

21-23 Parkhouse Street - FOBP response to Planning Application 19/AP/0469

FOBP object to 21-23 Parkhouse Street on the following grounds:

- The height of the building is not appropriate it is not in line with current policy and is not appropriate for the character and townscape next to Burgess Park.
- The design does not take into account and give sufficient weight to the planning policies on environment and wildlife
- The design does not consider the adverse effect of the development on Burgess Park and the likely significant effect of the loss of sunshine and impact of shade.
- Does not mitigate the effect and put in place environmentally friendly design such as e lighting, bat, bird nesting sites, green roofs, green walls or other green/environmentally friendly design features
- The design does not consider the impact on the park users and the wider impact on local people's health and well-being and the need for quality green spaces for the additional people and young people who will rely on Burgess Park for play and public amenity space and green space.
- The tall buildings along the edge of the Burgess Park does not meet the character and context of the area.
- Provision of playspace is inadequate

1. Negative effects on Burgess Park

Visual impact – the 10 storey development is overbearing on the park, it rises above the treeline and is over-bearing and out of scale to the height of dwellings in the immediate area. FOBP disagree with the design and impact statement (5.47) that the view of the 10 storey block is barely noticeable. The ten storey is above the tree line, it will dominate the park which is particularly narrow at that point.

Effect of the development on the setting of St George's Church, Grade II Listed Building – The church spire is a well known local landmark and a key feature of the sight lines of the local area and the re-designed Burgess Park. The height of the proposed building should not dominate or infringe on this view. It is not appropriate, and in-correct, for the design and access statement (5.41) to suggest that a 10 storey building is needed for local way-finding.

Sunlight and shadow - The impact of shadowing on Burgess Park from this development falls onto the New Church nature area. This will be negative for the environment and have a negative impact on the park and park users.

In addition there will be a further negative impact from further development planned along Parkhouse Street. Collectively the shadows cast by the tall buildings will impact across a larger area and the impact of the shadow movement will be maintained across the nature area. This area of the park will be in shade in the morning.

We have undertaken further research into shadow onto Burgess Park and the full impact on the nature area to the north of the site has not been adequately assessed. Burgess Park is Metropolitan Open Land and a borough Site of Importance for Nature Conservation (SINC). The impact on leisure, public amenity and wildlife should be considered.

The Building Research Establishment 'Site Layout Planning for Sunlight and Daylight' guide is not designed to be used with Sites of Importance for Nature Conservation (SINC).

Our own research indicates that for the six 'winter' months from the autumn equinox to the spring equinox – 21st September to 21st March -**the shadow from a 10 storey building (30 metres tall) is never less than 37 metres, at any time of the day.** This has been modelled with photographs taken on a monthly basis from the Galleria Court, Trafalgar Avenue which is a similar north/south alignment.

21st December: 9am 303 metres, 10am 157 metres, 11am 120 metres, 12noon 110 metres,

21st March: 8am 96 metres, 9am 63 metres, 10am 47 metres, 11am 40 metres, 12noon 37 metres,

This consultants shadow report shows that the park is in shadow during the morning through to 2pm in March. The figures above show the extent of this in December. Rather than June when shade is least. **The park will be in partial and moderate shade.**

The Royal Horticultural Society define types of shade¹ as follows:

- Full sun: More than six hours of direct sun per day at midsummer.
- Light shade: A site that is open to the sky, but screened from direct sunlight by an obstacle, such as a high wall or group of trees.
- **Partial or semi-shade: Three to six hours per day of direct sun at midsummer. Midday sun supplies considerably more light than morning or evening sun and sites illuminated at the middle of the day might be considered to be in light shade. Semi-shade is a term often used by writers but not defined. It is likely to mean a situation in half sun and half shade where there is some direct sun but possibly for less than half the hours of daylight.**
- Dappled shade: Mainly reflected or diffused light, for example through fairly open tree canopies all day. Dappled shade can approximate to light or open shade where sunlight filters through especially lightly branched and leaved deciduous trees such as silver birch.
- **Moderate shade: A site receiving sunlight for two or three hours of direct sunlight each day at midsummer. In this case too midday sun supplies significantly more light and might almost be considered a form of partial shade.**
- Deep or heavy shade: Usually under dense tree cover, e.g. beech, conifer hedges or overgrown shrubberies, and also overhanging buildings. In practical terms if a site receives less than two hours of direct sun per day, it must be considered to be heavy shade.

When tall buildings are placed along the Parkhouse boundary this will put this area effectively out of use in the mornings and will impact on plants and planting. The multiple shadows from the buildings will move across the space extending the period of shadow.

The City of London provide specific guidance² on access to sunlight and recognise the importance to health and well-being and impact on use of green spaces. This recognises the impact of north facing buildings and how mitigation should be considered for areas to benefit from sunshine, consider usage time of day and type of activity, the depth or coldness of shadow cast by a building being different from shade from a tree.

The council planning role must not ignore the cumulative impact of developments all along Parkhouse Street "the emerging context" and the impact this context will have on Burgess Park. The

¹ <https://www.rhs.org.uk/advice/profile?pid=934>

² <https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/design/Documents/sunlight-pan.pdf>

local authority is the custodian of the public realm and green spaces. Local authorities also have placemaking responsibilities

Characterising the value of the ecological site does depend on the environmental value and there is a well established hierarchy. Burgess Park is a local SINC level 2. However the value of this green space must be considered in the local context. What value does this green space and SINC have in the context of inner city London. The value is far greater than if this site was in the countryside or an outer London borough where people had greater access to green spaces. This green space is a regional park and has significant value. Areas to the north and east are deficient of green space.

The new Southwark Plan SP 2 Regeneration that works for all recognises the importance of green space has a significant impact for health and well being and this is a priority in the new

Park ecology and wildlife

The Burgess Park Habitat Survey report (London Wildlife Trust 2013) looked at the New Church nature site which is immediately beside the Parkhouse Street site. The survey assessment was "Current Wildlife Value: Moderate to High". This area was identified as the area with the highest value in the park. Since the report there has been a improvements in parks management plans for wildlife and a redesign of that area alongside the Parkhouse St site increasing wildlife value as part of the overall park management.

- The Southwark Council surveys of Sites of Importance for Nature Conservation (The Ecology Consultancy 2014) identifies the site as native broadleaved woodland and scrub (NB in ecological terms "scrub" refers to a specific habit type).
- The Burgess Park masterplan (LDA 2015) identifies the site as "scrub/woodland"; this terminology describes a particular type of habitat (neither woodland or grassland) and has environmental value.
- The Burgess Park West council funded revitalisation project completed in 2019 aimed to further enhance the wildlife value of this area of Burgess Park.

The Natural England state in their consultation response " *It is for the local planning authority to determine whether or not this application is consistent with national and local policies on the natural environment. Other bodies and individuals may be able to provide information and advice on the environmental value of this site and the impacts of the proposal to assist the decision making process. We advise LPAs to obtain specialist ecological or other environmental advice when determining the environmental impacts of development.* "

Southwark's current core plan commits to protect and improve Metropolitan Open Land. The policy includes "Requiring new development to avoid harming protected and priority plants and animals and help improve and create habitat" and also says "New development needs to make a positive contribution to Southwark's green space network.". This development will harm the wildlife site by reducing sunlight and does not make a positive contribution to the Burgess Park SINC.

The Mayor of London's London Plan includes policies on the protection of Sites of Importance for Nature Conservation (SINCs) land use planning policy can also be an effective mechanism to **address some of the indirect adverse impacts of urbanisation**, such as light pollution, which can disrupt the flight paths of bats and disorientate night-flying insects and migratory birds. The London Plan also highlights the need to avoid or minimise the **negative impacts of light, noise, shading** and other issues on habitats and species.

The new draft London Plan states *“Development proposals that are adjacent to or near SINC or green corridors should consider the potential impact of indirect effects to the site, such as noise, shading or lighting. There may also be opportunities for new development to contribute to enhancing the nature conservation value of an adjacent SINC or green corridor by, for example, sympathetic landscaping that provides complementary habitat. The London Environment Strategy includes guidance on identifying SINC as well as habitat creation targets and a comprehensive list of priority species and habitats that require particular consideration when planning decisions are made.”* The Plan also states that where there are negative effects then the site management should be further enhanced to mitigate this.

National policy documents emphasise the need to achieve no net loss of biodiversity and enhancement of biodiversity (CIEEM, 2016)³.

Set-back from the park boundary is 5m. The proposed block will have a detrimental effect on the character of the park. We would like to see the height reduced, setback increased and the design improved to be more sympathetic.

2. Design of the building is not exemplary

Bulk and mass - The height has been increased to 10 storeys plus a 7 storey block. The bulk and massing is not complimentary to the area and does not respond to the park. This will set an expectation as the appropriate height alongside the park (the emerging context) which is not in keeping with the nature of a green space. There is no intermediate roadway to provide a set back from the park.

Camberwell Fields is 7 storey this is at a strategic location at the entrance and on a roadway, with the road width between the block of flats and the park.

Alternative examples of buildings which do respond to a park setting are six storey around Hyde Park and Kensington Gardens, the set back building design of the Gallaria on Trafalgar Avenue and a similar approach at the Thames Barrier Park with Barrier Point.

The boundary - The design and access statement says that the amenity space rear of the residential block provides views to Burgess Park.

Park boundary treatment does not seem to provide an adequate boundary either though height or design. Friends of Burges Park would expect to see a systematic approach to the boundary treatment all along the boundary with the Parkhouse St plots of land. Either by retaining the present brick wall which is in place along a number of the plots, by building in a similar style or retaining the metal palisade fencing (Burgess Business Park) and planting a hedge which would be beneficial for wildlife.

There should not be a footpath/cycle route into the park into the nature area. This should not be part of the planning permission. If an entrance way is deemed essential as part of providing through routes it could be position closer to Wells Way and at the edge of he nature area.

³ <https://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/projects/EN010081/EN010081-000711-6.4.9%20-%20Appendix%2010B%20-%20Ecological%20Impact%20Assessment%20Methodology%20-%20Final%20-%20May%202017.pdf>

Detailing and materials - The design style is heavy, dark, dominant. The balcony designs are heavy. The repetition of the industrial vernacular does not reflect the location alongside a park. The design of the block as a tower is boring and unimaginative and does not create the new Parkhouse Street area as an area with high quality interesting design.

The design style from the Elephant and Castle through to the Heygate and the new Aylesbury blocks are all formulaic. The design of buildings have limited indications of individuality. It is not necessary to endlessly repeat the urban and industrial style of the Victorian era when the area was first developed. New design and new materials would be welcome to reflect the next stage of development of this area of London.

3. Local design guidance

Exemplary design - The draft new Southwark Plan expects tall buildings to be of exemplary design and not cause over shadowing or block views, create more landscaped public space and enliven places. The proposed building does not deliver on these planning goals.

Flood Risk – Access and design statement (5.49) The assessment is not correct. Groundwater flooding is high risk in the adjacent area from Burgess Park across to Coleman Road the additional waste water from the projected circa 500 households in the immediate area need s to be taken into account and rain water runoff minimised. A major groundwater flooding programme has just been completed on Coleman Road and Rainbow Street with additional temporary waste water storage.

The report relies upon: “London Borough of Southwark Strategic Flood Risk Assessment (SFRA) dated February 2008” additional recognition of ground water flooding has been undertaken since then. The document concludes that because there has no flooding in the past this will not happen in the future. This does not seem to take into account the significant increase in numbers of domestic properties and people which will create a strain on the sewer system.

The Southwark Council Local Flood Risk Strategy 2015 includes recommendations to mitigate surface water which do not seem to be addressed in the consultants reports for this development.

<https://www.southwark.gov.uk/environment/flood-risk-management/local-flood-risk-management-strategy>

Taking an area based approach

The London Plan is putting forward proposals to manage mitigation and improve quality green space.

*The Mayor will work with boroughs, statutory agencies and wildlife organisations to explore opportunities to establish a biodiversity net gain framework, including a biodiversity offsetting metric for London. Requiring **new development to include new wildlife habitat, nesting and roosting sites, and ecologically appropriate landscaping will provide more resources for wildlife and help to strengthen ecological corridors.** Biodiversity net gain is when a development leaves biodiversity in a better state than before. It can be delivered on a development site as an enhancement or, where this is not possible, after applying the mitigation hierarchy, as a biodiversity offset on an alternative site. Achieving net gains for biodiversity can have wider environmental benefits. New and improved habitats and biodiversity friendly landscaping can help to reduce flood risk, cool the city, and provide space for relaxation and to enjoy nature.*

Any conditions for S106 should contribute to improving and enhancing Burgess Park, including additional land purchase, to ensure there is a high quality green space for current and future generations

Character and context London Plan SPG guidance⁴

“Buildings, streets and open spaces should provide a high quality design response that:

- a. has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass;
- b. contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area;
- c. is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings;
- d. allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area; e is informed by the surrounding historic environment.

Places are connected and overlap – boundaries, edges and transitions are important.”

This is especially a consideration as places change with new development.

The Southwark Plan and area visions all acknowledge the added value which Burgess park offers but do not take sufficient account of the impact on new development, cumulative impact of development and how this will impact on the context of Burgess Park.

The Camberwell area has changed and is changing. It is the meeting point of Georgian and Victorian London as illustrated by many remaining building from this era. This is the over-arching character of the area, with building heights of 5/6 storeys maximum. The local context has been shaped by the development of Burgess Park. The character and context to the north of Burgess Park is different.

Burgess Park sets the context for Parkhouse St developments. New buildings should make a positive contribution to the park in their design and setting.

Playspace

The development provides residential roof terrace and space at the rear of the building.

Requires: 92.5sqm of under 5 play space increased to 100sqm⁵, 49.7sqm for 5-11 year olds and 29.1sqm for 12+. Total just under 180sqm.

The scheme is providing 77 sqm (page 28 Design and Access statement). A shortfall of 100 sqm.

The scheme is close to the park and is relying on it for play space – as are all the other developments planned along Parkhouse Street.

Burgess Park does provide considerable opportunities for playspace however to be aware that the information in the Design and access statement does not provide the full details required:

- The sports centre does not provide free/open access provision – all the sports facilities are bookable to maximise income (tennis and Sports Centre astro-turf pitches)

⁴ Character and context supplementary planning guidance London Plan 2011 implementation framework June 2014

⁵ GLA require 100msqm as minimum for under 5s.

- The adventure playground Giraffe House is not run by the council it is reliant on funding. It does not provide open access facilities and is little used by over 12 year olds.
- The Multi Games (MUGA) provision has been removed FOBP would like to see this replaced and be free/open access (there will be one when the Sports Centre is refurbished but there should be another at Camberwell end.
- Informal and playable landscapes should be available throughout the park. This requires maintenance and management techniques as much as formal play equipment. Incidental play opportunities are essential throughout the park which due to its size and shape means that walking to a playground is often more than a five minute walk or 1000 meters (12 minute walk).