relocation strategy must demonstrate that the needs of the businesses have been considered in full in accordance with the Council guidance and the requirements of Policy P35. This must set out whether (1) the businesses will be accommodated in the new development (see guidance for full set of criteria on considering relocation on site) or (2) if not possible, details of arrangements for businesses not relocating on site must be provided. This must be for each business and throughout the lifetime of the development if detailed phasing requires this. Details of each are provided in the guidance linked above which also provides detail on relocation assistance expected.

Public Toilets / Water Fountains

- Policy P35 (Town and local centres) states that larger schemes for main town centres that are 1,000 sqm (gross GIA) or more should provide free public toilets, public drinking fountains and public seating.
- Officers need further information on the proposed provision of public toilets and public waters fountains on site (or off-site if this is the case).

SCI, ES, and EQIA

Document	Section	Comments
General Comments	All	<ul style="list-style-type: none"> • Events and attendance are set out with Engagement Summary and Statement of Community Involvement. This has included many events and drop-in sessions over the course of several years.

		<ul style="list-style-type: none"> • The applicant formed a 'Community Champions Panel', which aimed to be a diverse and broadly representative group of local people. Detailed information on the topics and issues raised within meetings of this panel are included with the SCI. • The Business Relocation Strategy includes a list of applicable stores (as per Policy P33). However, the re-location strategy for these businesses is vague and non-committal. The Strategy states that Berkeley Homes will 'assist in its search', rather than re-locate the business. Further work is needed here to understand the needs of current occupiers and future re-location plans. • Several Education facilities have been consulted with, including Camberwell School of Art. • A map showing addresses of survey respondents has not been filled out. However, the ES includes a map showing where consultation event attendees live/work in the borough. If this information is available, this should be included within the report.
Engagement Summary	Accessibility and Movement	<ul style="list-style-type: none"> • Still limited detail on accessibility needs of pedestrians, wheelchair users, or those with buggies. This section should include how were these groups (those with issues around accessibility) were engaged with and include explicit design solutions that have been incorporated.
	Climate Change and Sustainability	<ul style="list-style-type: none"> • Response should include consideration of ability to adapt to climate change including reducing risks fuel poverty and managing potential overheating.
	Local Economy and Community Infrastructure	<ul style="list-style-type: none"> • Further detail is needed on the number of businesses, and clarification of how many businesses want to return. This is not evident from the Business Relocation Strategy either.
	Social Value Statement	<ul style="list-style-type: none"> • Document mentions 'Community Plan' but does not detail when and how this document will be produced in any detail – this should be expanded upon. Can a copy of the Community Plan be provided?
Equalities Impact Assessment	All	<ul style="list-style-type: none"> • EQIA identifies nearby Gypsy and traveller site (Springtide Close), but it is not included under the protected characteristic a reference to Gypsy, Roma and Traveller Communities. It does not assess in detail the impact of the development on this community or propose mitigations. A section on potential impacts and mitigation should be included. • Impact of climate change, fuel poverty, and overheating (which can disproportionately affect vulnerable groups) is not fully considered.

		<ul style="list-style-type: none"> • Lack of information relating to fear of crime and no targeted mitigations are included. • Document should address how non-English speakers' views were gathered. • The list of mitigations at the bottom, do these apply to all groups or are more specific to a particular group? • Peckham High St Islamic & Cultural Centre – no response received – will further attempts be made to contact them?
	Section 2: Users and Stakeholders	<ul style="list-style-type: none"> • Reports states 'Some of these retailers provide services that could be used predominantly by people of a certain culture, religious or ethnic background. For example Wing Tai Peckham is a Chinese supermarket and PAK Butchers sells halal meat.' • This is not picked up in business relocation strategy or other sections of EQIA – please include this impact in subsequent sections and propose mitigation where necessary. • Are the 10 mall hand carts and the 5 independent shops going to be relocated? The African fabric sales, repair and dress making – this is serving a specific group of people as is the Chinese Medicines and Remedies. This could be drawn out more in the EQIA, the impact of the loss of these units.
	Pregnancy and maternity	<ul style="list-style-type: none"> • EQIA states that air pollution poses higher risk to children and pregnant woman but does not include explicit mitigation measures.

Energy / Climate

BREEAM Comments

Topic	Comment
General	<ul style="list-style-type: none"> • All non-residential development over 500 sqm is targeting "Excellent" - no further comments. • Can the applicant confirm that all non-residential uses have been assessed against BREEAM? Are the fact that some of the non-residential uses are flexible affecting the BREEAM assessment – for example leisure and F&B being assessed as retail?

	<ul style="list-style-type: none"> In terms of water efficiency, the requirements have been met. BREEAM Wat 01 aims to achieve an 'Excellent' Rating and all homes are to achieve a water use of less than 105 litres per person per day (internal water use).
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Energy comments

Topic	Comment
General	<ul style="list-style-type: none"> Can the applicant please provide some details on which buildings (Buildings A-Q) labelled in Table 6 refer to which in the overall plan as well as the resi/non-resi breakdown of floorspace for each building? Can the applicant please submit a completed GLA Carbon Emissions reporting spreadsheet? Including the EUI and SHD and development information tab. Can the applicant please summarise the overall carbon emissions reduction percentage for the whole site including residential and non-residential? Can any improvements be made o
Part L Compliance	<ul style="list-style-type: none"> All BRUKL reports are passed within Be Lean, Be Clean and Be Green. The residential elements for SAP results show a pass result – no comments.
Be Lean	<ul style="list-style-type: none"> Within Be Lean it is stated that "In this case the 'Be Lean' performance for the heating system should assume the same system and performance values as the existing heat network

	<p>that will be included in the Part L 2021 baseline” - can the applicant please provide additional detail on what is meant by this?</p> <ul style="list-style-type: none"> ○ Specifically, what type of heat network is being referenced in this sentence? ● Achieving savings of 50% within the Be Lean stage for residential development is something which is great to see within an application – can the applicant please provide additional information on the major sources of emissions savings within this stage to understand how this carbon reduction is being achieved? ● Can the applicant please explain why a low carbon scenario is being used for Be Lean but not for Be Green stages for residential development? ● In Table 7, some buildings appear to achieve negative savings for TPER vs. DPER, can the applicant please explain how these negative savings are being achieved for the given buildings and what the key sources of energy demand are leading to their increase over the target rate?
Be Clean	<ul style="list-style-type: none"> ● The applicant has stated that the development will be futureproofed for a connection to a DHN should one become available. ● Can the applicant confirm if a single energy centre is being utilised? ● Are there individual heat pumps or a communal system for ASHP?

	<ul style="list-style-type: none"> • Is the approach the same for residential and non-residential development? • For the affordable housing aspects is this in a separate block or is this spread around?
Be Green	<ul style="list-style-type: none"> • Can the applicant please provide a more detailed layout for the PV layouts for the buildings including the Heat Pump systems and any other additional components which occupy the roof space? • Can the applicant please provide the associated kWp and kWh from the PV areas in Table 12 ? • Can the applicant please provide details if there a difference in approach/layout on resi and non-resi roof space for PV? • Can the applicant please provide an explanation as to why the efficiency of the residential heat pumps is lower than that for the non-residential heat pumps? • Can the applicant some more details on the utilisation of heat pumps to provide heating and hot water, detailing the number of heat pumps which each building is estimated to have and the associated heat demand for which it is meant to be designed? • Can the applicant please explain what is meant by “required” PV areas outlined in Figure 9 and Table 12? • Is the applicant expecting to utilise all of the solar PV generation from the PV layout? If not, is there consideration of exporting excess electricity into the grid? If so, has the applicant considered establishing a grid connection and export tariff for the excess electricity?

Overheating	<ul style="list-style-type: none"> • Has the applicant considered utilising the heat pump systems to provide cooling for residential and non-residential uses? • Has the applicant considered the constraints for natural ventilation during the evening/night, considering that the development will be in close proximity to a busy road (Peckham High Street) and Pub (Prince of Peckham)? How has this been built into the modelling? • Some apartments are showing exceedance of TM59 under future weather files – can any further mitigation be used here to reduce overheating in these apartments.
Be Seen	<ul style="list-style-type: none"> • Can the applicant confirm that they have uploaded the necessary contextual and performance data to the 'be seen' portal? • Can the applicant confirm the target dates for all subsequent 'be seen' stages? • Can the applicant please confirm that metering plans will be put in place to enable the in-use energy performance reporting?

Whole Life Cycle Carbon

Topic	Comment
Project and assessment details e.g. brief description of the project, software tool used, type of EPDs used.	<ul style="list-style-type: none"> • Provided in the GLA spreadsheet – no further comments.
Confirmation that the assessment accounts for a minimum of 95 per cent of the capital cost allocated to each building element category (or an explanation of any omissions).	<ul style="list-style-type: none"> • Provided in the GLA spreadsheet – no further comments.
An explanation of the third-party mechanisms that have been adopted to quality assure the submission.	<ul style="list-style-type: none"> • Provided in the GLA spreadsheet – no further comments.
Confirmation that options for retaining existing buildings and structures have been fully explored before considering substantial demolition, including incorporating the fabric of existing buildings into the new development.	<ul style="list-style-type: none"> • Provided in the GLA spreadsheet – no further comments.
The carbon emissions associated with pre-construction demolition.	<ul style="list-style-type: none"> • Provided in the GLA spreadsheet – no further comments.
The percentage of the new build development that will be made up of existing façades, structures, buildings.	<ul style="list-style-type: none"> • 0% - provided in the GLA carbon emissions reporting spreadsheet.
Summary of key actions to achieve the WLC emissions reported and the emission reductions they are expected to achieve,	<ul style="list-style-type: none"> • Provided in the GLA spreadsheet – no further comments.

including from the retention, reuse and recycling of existing structures and materials that are already on-site	
Opportunities to reduce the development's WLC emissions further.	<ul style="list-style-type: none"> • Key actions have been provided in the GLA spreadsheet. However, can the applicant please explain at a high level which options were explored and discounted and the reasons for why they were discounted?
Completion of the 'material quantities and end-of-life scenarios' table covering all building element categories.	<ul style="list-style-type: none"> • Provided in the GLA spreadsheet – no further comments.
Completion of the 'GWP of all life-cycle modules' table. Modules C3 and D of the GWP reporting table should also be informed by the Circular Economy Statement. Module B6 should be informed by the methodology outlined in the 'Be Seen' energy monitoring guidance.	<ul style="list-style-type: none"> • Provided in the GLA spreadsheet – no further comments.

Circular Economy

Topic	Comment/Relevant information
CE targets	<ul style="list-style-type: none"> • Policy requirements are being met as shown in the GLA spreadsheet – no further comments.

CE design approaches	<ul style="list-style-type: none"> • Within cell D47 within the GLA spreadsheet, outlining the Retain and Retrofit CE design approach, it is stated that “The Proposed Development primarily involves converting existing structures into residential units” - however, in the WLC spreadsheet, it is stated that no amount retrofitting will be taking place. <ul style="list-style-type: none"> o Can the applicant please explain whether elements of the existing structure will be retained/retrofitted and if so, update the WLC spreadsheet and pdf.
CE design principles by building layer	<ul style="list-style-type: none"> • No comments.
Pre-redevelopment audit	<ul style="list-style-type: none"> • This is provided in Appendix B – this has been reviewed and there are no comments.
Pre-demolition audit	<ul style="list-style-type: none"> • This is provided in Appendix B – this has been reviewed and there are no comments.
Bill of materials	<ul style="list-style-type: none"> • This has been filled out in the GLA spreadsheet – no further comments.
End of life strategy	<ul style="list-style-type: none"> • This is included in the CE statement – no further comments.

Operational waste management plan	<ul style="list-style-type: none"> • This is provided in the Operational Waste and Recycling Management Strategy document – no further comments.
Recycling and waste reporting	<ul style="list-style-type: none"> • Can the applicant please confirm how this will be made available to the council once the data is collected?
Lessons learnt and key achievements	<ul style="list-style-type: none"> • Can the applicant please confirm how this will be made available to the council once this information is gathered?