GREATER**LONDON**AUTHORITY

Good Growth

Tom Matheou
Avison Young
By email

Our ref: 2024/0001/P2F
Date: 13 March 2024

Dear Tom Matheou

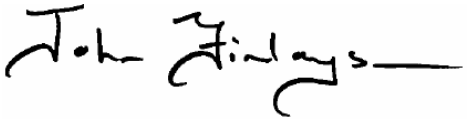
Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: The Aylesham Centre, The Aylesham Centre, Morrisons And Associated Car Park, Hanover Park, Peckham, Southwark, London, SE15 5EW
LPA: Southwark
Our reference: 2024/0001/P2F

Further to the pre-planning application meeting held on 16 February 2024 I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



John Finlayson

Head of Development Management

cc Allison Flight, Deputy Head of Development Management
TfL

Gardiner Hanson
Avison Young
By email

Our ref: 2022/0214/P2I
Date: 27 May 2022

Dear Gardiner Hanson

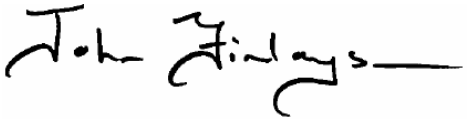
Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: The Aylesham Centre, The Aylesham Centre, Morrisons And Associated Car Park, Hanover Park, Peckham, Southwark, London, SE15 5EW
LPA: Southwark
Our reference: 2022/0214/P2I

Further to the pre-planning application meeting held on 28 April 2022, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



John Finlayson

Head of Development Management

cc Allison Flight, Deputy Head of Development Management
TfL

pre-application report 2022/0214/P2I

27 May 2022

The Aylesham Centre, Peckham

Local Planning Authority: Southwark

The proposal Comprehensive phased redevelopment of the site involving the demolition of all existing buildings and the provision of 1045 new homes, alongside significant retail (and other E-class commercial/business/service use) floorspace (including the re-provision of the existing Morrisons store) and associated works.
The applicant The applicant is **Berkeley Homes** and the architect is **Sheppard Robson.**
Assessment summary The proposed development of the site to demolish the existing shopping centre and deliver a mixed-use residential and commercial development is supported in line with Policies SD6, SD7 and H1 and Objective GG2 of the London Plan. However, further consideration should be given to the provision of a north-south bus route and changes to the massing to reduce the visual impacts.
Key next steps The future application will need to address the issues raised in this report with respect to urban design, affordable housing, fire safety, transport, and sustainability.

Context

1. On 28 April 2022, a virtual pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held the following attendees:

GLA group

- Zeb McInnes, Strategic Planner, GLA (case officer)
- Matt Christie, Team Leader – Development Management, GLA
- Mathieu Proctor, Team Leader – Growth Strategies & Urban Design, GLA
- Tim Gould, Spatial Planner, TfL

Local Authority

- Thomas Weaver, London Borough of Southwark
- Victoria Lewis, London Borough of Southwark
- Catherine Jeater, London Borough of Southwark

- Colin Wilson, London Borough of Southwark

Applicant

- Chloe Young, Development Director, Berkeley Homes
- Jacob Dunn, Senior Development Manager, Berkeley Homes
- Tom Anthony, Planning and Development Manager, Berkeley Homes
- Claire Haywood, Partner, Sheppard Robson
- Tom Kyle, Associate Partner, Sheppard Robson
- Brendan Weaver, Associate Director, Arup
- Lewis Eldridge, Director, The Townscape Consultancy
- Nick Alston, Principal, Avison Young
- Greg Smith, Associate Director, Avison Young

2. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3. The 2.7-hectare site is located within the Peckham Town Centre on a block bounded on its northern edge by the rear of a terrace and a bus station fronting Peckham High Street (part of the TfL road network), its western edge by Rye Lane, its southern edge by Hanover Park, and its eastern edge by McKerrell Road (each borough roads). The site is occupied by The Aylesham Centre and Morrisons Supermarket, a single-storey commercial development, with surface carpark and petrol filling station.

4. The site is located within the site allocation NSP74 'Aylesham Centre and Peckham Bus Station' in the Southwark Plan. The site allocation has an indicative residential capacity of 850 homes and the redevelopment must retain the supermarket use, re-provide the existing floor space, provide new housing including affordable housing, and provide new links, public realm and landscaping. A 20-storey height restriction on development proposals should be observed.

5. The north and west boundaries of the site lie within the Rye Lane Peckham Conservation Area. Two listed buildings are located nearby: Baptist Chapel to the south and 58 Peckham High Street to the north-west. Several locally listed buildings are in close proximity to the site.

6. The Peckham Bus Station is located immediately to the north of the site. There are other bus stops on Hanover Park and Rye Lane and further east on Clayton Road. The nearest railway station is Peckham Rye, which is located between 250 and 500 metres south of the site on Rye Lane. The railway station is not currently step-free however there are plans to upgrade the station to make it fully accessible. The site has a Public Transport Accessibility Level (PTAL) of 6b, which is the highest level.

7. A mostly unsegregated cycleway runs along parts of the TLRN carriageway. Rye Lane is pedestrian, cyclist and northbound bus-only with limited servicing access. The section to the south also carries southbound buses. Rye Lane forms part of Local Cycle Network route 22.

Figure 1: Aerial view of the site and surrounds

Details of this proposal

8. Comprehensive phased redevelopment of the site involving the demolition of all existing buildings and the provision of 1045 new homes, alongside significant retail (and other E-class commercial/business/service use) floorspace (including the re-provision of the existing Morrisons store) and associated works.

Figure 2: Masterplan design concept

9. The future application is expected to be referable to the Mayor under the following categories of the Mayor of London Order 2008:

    - ***Category 1A**: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats".*
    - ***Category 1B:** "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings— outside Central London and with a total floorspace of more than 15,000 square metres."*
    - ***Category 1C:** "Development which comprises or includes the erection of a building of (c) more than 30 metres high and is outside the City of London."*

Strategic planning issues and relevant policies and guidance

10. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Southwark Plan 2022 (adopted 23 February 2022) and the London Plan 2021.

11. The following are relevant material considerations:

    - The National Planning Policy Framework and Practice Guidance;
    - National Design Guide; and

12. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

• Good Growth	*London Plan*;
• Economic development	*London Plan; the Mayor's Economic Development Strategy; Employment Action Plan*;
• Regeneration Area	*London Plan; the Mayor's Economic Development Strategy*;
• Housing	*London Plan; Housing SPG; the Mayor's Housing Strategy; Play and Informal Recreation SPG; Character and Context SPG*; *Housing Design Standards draft LPG;*
• Affordable housing	*London Plan; Housing SPG; Affordable Housing and Viability SPG; the Mayor's Housing Strategy;*
• Retail	*London Plan*;
• Urban design	*London Plan; Character and Context SPG; Public London Charter draft LPG; Housing SPG; Play and Informal Recreation SPG;*
• Heritage	*London Plan;*
• Inclusive access	*London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG*;
• Sustainable development	*London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance draft LPG; London Environment Strategy*;
• Air quality	*London Plan; the London Environment Strategy; Control of dust and emissions during construction and demolition SPG*;
• Agent of change	*London Plan*;
• Transport and parking	*London Plan; the Mayor's Transport Strategy*;
• Biodiversity	*London Plan; the London Environment Strategy; Preparing Borough Tree and Woodland Strategies SPG;*

Summary of meeting discussion

13. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to town centres uses, retail, housing, urban design, transport, sustainability, and environment. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Land use principles

Town centre regeneration

14. Policies SD6 and SD7 of the London Plan support the vitality and viability of London's town centres and encourage mixed-use residential development and intensification. Policy SD10 of the London Plan supports boroughs in identifying strategic areas for regeneration in Local Plans and develop policies that are based on a thorough understanding of the demographics of communities and their needs and take into account local circumstances. As such, the proposed mixed-use regeneration of this part of Peckham Major Town Centre could be supported, subject to consideration of the proposed land uses below.

Residential units

15. Policy H1 of the London Plan supports the delivery of new housing on sites within town centres and close to stations. It sets 10-year housing targets for each borough including a target of 23,550 for Southwark. The principle of the addition of residential land uses is supported within this context.

16. The site is allocated as a mixed-use development in the Southwark Plan. The site allocation states there is an indicative site capacity for 850 new homes. The proposed land uses, links, public realm, and landscaping works are consistent with the site allocation. However, with 1,045 homes proposed, significantly more dwellings are proposed in the current pre-application than envisaged by the site allocation.

17. The applicant must ensure that the number of homes does not represent overdevelopment and is clearly informed by a design-led approach that conforms with the requirements of Policy D3 of the London Plan and the other design policies of the London Plan.

Re-provision of retail

18. Policy SD7 of the London Plan states that retail development should be focused on sites within town centres or if no in-centre sites are available, on sites on the edges of centres that are, or can be, well integrated with the existing centre and public transport (the sequential test). The site is located within the Peckham Major Town Centre and is easily accessible by rail and bus. The proposal includes the retention of the supermarket use and re-provision of retail floor space (11,420 sq.m.), which is consistent with the site allocation. The principle of the re-provision of retail is supported within this context.

Bus station and bus services

19. Policy T3 of the London Plan requires states that development plans should ensure the provision of sufficient and suitably located land for the development of the current and expanded public transport system including by identifying and safeguarding new sites/space and route alignments, as well as supporting infrastructure, to provide necessary strategic and local connectivity and capacity by public transport.

20. The Peckham Bus Station which, because of the constraints on bus permeability and its location, serves largely as a bus standing area rather than a public transport interchange and access to the town centre. Earlier proposals for the redevelopment of this site included a north-south street for buses and

cycling through the site adjacent to the frontage of the relocated supermarket, which was strongly supported by GLA and TfL officers. This offered significant benefits to bus to bus interchange, legibility of bus services in the town centre, and journey time and reliability improvements.

21. Further consideration should be given for the potential to provide a bus-only route through the site, with suitable infrastructure for bus stopping. At the meeting it was suggested that provision of a bus-only route would preclude the proposed widening of Rye Lane along that site frontage, however scale plans were not provided so comment cannot be provided. However, GLA and TfL officer's strong preference would be for a bus-only street, with or without northbound buses re-routed from Rye Lane. This would align with Southwark's local policy.

22. Further to this, there is potential for redevelopment of the bus station, which was also a feature of the earlier proposals which was strongly supported by GLA and TfL officers. At the meeting it was discussed that without integration into a comprehensive site redevelopment the bus station imposes a constraint on the site and the design will need to deal with the agent of change issue in respect of noise arising from bus standing and 24/7 bus operations, balcony and window location, and views. In the absence of electric buses, air quality is also an issue. There are also operational and safety concerns due to the bus station being on a potential key pedestrian desire line from Peckham High Street to the development, in particular to the relocated supermarket.

23. A new bus-only 'high street' is a key feature of British Land's Canada Water Masterplan. Millennium Retail Park in Greenwich has a bus-only street along the frontage of the cinema, various food and beverage outlets, a DIY store (with current proposals to replace that with residential development) and what was previously a supermarket (now IKEA).

24. TfL currently has no funding to make any changes to the bus station, so any improvements would need to be funded via site redevelopment and/or third-party funding. There are no plans to bring forward its development in isolation given the challenges that this would present in terms of design, deliverability, and viability, effectively sterilising the site from redevelopment. A masterplan scheme would allow for a better overall design and layout for both sites, and this is more likely to meet London Plan and local policies and deliver the expected high standard of town centre development.

Housing

Affordable housing

25. Policies H4 and H5 of the London Plan seek to maximise affordable housing delivery in London. Policy H4 sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable. Policy H5 and the Mayor's Affordable Housing and Viability SPG establish a threshold approach to viability, whereby schemes that achieve a minimum threshold of affordable housing with a specified tenure split, without public subsidy, while meeting other relevant policy requirements and obligations to the satisfaction of the Council and the Mayor can follow the Fast Track Route. Fast Track schemes are not required to submit a viability assessment or be subject to a late stage

viability review. Schemes which do not meet these criteria must be considered under the Viability Tested Route. The applicant should note that all Stage 1 and 2 referrals following the Viability Tested Route will be required to pay the GLA's costs via an upfront payment of £10,000 plus VAT. More information on this can be found here.

26. In terms of tenure mix, Policy H6 of the London Plan requires a minimum of 30% of units be low cost rented homes (London Affordable Rent or Social Rent), 30% intermediate products, and the remaining 40% to be determined by the Council as low cost rented homes or intermediate products.

27. At the meeting the applicant has indicated that the development would deliver 35% affordable housing with the tenure mix unclear. This offer could meet the criteria set in Policies H5 and H6 of the London Plan and therefore be eligible for the Fast Track Route, subject to the proposed tenure split and affordability meeting GLA and Council requirements. Should the proposed development meet the requirements of the Fast Track Route then an early stage review mechanism would be required in line with Policy H5 of the London Plan. GLA officers request early engagement on any draft S106 agreement to ensure these requirements are appropriately secured in line with the requirements of the London Plan and the Affordable Housing and Viability SPG

First Homes

28. The requirement to reflect First Homes in development plans and planning applications was introduced by a Written Ministerial Statement (WMS) on 24 May 2021, with further details provided in Planning Practice Guidance. At least 25% of the homes within a development should be provided as First Homes, with a minimum discount of 30% of market value secured in perpetuity and with a purchase price that does not exceed £420,000.

29. The GLA's First Homes Planning Practice Note sets out that London Plan policy requirements, London's housing need and deliverability and affordability issues clearly favour the provision of low-cost rent, London Living Rent and London Shared Ownership products over First Homes in London.

30. The applicant does not propose First Homes within the development. This does not raise any strategic concerns and GLA officers will carry out a balancing exercise, taking into account these and any other material considerations at application stage.

Housing choice

31. Policy H10 of the London Plan encourages a full range of housing choice. It states that for low-cost rent, boroughs should provide guidance on the size of units required to ensure affordable housing meets identified needs. The applicant should engage with the Council to ensure that sufficient family-sized housing is provided. Any application should provide a breakdown of the sizes of the proposed affordable and market units.

Children's play space

32. Policy S4 of the London Plan seeks to ensure that development proposals include suitable provision for play and recreation, and incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child that is not segregated by tenure. Further detail is provided in the Mayor's Supplementary

Planning Guidance ‘Shaping Neighbourhoods: Play and Informal Recreation’, together with a population yield calculator.

33. The amount of play space provided on-site/off-site is unclear but should ideally be provided on-site. Further clarity regarding how any play space areas have been calculated should be provided with the measured areas overlaid on detailed landscaping and internal plans to give the Council assurance that the measurements adhere to the Play and Informal Recreation SPG definition of being legitimate. It is unclear whether any additional quantum will be provided off-site. Any provision should be within a suitable walking distance (dependent on the age group as outlined within the SPG) and travel distances should consider physical barrier such as busy roads. Off-site provision, in dialogue with the Council, should also consider any play space deficiencies within the local area.

Urban design

34. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability, and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Optimising development capacity and residential density

35. Policy D3 of the London Plan requires developments to make the most efficient use of land and to optimise density, using an assessment of site context and a design-led approach to determine site capacity. Higher density developments should be promoted in locations that are well connected to jobs, services, infrastructure, and amenities by public transport, walking and cycling. Given the location of the site with good access to jobs, amenities and public transport, the proposed density is appropriate.

36. Policy D4 of the London Plan requires that developments which exceed 350 units per hectare or 30 metres in height, must undergo at least one design review, or demonstrate that they have undergone a local borough process of design scrutiny. Further information on this should be made available to GLA officers as part of any formal application.

Tall buildings

37. Policy D9 of the London Plan seeks to manage the development and design of tall buildings within London. It states that tall buildings should only be developed in locations identified as suitable in development plans, provided that their visual, functional, environmental and cumulative impacts are addressed.

38. Policy P17 of the Southwark Plan identifies buildings above 30 metres (25 metres in the Thames Special Policy Area) or significantly higher than surrounding buildings or their emerging context as tall buildings. Given the proposed building heights, the proposal meets the definition of a tall building as set out in Policy D9 of the London Plan and local policy.

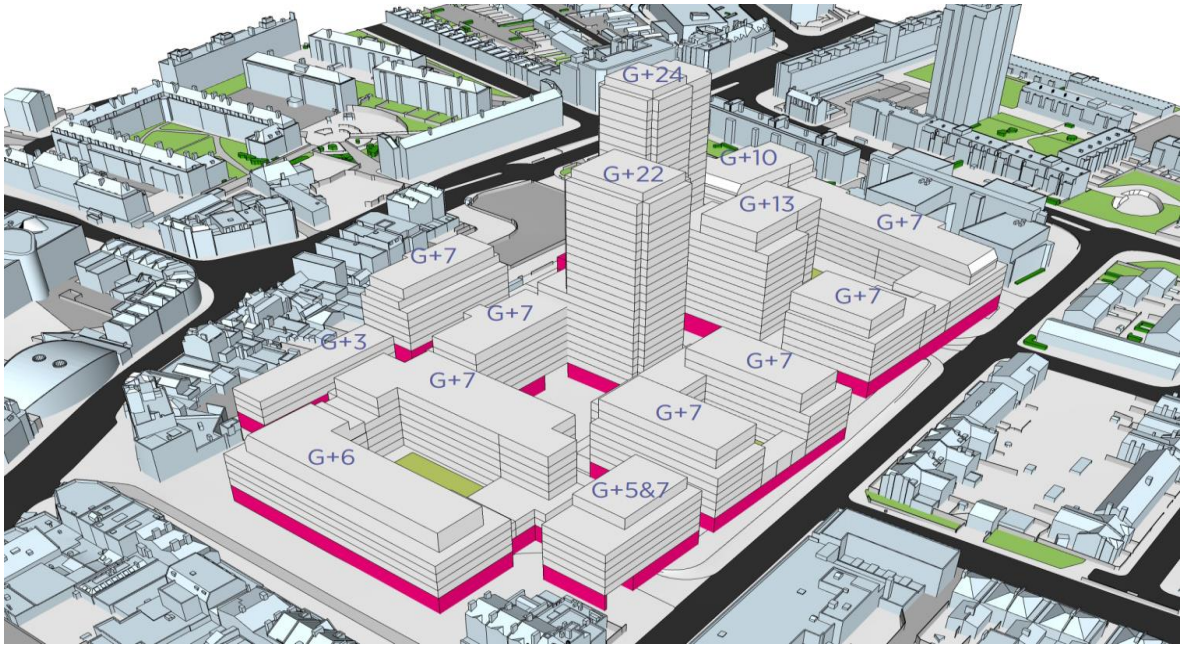


Figure 3: The proposed massing strategy

Appropriateness of the site for tall buildings

39. Policy P17 of the Southwark Plan identifies Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone as the typical areas where tall buildings are expected. Given the site is located within the Peckham Major Town Centre it is considered an appropriate location for a tall building as set out in Policy D9 of the London Plan and local policy.

Visual impacts

40. The proposed development will be 6-24 storeys in height. The overall building height strategy is supported, however, a greater variety in heights and massing is encouraged, with particular concern over the massing in the east of the site around the new towers and proposed supermarket building. The similarity in heights of the two proposed towers compromises the scheme and a greater contrast to create a single focal point should be considered.

Functional impacts

41. The proposed development has a logical layout and would provide an uplift in housing including affordable housing. In addition, the scheme would introduce landscaping and public realm improvements, all of which would support the regeneration of the town centre. The site has a public transport accessibility level of 6b and sufficient public transport infrastructure exists to support the impact of the increased activity on the site. The applicant should work with the Council to ensure that any aviation or telecommunication impacts arising from the development are suitably addressed in line with Policy D9C2f of the London Plan.

Environmental impacts

42. Concern is raised with the density of the development with almost uniform massing limiting lights to homes and spaces. The applicant will need to carry out a daylight and sunlight analysis which should explore any potential impacts on the proposals themselves as well as the existing context. The shadow

studies should help to demonstrate conditions at the winter solstice (when the sun is lowest in the sky) which represents the 'worst case' solar access scenario. The analysis should present the existing and proposed conditions.

43. Given the height of the building, the applicant will need to carry out wind microclimate assessment to avoid any tunnelling effect between the buildings and to open spaces / central square.

Cumulative impacts

44. In terms of cumulative impacts, the height and scale are over and above the prevailing context which is characterised by low-rise development. As such, the development would not result in cumulative impacts with other surrounding tall buildings.

Tall buildings conclusion

45. A final decision will be based on the overall compliance of the development with Policy D9 subject to the above issues being resolved in regards to appropriateness of the site, visual impacts, functional impacts and environmental impacts.

Development layout, public realm, and landscaping

46. The nearby HSBC building is an extraordinary local landmark and any efforts within the masterplan to increase its prominence are supported.

47. The relationship between the proposed development and the existing bus station to the north is unclear and unresolved. Officers query whether there will be a safe and intuitive pedestrian access into the bus station, and onwards to Peckham High Street, from the new proposed north/south route.

48. The proposals to introduce new routes into what has been an impenetrable site is supported. Further consideration should be given to providing more routes/streets through the site, especially east/west. Officers query whether the convoluted route from south-west to north-east can be made clearer and more intuitive.

49. Further consideration should be given to providing more street-level activation outside the proposed supermarket, which will provide life to the public parts of the development, improve access, and deter antisocial behaviour, particular outside of busier times.

50. Further consideration should be given to providing more public realm, potentially modest public space, next to or around the large block on Hanover Park earmarked for leisure use. This may already be the intention with the main north/south route, but slightly unclear at present.

51. The additional 6 metres of public realm on Rye Lane is supported. This should produce a robust, inclusive space capable of accommodating seating and planting of scale. This space has a favourable orientation and could be quite successful. Further consideration should be given to the spaces at the north-west/south west corners of the site, along with the linear Rye Lane space, being one space. This could be designed with a consistency in materials and planting.

52. There appears to be several mature trees on Hanover Place which should be retained wherever possible, complementing new streets and spaces.

53. There is an opportunity for landscape and street trees on McKerrell Road. This is currently quite a hard, urban environment and the new development is an opportunity to soften and green the western side of the street at least.

Architecture and materials

54. Given this is a key site within the town centre and this being a long-term project, consideration should be given to mitigate any blight to Aylesham Centre in short to medium term ahead of its redevelopment.

55. Consideration should be given to variety in scale. Different parts of the site, types of homes or land uses need different architectural approaches. Taller buildings and key parts of the masterplan should be distinctive, as should the various spaces and street elevations, which have the potential to be local landmarks. Peckham has a lot of character and this should inform the evolving architecture. A generic London Vernacular approach would be a missed opportunity.

Residential quality

56. New streets and spaces, especially a major east/west route at top of site, may benefit from generous and distinctive residential entrances. This would increase security and inclusiveness of both homes and streets.

57. Several cores appear to serve more than 8 units, from cranked double-loaded corridors with no access to daylight, sunlight, or natural ventilation. This is not a feature of exemplary design.

58. There are a significant number of single-aspect homes, including single aspect north-facing homes. These are concentrated along the primary east/west route at the top of the site so may also be subject to noise from the street. This may be a symptom of overdevelopment, with a reduction in homes allowing for more through units, etc.

Agent of change

59. Policy D13 of the London Plan sets out the Agent of Change principles, which places the responsibility for mitigating impacts from existing noise and nuisance-generating activities on proposed new noise-sensitive developments. This policy states that developments should employ good design and explore mitigation measures early in the design stage to ensure that established noise and nuisance-generating uses remain viable and without unreasonable restrictions. Any future application must demonstrate mitigation measures to ensure the amenity of the residential units in relation to noise, dust, fumes and light pollution from the road and surrounding non-residential uses.

Fire safety

60. In line with Policy D12 of the London Plan the future application should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

61. Further to the above, Policy D5 of the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.

Inclusive access

62. Policy D3 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The future application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment.

63. Policy D5 of the London Plan requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. The applicant would provide 10% of the rooms as wheelchair accessible, which would be acceptable.

64. The future application should include plans that show where the wheelchair accessible homes would be located and how many there would be. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled. This information and typical flat layouts and plans of the wheelchair accessible homes should be included in the design and access statement. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Sustainable development

Energy strategy

65. The applicant should follow the GLA Energy Assessment Guidance 2020 which sets out the information that should be provided within the energy assessment to be submitted with a planning application.

Net zero carbon target

66. The London Plan requires all major developments (residential and non-residential) to meet a net-zero carbon target. Currently this should be met with a minimum on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations with any carbon shortfall to net zero being paid into the relevant borough's carbon offset fund. The applicant should note that upon adoption of the new Part L of the 2021 Building Regulations on 15 June, applicants will be expected to achieve a minimum 35% improvement over Part L 2021. A minimum 10% saving for residential and 15% for non-residential above Part L 2021 for energy efficiency measures alone will also be expected. The Energy Assessment Guidance is being updated to reflect this.

67. The applicant should submit a completed Carbon Emissions Reporting spreadsheet alongside any planning application to confirm the anticipated carbon performance of the development and should clearly set out the carbon emission factors they are proposing to use in their energy assessment. Although results for both sets of carbon emission factors should be submitted, applicants are encouraged to use the SAP 10.0 carbon emission factors for referable applications when estimating carbon dioxide emission performance against London Plan policies. For developments in Heat Network Priority Areas with the potential to connect to a planned or existing district heating network (DHN) the SAP 2012 emission factors may be used provided that the heat network operator has developed, or is in the process of developing, a strategy to decarbonise the network which has been agreed with the GLA.

68. The carbon emission figures should be reported against a Part L baseline. Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets for all stages of the energy hierarchy should be provided to support the savings claimed.

Be Lean

69. The applicant is expected to meet the London Plan energy efficiency targets:

    a. **Residential** – at least a 10% improvement on 2013 Building Regulations from energy efficiency measures alone

    b. **Non-residential** – at least a 15% improvement on 2013 Building Regulations from energy efficiency measures alone

70. The applicant will be expected to consider and minimise the estimated energy costs to occupants and outline how they are committed to protecting the consumer from high prices. See the guidance for further detail.

Energy flexibility

71. The applicant will be expected to investigate the potential for energy flexibility in new developments, include proposals to reduce the amount of capacity required for each site and to reduce peak demand. The measures followed to achieve this should be set out in their energy assessment. See the 2020 guidance for further details. Thermal as well as electrical storage measures should be considered.

Cooling and overheating

72. The Good Homes Alliance (GHA) Early Stage Overheating Risk Tool should be submitted to the GLA alongside any planning application to identify potential overheating risk and passive responses early in the design process.

73. Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the cooling hierarchy. Dynamic overheating modelling in line with CIBSE Guidance should be carried out (TM59 for residential and TM52 for non-residential) for all TM49 weather scenarios.

74. The area weighted average (MJ/m2) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should

demonstrate that the actual building's cooling demand is lower than the notional.

Be Clean

75. The applicant should investigate opportunities for connection to nearby existing or planned district heating networks (DHNs). Where such opportunities exist, this should be the priority for supplying heat to the site in line with the London Plan heating hierarchy. Evidence of this investigation should be provided including evidence of active two-way communication with the network operator, the local authority and other relevant parties. This should include information on connection timescales and confirmation that the network has available capacity. See the guidance for full details on the information to be provided.

76. The site should be provided with a single point of connection and a communal heating network where all buildings/uses on site will be connected. Relevant drawings/schematics demonstrating the above should be provided.

77. The applicant should provide evidence confirming that the development is future proofed for connection to wider district networks now or in the future, where an immediate connection is not available.

78. Where a DHN connection is not available, either now or in the future, applicants should follow the London Plan heating hierarchy to identify a suitable communal heating system for the site.

79. The London Plan limits the role of CHP to low-emission CHP and only in instances where it can support the delivery of an area-wide heat network at large, strategic sites. Applicants proposing to use low-emission CHP will be asked to provide sufficient information to justify its use and strategic role while ensuring that the carbon and air quality impact is minimised.

Be Green

80. All major development proposals should maximise opportunities for renewable energy generation by producing, using, and storing renewable energy on-site. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.

81. Solar PV should be maximised; the applicant proposes this and is seeking to fully exploit both the roof (with low angle E/W panels) and potentially considering BIPV as well. This is welcomed. The applicant should submit the total PV system output (kWp) and a plan showing that the proposed installation has been maximised for the available roof area and clearly outlining any constraints to further PV.

82. Should heat pumps be proposed, the applicant will be expected to demonstrate a high specification of energy efficiency measures under Be Lean, a thorough performance analysis of the heat pump system and, where there are opportunities for DHN connection, that the system is compatible. The detail submitted on heat pumps should include:

    a. An estimate of the heating and/or cooling energy (MWh/annum) the heat pumps would provide to the development and the percentage of contribution to the site's heat loads.

b. Details of how the Seasonal Coefficient of Performance (SCOP) and Seasonal Energy Efficiency ratio (SEER) has been calculated for the energy modelling. This should be based on a dynamic calculation of the system boundaries over the course of a year i.e. incorporating variations in source temperatures and the design sink temperatures (for space heat and hot water).

c. The expected heat source temperature and the heat distribution system temperature with an explanation of how the difference will be minimised to ensure the system runs efficiently. The distribution loss factor should be calculated based on the above information and used for calculation purposes.

d. Whether any additional technology is required for top up or during peak loads (e.g. hot water supply) and how this has been incorporated into the energy modelling assumptions.

Carbon offsetting

83. The applicant should maximise carbon emission reductions on-site. Should the site fall short of the carbon reduction targets and clearly demonstrate that no further carbon savings can be achieved, the applicant would be required to make a cash-in-lieu contribution to the boroughs' carbon offset fund using the GLA's recommended carbon offset price or, where a local price has been set, the borough's' carbon offset price.

84. Energy strategies should provide a calculation of the shortfall in carbon emissions and the offset payment that will be made to the borough.

Whole Life-Cycle Carbon Assessment

85. In accordance with Policy SI2 of the London Plan the applicant will be expected to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

86. The applicant should submit a whole life-cycle carbon assessment to the GLA as part of any planning application submission, following the Whole Life-Cycle Carbon Assessment Guidance and using the GLA's reporting template. The applicant will also be conditioned to submit a post-construction assessment to report on the development's actual WLC emissions. The assessment guidance, template and suggested condition wording are available on the GLA website[1].

Be Seen

87. The applicant will be expected to monitor its development's energy performance and report on it through an online monitoring portal. The applicant should review the 'Be Seen' energy monitoring guidance to ensure that it is fully aware of the relevant requirements to comply with the 'Be Seen' policy. The applicant should provide a commitment that the development will be designed to enable post construction monitoring and that the information set out in the 'Be Seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This will be secured through suitable legal wording.

[1] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance

Circular economy

88. Policy D3 of the London Plan requires development proposals to integrate circular economy principles as part of the design process. Policy SI7 of the London Plan requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

89. Therefore, the applicant is required to submit a Circular Economy Statement in accordance with the GLA guidance. The applicant will also be conditioned to submit a post-construction report, with suggested wording available on the GLA website[2].

Environmental issues

Urban greening

90. Policies G1 and G5 of the London Plan embed urban greening as a fundamental aspect of site and building design. Features such as street trees, green roofs, green walls, rain gardens, and hedgerows should all be considered for inclusion and the opportunity for ground level urban greening should be maximised. The applicant must calculate the Urban Greening Factor as set out in Policy G5 and seek to achieve the specified target prior to the Mayor's decision-making stage. A landscaping plan should also be provided.

Sustainable drainage and flood risk

91. The drainage strategy should aim to reduce surface water discharge from the site to greenfield rates in accordance with Policy SI 13 of the London Plan. Where greenfield runoff rates cannot be achieved and robust justification is provided, a discharge rage of three times the greenfield rate may be acceptable.

92. The drainage strategy should maximise opportunities to use Sustainable Drainage System (SuDS) measure at the top of the drainage hierarchy, as set out in Policy SI 13 of the London Plan. Roofs and new public realm areas present an opportunity to integrate SuDS such as green and blue roofs, tree pits, and permeable paving into the landscape, thereby providing amenity and water quality benefits.

Air quality

93. As set out in Policy SI1 of the London Plan, an air quality assessment will be required, and must include:

- Assessment of baseline conditions;
- Assessment of exposure of future occupants to the annual mean air quality objectives;
- Assessment of the impacts of additional road traffic or introduced energy plant on existing air quality;
- Construction dust risk assessment; and

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

- Air quality neutral assessment.

94. It is expected that the development will be subject to the EIA regulations. As such, the development proposal must consider the air quality positive approach in line with Policy SI1(C) of the London Plan. An Air Quality Positive Statement will be required - the applicant is referred to the draft Air Quality Positive London Plan Guidance. Evidence of consideration of air quality in the development design will be required.

Biodiversity

95. Policy G7 of the London Plan sets out an ambition to increase tree canopy provision by 10% across London. This should be supported and must not solely consider tree planting rates given saplings / immature trees (with small canopies) are likely to be planted. Further to this, Policy G6 of the London Plan states that there should be a biodiversity net gain on all development sites. i.e., 'where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost. This approach does not change the fact that losses should be avoided, and biodiversity offsetting is the option of last resort.' This should be demonstrated.

Transport

Walking, cycling and public realm

96. The proposal for improved pedestrian permeability across the site is welcomed. These routes must be suitable to accommodate cyclists, to enable permeability within and through the development for all forms of active travel and promote the safety and comfort of both. These internal cycle routes would be primarily for users of the development, rather than for 'through' cyclists.

97. The proposal to provide significant areas of new public realm within the site is strongly supported. However, the outcome of this in transport terms is significant pressure on existing highway and what are possible lost opportunities for improvements to transport services for all and vehicle domination elsewhere.

Car parking and vehicular access

98. The residential development will be car-free, which is line with Policies T6 and T6.1 of the London Plan. Further discussion is required over details, including on the level of parking for disabled residents and other disabled people in the context of the proposals for public transport services and access, and active travel provision within the town centre and to other local services and facilities and employment opportunities.

99. Policy T6.3 of the London Plan requires that retail development is car-free. As discussed at the meeting, Morrisons intends to re-provide its existing car parking. This will need to be considered within the context of the scheme benefits alongside full mitigation of transport and other impacts of car parking. The application must therefore be supported by:

- Full evidence of the lease requirement and/or agreement with Morrisons;

- Active engagement with Morrisons over parking data at the existing site and comparable sites and trends in take-up of alternative options such as home delivery;
- Viable proposals for reducing car parking over time (as is to take place at Canada Water, by way of example);
- Provision and promotion of alternatives to private car use so that they are seen as the first choice even by the increasingly lower proportion of car-owning households in the area. This will include a wide range of measures, but notably enhancements to bus access for the development and other scheme changes set out in this letter, along with strong support for active travel;
- Charging for car parking at rates (as well as controls over length of stay) to encourage public transport use with receipts going to a ringfenced sustainable travel pot; and
- Priority for disabled people who need to use their car to access the supermarket, other commercial units within the development and the town centre, and housing.

100. The provision for a central residential/commercial servicing yard appears to be a good option but concerns are raised on the walking and cycling environment of the proposed east-west route through the southern part of the site that would be crossed by many motor vehicles. Robust management will be needed and should be demonstrated in the submission. Officers query how suitable this is for every type of delivery, with an anticipation that residents would expect to receive deliveries to their residential cores.

101. The supermarket servicing and car park access on Hanover Park raises concerns over the proportion of inactive frontage there and the walking and cycling environment.

102. In line with Policy T7 of the London Plan, it is not considered appropriate for any servicing to take place on-street on Hanover Park, as to do so would detract from the space available for walking, cycling, landscaping and, if necessary, bus stops and the set down and pick up of disabled people.

Transport Assessment

103. A transport assessment and all the usual supplementary documents should accompany the formal application. The network impact will need to be assessed and there may be a case for contributions toward improvements to walking, cycling and bus networks including on the TLRN.

Conclusion

104. The proposed development of the site to demolish the existing shopping centre and deliver a mixed-use residential and commercial development is supported in line with Policies SD6, SD7 and H1 and Objective GG2 of the London Plan. However, further consideration should be given to the provision of a north-south bus route and changes to the massing to reduce the visual impacts. The future application will need to address the issues raised in this report with respect to urban design, affordable housing, fire safety, transport, and sustainability.

for further information, contact GLA Planning Unit (Development Management Team):
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GREATER**LONDON**AUTHORITY

Good Growth

Mark Knibbs
Avison Young
By email

Our ref: 2023/0663/P2F
Date: 12 December 2023

Dear Mark Knibbs

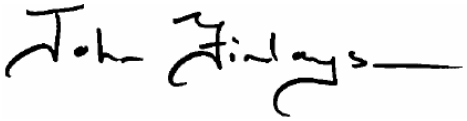
Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: The Aylesham Centre, The Aylesham Centre, Morrisons And Associated Car Park, Hanover Park, Peckham, Southwark, London, SE15 5EW
LPA: Southwark
Our reference: 2023/0663/P2F

Further to the pre-planning application meeting held on 16 November 2023 I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



John Finlayson

Head of Development Management

cc Allison Flight, Deputy Head of Development Management
TfL

pre-application report 2023/0663/P2F

12 December 2023

The Aylesham Centre

Local Planning Authority: Southwark

The proposal
Comprehensive phased redevelopment of the site involving the demolition of all existing buildings and the erection of buildings ranging in height from 4-20 storeys with 850-900 residential units, alongside significant retail (and other E-class workspace uses) floorspace (including the re-provision of the existing Morrisons store) and associated works.
The applicant
The applicant is **Berkeley** and the architects are **dRMM, Nim Tim Architects** and **Jas Bhalla Architects.**

Context

1. On 16 November 2023, a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held on MS Teams with the following attendees:

GLA group

- Zeb McInnes, Strategic Planner, GLA (case officer)
- Matt Christie, Team Leader – Development Management, GLA
- Jan Ackenhausen, Senior Urban Designer
- Tim Walder, Principal Conservation Officer, GLA
- Andrew Hiley, Principal Planner, TfL
- Alex Weir, Planner, TfL

Local authority

- Catherine Jeater, London Borough of Southwark
- Eleanor Heagney, London Borough of Southwark

Applicant

- Chloe Young, Berkeley
- Tom Oluade, Berkeley
- Judith Stichtenoth, dRMM Architects
- John Naylor, dRMM Architects

- Lewis Eldridge, The Townscape Consultancy
- Lucy Williams, The Townscape Consultancy
- Isha Hasme, The Townscape Consultancy
- Nick Alston, Avison Young
- Mark Knibbs, Avison Young
- Jas Bhalla, Jas Bhalla Architects
- Nimi Attanayake, NimTim Architects
- Brendan Weaver, Arup Transportation

2. The meeting was a follow-up pre-application meeting to discuss the above proposals. On 27 May 2022, a report was issued following an initial pre-application meeting on 28 April 2022. An additional report on urban design and transport was issued on 3 November 2022. This report should be read in conjunction and as an update to the previously issued reports.

3. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Details of this proposal

4. Comprehensive phased redevelopment of the site involving the demolition of all existing buildings and the erection of buildings ranging in height from 4-20 storeys with 850-900 residential units, alongside significant retail (and other E-class workspace uses) floorspace (including the re-provision of the existing Morrisons store) and associated works.

Summary of meeting discussion

5. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use principles, urban design, heritage, and transport. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Land use principles

Residential units

6. The indicative site capacity in the site allocation in the local plan is 850 homes. The applicant has reduced the number of residential units from 1,045 to between 850 and 900 units since the previous pre-app meeting, which is more in line with the site allocation. This reduction is positive, and further discussions on the appropriate quantum of units is encouraged.

Re-provision of retail

7. The proposal includes the retention of the supermarket use and re-provision of the retail floor space (10,500 sq.m.), which is supported.

Workspace and cultural floor space

8. The applicant has indicated that workspace and cultural floor space could be considered in the development, which is supported. At least 10% affordable workspace should be provided and an affordable workspace strategy be secured in the S106 agreement. Any cultural space should be fully accessible to the public and a cultural plan should be provided as part of the formal application.

Bus station and bus services

9. GLA and TfL officers remain of the view that a comprehensive redevelopment including the bus station, as per the site allocation, would have significantly greater benefits than a scheme that excludes the bus station, and the latter would create significant challenges for the safe management and operation of the bus station. In both development scenarios, a north-south bus route through the site would have significant benefits for the development, the town centre and bus passengers. GLA and TfL officers remain open to discussion on both these topics.

Housing

Affordable housing

10. At the meeting, the applicant was encouraged to prioritise developing the affordable housing offer. The applicant was reminded that, on the site as currently envisaged, the affordable housing threshold of 35% would apply in order to follow the Fast Track Route. The applicant was advised that if following the Viability Tested Route, GLA officers request early engagement on the financial viability assessment.

Urban design

Site layout

11. The proposal introduces a series of perimeter blocks and point blocks set within a generous network of open spaces. Whilst this largely reflects the Council estate typology and urban grain of adjacent sites to the east and the south of the site, it is a very abrupt change from the much finer grain of the historic areas bounding the site to the north and the west. A more sensitive approach to boundary treatments, urban grain, and massing would be appropriate to ensure the development stitches in seamlessly with its immediate surroundings.

12. The site will create a new urban edge along its boundaries at Rye Lane, Hanover Park and McKerrell Road. The site does not have a direct frontage onto Peckham High Street as the red line boundary excludes the bus station. Residential development directly adjacent to the bus station must consider agent of change principles set out in Policy D13 of the London Plan to not harm ongoing operations of the bus station. Access decks facing out onto the bus station are proposed to shield residential uses from noise and other nuisances, which can be supported in principle. Further work should explore opportunities to avoid a ‘back of house’ feeling along the bus station and Peckham High Street, with appropriate ground floor uses and design principles.

13. The redevelopment is set within a network of publicly accessible open spaces and routes. A new supermarket is provided towards the west of the site, made accessible from Peckham High Street and Rye Lane with new public east-west

and north-south routes. While the approach and its opportunities in terms of ground floor activation and public realm creation is positive, it will be important to ensure buildings and public spaces are safe and accessible at different times of the day, including during the night. Early engagement with a designing out crime officer is recommended.

14. The existing Aylesham Centre and shopping arcade along Rye Lane are proposed to be demolished and replaced with a new building. It is understood that the existing building does not meet current retail and residential standards. Considering the relatively recent construction of the existing building, the applicant should consider its reuse in part or in its entirety in line with the aims of Policy SI7 of the London Plan.

Tall buildings, scale, and massing

15. The proposed building heights vary between 4 and 20 storeys, in line with the site allocation. The site is considered an appropriate location for tall buildings in accordance with Policy D9 of the London Plan.

16. Further townscape views must be agreed with the LPA and should include views from Peckham High Street looking west, and from Purdon House Estate.

17. The overall massing visually responds to the building grain of the Council estates and modern residential blocks to the south-east. The transition to the much finer urban grain to the south-west is less successful. A gradient of urban grain and mass should be explored to soften the transition between Rye Lane / Peckham High Street into the site.

18. There appears to be an opportunity to introduce a finer grain and more porosity at Rye Lane. The existing 2-storey Aylesham Centre and shopping arcades are proposed to be replaced with a new 4-7 storey retail and residential building. New public routes will lead through the building towards the public realm created within the site. Whilst the reprovision of a strong linear urban edge in this location can be supported, options to break up the continuous frontage into separate buildings with subtle variations in height and setback from the street may help to create a better transition between the traditional urban fabric and the new development, address overcrowding of the street and create more legible entrances into the proposed east-west pedestrian routes. Setbacks of the higher levels and building heights of the north and south edges should respond to those of adjacent buildings.

19. The creation of a new permeable urban edge at Hanover Park is positive and can be supported in principle. Street sections should be provided to demonstrate how the massing of the proposed development responds to the surrounding context.

20. The applicant is requested to share a geo-located VuCity model of the proposal.

Residential quality

21. Policy D6 of the London Plan states that housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 of the London Plan than a dual aspect

dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.

22. The target for 70% dual aspect is positive. The applicant is highly encouraged to increase the dual aspect target and deliver exemplary residential quality.

23. Given the ground floors are expected to have 360-degree exposure to the surrounding public realm, adequate differentiation must be made between residential and commercial entrances.

24. The location of ground floor maisonette dwellings is encouraged to maximise the number of entrances from the street and create better opportunities for overlooking of the public realm.

Architecture and materials

25. Policy D3 of the London Plan requires architecture to make a positive contribution to a coherent public realm, streetscape, and wider cityscape, incorporating the highest quality materials and design appropriate to the surrounding context. Carefully considered design coding will be key to ensure the design principles derived from the extensive engagement and area analysis will go on to inform building design throughout the different design and delivery stages.

26. Given the scale, setting and height of the development, the proposal must undergo at least one design review using the LPA's Design Review Panel or the Mayor's London Review Panel.

Landscaping and public realm

27. The development is set within an extensive public realm network, introducing new north-south and east-west routes linking together a series of public spaces. Whilst this public space ambition is highly welcomed, careful consideration must be given to the scale, dimensioning and access of these public spaces. There is a risk that too much openness may create unwelcoming streets and spaces. A more fine-grained approach to public realm dimensioning and gradients of public, semi-public, and private outdoor spaces should be explored, taking cues from the intricate network of existing public and semi-public yards and alleyways making up Peckham's spatial structure and identity. The production of a figure-ground plan would be helpful to understand how existing and proposed public space structures will relate to each other.

28. New routes and connections should be meaningful and logical. The proposal should demonstrate how the proposed public realm network ties in with the wider public space, green space, walking and cycling network, as set out in Policies D8 and G1 of the London Plan.

29. Design cues and activation principles at key locations along the public realm network should be introduced to ensure interest, safety, and orientation.

30. The proposal will create a new north-south route between Peckham High Street and Hanover Park. It will connect to the existing Bull Yard alleyway and cut across the bus station to connect to a proposed linear park continuing to Hanover Park. The legibility of this route appears to be compromised by the bus station and in particular a brick utilities building within the bus station premises.

31. A new east-west route is created between Rye Lane and the new supermarket. The route connects to Rye Lane through a new building. Where possible public undercrofts should be avoided, to enhance legibility and clearly signal the public nature of routes.

32. Policy S4 of the London Plan sets out the quantum of play space new development must provide where family housing is delivered. It is recommended play space, multi-use games areas, and other outdoor activity spaces for children and young people are planned for at early stages as part of the public realm strategy, to allow for the delivery of truly public play spaces creating benefits for the wider community.

33. The applicant is encouraged to use extensive open space as an opportunity for a holistic drainage and SUDS hierarchy as set out in Policy SI13 of the London Plan, and to maximise formal and informal planting and canopy cover. This will help to achieve the UGF target of 0.3 as specified in Policy G5 of the London Plan.

Fire safety

34. In line with Policy D12 of the London Plan the future application should be accompanied by a fire statement, prepared by a suitably qualified third party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

35. Further to the above, Policy D5 within the London Plan seeks to ensure that developments incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the buildings.

36. The applicant is strongly encouraged to provide a second staircase in each of the buildings over 18 metres.

Inclusive access

37. Policy D3 of the London Plan seeks to ensure that new development achieves the highest standards of accessible and inclusive design (not just the minimum). The future application should ensure that the development: can be entered and used safely, easily and with dignity by all; is convenient and welcoming (with no disabling barriers); and provides independent access without additional undue effort, separation or special treatment.

38. Policy D5 of the London Plan requires that at least 10% of new build dwellings meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’ (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

39. The future application should include plans that show where the wheelchair accessible homes would be located and how many there would be. These should be distributed across tenure types and sizes to give disabled and older people similar choices to non-disabled people. This information and typical flat

layouts and plans of the wheelchair accessible homes should be included in the design and access statement. The Council should secure M4(2) and M4(3) requirements by condition as part of any permission.

Heritage

40. The Rye Lane shops are within the boundary of the Rye Lane Conservation Area, which assesses them as neutral in their contribution and capable of replacement with more appropriate buildings. None of the buildings on site are listed or considered to be non-designated heritage assets.

41. The site is in the setting of the following designated heritage assets:

- 58 Peckham High Street, listed Grade II;
- Baptist Chapel, listed Grade II;
- Post Office Depot (former Quaker Meeting House), listed Grade II;
- Peckham Rye Station, listed Grade II;
- 98 to 108 Peckham Hill Street, listed Grade II;
- Rye Lane Conservation Area;
- Peckham Hill Street Conservation Area; and
- Holly Grove Conservation Area.

42. A Heritage Statement would be required, in line with Paragraph 195 of the NPPF. A VuCity model should be provided to enable GLA officers to clarify the required viewpoint positions. A Heritage, Townscape and Visual Impact Assessment (HVTIA) should be provided with viewpoints agreed with the LPA and include a map of the Zone of Theoretical Visibility. The HTVIA should include a clear discussion of the impacts on the settings of heritage assets.

43. The applicant should consider retaining the Rye Lane shop frontages, since these are neutral, although a new development of quality here could enhance the conservation area. The proposal should include a good range of unit sizes which is consistent with the historical patterns of urban grain and plot size of shops.

44. The potential visual impacts of the tall building on the setting of heritage assets will need to be robustly assessed. Early townscape views (Peckham High Street / Burger King and Peckham High Street / Persepolis views) appear to demonstrate that the setting of the Higgins and Jones Clock Tower would be particularly impacted by the proposal. The combined mass of the buildings appears very bulky when viewed from the west, reducing the visual singularity of the clock tower. The clocktower is not a listed building, but it is one of the taller landmarks within the Rye Lane Conservation Area, and its appearance as a singular element should be retained. A more fine-grained approach to building height and massing would be welcomed, including options for more slender taller buildings, and locating taller buildings further south, away from views of the clock tower.

45. There are concerns around the visual impact of the proposed development on the Peckham Hill Street Conservation Area and the listed buildings within it, in

the view down Peckham Hill Street looking south. No image is provided but consideration should be given to any impacts on the borough view from One Tree Hill View to the north.

Conclusion

46. It remains the preference of GLA officers for the applicant to pursue a comprehensive masterplan which includes the bus station and provision of a north-south bus route. The amendments to the scheme including refinements to the height, massing, quantum of units, and public realm and landscaping are welcomed. Further refinements to the massing strategy, positioning of tall buildings, residential quality, public realm, and transport are required. The applicant should ensure that the matters raised in this report and the matters raised in the previously issued pre-app reports are fully addressed prior to the submission of any planning application.

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for further information, contact GLA Planning Unit (Development Management Team):
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email: lucinda.turner@london.gov.uk

GREATER**LONDON**AUTHORITY

Good Growth

Gardiner Hanson
Avison Young
By email

Our ref: 2022/0669/P2F
Date: 3 November 2022

Dear Gardiner Hanson

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008

Site: The Aylesham Centre, Peckham, Southwark, London, SE15 5EW
LPA: Southwark
Our reference: 2022/0669/P2F

Further to the pre-planning application meeting held on 4 October 2022, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely

John Finlayson

Head of Development Management

cc Allison Flight, Deputy Head of Development Management
TfL

pre-application report 2022/0669/P2F

3 November 2022

The Aylesham Centre

Local Planning Authority: Southwark

The proposal
Comprehensive phased redevelopment of the site involving the demolition of all existing buildings and the erection of buildings ranging in height from 4-25 storeys with 1,045 new homes, alongside significant retail (and other E-class commercial/business/service use) floorspace (including the re-provision of the existing Morrisons store) and associated work.
The applicant
The applicant is **Berkeley Homes,** and the architect is **Sheppard Robson.**

Context

1. On 4 October 2022, a virtual pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held with the following attendees:

GLA group

- Zeb McInnes, Strategic Planner, GLA (case officer)
- Matt Christie, Team Leader – Development Management, GLA
- Mathieu Proctor, Team Leader – Growth Strategies & Urban Design, GLA
- Andrew Hiley, Spatial Planning, TfL

Local Authority

- Tom Weaver, London Borough of Southwark
- Lauren Wilkinson, London Borough of Southwark
- Catherine Jeater, London Borough of Southwark
- Dipesh Patel, London Borough of Southwark

Applicant

- Chloe Young, Berkeley Homes
- Jacob Dunn, Berkeley Homes
- Claire Haywood, Sheppard Robson
- Tom Kyle, Sheppard Robson
- Brendan Weaver, Arup

- Lewis Eldridge, The Townscape Consultancy
- Nick Alston, Avison Young
- Mark Knibbs, Avison Young
- Simon Roberts, WSP

2. The meeting was a follow-up pre-application meeting to discuss the above proposals. On 27 May 2022, a report was issued following an initial pre-application meeting on 28 April 2022. This report should be read in conjunction and as an update to the previously issued report.

3. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Details of this proposal

4. Comprehensive phased redevelopment of the site involving the demolition of all existing buildings and the erection of buildings ranging in height from 4-25 storeys with 1,045 new homes, alongside significant retail (and other E-class commercial/business/service use) floorspace (including the re-provision of the existing Morrisons store) and associated work.

Summary of meeting discussion

5. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use principles, urban design, and transport. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Land use principles

Residential units

6. The indicative site capacity in the site allocation in the local plan is 850 homes and the proposed number of homes is 1,045 new homes. The applicant is reminded to ensure the number of homes does not represent overdevelopment and is clearly informed by a design-led approach that conforms with the requirements of Policy D3 of the London Plan and the other design policies of the London Plan.

Re-provision of retail

7. The proposal includes the retention of the supermarket use and re-provision of the retail floor space (10,500 sq.m.), which is supported.

Offices and affordable workspace

8. Policy E1 of the London Plan seeks to support the strengths of London's office market. Policy E3 of the London Plan seeks to provide affordable workspace at rents maintained below the market rate for space for specific social, cultural, or economic development. The applicant has advised that offices and/or affordable workspace could be provided as part of the development. Given the

site's town centre location, potential office uses would be supported subject to confirmation of the balance of floorspace within the overall land-use mix. At least 10% affordable workspace should be provided and an affordable workspace strategy be secured in the S106 agreement.

Bus station and bus services

9. As discussed at the previous meeting, a key ambition for the GLA and TfL is for a comprehensive redevelopment to include the Peckham Bus Station site and provision of a north-south bus route through the site.

10. At the meeting, the applicant advised that neither of these options are being pursued in the current proposal and are of the view that the current proposal does not preclude the redevelopment of the bus station in future.

11. A non-comprehensive development raises various concerns including an inability to provide an active frontage on Peckham High Street in place of the bus station, poor pedestrian and cycle connections to the north and associated conflicts, and agent of change issues associated with bus operations.

12. In the case of a comprehensive or non-comprehensive development, the provision of a north-south bus route through the site would provide major benefits for both bus passengers and the development, as well as improving bus operations, passenger waiting environment, and interchange. Without this, it is difficult to see how a non-comprehensive development will benefit bus service and passengers, which is important in the context of London Plan mode share targets and minimising access to the development and wider town centre by private vehicles. It will also help activate the development at times when there is less or no retail footfall, which will have benefits in terms of 'perception of security' and is a prerequisite in realising the Council's ambition to close the northern end of Rye Lane to motorised vehicles. Therefore, the applicant should demonstrate how such a provision could be delivered in a non-comprehensive scheme, in further discussions with GLA and TfL officers.

13. It is understood that the applicant is willing to engage in workshops with GLA and TfL officers to explore options for the north-south bus route. This is strongly welcomed and should be a holistic discussion that looks beyond the red line boundary and considers how any submitted design could work with a reconfigured bus station (within its existing footprint), and potential alternative standing locations within the wider area.

Housing

Affordable housing

14. At the meeting, the applicant was encouraged to prioritise developing the affordable housing offer as it will help to inform other aspects of the development including development layouts and heights.

Urban design

Height, scale, and massing

15. GLA officers appreciate the testing of alternative height and massing options, with those that produce a greater variety in heights and massing preferred over the option with a more consistent height.

16. GLA officers support the principle of the towers being a distinct part of the masterplan, as well as having a single focal tower, as opposed to two towers of the same height as shown at the previous meeting. Further assessment of local/strategic views, alongside wind/shadow studies from within the site are required to assess whether 26 storeys is an appropriate height. The stepping down to manage transition with adjacent streets is supported.

17. Concerns remain about cumulative massing in the east of the site around the new tower and proposed supermarket building, however, central amenity space is well orientated, and likely to have access to adequate daylight and sunlight.

18. GLA officers query whether wind microclimate studies been undertaken to test conditions in the central square. There appears to be some potential for significant overshadowing and /or down draft from tall buildings above

Development layout

19. As already discussed, there are concerns around the relationship between the proposal and retained/existing bus station to the north.. It is queried whether there will be a safe and intuitive pedestrian access into the bus station, and onwards to Peckham High Street, from the new proposed north/south route.

20. The evolution of the masterplan to increase the width of the key routes is supported, including the east / west route between Rye Lane and the supermarket.

21. The emphasis on supermarket entrance is good idea, however, concern is raised about the longevity of such uses, and shaping long-term urban design around them as this will occupy a significant part of the masterplan area.

Residential quality

22. The increase in dual-aspect units is supported, however, there is still a significant number of single-aspect units accessed from double-loaded corridors without access to natural daylight/sunlight or ventilation, which should be addressed. Single aspect west facing units fronting Rye Lane may be subject to overheating if noise limits ability to open windows.

Architecture and materials

23. Given this is a key site within the town centre and this being a long-term project, consideration should be given to mitigate any blight to Aylesham Centre in short to medium term ahead of its redevelopment.

24. Consideration should be given to variety in scale. Different parts of the site, types of homes or land uses need different architectural approaches. Taller buildings and key parts of the masterplan should be distinctive, as should the various spaces and street elevations, which have the potential to be local landmarks. Peckham has a lot of character, and this should inform the evolving architecture. A generic London Vernacular approach would be a missed opportunity.

25. It is noted that most of the balconies will be projecting. This could have a major impact on architecture and presence within the town centre. It is potentially a symptom of over-development if a greater balance between onboard and projecting balconies cannot be found.

26. The illustrative design for the Pavilion building is compelling and has real potential as new local landmark.

Landscape and public realm

27. The additional 6 metres of public realm on Rye Lane is supported. This should produce a robust, inclusive space capable of accommodating seating and planting of scale. This space has a favourable orientation and could be quite successful. Further consideration should be given to the spaces at the north-west/south-west corners of the site, along with the linear Rye Lane space, being one space. This could be designed with a consistency in materials and planting.

28. There appears to be several mature trees on Hanover Place which should be retained wherever possible, complementing new streets and spaces.

29. There is an opportunity for landscape and street trees on McKerrell Road. This is currently quite a hard, urban environment and the new development is an opportunity to soften and green the western side of the street at least.

Heritage

30. Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should 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. These policies also apply to non-designated heritage assets.

31. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. Regarding listed buildings, all planning decisions should "have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses" and regarding conservation areas special attention must be paid to "the desirability of preserving or enhancing the character or appearance of that area". The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. The NPPF states that in weighing applications that affect non-designated heritage assets, a balanced judgement is required having regard to the scale of any harm or loss and the significance of the heritage asset.

32. The north and west boundaries of the site lie within the Rye Lane Peckham Conservation Area. Two listed buildings are located nearby: Baptist Chapel to the south and 58 Peckham High Street to the north-west. Several locally listed buildings are in close proximity to the site.

33. A heritage, townscape and visual impact assessment should be undertaken using the body of work already commenced. The townscape analysis should consider long, mid, and immediate views from key locations and sensitive locations. Given the massing of the development, it has potential to cause harm to the surrounding heritage assets, contrary to Policy HC1 of the London Plan.

The applicant should ensure the massing is designed with a view to reducing the impacts on the setting of surrounding heritage assets.

Transport

34. In addition to the concerns already raised with regards to the north-south route and interface with the existing bus station, the following transport issues will need to be addressed:

- Taxi provision, particularly for the relocated supermarket, so that there are no impacts on the public highway and/or TfL assets
- Interface of the development with the bus stops on Hanover Park, including future extension (which with the north-south bus street could potentially be reduced/removed)
- Non-policy compliant car parking provision
- Managing the impact of servicing, particularly for uncontrollable residential deliveries, on the public highway and/or TfL assets, and minimising transit of the bus station in line with existing access agreements with TfL
- Managing potential moped deliveries from food and drink outlets
- Cycle store/short stay cycle parking location and access so that it is as safe, secure, and convenient for users as it is for non-cyclists accessing the development
- Car-free development is supported, however, the applicant will need to demonstrate if there are any accessibility and equality issues associated with the reduction in car parking

Conclusion

35. It remains the preference of GLA officers for the applicant to pursue a comprehensive masterplan which includes the bus station. Should this not come forward at application stage, then further consideration should at least be given to provision of a north-south bus route. The applicant's commitment to explore this with TfL is strongly welcomed. The amendments to the scheme including refinements to the height and massing and public realm and landscaping are welcomed. Further refinements to the massing strategy, positioning of tall buildings, residential quality, public realm, and transport are required. The applicant should ensure that the matters raised in this report and the matters raised in the previously issued pre-app report are fully addressed prior to the submission of any planning application.

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pre-application report 2024/0001/P2F

13 March 2024

The Aylesham Centre, Peckham

Local Planning Authority: Southwark

The proposal
Comprehensive phased redevelopment of the site involving the demolition of all existing buildings and the erection of buildings ranging in height from 4-20 storeys with 850-900 residential units, alongside significant retail (and other E-class workspace uses) floorspace (including the re-provision of the existing Morrisons store) and associated works.
The applicant
The applicant is **Berkeley** and the architects are **dRMM, Nim Tim Architects** and **Jas Bhalla Architects.**

Context

1. On 16 February 2024 a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held at the GLA's offices with the following attendees:

GLA group

- Zeb McInnes, Senior Strategic Planner, GLA (case officer)
- Jan Ackenhausen, Senior Urban Designer, GLA
- Charleen Henry, Senior Urban Designer, GLA

Applicant

- Tom Oluade, Berkeley Homes
- Harry Lewis, Berkeley Homes
- Judith Stichtenoth, dRMM
- Jonas Lencer, dRMM
- Brendan Weaver, Arup
- Neil Matthew, Gillespies
- Lewis Eldridge, The Townscape Consultancy
- Nicholas Alston, Avison Young
- Mark Knibbs, Avison Young

2. The meeting was a follow-up pre-application meeting to discuss the above proposals. On 27 May 2022, a report was issued following an initial pre-

application meeting on 28 April 2022. Additional reports were issued on 3 November 2022 and 12 December 2023. This report should be read in conjunction and as an update to the previously issued reports.

3. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Details of this proposal

4. Comprehensive phased redevelopment of the site involving the demolition of all existing buildings and the erection of buildings ranging in height from 4-20 storeys with 850-900 residential units, alongside significant retail (and other E-class workspace uses) floorspace (including the re-provision of the existing Morrisons store) and associated works.

Summary of meeting discussion

5. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use principles, affordable housing, urban design, and heritage. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Land use principles

Principle of development

6. The principle of the mixed-use residential-led development on the site remains supported.

Bus station and bus services

7. The applicant has advised that a north-south bus route nor a comprehensive masterplan including the bus station would be pursued. The opportunity for safeguarding the linear route in front of Morrisons could be explored, however, GLA officers acknowledge challenges with delivery of the route given it will be become well-established public realm. Discussions between the GLA and TfL on the way forward for this matter are ongoing.

Housing

Affordable housing

8. At the meeting, the applicant advised that the proposed development would provide 35% affordable housing by habitable room as 70% social rent and 30% intermediate, which would be eligible to follow the Fast Track Route. Affordability levels and an early-stage review should be secured in the S106 agreement.

Urban design

Site layout

9. Further work is required to address the development's edges and their relationship with the surrounding context, the public realm structure, hierarchy

and character, and the relationship between the buildings and the street. Whilst detail is provided on the Rye Lane edge, the treatment of the remaining edges will require the same level of rigour in terms of addressing the context, design, and activation.

10. To the north, the relationship between the development and the rear of the properties fronting Peckham High Street should be improved in terms of design, safety, and useability. As discussed at the meeting, the Becontree Estate Design Code developed by Be First on behalf of the London Borough of Barking and Dagenham could be a useful precedent.

11. To the east, the location of the servicing and car park entrances along Hanover Park would benefit from appropriate design principles to ease the functional and inactive frontage. The edge treatment towards the adjacent bus station and Purdon House should create good, legible, and safe routes into the site.

12. To the west along Rye Lane, preference should be given to avoiding the creation of open routes over undercrofts. If this is not possible, appropriate design measures should be applied to create passages that are clearly legible from the street, read as public routes, incorporate active edges, and achieve good daylight, sunlight, and views. Appropriate public and community uses should be located at the end of the northern route, to create a destination that is clearly legible from Rye Lane.

13. The development should ensure the public spaces provide a clear structure and hierarchy. It is recommended to structure the public realm as sequences of connected spaces, taking cues from the connected yard spaces that are characteristic of Peckham.

14. Given all buildings are surrounded by publicly accessible open space, it will be crucial to create a sufficiently granular mix of ground floor uses to address this 360-degree exposure, limit the length of any inactive frontages, and better frame the public realm. This is particularly the case for buildings A-B-C and E, where a shared ground plane could create a shared servicing space, frame Aylesham Gardens, and create a podium for outdoor resident's amenity space. This is also relevant to the space between buildings H and J which would be better suited to a secured communal garden.

15. The applicant is recommended to engage with the GLA Regeneration Team on opportunities to develop the purpose, evolution, and management of the proposed Peckham Yard area.

<u>Tall buildings, scale, and massing</u>

16. The building heights have been pulled away from the streets since the previous iteration, which creates better edge conditions. The reorientation of the tallest building towards the south creates a more generous distance to the locally listed Jones and Higgins clocktower when viewed looking east from Peckham High Street. However, due to its increased height the parapet of the commercial building now aligns with the parapet of the Jones and Higgins building.

17. Townscape viewing locations have been agreed with the LPA. It is suggested to include two further views in the future planning application: looking north from Cicely Road and looking west from Clayton Road along the entrance to the Flamborough House car park towards the proposed Morrisons supermarket

and the bus station. As discussed at the meeting, the Vu City model should also be shared.

18. The applicant is encouraged to go through a formal design review process in line with Policy D4 of the London Plan.

Residential quality

19. The applicant has indicated all residential units comply with relevant internal space standards, which is supported. The applicant should allow for sufficient levels of flexibility and storage. All dwellings appear to have a private outdoor space.

20. The proposal aims for 70-75% dual aspect units, which is highly supported. Where dual aspect cannot be achieved, proposals must demonstrate compliance with daylight, sunlight and ventilation requirements as set out in Policy D6(C). North-facing single aspect dwellings should be avoided. Concerns relating to privacy and daylight and sunlight, particularly to ground floor dwellings, should be addressed.

21. GLA officers acknowledge positive changes to the massing of buildings above the Morrisons however they still appear to be positioned relatively close to one another, which may compromise privacy, overlooking, create a sense of enclosure and impact daylight and sunlight performance of individual dwellings. The applicant should explore increasing the distance between buildings to address these concerns.

Architecture and materials

22. Three residential typologies are proposed to address the constraints and opportunities of the site. Further detail on the design approaches of individual buildings is required to assess against the requirements of Policy D9.

23. The proposal should allow for variation and bespoke design approaches and detailing for each individual building to help weave the development into the existing urban fabric. A diverse palette of design approaches for different building elements, such as the base, middle and crown, should inform the design process. Buildings should have a clearly legible base which addresses the street and context of the surrounding built environment both in scale and rhythm, and residential entrances should be easily identifiable and clearly distinguishable from commercial entrances. Chamfered corners with entrances could assist in creating an active and legible public realm.

24. The proportions and detailing of the roofline and the crown of point buildings will be key to respond to some of the more sensitive views, looking south from Peckham High Street, and looking east from Peckham High Street. This includes the treatment of the roofline of Building D, which appears to rise above the parapet of the Jones and Higgs building. Similarly, the tops of medium scaled buildings should also be sensitively designed to create variation between buildings avoiding a plateau affect when seen in views from the south, including from the Bussey Building, which has local significance.

25. Three different architects are proposed to design one building each and collaborate on the Rye Lane building. These efforts should avoid pastiche and be translated throughout the building across all its facades and internal design.

The joint approach across the scheme is supported and should be deployed across all proposed buildings to ensure architectural variety.

Landscaping and public realm

26. The proposal makes a generous contribution to the public realm in Peckham, with a series of new public spaces and linear connections. However, as discussed, the quantum, structure, character, hierarchy, and purpose of the public realm needs to be more defined and reflective of the publicly accessible open spaces in the wider area. A more locally inspired palette of public realm principles and materials should be considered.

27. Further work to address connections towards the north and east of the site should be undertaken to create safe, legible, and accessible routes to tie into the wider walking and cycling network.

28. All public spaces should receive adequate levels of daylight, sunlight, shading and address wind impacts. Mitigation measures should be considered.

29. Safety and inclusion should be a key consideration of the design process, particularly for women and girls. Further guidance can be found in the GLA Public Space Safety Guidance 2022.

30. The status, purpose and legibility of the Linear Park and the east-west route leading from Rye Lane to Building G is not clear. The applicant should consider design approaches to improve the character and legibility of the spaces, including activation.

31. As discussed in the meeting, the public open space at Hanover Walk could be re-purposed as private residential communal space with physical separation from the Linear Park and east-west route. Concern is raised that the quantum of open space may be higher than necessary with this space undermining the public realm hierarchy.

Heritage

32. A Heritage Statement would be required, in line with Paragraph 195 of the NPPF. A VuCity model should be provided to enable GLA officers to clarify the required viewpoint positions. A Heritage, Townscape and Visual Impact Assessment (HVTIA) should be provided with viewpoints agreed with the LPA and include a map of the Zone of Theoretical Visibility. The HTVIA should include a clear discussion of the impacts on the settings of heritage assets.

33. The scheme has been revised since the last meeting. The relevant revisions are: Building A/B/C (on the west side of Rye Lane) has a remodelled massing with the two upper floors setback, intended to improve the relationship with Rye Lane and adjacent buildings and townscape views; Building M has been adjusted in form to reduce impacts on the views of Higgins and Jones Clock Tower from Peckham High Street.

34. In both the Burger King and Persepolis views of Jones and Higgins, the impact on the setting of the locally listed clock tower is reduced, since the mass appears further to the south. In the view south from Peckham Hill Street the massing has been revised so that a single building mass backdrops the listed High Street buildings. The impacts are reduced but is likely that harm will still

be caused to the setting of these listed buildings and the Peckham Hill Street conservation area through the introduction of tall buildings into the view.

35. The revisions to the massing of Building A/B/C improves the relationship with the street and tends to conserve the view of Jones and Higgins Clock Tower from the south along Peckham Rye; this change is welcomed. The efforts made to breaking up the massing and create differentiation in this long building are also welcomed, in the context of the conservation area.

36. The proposed development is now in the range of 4/5/6/7/8/9/10/11/13/16 and 20 storeys. 20 storeys is a tall building in this part of Peckham, the modern housing to the east of the site being 7 storeys in height. Careful consideration will need to be given to the potential visual impacts on the setting of heritage assets and these will need to be robustly assessed. No image is provided but consideration should be given to any impacts on the borough view from One Tree Hill View to the north.

Conclusion

37. The principle of the mixed-use residential-led development on the site remains supported. The applicant has advised that the comprehensive redevelopment including the bus station, and provision of a north-south bus route, will not be pursued. Discussions between the GLA and TfL on the way forward for this matter are ongoing.

38. The amendments to the scheme are welcomed, however, further refinements to the massing, layout, residential quality, architecture and materials, and public realm should be considered.

39. The applicant should ensure that the matters raised in this report and the matters raised in the previously issued pre-app reports are fully addressed prior to the submission of any planning application.

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