

Friends of Burgess Park Response Planning application 35-39 Parkhouse Street 19/AP/2011

FOBP object to the development due to the 10 storey height which will over-shadow Burgess Park and impact on the views of St George's Church. The site is north facing meaning that the development will have shadows of over 100m stretching across the park.

New developments around the park need to contribute to the character of the area, enhance the environment, contribute to health and well-being and be sustainable.

The development does not deliver benefit against the holistic goals of national and local planning policy. Whilst it does deliver on housing it does not deliver on wider environmental and social/health objectives and for this site beside Burgess Park these aspects of the planning balance should have great weight.

The cumulative impact of new developments 10 storey in height along Parkhouse Street will have a negative effect on the park, wildlife and park users.

Planning policy

The development does not comply with the requirements of the National planning framework, Section 2, Achieving sustainable development. The development will have a negative impact on the social and environmental objectives. The scheme does not deliver on the social objective "with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being. Or the environmental objective "to contribute to protecting and enhancing our natural, built and historic environment".

The proposals do not positively support the new London Plan Urban Greening factor.

The proposed development does not conform to the current Southwark Plan policy on tall buildings. The new Southwark Plan is in draft form and includes comments from the public consultation on the changes to the tall buildings policy and the Burgess Business Park site allocation. The Burgess Business Park/Camberwell Union Planning Inquiry outcome is unknown.

Preserving high quality green space for the benefit of all local residents must give greater weight to the environmental, health and social elements in determining the planning balance for a development which will reduce the quality and benefits available to local people now and in the future.

Height of buildings and density – The development of 6, 8 and 10 storeys 100 flats (35% affordable of which 14 social rent) exceeds the current policy on density of accommodation. The design is not exemplary because of the reasons set out below: impact on St George's Church, character of the area, impact and overshadowing Burgess Park. The proportion of social rent does not meet the needs of local people.

Impact on St George's Church - The view across the park with St George's Church tower (page 15 Design and Access) is to over-bearing and impacts on the views of the St George's tower and the chimney for the old Library bath and Washhouse. These are important local landmark building.

Set back – Despite the set back of 5m the buildings remain very close to the park. Across the majority rest of the park buildings are set back to the other side of a road or in a small number of locations at the other end of gardens. The buildings are extremely dominant and due to closeness are not directly comparable to Camberwell Fields or Aylesbury developments such as Arments Court which are both set back by width of a road and pavements eg appx 12 to 18 meters. (Manual for Street Dept of Transport 2007)

Building design and massing impact on Burgess Park – The height of 8 and 10 storey blocks will be intrusive to Burgess Park. The overshadowing of the north facing blocks will cast long shadows during most of the year and impact on the wildlife.

“... the quality of vegetation within the park north of the site is relatively poor” (3.10 site and context Design and Access. This implies that the shadow from 10 storey buildings alongside the park will have negligible impact. **This is incorrect.**

This implies that the shadow from 10 storey buildings alongside the park will have negligible impact. However, the park to the north of the site has been specifically designed as a wildlife area. The council £3.5M Burgess Park West project completed in 2019 enhanced the wildlife value of the New Church nature area of Burgess Park by taking out the New Church Road and increasing the size of the nature area. This means that the planting is of high value specifically for pollinators and supporting other wildlife species. Casting this section of the park into shade will impact on pollinators, wildlife and habitat. Shade from buildings is solid and cold¹, with quite different qualities to shade from trees. Length of shadows during the winter months will extend to the main path through the park. Substantial shade will change the habitat, the types of plants and reduce suitability for many insects, butterflies and moths which in turn will impact on bats and bird life. The environmental importance of pollinators is recognised in research reports.

The size and shape of the park is an irregular lozenge shape positioned across central Southwark. The area of the park alongside Parkhouse Street is the narrowest section of the park and the narrowest point is beside Wells Way. The value of the space is very much needed in this section of the park and having a no-go area due to deep shade is not effective use of public green space.

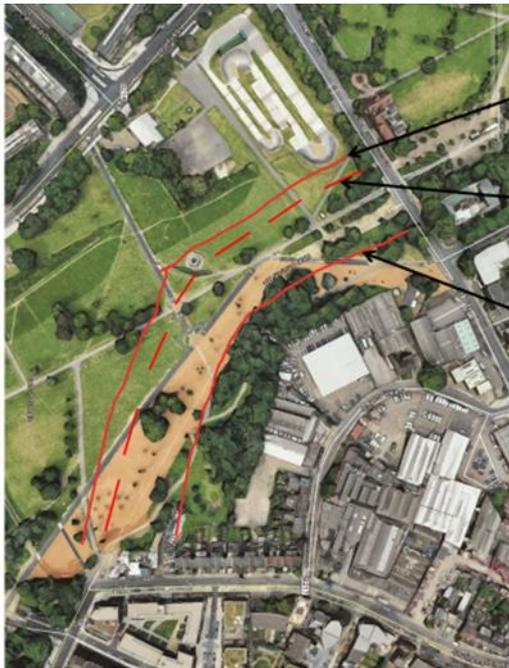
The impact on this section of the park from over-shadowing will be extensive if approval is given for more 8 and 10 storey buildings. The emerging context is for more 10 storey buildings along the south side of the park. Together the cumulative impact will be significant shadowing across and beyond the new pedestrian pathway (circa 60-100+ meters) will have a negative impact on the park and the biodiversity of the park. Intense shadow will make that area of the park undesirable for park users. A wall of deep shadow will fall across at least one third of the park.

The deep shade will affect the safety of the new path and cycle route. It will remain frosty all day long in the winter on the part nearest the nature reserve. It is a route where cyclists from the west end turn to go on the route towards E&C and it has already claimed casualties.

The sunlight and shadow assessment – The sunlight and shadow assessment sets out the impact on Burgess Park for March and June. In March the shadows reach St George’s Church and the main footpath. In the winter months the shadow will extend further. Our own assessment is that the cumulative impact of shadows from the proposed new developments (emerging context) will reach as far as the lime kiln and beyond the main canal path - over 100m and cover about one third of the park at that time during the mornings for much of the year.

The impact of 10 storey developments along Parkhouse Street will have a substantial cumulative impact and this has not been adequately quantified in relation to the site allocation and policy of the new draft Southwark Plan.

¹ RHS Typology of shade

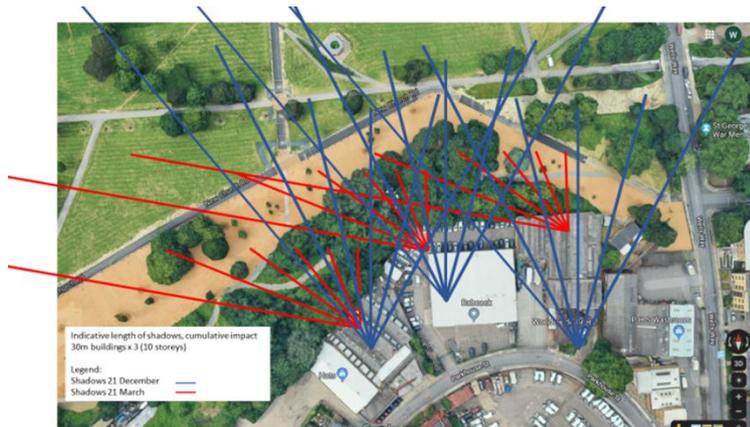


100m line from Burgess Park southern boundary:
100 metres is the AVERAGE shadow throughout the day, from a 10 storey, 30 metre high building, for 4 'winter' months of the year: from 21st October until 21st February.

89 metres from Burgess Park southern boundary:
89 metres is the MINIMUM shadow for any time of the day, from a 10 storey, 30 metre high building, for 2 months of the year: from 21st November until 21st January.

36m line from Burgess Park southern boundary:
36 metres is the MINIMUM shadow for any time of the day, from a 10 storey, 30 metre high building, for 6 months of the year: from autumn equinox 21st September until spring equinox 21st March.

Indicative shadow lengths at hourly intervals of 30m buildings x 3



[FOBP full report available here.](#)

Lighting

The development lighting will increase the impact of light pollution on wildlife, especially insects and bats in the new wildlife area. This area has been created at great expense to support threatened wildlife.

We would like a planning condition to ensure:

- The height of light columns as short as possible to reduce ecological impact of light pollution.
- Considerate to neighbouring property to limited light pollution expected into park.
- Consideration of balcony treatments; size of screen and lighting, to avoid light pollution

Equal consideration should be given to noise pollution. It is not fair or just for the future new development occupiers to complain about noise from the park, BMX track or park events such as the fun fair or other events with music and entertainment. These are established and expected uses for Burgess Park. The London Plan Policy 7.15 Reducing and Managing Noise and the Agent of Change principle should be applied to the design standards for this building.

The balconies on the property facing the park will be north facing. They could be better described as winter gardens and designed accordingly to acknowledge the shaded aspect and manage the impact of noise and light pollution to the park.

Some of the balconies are within the 5m set back required.

Transport - The transport plan disputes the PTAL 2 due to wider transport network. Transport links are a walk or cycle ride away. The area is reliant on bus routes because the train stations are a long walk or a bike or bus ride.

The transport distances are:

- Walworth Road approximately a 12 minute walk.
- Denmark Hill station is a 25 minute walk or walk to Walworth Road to get a bus
- Elephant and Castle can be reached by Wells Way bus or 30 minute walk.

The Southwark spine cycle route is shown through Burgess Park which is incorrect the route is via Wells Way and more work is needed to improve this route. The Quietway route along St George's Road has not been completed, the section through the park is completed.

The travel plan sets out the number of buses per hour but does not provide analysis of demand at peak time. Local people have campaigned for additional bus provision and this was a key issue for local residents with the Burgess Business park development.

The travel plan does not provide analysis in relation to the impact on local residents.

The impact of cumulative development on Burgess Park

Burgess Park is already a well-used park. The new developments and cumulative impact of the many proposed developments will impact on park use, wear and tear, facilities etc. **FOBP would like to see all new developments beside and close to Burgess Park contributing positively to the environment, bio-diversity and wild-life, with:**

- Bat boxes, Swift bricks
- Planting/landscaping which supports the 2020 Southwark Biodiversity Action Plan
- Green roofs and walls incorporated into buildings
- Lighting which causes minimum intrusion to the park to avoid light pollution on wildlife, especially insects and bats in the new wildlife area
- Minimise noise pollution into a park
- Protection for tree roots which spread beyond the park boundary into development site
- Set back of new building from the park to be maximised (more than min 5m)
- Reuse and repair of buildings, boundary walls etc to minimise environmental impact
- Ecology assessment of impact on wildlife especially of overshadowing

Burgess Park to benefit from contributions which enhance the environment/bio-diversity and contribute to health and wellbeing:

- Tree planting for Burgess Park to screen the views from within the park of large buildings
- Contributions for play and youth provision for over 12s with ongoing sport, play, leisure, cultural activity
- Contributions for play/leisure facilities for under 12s and under 5s
- Contributions to the repair of park infrastructure due to wear and tear because of high levels of usage
- Additional toilet provision

Some of the above should be conditions of planning approval and some would be suitable to be funded via S106 agreements.