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Aylesham Community Action (ACA)

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24/AP/2074 Aylsham Centre Redevelopment – ACA objection

We strongly object to the planning application and ask the Planning Committee to refuse planning permission. The benefits that Berkeley Homes say their plans will bring do not outweigh the substantial harm the development would cause.

INTRODUCTION

1. ACA (Aylesham Community Action) was set up by local residents in August 2020 in response to the pre-application consultation by the then owners Tiger Development/Blackrock.
2. ACA has developed an information and engagement process so local people can learn about the proposals for the Aylesham site and discuss the impact with each other. The overwhelming response in over 2,400 objections has been that the proposals will cause substantial harms to Peckham.
3. These harms are grouped under these headings and detailed in the following pages:
 - **Housing** - The proposed development does not offer enough affordable housing and will increase the displacement of lower income and Black, Asian and Minority Ethnic (BAME) people. The focus on one-bedroom and studio flats will not address the lack of family housing in the area.
 - **Social and Economic Impact** – There will be substantial negative socioeconomic and equalities impacts to Peckham, particularly to marginalised groups. This impact has not been properly assessed or mitigated.
 - **Environment and Sustainability** – The proposed open space is of insufficient size and quality. Green space does not comply with the GLA's Urban Greening Factor requirements. The failure to meet London Plan standards for access to daylight and sunlight will cause harm.
 - **Heritage** - The proposed development will cause harm to the Rye Lane Peckham Conservation Area and other designated and undesignated heritage assets in Peckham town centre. This harm is not counterbalanced by public benefit.
 - **Design** – As a high-density development, the scheme fails to meet appropriate design standards. Evidence for this lies in the overall form and impact on townscape, of both buildings and external spaces. In addition, standards of internal design are minimal. The scheme causes harm on all planning and architectural fronts, with long-term adverse impacts.
 - **Transport** – There will be a negative impact of the extra population on the capacity of public transport and on the junction of Rye Lane and Peckham High Street, close to the site. This impact has not been properly assessed or mitigated. The application fails to comply with the transport policies in the London Plan or the Southwark Plan.
4. **Consultation** – The failure to comply with the DCC (Development Consultation Charter) has resulted in unsatisfactory consultation by Berkeley Homes. The ACCF (Aylesham Centre Community Forum) created by the Council failed to mitigate this. Refusing permission will enable a revised brief to be co-produced by the council and the local community, for a plan to meet local needs which supports the town centre to develop its uniquely Peckham character and contributes to the health and well-being of the existing population as well as future generations.

HOUSING

The proposed development does not offer enough affordable housing and will increase the displacement of lower income and Black, Asian and Minority Ethnic (BAME) community members. The focus on one-bedroom and studio flats will not address the lack of family housing in the area.

5. The application does not provide a high enough proportion of social housing and 'affordable housing'.
 - The provision of just 77 affordable homes (12%) is not appropriate for the site, considering the socioeconomic context of Peckham and the acute need for social housing for families (i.e. larger units). Berkeley Homes argues that this is justified by the viability assessment and the risk of not achieving the company's expected profit. However, Berkeley's viability assessment is not definitive, and is only one aspect to consider. Allowing Berkeley to deliver such a low amount of affordable housing would mean that the developer would pass on the cost to the community (and the Council). In the heart of Peckham, the cost to the community is simply too high. It is unacceptable to miss the opportunity to deliver the social housing that is desperately needed on a strategic site like this.
 - Lack of social and affordable housing is displacing existing communities, particularly BAME people. Recent research by Trust for London (<https://trustforlondon.org.uk/>) found that in 53 neighbourhoods across London where average incomes increased by 11% between 2012 to 2020, when average incomes in the rest of London barely changed, there was a significant decline in BAME communities, a drop in the number of families with children and a rise in the number of couples without children and adults in their 30s and 40s. Three of these neighbourhoods are in Peckham: Peckham North, Peckham North West and Peckham Park Road.
 - The size and location of the site mean more social and affordable housing is required. The London Plan has a strategic target for all new homes delivered to have 50% genuinely affordable housing (Policy H4) and Southwark's target is for 50% of all new homes to be social rented and intermediate homes (Southwark Plan SP1).
 - Southwark is one of the most deprived boroughs in England (43 out of 343). Peckham and Rye Lane wards are the 2nd and 10th most deprived wards in Southwark (Southwark Joint Strategic Needs Assessment 2023). The Peckham Area Character Study states that *"Accessibility to housing and local services is low across the entire Peckham Area. Deprivation in this category is higher in the town centre and north-west of Peckham."* The Aylesham Centre is a strategic site in central Peckham where the number of families on the housing waiting list is 4,000, with 18,000 on the waiting list in Southwark as a whole. BH's proposal does not get near to meeting the strategic targets for such an important site.
6. The development is likely to increase house prices and rents. The impact of building almost 800 new privately owned homes will be to push up rents for people living in the area. The Peckham Area Character Study (2025) noted that median house prices in Rye Lane Ward, at £650k, were higher than median house prices in Southwark as a whole (£545k) and that high house prices in an area usually also raise private rental prices for that area. While this will affect all local residents, people on low incomes will be hit hardest and are most likely to be displaced, as reflected in these quotes from the objections:

"This development is not in any way sympathetic to the local community from an aesthetic and human perspective. It will displace many of our neighbours and does not provide even marginally for those who so desperately need a good housing provision."

"It will kick people out of their businesses and homes without providing any alternatives... Peckham is a working class area, in which people from lower socioeconomic areas need housing and are effectively being priced out of the market."

7. The size and distribution of housing units does not reflect local housing needs. There is a lack of family housing in Peckham. A 2024 ITV report found that over half the 300 pupils at Harris Primary Academy in Peckham were homeless or living in temporary housing. This was a common concern expressed in many objections, e.g.:

"It's a terrible idea to allow and support the construction of luxury second homes down the road from a primary school where most of the children are homeless."

Many families are being forced to move out of the area: there has been a 32% drop over the past decade in primary school applications in Southwark overall, with many local schools affected (Trust for London).

- The proposed development includes too many small flats at the expense of family homes.
- Local people have expressed concerns about the extent to which the new residents will contribute to the local community, as this objection reflects:

"There is no information about how the building and its inhabitants will contribute to the local scene and community - a great concern is that it will attract commuters who have no connection to the area or intention of integrating with the community."

- Many of the one-person flats are studios or only have space for a single bed. Southwark Plan's Housing Policy P2(7) states that studio flats are not appropriate for families and that developments should include a maximum of 5% of studio accommodation. BH argues that these small flats (over 10% of the total accommodation) could be divided to create a separate sleeping area, but as this would only accommodate a single bed, the flats would still be inappropriate for families and should be considered studios.
8. BH has made no commitment to accommodate a Community Land Trust (CLT) on the site, even though the Southwark Plan's site allocation requires that the Aylesham Centre site provides new intermediate affordable housing through a CLT. While BH has said they will consider including a CLT, this is not a meaningful commitment and we have no faith that CLT housing will be delivered. If not CLT, the intermediate housing will be delivered as shared ownership. This is not affordable for the majority of Southwark residents, and in London is characterised by high and escalating service charges, rising rents, and difficulties in selling on the property (<https://www.insidehousing.co.uk/insight/what-is-the-future-for-shared-ownership-88805>). This is not an acceptable form of housing for people on low incomes.
9. Quality of housing is important, not just numbers. The conditions for people living in some of the housing provided by the scheme will not be optimal, with over 20% of flats being single-aspect and many suffering from inadequate daylight and sunlight.

SOCIAL & ECONOMIC IMPACT

The development will cause substantial negative socioeconomic impact to Peckham, particularly marginalised groups. This impact has not been properly assessed or mitigated.

Defects in EIA Chapter 6

10. Chapter 6 of the EIA (Environmental Impact Assessment) on Socio-Economics has not assessed the impact beyond the proposed future residents of the site, future employment relating to the development and the small businesses located on the site. This excludes the impact of the development on the existing residents, businesses and customers in the overall town centre and the existing residents in the SE15 area which is a significant part of the town centre catchment area.

These negative direct and indirect impacts on the business owners and their customers, and the functioning of the overall local economy, have not been assessed or mitigated. They include:

- **Housing prices:**
 - Effect on local house prices, particularly given very low level of 12% 'affordable' housing.
 - Whether local people can afford the housing - particularly in light of the high levels of deprivation in the area (which the analysis acknowledges).
- **Specific shopping needs and specialist shops**
 - How existing businesses meet a specific local need (in terms of what is sold and at what price), and whether the shops post-development will still meet this need.
 - Many of the town centre businesses supply goods and services to people who have African heritage. These include for example food shops and restaurants, hair dressers and shops selling skin and hair products.
 - In addition some businesses, for example, the market stalls, supply people who are economically vulnerable.
 - The assessment looks at potential additional spending - i.e. merely pure quantum of money - but overlooks this more nuanced analysis of what local people need and can afford.
- **Impact on businesses and the local economy**
 - The effect of the development is likely to be higher rents leading to displacement of many of the BAME businesses and the businesses catering for economically vulnerable people.
 - The socio-economic impact on the existing small and independent businesses and their customers in the town centre overall from being displaced will clearly be significant.
 - For the small shops and small/independent businesses on site, the Business Relocation Strategy fails to meet the standard required by Policy P33 and creates a very high risk of permanent displacement of these businesses.

Demographics missed

11. There is insufficient evidence in the submitted documents to make a robust assessment of the impact on the existing town centre businesses and on their customers. The missing evidence would have illustrated the impact on these significant local demographics in Peckham:
 - 37% of local residents who self-identity as being of **black ethnicity**, served by a large number of the existing businesses. (Ethnic data from the 2021 census and in the Fact-Based Audit in the Engagement Summary.) The EQIA (Equality Impact Assessment - page 28) identifies the high proportion of people who self-identify as black in the local population as a possible differential negative impact because *"this profile is significantly different to the average for Southwark or London."*
 - There are many local people who are **economically vulnerable** in the immediate catchment area of the town centre. Many local people are dependent on supplies that they buy from small traders in the town centre. The Old Kent Road ward has the lowest median income of all wards in Southwark, and Peckham ward has the second lowest. Four of the wards in the town centre area have a high percentage of people claiming out of work benefit, with two of them significantly higher than in the whole of Southwark. (Multi-Ward Profiles 2023 East Central Southwark - Southwark's Joint Strategic Needs Assessment.)
 - * 2021 Census figures show that in the wards in the town centre catchment area, 19.7% of **young people** are age 18 or under. By the time the Aylesham site is redeveloped as proposed, most young people who have grown up in the area will be more unable to find accommodation near their families because market prices for homes for sale or rent will have become even more unaffordable.

Anecdotal evidence

12. In the absence of adequate assessment in the EIA, the following anecdotal evidence has been gathered to illustrate the social and economic harm that the development would create.

- The Council's 2024 version of the Peckham Character Area Study reports: *"There are also concerns about some on-going and planned developments. They may have an impact on housing affordability, local businesses and income inequality. There are concerns about rising housing costs undermining support networks."*
- The Aylesham site is in the parish of St Mary's. The vicar's objection says *"...I have seen [in Woking] outcomes that have disproportionately affected the character of the town over time in the name of progress and cannot be reversed. I fear this particularly for Rye Lane and the micro businesses with continuing high and unaffordable rents that will happen..."*
- In addition PECAN, the local charity which actively supports vulnerable individuals, and whose office is on Peckham High Street directly opposite the Aylesham site, objects to the plans because they do not *"address the needs of disadvantaged members of our community..."*
- ACA has held monthly public community discussions in Peckham Levels about the Aylesham plans. There has been a diverse ethnic attendance and a spread through different adult age groups. Also throughout many other community events, and at numerous Rye Lane street stalls talking with passers-by, the consistent message has been the unwelcome dramatic change the development would bring to Peckham town centre, for some or all the reasons collected together in this overall ACA objection.

The nature of Peckham as a place

13. In Part 5 of the Applicant's Engagement Summary, the Social Value statement asserts that the Applicant's "vision is for a development that is uniquely Peckham and that positively contributes to the continued success of the town centre". The overwhelming response of local people to the development does not agree that this vision will be achieved by these plans. Over 2400 people have objected to the plans either or both because they destroy the uniqueness of Peckham town centre or fail to meet critically important needs.

14. The Design & Access Statement says that the plan is 'to create a new neighbourhood in Peckham Town Centre', and that it will be 'well-integrated' into the town centre. But it is the opposite – a monolithic, generic intrusion. The large new neighbourhood appears so different from the existing town centre and not integrated, that it is described locally as like an 'alien citadel imposed from outside'. This is unsurprising as the Conservation Area Appraisal (3.1.4 page 20) says, *"The character of the Rye Lane Peckham Conservation Area is attributed to the eclectic architectural styles and materials."*

Displacement of local people

15. Comments in the many objections on the Planning Portal for the Aylesham planning application give examples of the concern that the development plans will displace existing residents and businesses. Two recent research publications on the links between gentrification and displacement of social and economically vulnerable people in Peckham are evidence that these kinds of concerns are supported by the data:

- 'The Neighbourhood of Peckham, Southwark: a Study of the Process of Gentrification between 1997 and 2022' (Jelali, H., 2023) examines the impact of these policies on Peckham <https://univ-sorbonne-nouvelle.hal.science/CREW/tel-04585596v1>
- Trust for London's Poverty Profile (March 2025) analyses 53 London neighbourhoods including three in Peckham. The results show that families and low-income Londoners may be being priced out of their neighbourhoods, and ultimately out of London. https://trustforlondon.org.uk/data/gentrification-across-london/?utm_source=Newsletter&utm_medium=Briefing&utm_campaign=LPP

ENVIRONMENT AND SUSTAINABILITY

The proposed open space is of insufficient size and quality. Green space does not comply with the GLA's Urban Greening Factor requirements. The failure to meet London Plan standards for access to daylight and sunlight will cause harm.

16. There is an insufficient amount of green and open space for the new residents and for Peckham's existing community. The developer's claim that the proposal offers "Extensive publicly accessible landscaped grounds" (DAS, December 2024, p4) is highly misleading.
- The 10,240m² of new publicly accessible space at ground floor level that the developer claims to be providing, is a small amount for the expected 1700 new residents and publicly accessible spaces. This would be about 6m² of public space per new resident, and doesn't account for use of the public space by workers and non-residents. Camden Council's Open Space Strategy (2021) requires that developments provide 9m² per resident and 0.74m² per worker. While Southwark Council hasn't established a specific amount of open space to be provided by developments, if Camden Council's approach were applied, the Aylesham Centre development would be required to provide 15,300m², considering only the needs of the residents and not including the provision for workers.
 - Not only is the amount of green and open space inadequate for residents and commercial users, the developer wants the local community and the Council believe that the same space can also be used to provide benefits for the wider community. In the 'You Said, We Did' section of the Engagement Summary document, the developer argues that "*The development will create a significant new open space in the town centre...The proposed public open spaces have potential to host a variety of community events*" (p36). The developer fails to provide any detail about how these community uses will co-exist with the already severely restricted space for residents, workers and visitors, who will own and manage the spaces, and to what extent they will be inclusive and accessible, as required by London Plan Policy D8.
 - Even the figure of 10,240m² of 'publicly accessible space at ground floor level' touted by the developer appears to be misleading. Southwark Law Centre has calculated that the actual amount of usable public space at ground floor level is far less, as the developer's figure includes ancillary space, service roads etc.
 - There is a lack of provision of play areas for younger children, especially children 0-4 years, as the areas identified appear to overlap with general public realm, with the risk that younger children's specific play needs will not be met. For example, the diagram showing where play space for different ages is provided (Landscape DAS, Appendix 1 of revised DAS, p67) reveals that about two thirds of Aylesham Gardens, which is presented as the main open space on the site, is simultaneously allocated as play space for 0-4 year olds.
 - For 12+ children, only 210m² of a target provision of 551m² is to be provided onsite. The need for facilities for older children and young people was one of the concerns expressed most strongly during the consultation (Engagement Strategy, 'You Said, We Did' section). The developer has said they will make payments for facilities at other sites in the area. This undermines their own claim to be providing 'a range of play spaces' for local children (Social Value Statement, p36).
17. The development fails to meet the GLA's Urban Greening Factor (UGF) requirements. A 'good' Urban Greening Factor (UGF) score is typically considered to be 0.4 for predominantly residential developments such as the proposed Aylesham Centre development (London Plan Policy G5). A higher score indicates a greater amount of quality urban greening. The development only scores 0.38 UGF, which falls short of providing a significant improvement in green infrastructure, which is critical in a dense urban area like Peckham. The proposal shows a complete lack of concern for the need to support biodiversity and nature enhancement and should be rejected for this reason alone. The

scheme has not been designed to strengthen biodiversity corridors by linking any green space on the site to natural areas in the vicinity, such as Cossall Park. This is a missed opportunity.

18. The open and green space in the development is of poor quality.

- Much of the area that is referred to as green and open space is made up of service roads. Giving parts of the development 'green' names, does not in practice provide the green and open space needed. For example, Garden Walk (DAS, p62) is elsewhere described as part of a 'retail loop' running alongside restaurants and shops (DAS, p64), therefore cannot be considered green space. This kind of greenwashing should not be accepted.
- The open space or 'public realm' is surrounded by tall buildings and one of the two main areas (Discovery Garden) will only get 2 hours of sunlight in March (less in winter months). This will make it an unattractive place for recreation and amenity during much of the year.
- The overlap of pedestrian and vehicular space is dangerous and leads to poor open space. The two maps at the bottom of p64 of the DAS show clearly the way that the developer has overlaid different movement activities along the same routes, with no apparent recognition of the needs of different users and the risks of shared transport spaces. Just to mention one particularly obvious conflict, pedestrians (including elderly people, disabled people, people with young children, etc) are expected to use the east-west route from Morrisons to Rye Lane, which will also be used by cyclists and, in one part, by primary service vehicles, and which will cross a route used by secondary service vehicles. The proposed public space does not comply with Southwark Plan Policies P13(5) (ensure high quality public realm that is safe, legible and attractive) and P13(8) (provide accessible and inclusive design for all ages and people with disabilities).

19. The dense tall buildings create a series of negative environmental impacts.

- The overly dense design of the development exacerbates loss of daylight and sunlight, both to homes within the development and to nearby buildings on the Clifton Estate (e.g. Purdon House). Calculations indicate that homes around the site will experience a 31% decrease in winter daylight, while Purdon House and 81 Hanover Park will have a quarter drop in the visible sky from their windows.
- The proposal also recognises that the height of the buildings will cause wind tunnel effects. It suggests that there will need to be mitigation for wind impacts on two areas of buildings L and H as well as landscaping measures to mitigate wind impacts at ground level. This makes it questionable whether the height and density of buildings are compatible with a comfortable environment for residents and visitors to move about. Much of the movement through the site will be along the diagonal route from Rye Lane to the Morrisons supermarket – this seems likely to be a particularly windy area which will affect the comfort and potentially the safety of less able-bodied users.
- The proposal fails to comply with requirements for net zero climate emissions. Despite the developer acknowledging that, *"Residents wanted to see a sustainable design approach in response to the Climate Emergency"* (Engagement Summary p28), the proposal fails to effectively address climate change risks, which represents a missed opportunity. Tall, dense buildings are particularly energy intensive and lack the capacity for adaptation to changing climate conditions.

HERITAGE

The proposed development will cause harm to the Rye Lane Peckham Conservation Area and other designated and undesignated heritage assets in Peckham town centre. This harm is not counterbalanced by public benefit and fail to meet local need.

20. The size and overbearing nature of the development will damage the conservation area and Peckham's heritage. The proposal disregards the fine grained, layered historic context of the site, its architectural interest, and distinctive sense of place. By 'Peckham's heritage', we do not only mean historic buildings as built objects. We also include local people's sense of belonging, wellbeing, pride and connectedness engendered through their experience of the unique character and history of Peckham. This sense of Peckham town centre as a particular and unique place is described in the quotes below, from local people:
- *"The old village chaotic hustle-and-bustle of the high-street would be lost to slick corporate development, much like other areas of London that have suffered similarly"*
 - *"This development would punch the heart out of an amazing neighbourhood."*
21. The harm to Peckham's heritage caused by this proposal is not outweighed by benefit to the community. On the contrary, the proposed scheme does not provide adequate affordable housing or open space, and it will damage the local economy. The harm and destruction which this proposed scheme will bring to Peckham as a place will inevitably affect the health and wellbeing of thousands of people who call Peckham their home. The result is a bleak combination of a development which fails to meet local need while causing permanent damage to Peckham's heritage.
22. The Aylesham site is partially located within the Rye Lane Peckham Conservation Area. The conservation area is eclectic, with a variety of architectural styles, and buildings from the 18th to 20th centuries. Building heights are generally two to four storeys, with larger buildings, such as Peckham Library and Peckham Pulse, around Peckham Square. There are four listed buildings in the conservation area. To the northwest of the site, at a distance of approximately 50 metres, No. 58 Peckham High Street is a grade 2 listed house dating from the 1720s with a later Victorian shopfront. There are several locally listed buildings to the north and west of the site: to the north, the group Nos 98 - 104 Peckham High Street is a remaining fragment of Peckham's history as a rural village; at the northwest boundary, the former Jones and Higgins department store, with its prominent clocktower, is a historic landmark; and to the south, on Rye Lane, the prominent former HSBC bank marks the corner of Rye Lane and Hanover Park. The recent Peckham Townscape Heritage Initiative project has supported the repair of a cluster of 9 historic buildings, including the above-mentioned nos.100 and 102 Peckham High Street.
23. The 'Physical Planning Context' section (page 10) of Southwark Council's own draft Peckham Character Area Study (see extract below), reinforces the significance of Peckham's heritage value, conservation area and historic townscape as follows:
- Peckham is:*
- *An area of heritage value, particularly in the conservation areas with many interesting Victorian, Edwardian and inter-war buildings, including Peckham Rye Station, and the Baptist church with the former Jones and Higgins department store at the heart of Peckham town centre. Outside designated conservation area the historic residential layout remains intact.*
- Developments in Peckham should:*
- *Reveal and enhance Peckham's underlying historic townscape.*
24. The proposed development fails to achieve even the most basic objective of the National Planning Policy Framework (NPPF), which is to contribute to the achievement of sustainable development through meeting economic, social and environmental objectives - including '*to enhance and protect our natural, built and historic environment*' (para 8c). NPPF Para 9 states that local circumstances should be taken into account '*to reflect the character, needs and opportunities of each area*'.

25. The proposed development comprises of a cluster of tall buildings in a low-rise town centre. Historic England's Advice Note 4 (2nd edition, 2022) provides advice on planning for tall buildings within the historic environment, based on principles (item 1.3) which advise that *'Decision making (is) informed by understanding of place, character and historic significance'* and that tall building proposals should *'take account of local context and historic character'*. Furthermore item 2.8 refers to governmental National Design Guide (2021) which sets out characteristics of good design including *understanding and responding to context* (paragraph 43), and *valuing heritage, local history and culture* (paragraph 46).
26. The proposed scheme does not preserve or enhance the conservation area. It damages the conservation area by imposing a massive bulk of development which is extremely out of scale with its context. The proposals clearly contravene the Rye Lane Peckham Conservation Area Appraisal as follows:
- (item 4.5.3) *'New buildings should respect prevailing building heights and not unnecessarily dominate views out of the conservation area'*.
 - (Item 5.5.3) *'In each situation buildings should remain within the range of heights of the block of buildings in which they are sited'*
 - (Item 5.3.6) *'Whilst opportunities for buildings of eight to ten storeys maybe appropriate to the east of Rye Lane... these should not dominate views or overshadow the conservation area'*.
27. The proposed buildings, by their height and massing relative to context, contravene the site allocation policy (NSP74) in the Southwark Plan, in numerous ways, as follows:
- On Design and Accessibility Guidance:
'Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.'
'Redevelopment or refurbishment of the site should introduce active frontages throughout the site, and retain and enhance frontages to Rye Lane, taking Rye Lane Peckham conservation area into consideration.'
 - On Approach to Tall Buildings:
'Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage and townscape.....Careful consideration would also need to be given to the neighbouring residential areas and important local heritage buildings.'
 - On Impacts Listed Buildings or undesignated heritage assets:
The site is within the setting of Grade II listed Rye Lane Chapel and a group of listed buildings on Highshore Road. The site is also within the setting of a number of important unlisted buildings on Peckham High Street and Rye Lane, including Jones and Higgins Clock Tower and 43-49 Rye Lane.
Note: The setting of Grade II listed 58 Peckham High Street is not referenced in the site allocation, which is evidence of deficiency in the preparation of this policy.
28. Other contraventions of the Southwark Plan
- The scheme fails to *"conserve and enhance the significance of designated heritage assets and make a positive contribution to wider townscape character"*, in breach of Southwark Plan Policy P17 (Tall Buildings). Furthermore, and despite clearly affecting multiple heritage assets, there is a distinct lack of *"clear and convincing justification in the form of public benefits"*, also in breach of Policy 17 (Tall Buildings).
 - The scheme does not, *"preserve[s] or enhance[s] the character or appearance of the conservation area and settings taking into account their significance, views into and out of the conservation area"*

and its positive characteristics”, as identified in the Conservation Area Appraisal and Conservation Area Management Plan. This contravenes Southwark Plan Policy P20 (Conservation Areas).

- The proposed development does not “*conserve and enhance the significance of [...] non-designated heritage assets*”, in this case, several unlisted buildings of townscape merit. This is a requirement of Southwark Plan Policy P21 (Conservation of the Historic Environment and Natural Heritage).

DESIGN

As a high-density development, the scheme fails to meet appropriate design standards. Evidence for this lies in the overall form and impact on townscape, of both buildings and external spaces. In addition, standards of internal design are minimal. The scheme causes harm on all planning and architectural fronts, with long-term adverse impacts.

Scale and Density

29. The scheme proposes 867 apartments within a site area of c.2.7 ha. and includes retail provision and originally a bus stand. The site allocation in the Southwark Plan (2022) is for 850 homes, including homes to be built above the bus stand (the site allocation did not specify how many units should be on the Aylesham site proper and how many should be above the bus stand). No building on the bus stand area (which belongs to Transport for London) has been included in this planning application, so the number of residential units significantly exceeds the site allocation.
30. Assuming an overall occupancy level of 3 persons per dwelling, this results in a density of approximately 350 units (or 1000 persons) per ha. This is an extremely high figure for an inner London suburb and at the upper limits of practical viability. It derives from the indicative number of 850 fixed in the new Southwark Plan 2020. Despite requests for further and better particulars that justify this figure, and explaining the methodology used to describe it the public has been given no further information. Bearing in mind the depth and breadth of objections the scheme has aroused, this figure must be regarded as highly suspect and in itself it is a prime cause of harm bearing on the future of Peckham.

Form and Typologies

31. At such densities matters of architectural form take on proportionately greater significance, and there are concomitant issues of costs. More crucially for a scheme so intimately engaged within a local community, there are issues of integrated planning use. From the outset it seems the only acceptable typologies were orthodox layouts comprising discrete medium height rectilinear blocks with an identical N-S orientation.
 - Blocks are placed in tight clusters consistent within environmental constraints, e.g. daylight and sunlight restrictions wind impacts, etc. Considerable effort seems to have been spent on distinguishing more or less identical blocks with different colour schemes and other differences, and which only go to emphasise the underlying similarities. Refer to the Heritage section for comments on the wider impact on heights, further views and visual appearance.
 - There is no evidence that other typologies were considered as the design developed. This represents numerous lost opportunities to consider alternative typologies more appropriate to this level of density. This could have included deck housing, linked blocks and more complex and appropriate blocks. This is not to mention more imaginative non- residential mixed uses at high level such as creches, vertical growing facilities and community spaces. Typically, the effect as proposed is a soulless dormitory, dull and drab with absolutely no sense of that elusive concept ‘a vibrant multicultural community’. As an architectural form the scheme fails.

Internal Space Planning

32. The apartments are located in 14 separate blocks arranged in clusters of 2 -4 dwellings per floor. The internal layouts are generally the minimum specified in LBS Residential Design Guide SPD. Specific objections are:

- Room sizes and configurations are awkward and some rooms are difficult to furnish,
- Bedheads of many single bedrooms are located under windows.
- The majority of family layouts consist of multi-purpose living/dining/kitchen spaces. Kitchen spaces should always be separated from living rooms.

External Open Space

33. The uses and relationships of public open space have been left until the last minute in the design process and relegated to considerations as landscaping. But there are deeper and prior questions of access, ownership, maintenance, and the nature of privately owned, publicly accessible space (popas). External spaces are fundamental to the everyday experience of Peckham and the sense of inclusion that good design should suggest. The planning application needs to state clearly whether the ground floor open areas are primarily for the use of residents, shoppers, workers or other visitors, which areas are active spaces and which are closed off to the general public. We question whether the design is in any way sustainable, in the sense of making real space for biodiversity, and considering opportunities for food growing ('field to fork' projects) and vertical growing.

Cultural Spaces

34. Peckham is frequently cited as a prime cultural hotspot in south London. Much of this is a form of PR, allusive and implicit, yet there has been little if any debate on the role the Aylesham development might play in fostering and facilitating creative projects. A place like Peckham should ideally generate its own creative arts environment that will be incremental and bottom up, the development should have been an opportunity for promoting community endeavours, such as, potentially, local arts spaces, a local arts hub, a new residents' centre, sports facilities, nurseries, community club spaces, tenants meeting rooms? Until such things have been considered the project cannot claim to reflect Peckham as a creative suburb.

Car Parking

35. At present the Morrisons car park occupies about two thirds of the site area and provides c360 parking bays. The car park is officially provided for supermarket customers only although it is unclear whether this includes shoppers at other retail outlets on the site. The scheme proposes to reduce parking to 140 spaces. The potential impacts on the town centre economy, cultural, social and community uses of the loss of over 200 parking spaces, have not been addressed in the consultation. Given that these impacts could be significant, this is a serious omission.

TRANSPORT

There will be a negative impact of the extra population on the capacity of public transport and on the junction of Rye Lane and Peckham High Street, close to the site. This impact has not been properly assessed or mitigated. The application fails to comply with the transport policies in the London Plan or the Southwark Plan.

Peckham Rye Station

36. The station is severely overcrowded at busy times, and totally inaccessible to anyone with difficulties in using the stairs. Network Rail's plans to redevelop the back of the station to deal with these issues are dependent on Government funding which has not yet been agreed. This cannot be guaranteed in the current public financial situation so there is a risk that the station will become unsafe to use.

Local bus services

37. There are good bus services coming through Peckham town centre. But they are frequently at full capacity. TfL's response to the Arup note (added to the planning portal on 4 February 2025), says that BH has underestimated trip generation by between 17-45%, meaning the impacts on the transport network capacity have not been properly calculated or mitigated.

Junction of Rye Lane and Peckham High Street

38. This junction is very overcrowded with every form of transport from pedestrians and cyclists, to cars, commercial vehicles and buses. It is a dangerous place especially for pedestrians. The development would increase substantially the numbers of pedestrians and cyclists there, and increase the risks of accidents. The Application fails to propose any improvements to this junction which is adjacent to the development.

Transport policies

39. Because of these overcrowding and safety risks and the failure to assess the bus needs and propose improvements to the surrounding public highways, the application fails to comply with several transport policies:

- London Plan Policy T4(B): *"transport assessments/statements should... ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed"*;
- London Plan Policy T4(F): *"Development proposals should not increase road danger"*;
- Southwark Plan Policy P49: development must (1) *"demonstrate that the public transport network has sufficient capacity to support any increase in the number of journeys"* and (3) *"improve, maintain and enhance public transport services"*;
- Southwark Plan Policy P50: development must (3) *"ensure safe and efficient operation of the local road network, the bus network and the Transport for London Road Network"*.

CONSULTATION

The failure to comply with the DCC has resulted in unsatisfactory consultation by Berkeley Homes. The ACCF (Aylesham Centre Community Forum), created by the Council as an additional process failed to mitigate this.

Engagement Strategy

40. BH failed to produce an Early Engagement Strategy, despite this being a *"requirement for pre-application discussions"* pursuant to the Development Consultation Charter (DCC). This failure led to a poor consultation process, flawed demographic analysis (as detailed above), and no substantive change to the application to reflect consultee concerns. The ACCF (Aylesham Centre Community Forum) set up by the Council had the potential to provide a remedy for the defects in the BH process. However as an untried and untested process it was unable to fulfil that potential, as the Council acknowledged.

We believe that failure to meet clear and unequivocal requirements in the DCC amounts to a breach of legitimate expectation, meaning it would be unlawful to grant permission for the Application on this basis.

41. The defects in the consultation process prevented a useful engagement with the local community:

- BH took many actions in the community, but the pre-application community engagement was performative to tick the 'consultation' box. This can be seen by over 2,400 objections to the planning application and only 58 in support. Some minor details may have been changed but the shape of the plan was basically the same from the beginning to the planning application.
- Further evidence for the failure of the process is that only in the last two months before the planning application was submitted did BH arrange public discussions which local people had called for throughout the process. These were in a small shop unit in the Aylesham Centre and not all who came could get in. The sessions were poorly designed and facilitated, and BH staff did not appear to be taking notes. The sessions were not about engagement but about delivering BH information to those present.
- The draft Peckham Character Area Study has said *"Many residents and businesses were cynical around consultation. They did not feel that local voices affect the planning process. There is a belief that decisions are already made. Some felt that the council are making efforts to improve engagement but it is not yet enough. Others felt that there is even less engagement. Many people have positive relations with councillors. Yet, they still feel that they are not able to have an impact at a council level."* The BH consultation process and the Council's were yet more examples of the same old approach.

Engagement Summary

42. Availability of an Early Engagement Strategy would have been a significant help in guiding the BH process into methods of communication and engagement which would have created meaningful discussion and dialogue, and avoided poorly executed processes. For example:

- The BH website was difficult to navigate and was not easy to search for even after its redesign.
- There was very poor signage at some of the venues so they could not be found by visitors.
- At the drop-in exhibitions some displays were misleading or inaccurate or inaccessible by the general public, and were repeated without correction.
- Comments of visitors made in conversations with the BH staff were not being recorded.

43. At the many interactions ACA has facilitated, there has been a lot of comment about the poor processes at the events. Given our experience of the whole consultation process we consider that the summaries in *Part 3–Stakeholder Views and Vision for the Site* and *Part 4 You said—we did* do not give a good representation of these comments.

Part 5 Social Value Statement

44. The DCC requires the Engagement Summary to submit a Social Value Statement (SVS). The SVS provided by the Applicant is deficient in the following ways:

- The SVS is required to show *"the economic, social and environmental impacts of the development, how the development will contribute to the long-term wellbeing and resilience of existing and future residents and businesses"*. However, it focuses disproportionately on the benefits from the development for future residents without giving an adequate assessment of the negative effects on the existing residents, the existing local community and the nature of the existing town centre economy.
- The SVS highlights *"the Applicant's vision for a development that is uniquely Peckham and that positively contributes to the continued success of the town centre..."*
On the contrary it appears like a development that could be anywhere. It provides no evidence to show how the proposed development is 'uniquely Peckham'. It is notable that the **CF** retail strategy

document looks at general market trends rather than what Peckham needs and currently has, and could be enhanced.

Conclusion

45. As the thousands of objections submitted by the public demonstrate, those who live and work in Peckham and know the place very well in all its aspects believe that the proposed development will destroy the unique characteristics of Peckham, and that the small benefits it will give are far outweighed by the aggregated harms that the development will cause.

07 May 2025

Aylesham Community Action

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