Friends of Burgess Park – comments revised application December 2024

Aylesbury 2b site – Thurlow St to Bagshot St: 22/AP/2226

FOBP objects to this application.
The height of the tower will set the scene for the emerging development context, and the cumulative impact of tall and taller towers along Albany Road. The cumulative impact will be to the detriment of Burgess Park.
FOBP calls for all developments near Burgess Park to maximise the green benefits of their development to be sympathetic to the park-side location. The Urban Greening Factor score is 0.39 and should be increased above the minimum 0.4 and monitored not to fall below this score.

Planning conditions requested

- **Light and noise from the tower block balconies should be minimised by their design**
- **Bat bricks and swift bricks should be installed into the developments**
- **Additional tree planting in Burgess Park along view lines**
- **Economic training and apprenticeship schemes should include biodiversity, ecology and horticulture there is a shortage of these skills and potential opportunities for local employment and social enterprise in maintenance contracts.**
- **Cycling improvements to Thurlow Street and Albany Road and the entrances to Burgess Park including Bagshot St – all are used by a mix of cyclists and pedestrians. The cycling provision is not adequate for these routes. We disagree with the positive assessment in the Health Impact assessment.**

Height of the tower

FOBP recognises the council intention to redevelopment of the Aylesbury Estate and the existing approved masterplan design. The changes which the development proposals for Aylesbury site 2b include increased density and **a taller tower block is not supported**. The height is overbearing especially the cumulative impact when considered in the context of the proposed towers along Albany Road. The height of this 2b proposed towers has increased from the initial masterplan design and will be overbearing to Burgess Park views and vistas. At 25 storeys it is significantly higher than the existing 14 storeys and drives the emerging context for taller towers along Albany Road in later stages of development.

The height of the tower deviates from the site allocation which is for 15 to 20 stories. The Southwark Plan notes Aylesbury is a site for taller building on and sites adjacent to Albany Road and Burgess Park, but that taller buildings are: generally higher than their surroundings context but are not significantly taller to qualify as tall buildings.

The tower is out of keeping with the surrounding blocks and not in keeping with the policy of the Southwark Plan.

Landscaping

We are encouraged by the apparent intent and direction of the planting and landscape design because what is there appears to be wildlife-friendly and diverse, with significant inclusion of native

species and a fairly decent small park added, not just expecting Burgess Park to absorb all the burden of added residents and increased density.

However, we are concerned that overall, the new planted spaces look like they actually cover less area than in the existing condition. Furthermore, Thomson Environmental Consultants state in sections 2.4.3 and 4.2 of BNG conformance statement that they are not meeting BNG requirements. It appears the developers are arguing that it is acceptable to have less area of green space and not meet the letter of BNG, because they can count canopy area of tree and new hedgerow separately. They are banking really heavily on claiming their newly planted hedgerows will have high habitat quality value, so this must be carefully monitored.

In order to increase biodiversity units FoBP would be interested in seeing a small wildlife pond (with regular trained maintenance responsibility guaranteed). It would also be appropriate to reduce the density of the project, which is very ambitious. There is no precedent for the enormous tower.

Thomson Environmental Consultants has ranked all the areas before and after as "low strategic significance" although they form the connection between two SINCs adjacent to the project. In fact, these areas are clearly actually of high strategic significance with multiplying factor of 1.15, not 1.0. - they are highly ecologically desirable and strategically located for local conditions, and critical to increase connectivity between the two SINCs.

Roof garden design is not clear, and combined with non-habitat use of photovoltaics, although it is also claimed as habitat in order to meet BNG. FoBP would like to see more details of roof garden design in order to confirm the extent of planting and its value as habitat.

Proposed green spaces are also more broken up between buildings, and much more shaded than the old spaces. All green spaces should receive at least 6 hours per day of sunlight for healthy plant growth and to provide reasonable mental health benefits. In addition, the new hard surface MUGA is taking up a large area coloured green is misleading.

Biodiversity and nature corridors – Burgess Park/Surrey Sq - The proposed new park on Bagshott St provides a unique opportunity to enhance a nature corridor to link the two Sites of Importance for Nature Conservation (SINCs) at Surrey Square and Burgess Park.

The Southwark Plan continues the commitment for "… the three green fingers which will run from Burgess Park into the Action Area Core connecting with Surrey Square Park, the Missenden Play area and Faraday Gardens and providing important public space;" The plan does not embrace this concept with generous green corridors. More could be done on Thurlow St but this is minimal and the design requirements for the Southwark Spine are not detailed.

Bat corridor along tree lines – importance of supporting bat population. "Surveys, consisting of static monitoring and dusk emergence/dawn re-entry surveys, carried out in 2014 (WSP, 2014). revealed five species of bat were active on site, including Nathusius' pipistrelle (Pipistrellus nathusii) and Leisler's (Nyctalus leisleri)"

Bat bricks (not bat boxes) – need long term built in provision with bat bricks. Need to plant more night-scented species such as jasmine, honeysuckle, etc to attract bats prey https://sussexwildlifetrust.org.uk/discover/in-your-garden/article/31#:~:text=Night%2Dscented%20stock%20(Matthiola%20bicornis,Sweet%20rocket%20(Hesperis%20matronalis)

Swift bricks (not bird boxes) in all buildings (swift boxes are suitable for other birds). Swifts are usually seen at Burgess Park.

Due to the height of the tower lights from within, balcony lighting, and noise should be a consideration to minimise the impact on the park. Bat and swift boxes should be a planning condition.

The park edge and the park setting – The scheme is set back from Burgess Park by the width of Albany Road but will benefit from the park side location and views across the park. Views from the park and sightlines across and out of the park are also important. The size and scale of the Aylesbury developments are such that they must have a positive impact on its setting and the character of the surrounding area, which includes Burgess Park.

Tree planting is needed in Burgess Park to mitigate views along walking routes and sightlines, on the main route towards the Old Kent Road. Work is needed to enhance the woodlands along Albany Road which is directly opposite the developments to enhance the park edge.

Biodiversity Net Gain and Urban Green in Factor - Whilst the application scores on BNG the scheme itself does reduce the amount of green space, and increases density. The urban greening factor score is "projected score of 0.39" which suggests it might decrease. Ideally Southwark Council schemes should achieve and deliver the minimum of 4.0.

Landscape maintenance - There is an opportunity across the Aylesbury to support training and apprenticeships – future local employment and social enterprises - focused on supporting wildlife and the appropriate type of maintenance regime. There is a shortage of these skills and this is as important as the building trade apprenticeships. **Landscape, biodiversity and maintenance training and local jobs as part of the scheme and the "Building Academy" within the planning conditions.**

Active travel - Walking and Cycling routes

Walking and cycling along Albany Road is not pleasant; it is noisy and always busy with traffic. The new planned routes which take walking and cycling off Albany Road onto other routes is welcome. However these routes also need to allow movement north/south into, around, and past Burgess Park. Burgess Park is already very busy with cyclists some going at speed.

The Travel Assessments covers the improvements East/West with new streets, there is nothing on improvements to Thurlow St to make it a better place to cycle. The Southwark Spine route, on reaching the Albany Road junction, is difficult to cross Albany Rd to then take a route across Burgess Park or along Albany Road to Wells Way, at this point it narrows and has limited space for cars to overtake cycles. The reports say that further consultation is planned on the Southwark Spine route Sept/Oct 2022.

Safe alternative routes around Burgess Park must be established as part of the Aylesbury redevelopment. **It will be some time before the planned East/West route is completed, progress is needed more quickly on Albany Road improvements for cycling.**

Play

The play provision on the 2b site needs to be seen in the wider context of play across the Aylesbury and Burgess Park. The new MUGA is welcome as part of the Bagshot St park. However, there is also loss of play on Kinglake, loss of MUGA in Burgess Park, other MUGAS will be removed on Aylesbury and overall the amount of green space will decrease.

Informal play opportunities across the site would encourage walking and support play across the area. Urban games such as parkour and table tennis could work well. Play and leisure provision is not only for children. These facilities need to be included into the area.

Do children have access to all play spaces? Fobs and gates? The landscape report says*: "As per the existing arrangement, this space is accessible from the grounds of Faversham House via a gate. A similar arrangement is proposed to the communal garden of Plot 5C."* What does this mean for children/young people's access?

The overall play space (P132 landscape report) diagram shows the small spaces and compared the Aylesbury as it exists at the moment. The spaces are then surrounded by streets, parked cars and vehicle movement. The play facilities use and children's mobility relates to the transport strategy and children's movement. Would parents let children walk to school unaccompanied, can children move freely between the play spaces? The roads between the properties must be "home zones" and nature corridors.