



Southwark Council  
Development Management  
Chief Executive's Department  
London SE1P 5LX

Date: 15 November 2022

For the attention of:  
Berkeley Group  
Avison Young  
Sheppard Robson

Dear Mark Knibbs,

Cc: Berkeley Group, Sheppard Robson

## **22/EQ/0015 – Aylesham shopping centre, Rye Lane, Peckham**

I write in regards to the current pre-application discussions, regarding the Aylesham shopping centre in Peckham. This is a sensitive site which greatly affects the town centre, conservation area and the Council are keen to see positive change happen in this location that meets the criteria and spirit of the site allocation NSP74

At this stage of the PPA we would like to provide some meaningful feedback on the masterplan as we outlined at our meeting of 2 November. There are some positive aspects of the proposals but there remain a number of significant issues that need your teams consideration. We therefore provide this feedback as a constructive way forward to assist in resolving these issues.

With this in mind, we would strongly recommend that a number of design focussed workshops take place to work on the masterplan before progressing further with the programme currently set out in the PPA. These would pick up on and hopefully progress the issues that we discussed at our last pre application meeting on November 2 2022.

## **Strategic Design approach/Masterplan**

### **Overview**

The fundamental masterplan structure, involving east-west and north-south routes across the site, the re-provision of the Morrisons store with residential over and the redevelopment of the Rye Lane retail frontage are all key elements identified in the

NSP74 site allocation diagram and supporting text. The broad principle of your approach is therefore supported. However its detailed execution requires reconsideration and the following sets out our advice in that regard.

### **Development Quantum**

This is a key driver of built form including height mass and bulk, consequent impact on neighbouring amenity, heritage assets and quality and quantity of open of open space. All 4 options of the scheme that you have presented to us to date have been predicated on a quantum of 1050 new homes. The recently adopted Southwark Plan (2022) policy NSP 74 has an indicative residential capacity of 850 new homes. This is for the entire allocation including the bus station, but it is indicative and could be larger, particularly given the need for housing (and especially affordable housing) in the borough. The 4 options presented demonstrate that exceeding this indicative capacity by almost 25% on this site alone would be detrimental to the character of Peckham town centre and the conservation area and would produce some poor quality public spaces (particularly on the east-west route) as well as impacting daylight sunlight to neighbouring residents. In order for us to make any positive progress and address the issues outlined below you will need to look at options with fewer homes than the 1050 proposed to date. In our last pre application meeting we discussed testing options (including of 900 or 950 homes) to see if they could help resolve the issues set out below.

### **Building typologies/uses**

As a housing led scheme coming forward in a challenging economic climate we can appreciate the need to achieve efficient layouts to the residential blocks as doing so helps deliver a viable scheme that can in turn deliver our affordable housing requirements. However there has been much initial discussion about the distinct character of Peckham and “Peckhamness”. In particular the way that buildings such as Bussey and the car park have been repurposed with great success and the very rich and varied character of the conservation areas.

As an example the recently completed student scheme at Eagle Wharf has a particular response to its frontage on Peckham Hill Street reflecting the semi-detached villa buildings that flank it within the conservation area. This is not just an architectural wallpapering exercise, the layout and use within those buildings reflects the exterior form. Similarly the workspace completed at the junction of Rye Lane with Blenheim Grove, is an example of how plot sizes drive distinct building forms along the high street frontages.

Within a site of this size it should be possible to accommodate some key feature buildings that are not a standard residential plan typology, for instance along the Rye Lane frontage and with the proposed commercial building. To be absolutely clear this is not just a request to change building elevations and dress them in different clothes. We would like you to explore having a different approach to the internal planning and subdivision of those buildings. The same principles apply to the public spaces being produce. As pointed out in the last pre application the interface of your scheme with the rear of Peckham High Street provides an opportunity to make overt reference to similar spaces that already exist in the area. Without doing this the scheme’s fit with its wider context risks appearing at best superficial, at worst non-existent. This in turn may give the impression that the scheme is part of a process of

gentrification, as it could be perceived as actively (if unintentionally) eroding the character that makes this area special.

Some re-consideration of building layouts may also help reduce the number of flats which would be single aspect and north facing. We appreciate this is a challenge on a site in which the fundamental masterplan structure includes an east west axial route, as suggested by the NSP, but its something we would appreciate your team giving further consideration to.

### **Building Height/Tall buildings**

- The NSP identifies that development of up to 20 storeys could be appropriate in this location. Reducing the maximum height of development in your Option 4 to 20 storeys and retaining the quantum of 1050 homes has resulted in a pillowing effect with the proliferation of tall buildings on the site and an increase in height of the sites perimeter buildings. Views presented at our last meeting clearly showed that this would be harmful to the character of the town centre and the daylight/sunlight analysis indicated it would also have a significant impact on neighbouring resident's amenity. The original proposal for two towers maximum located at the key open spaces to the east of the site is considered to be the optimum arrangement. Officers would consider one of these buildings being taller than 20 storeys, providing a clear link could be made to the wider public benefits the scheme would engender. Beyond that none of the remaining buildings should generally exceed 10 storeys in height, and the sites perimeter buildings should be of a height that successfully manages the transition in scale from the existing buildings that surround the site to the two taller buildings proposed at its centre.
- The approach outlined above will only be achieved if there is some movement on overall development quantum.

### **Other Masterplan Comments**

- The masterplan should include character areas defining each part of the scheme and helping to shape the architectural and urban response for example:
  - Rye Lane
  - Peckham High Street (the backs)
  - Hanover Park
  - The linear Park
  - The Square
  - The Shopping Street
- The omission of the TFL Bus Garage from the scheme means that the site risks being perceived as largely cut off to pedestrian access from Peckham High Street / Queens Road making it difficult for a large proportion of Peckham residents to access the site. Consideration should be given to the bus garage and enhancements that would enable safe access to the site – a bus station with good pedestrian access routes across it at the entrance to the site should be a positive aspect of the scheme. We would be happy to work with you and TfL to see how this could be improved to the benefit of both your scheme, the TfL bus station and the wider town centre.

- In addition to commercial retail and residential uses, we ask for wider cultural or civic uses to be incorporated into the scheme. This provides an opportunity to enhance Peckham as an emerging cultural hub, building on the successes of established providers including Camberwell College of Arts, the Library, Mountview and Peckham Levels with other mean-time cultural uses and pop-ups. A cultural use on this site could enhance its civic presence and provide added public benefits.
- Prepare a movement study to demonstrate how the Masterplan will enable people from Peckham to access every part of the Masterplan including access for pedestrians and cyclists. Public realm should connect up better with current access points and streets including Cerise Road, Queens Road and Bull Yard
- Elevated views from the Bussey Building and the Car Park of St Paul's Cathedral extending to the Shard, should be considered
- A land-use plan could help to demonstrate the distribution of uses across the site

### **Heritage assets**

- A heritage assessment of the designated and undesignated heritage assets, including an assessment of significance and impact on setting should be the starting point for this master planning process and remains outstanding.
- The response to the conservation area should refer to the conservation area appraisal and historic area assessment highlighting designated and undesignated heritage assets and restating its features of significance. Guidance from Historic England is available in the form of "GPA3 *Setting of Heritage Assets*" 2017.
- NPPF para 199 requires "great weight" to be given to the assets conservation. This would apply to the conservation area, and in particular the settings and experiences of the Higgins and Jones building, and the terrace 96 and 98-102 Peckham High Street, and the HSBC building as these buildings contribute positively to the significance of the conservation area.
- With regards to para 202, currently the proposals are considered to be harmful to the significance of the conservation area. The harm would likely be "less than substantial", however this should be understood in the context of NPPF para 197, "a) the desirability of sustaining and enhancing the significance, b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and c) the desirability of new development making a positive contribution to local character and distinctiveness." There would be some benefit to the conservation area by providing a setback to Rye Lane, however this benefit would be eroded by the impact on the conservation area, particularly on the views of the Higgins and Jones building, and its excessive scale when seen in the context of 96 and 98-102 Peckham High Street. Officers remain concerned regarding the impact on the conservation area, and reconsidering the quantum of development on the site would help address these concerns.
- The council's tall buildings study demonstrated that height should be located in the south-east quadrant of the site in order to avoid a harmful impact on the conservation area and its features of significance
- Townscape and visual impact assessment should be used and all the approaches tested at multiple locations including along Rye Lane, Peckham

High Street, Peckham Hill Street and Queens Road highlighting any harm to heritage assets and including any mitigating measures taken.

- Height should be introduced in a measured way and in a layered approach with shorter buildings in the foreground (at the edges of the site) and taller buildings in the backdrop towards the centre of the Masterplan
- The conservation area appraisal suggests to the rear of the main historic frontages buildings of up to 8 to 10 storeys could emerge – along the northern edge of the site. This could assist with the layered townscape approach here meaning that taller elements could be set behind the 8-storey cap at the northern edge.
- With regards to the Jones and Higgins building, it is prominent in long views from a number of locations and acts a focal point in junction. Its clock tower has visual prominence and cluttering the skyline behind it should be avoided. Again, the building on the perimeter of the site should reach a shoulder height of approx. 8 to 10 storeys and aim to not crowd the clock tower views. A building alongside the southern flank of the Jones and Higgins building, but with a small set back in line with the proposed Rye Lane frontage may be acceptable and reveal better the views of the Jones and Higgins building – however this is dependent on the scale and massing of the building being appropriate and the scale of the public realm square area being of a “Peckham” scale.
- NPPF para 134 requires development that is not well designed to be refused, especially where it fails to reflect any local design guidance and SPDs.

### **The current options**

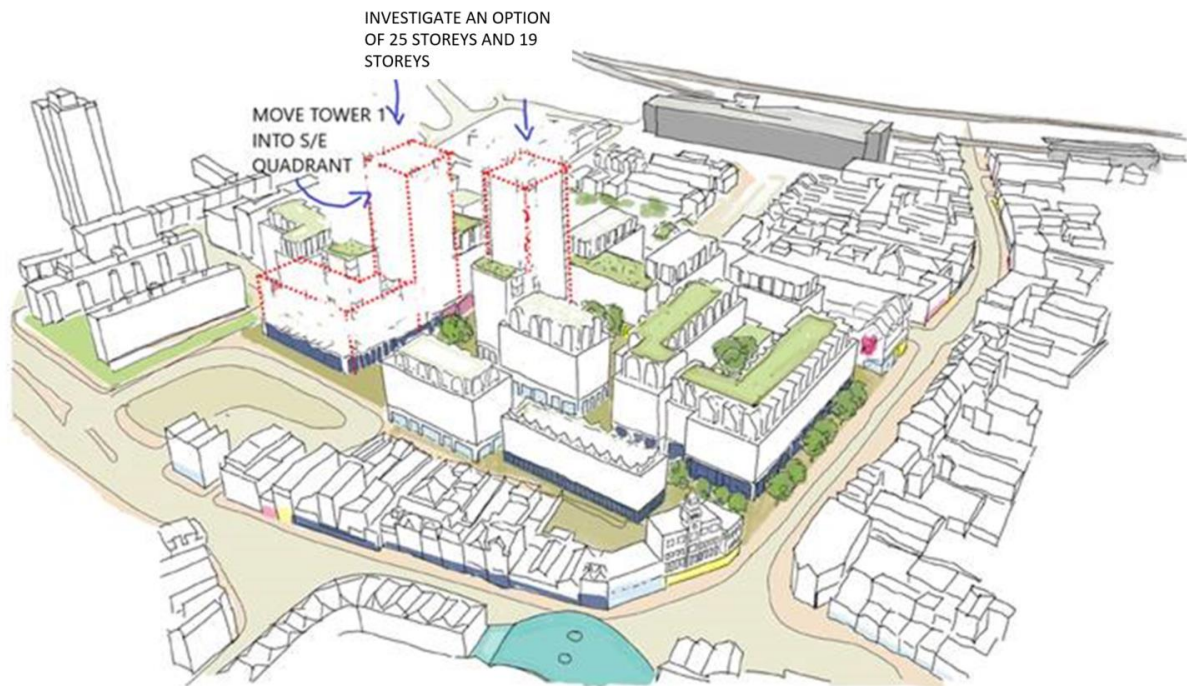
- Options 1 and 2 presented (2 Nov) included an increase in the number of tall buildings across the site (the ‘lower’ option includes 3 No 20-storeys and 1 No 18-storeys with heights along the western and northern edges of the site ranging between 12 and 14 storeys)
- The public realm is now concentrated in the east-west shopping street (12 – 15m in width) and north-south linear park (around 20m in width)
- The central square and the Rye Lane Square are omitted
- New north-south ‘alley’ introduced

The information presented raised a number of issues about the, height and the conservation area, the new public spaces, the Masterplan and streets, and the architectural quality and amenity

### **The preferred option (subject to adjustment of quantum of housing and further development)**

The 5<sup>th</sup> April 2022 Option appears to establish a sound approach to the site more in keeping with the broad aspirations of the allocation. It includes 2 towers, 3 public squares and low-rise blocks to the remainder of the Masterplan.

The two towers, which at 22 and 27 storeys exceeded the 20 storey height set out in the NSP were located closer to the south and eastern quadrant of the site and included lower buildings (not exceeding 8-storeys) in the foreground.



We like the direction of travel in this option and ask that this is pursued further, but that in doing so the fundamental issue of overall development quantum need to be reconsidered as is the approach to building typologies and height outlined above.

### **Comments on Option 4 (As discussed in the meeting of 2.11.22)**

#### The conservation area

- The views south along Peckham Hill Street and east along Peckham High Street raise significant concerns about the harmful impact of the scheme on the conservation area
- Tall buildings spring directly from the rooftops of the conservation area buildings in the foreground in many views causing harm to the conservation area
- The combination of the northern blocks into long singular block, coupled with raising them in height to around 12-14 storeys will be detrimental to the character and appearance of the conservation area and introduces unjustified harm
- The layered approach to height across the site mentioned above should be considered and tested
- Consideration should be given to the backs of the Peckham High Street buildings – to turn this space into a positive space (not a car park/service alley)

#### Public spaces and streets

- Public realm should be accessible, bathed in light and green in character – a sunlight study of the public realm to against BRE standards is necessary

- The omission of the two squares (in earlier version of the proposal) is substantially detrimental to the scheme and lacks the generosity required of a such a large scheme. We would encourage the reintroduction of the two squares at grade as two meaningful pieces of public realm in the Masterplan.
- The east west-shopping street (around 150m long) is demonstrated to be in shadow for most of the year and is a severely diminished public space (at just 12-15m in width). In addition 3 of the towers are proposed to rise sheer from the edges of the narrow shopping street – this proposal will introduce an inappropriate and harmful typology to Peckham
- Whilst the Rye Lane Square may expose the flank of the Jones and Higgins Building, this may also present an opportunity to repair the building and enhance this important local landmark – Our preference would be to avoid this being an exposed flank wall. Have you considered talking to the owners/architects of the J&H Building?
- A study of active frontages in the site and along the perimeter of every block should be provided (to scale)
- An overlay of servicing across the site should be provided to show how vehicles will traverse across the site including for servicing and Fire Access for every block – existing estate roads should be avoided

#### Architectural quality and amenity

- Southwark Plan P17 requires tall buildings to be of exemplary architectural design and residential quality. Dual aspect is a measure of exemplary design – the typical floor layouts demonstrate a high proportion of single-aspect homes which is a substantial concern. The current proposal is working towards a low proportion of homes being dual aspect with only 62% currently proposed. This % of dual aspect homes needs to increase in order to consider the residential design to be of an exemplary standard. (See earlier comments in the building typology section) Clarity is required on unit types for single aspect homes. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided as per the London Plan guidance.
- You need to develop a coherent and convincing narrative about the architectural approach you intend to take and how it relates to the town centre. As with any large scheme there is scope for some of the buildings to have a more “background” character, whilst others should have a more overtly “foreground” presence. As set out in the building typology section the exterior of the buildings should reflect their interiors. In accommodating Peckham type uses you should get buildings that have Peckham type exteriors without them looking forced and artificial.
- Separation distances are challenging within the scheme especially in the centre of the site where tall buildings are currently proposed to be less than 21m with direct overlooking. We appreciate this is a town centre location so there is some scope for flexibility on this issue – but going forward layouts should include figured dimensions of streets and squares as well as separation distances between buildings and some narrative on the consideration you have given to managing overlooking through the design process.

- Sunlight/daylight studies have raised significant concerns affecting especially residents in the conservation area (on Peckham High Street). The study should also extend to permitted schemes (not just existing windows and sunlight should be considered (as these properties are south-facing)).
- There is concern regarding the daylight impacts on McKerrell Road in particular. In the presentation sent to LBS, 29 (67%) windows of the 43 tested do not meet the target of 15% for Purdon House. Clarity is needed on the impacts when the overhang effect is removed. It was explained at the meeting that this would improve the VSC results, however, this information has not yet been sent to LBS to fully assess. 52% of the windows tested on 81 Hanover Park north and 34% of the windows tested on 81 Park Hanover south also do not meet the target of 15% as per the presentation sent to LBS.
- A sunlight analysis needs to be carried out on all properties to understand the impacts of the massing on existing neighbours particularly those who are south-facing e.g. Peckham High St.
- Where there are impacts on immediate neighbours, have you considered approaching the TRAs to see if there are benefits that they may want to see emerging from the scheme – for instance a TRA Hall or after-school centre? Following our meeting with members we will forward you contact details for the respective TRAs.

### Landscaping

- A character assessment should be made of green infrastructure links into and around the site. This could include a description of green open spaces and new proposed spaces (e.g. Peckham Station) which are a key characteristic of the conservation area, as well as the more constrained pedestrian character around the Bussey building and alleys off Rye Lane.
- Setbacks on Rye Lane and Hanover Park TPO are welcome to retain existing green heritage (TPO trees) and enable improved public realm.
- The north/south passageway to the rear of the corner site and heavily overshadowed east/west linear open space is of unacceptably poor amenity. The sketch plan does not represent an accurate image of how street greening is feasible. This would require a more generous width of public realm
- The H2 podium should be amended as previously scoped to provide a central square at grade. Likewise, pinch points should be avoided along the retail lane.
- Challenges remain on how to ameliorate the harsh boundary treatment on McKerrell Road and Purdon House.
- The rear of properties on Peckham High Street needs activation and a high quality landscape led design. The need for a car park and servicing dominated layout should be avoided.
- The location of basements should be indicated.
- Overall, landscape design and quantum needs to be informed by UGF and BNG.

### **Community Engagement**

Engaging with the community is strongly encouraged. The community should have an opportunity to comment on the masterplan as early as possible. This should



include reaching out to community groups, nearby TRAs and community forums. We welcome the opportunity to discuss your consultation plan with you and provide advice how to engage with the community.

We welcome the on-going discussions about this proposal but to date the principle design focus would appear to be the need to accommodate 1050 homes on the site with all other considerations being secondary. This needs to change if we are to deliver a positive outcome on the site and deliver the aspirations of both the Southwark Plan and the local community.

With this in mind we would encourage further design workshops to focus on the masterplan before continuing with the current programme proposed in the PPA in order to progress this scheme successfully.

Kind regards,

Colin Wilson