FOBP objection to Joseph Homes 20/AP/0858 March 2021

Summary (submitted on the planning portal)
Friends of Burgess Park object to the application due to:

- The height of buildings beside Burgess Park and impact on Metropolitan Open Land openness.

- The new access path into Burgess Park serves only to funnel more foot traffic into the woodland nature area and will need a new pathway to connect to the main pathway.

- Ecological impact on the nature area due to reduced sunlight from the tower blocks 8 and 11 storey, will be damaging to the park, park users amenity and wildlife.

- The negative cumulative impact of all the developments x 4 along the south side of the park (development along Parkhouse St) need to be considered together; they will change the skyline, views and openness of the park.

The protection afforded for green space, the natural environment and the suitability and sensitivity of locations for development is explicit within the NPPF, London Plan and local borough plan. Due weight needs to be given to the environmental objectives and protections in assessing this application. The cumulative impact of all the other planned developments along the south side of Burgess Park also need to be taken into consideration as well as the specific characteristics of this section of the park.

Southwark Core Plan does not identify tall buildings on the spatial maps or the Camberwell Area Plan for the area beside the southern edge of the park. NSP22/Burgess Business Park site allocation says taller buildings may be considered, implying less height than a tall building. Elsewhere the planning policy is clear, tall buildings will be in specific areas/opportunity areas.

The proximity of the refused appeal scheme (Peachtree/Camberwell Union) and its inclusion within the same site allocation mean that the decision and findings set out within the inspector report are a material consideration to the determination of the Joseph Homes application.

The Joseph Homes site is on the park fringe, closer to St George's Church, and the impact of the scheme will harm the townscape and amenity of the area, and park openness. The cumulative impact in the overall context with the other planned developments is significant. They will completely change the character and appearance of the area.

Since the earlier planning application the Local Development Study has been produced. Joseph Homes have moved the building line back 5m, dropped by 3 storeys one small section, the mass of the building remains at 8 and 11 storeys. It is not a "slender and elegant tower" as claimed, when viewed from the park, and does not change overbearing nature of the scheme. The design amendments reduces the size of the green link by 171 sq m, the quality of the access point and how it joins the park, where it goes to is not sufficiently developed and is intrusive in the nature area.

The cumulative impact of all the developments and inter-relationship of all the heights (as set out in the LDS) mean that all the building heights across the six development sites must be reduced so that at the centre of the site the building lines are below the height of the chimney. With associated height reductions on this development.

Burgess Park is a unique Southwark park with MOL and SINC status, the largest green space in Southwark, it must be protected.

Submitted in full to Planning

1. Burgess Park west location
The location and relationship of the developments to the park mean that there are specific considerations for this location:

- This site is unique because it is bounded by a wall, most of the rest of the park is bounded by roads.
- This location creates a sheltered and tranquil space for people and wildlife.
- The area is not overlooked,it is different character to the park edge to the north and in due course the taller buildings at Old Kent Road
- This area of the park is the most established nature area in the park.
- The area is a quieter space than by the main wide paths and through routes across the park.
- The openness of the park due to low lying buildings to the south, the layout and master plan landscaping responds to this with the main paths and views which orientate and accentuate the feeling of openness.

2. Height and massing of buildings
Planning Officers original comment was for 10 storeys beside the park noted on the feedback. These meetings took place before during and after the LDS study was being undertaken. The inter-linkage of building heights across the NSP site allocation is an essential element of this scheme. Applicants should all have been asked to keep their respective heights in line with a total central height below the height of the chimney.

2.1 Overshadowing - The height at 40.25m and mass will provide a large shadow across the park. The shade of this development and the two other planned developments on either side will impact on the quality of life of park users. The sunny glades between the trees through the wildlife area will disappear. This will be in shade due to the building and darker especially noticeable in the October to March months of the year. The impact on the park of 8 and 11 storey buildings (and the cumulative impact of all the tall buildings planned) will reduce the value of the amenity for current and future residents and park users.

The 2019 shadow studies by FOBP for 30m (a typical 10 storey building) remain valid. The buildings will cast shadows over 100m in the winter over-shadowing park users and wildlife. This will impact on use and usability. The buildings will loom and overlook the park leading to encroachment of a green tranquil space, as it currently is. The woodland walks through the copses along the Parkhouse Street sites is well used throughout the year, it is sunny and people use the space. The reduced sunshine to the space will reduce the amenity value for local residents. In an area with a large population and limited green space and deficiency of green space to the north of the park it is important the park is seen as usable and pleasant space across all the seasons of the year, there is ample evidence that Southwark residents need to be more active which will help improve health and well-being and tackle underlying health conditions.

2.2 Park context and function - The Ecology report notes the wide range of habitats and species. Changes to sunlight will have an impact. For a park in inner urban London a range of wildlife is essential, but does not have to be at risk or rare species to be important for the park and park users.

If Central Park in NYC is looked to as a planning precedent, note the differences:

- Around Central Park NYC, all buildings are set back from the park about 31m (100ft) due to wide roads and 2 wide pavements surrounding - Burgess Park (at the site) has no road separating it from the new buildings.
- Burgess Park is less than 1/2 the size of Central Park
- The southern edge of Central Park in NYC is the shortest edge whereas in Burgess Park it is the longest edge - this affects the path and size of the shadows.

Further comments on ecology below, at No.4.

2.3 Local context and character - The development does not respect the local character of the area. The area around Wells Way and Southampton Way is a residential area with building heights of up to 4 or 5 storeys at the major junction where these roads meet and beside St George's Church. The industrial site along Parkhouse St whilst intensifying and densifying should still sit within that wider context. The existing chimney at circa 10/11 storeys is the dominant height on the site and the local landmark and wayfinder. All other buildings across the development site as outlined in the LDS should sit below that height. Without this approach the scheme will compromise the wider area.

The views across Burgess Park provided to the new developments in the "Heritage' and 'Townscape and Visual' report Part 4 wire frames images does not convey the impact. It is impossible to understand the cumulative impact of the height and mass of the buildings without visual images and preferably a model. The report identifies: "The visual impact of the proposed development is largely contained and is limited across longer distances, with the exception of views from Burgess Park." This clearly states that the impact on the park is a significant harm. Proper information on the cumulative impact must be considered.

Burgess Parks acts as the mid point between the density and taller building to the north with the central London, Elephant and Castle and Aylesbury area and the lower lying buildings to the south. Further development to the east and the Old Kent Road are expected. This means it is even more important that the area to the south of the park does not have tall buildings. The implications to the sunshine along the park edge, of what is a narrow park, will be significant, Otherwise the park becomes dominated by tall buildings. The locations for tall buildings are not adequately outlined in the Camberwell Area Vision (high level) or the site allocation (detail).

The main tall building in the park and the focal point of the main paths is St George's Church Tower. The focal point proposed for the new entry point to the park can be achieved through alternative means than height; high quality design, interesting and attractive use of materials and other design attributes to indicate an entrance way. It does not need to be achieved by height of the building. A significant aspect of the design of this entrance point should be adequate width and a sense of openness to convey it is for public use. The building height is not of such relevance as ground level legibility. The overall height of the building should be lower than the church tower. In terms of historical context in its early years, St.George's stood virtually isolated – a towering landmark in otherwise largely open countryside. The adjacent canal had been constructed 10 years earlier, but the area was still mostly fields and market gardens.

St George's with Wells Way swing bridge and tower mill

Any judgement about the development and the impact on St George's Church and the relationship with the park as a whole, needs to consider all of the proposed NSP 22 schemes context to make a judgement about the viewer's ability to appreciate the architectural quality and appearance of the church in the designed views through Burgess Park.

2.4 MOL openness - The Planning Inquiry (Peachtree/Camberwell Union) comments on views and openness are relevant to this application. The decision points out the southern edge of the park had a different character, dominated by a tree line, impacting on the openness of the views and the skyline. Explicitly recognizing "*This is an important part of enjoying the natural environment and green space that the park offers for its visitors*."

The visual impact of the 11 storey block, plus the 8 and the additional planned tall buildings along the park edge on the adjacent sites will impact on the openness of Burgess Park. The height is overbearing above the trees and even with a 5m set-back is much closer to the park, and almost in the park. This openness will be further intensified by the shade from the buildings.

The buildings will cause the park to feel closed in and lose the sense of openness. At this point the park is at its narrowest in width. So the winter shadows reach more than halfway across the park.

The openness will affect amenity of the views across the park, currently the illustrations do not show the impact of all planned developments. This will impact on the western end of the park and views. The height of the buildings must be reduced.

2.5 Other design comments:

Play provision - The 0-5 age group play provision alongside the main path and onto the pavement does not seem very satisfactory unless this is a notional allocation of space to show provision. 0-5 play provision would be better located further from the pavement and road.

The design would need to minimise overlooking the park, impact of balconies, balconies set-back, lighting and noise pollution from flats. With the small 5m set back from the park boundary the development will feel very intrusive.

The new 109 new homes with the density of the proposed development is 323 units per hectare. The Planning Statement addendum admits that the density is still too high (although lower than the original plans). There are 312 habitable rooms, compared to 416 in original plans. Maximum based on the 200-700 per hectare formula, would be 245. The density has been reduced from the earlier scheme but is still higher than would be allowed under the Southwark core plan. So alternative factors such as size of dwellings need to be carefully reviewed, especially since the pandemic has made clear the impact of overcrowded accommodation, increased working from home and the need for adequate ventilation and space. The design size guidance is meant to be minimum, rather than the expected and accepted size.

3. Access into Burgess Park

3.1 FOBP are opposed to the new entrance into the park on the following grounds:

- The route will become a cycle route - the north-south route will cross the paths through the nature area running wes/east which will lead to problems with conflict between cyclists and pedestrians.
- The path does not link up with existing main through routes in the park, leading to desire lines and then further hard surface paths.
- Increased footfall through the nature area as a through route will impact on the wildlife.

The planning documents confirm that the link into Burgess Park will be for pedestrians and cyclists. This will not be a small entrance used by immediate residents. Managing the north/south movement of people across Burgess Park is a major issue and will increase as more people use cycles, electronic bikes and escooters. The council's planning policies, and the London Plan all support increased active travel and improved and pleasant routes. FOBP do not think that the extra entrance way is necessary for ease of movement and will have a negative impact on the function of the park area, design and character. The entrance on Wells Way is 238m and 3 minutes walking distance away.

It is anticipated that with the denser tree cover it will likely lead to concerns about lighting and requests for lit paths, which currently are not generally seen as desirable in parks.

Joseph Homes correspondence with FOBP states: *The path that runs through the planted buffer has been designed as a series of stepping stones embedded within the planting. These help to discourage cyclists using the route at speed.* They also state: *To further discourage the use of the pedestrian route for cycling the area of hard surface adjacent to the building has been reduced to 2.5m. The reduced width is a deliberate design move to aid in reducing the speed of cyclists.* The new Quietway route in the park is 3.8m appx. A new pathway will be needed to join from the development through the nature area to the main pathways immediately, presumably a 2.5m pathway, there

has been no information about this so far. The gravel pathways in the nature area are 1.9m wide, narrower, informal curving paths. The straight line pathway will cut across one or two gravel walkways through the nature area, depending on the orientation.

3.2 If the through route is approved much greater co-ordination is required on hard and soft landscaping, consideration of planting and further enhancement of the park planting. The "Green link" does not link to anything of ecological significance at the moment. However it could be part of a well planned link which cuts through all of the Burgess Business Park sites if there is coordination on landscaping and stepping stones for nature throughout the sites. The London Plan is G1 expects green infrastructure to be planned, designed and managed in an integrated way to achieve multiple benefits. There is an emerging plan - being developed by FOBP with local groups - for green wildlife links from Burgess Park to Camberwell Green, linking Benhill Road nature area and Brunswick Park. All the developments taking place on the site could be an exemplar model of increasing corridors for wildlife alongside walking and cycling.

If the new entrance way into the Park is approved we would want to see:

- Appropriate footpaths to reduce cycling speed and be permeable - as outlined by Joseph Homes
- The pathway will need to link to the main park pathway and make sense for north/south wayfinding, minimising desire lines
- Re-view of the pathways and linkages north/south with a view to removing some other pathways
- Review of the lighting plan on the Joseph Homes to reduce the lighting at the park entrance way as the path will not be lit beyond the Joseph Homes site.
- Further planting to ameliorate the new overshadowing from buildings, new pathways and ensuring a high quality integrated landscape across the two sites will be needed- there would need to be some funding made available to Parks to enable this to happen.

4. Ecology impact Burgess Park

4.1 Wildlife - The harm to the biodiversity to the park outweigh the benefits of the building as currently designed. Insufficient ecological study of impact on Burgess Park nature area has been made. The main feature in this section of the park is an under-storied woodland and scrubland (NB this term is a recognised type of habitat it does not mean poor quality and of no value). The woodlands in Burgess Park are the only woodlands in the area serving approximately 75,000 people (population of surrounding wards OKR+CG+F+SG+P). Developer's Waterman ecology report from 2020 estimated no impact from overshadowing, construction, pollution, or increased traffic - we disagree.

Burgess Park is MOL and SINC and makes a significant contribution to the green space of the inner city area and the wider ecological networks. The Southwark Nature Action Plan (2020) identifies a green corridor reaching from Kennington, across Burgess Park to Southwark Park and this is further enhanced by the proposals in the OKR AAP (draft) for the green link through the opportunity area. This supports and moves forward plans for strategic planning of green space networks in G1 Green Infrastructure.

One of the main reasons for the development of the Burgess Park west scheme for an increased nature area was the feedback from the public consultation undertaken by the council on the park masterplan. The plan was created in 2010 and updated in 2014 and 2015 based on feedback from three public consultations.

4.2 Urban Greening Factor - The urban greening factor achieves the level 0.4. However this development given its extreme high density and sensitive proximity to the nature area should be

required to achieve more than just minimum UGF. We request 0.65. Southwark should expect a higher standard alongside any green space in recognition of the wider policy requirements on integrating green infrastructure into wider networks.

4.3 Boundary treatment for the park - The revised landscape plan says " A green wall of 1.8m has been introduced to increase the Urban Greening Factor to be greater than 0.4". We support developing a brick wall all along the site, retaining the existing brick walls and building new as necessary. This will ensure a continuity and aesthetic to the boundary across the different landowners. This can still be become green and provide opportunities for nature with cracks for nesting, moss and lichen, space for insects as well as climbers etc.

4.4 Ecology Survey - It is in the Developer's interest to downplay the habitat value, both now and in the future, of the Burgess Park west area. We believe that the Council with all the Developers building along the park edge should carry out a full survey of the nascent site, including soil analysis, so an extant species list of plants and animals can be obtained, and further conclusions drawn about the potential of the site and how it can best be achieved in order to mitigate the impact of development, anticipating that any building work will be more than the current 2-3 storey.

Sustainability policies seek to avoid harm to priority species, and these are set out in the Southwark Nature Action Plan. Including species identified in the park by local ornithologists although not recorded on GiGL. We know we have Red List birds in the local area - e.g., sparrow, starling, grey wagtail and song thrush - so there is every chance the Burgess park west woodland and wider park is being used. (https://www.rspb.org.uk/birds-and-wildlife/wildlife-guides/uk-conservation-status-explained/). There is limited reporting of wildlife to crowd sourced sites and literature on the effect of overshadowing on tree growth is minimal.This means there is a poor evidence base. Not that the development will have no impact.

Impact of shade should not be dismissed and access to sunlight for open space is a major consideration. Other London boroughs including the City of London and Kensington and Chelsea recognise that the impact of sunlight and shadow on parks, public areas for sitting out and play grounds require a different approach. The Royal Horticultural Society also recognise that shadow comes in various forms with different impacts on plants and the natural environment. The scale includes dark shade and dappled shade from trees. A built form of the size and scale of the proposed block will cast dark shade as it moves across the park. In addition there will be further shadowing from the developments planned at Parkhouse St where the length of the shadows also extend across the western end of the park.

If approved the development will have to mitigate the park impact including:

Cyclists - The proposed landscape design includes features on the pathway to attempt to slow cyclists and operate as a shared space. It is worth noting that the inlaid stone bricks in Burgess Park paths have had no impact on speed. Page 17 D&A the green link IS described as a cycle link.

Impact of shade and lack of sunlight - ecology report states impact as "insignificant" -- this seems to be a mistake and we request an unbiased independent report, taking into account the work undertaken in 2018/19 and the massive use of the park in 2020/21. The ecology of the woodland will need to be managed to mitigate the shade and be managed to transition with alternative species.

Lighting and noise pollution - the proposed lighting plan should minimise the impact on the park, and noise both from the park to the properties and from the properties - especially those higher up - to the park. Southwark's NSP Policy 65 Reducing noise provides strong recognition of the impact of noise and retaining soundscapes this will be vital with all the developments along the south wall of the park.

Pathway - a new pathway will be needed to link the site path to the main park pathways.

Ecology - Suitable habitat enrichment for wildlife including swift and bat boxes etc as outlined in the Southwark Nature Action Plan for priority species.

Green space provision - additional green space is needed due to all the development around Burgess Park and pressure on green space. Consideration should be made for s106 funding securing additional land for Burgess Park.

New residents living in the properties will benefit from a thriving and high quality nature area as well as local residents, rather than a poor quality and damaged area which will take decades to self- regenerate and respond to the altered natural environment caused by the new building