Comments on and Extracts from the Planning Proposal for Burgess Park Sports Centre (my comments are generally in bold / images are at the bottom of the document)

https://planning.southwark.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=_STHWR_DCAPR_9582866

planning no. 19/AP/1275

Standard Consultation Expiry Date	Sat 20 Jul 2019
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Demolition of existing sports centre and adjacent all-weather pitch and construction of a new single storey sports centre with 2. No. new all weather pitches, new multi-use games area (MUGA), associated lighting and hard and soft landscaping including new 'spectator mounds' to west and north of new pitches

Southwark Council has worked with various sporting bodies to develop the plans.

Through consultation with the Client [Southwark Council] and relevant internal Council stakeholders as well as the FA, Football Foundation (FF) and Sport England, the preferred option . . .has been developed.

1. Why Southwark believe the development is required.

The FA believes that Southwark needs more full size artificial pitches for recreation and football demand. This demand is going to increase with a predicted growing population.

The project will deliver two new floodlit full size equivalent 3G artificial grass football pitches to replace the existing pitch, both to Football Foundation standards and one that will also provide for rugby. The

addition of a second pitch will help to address the current deficit of 3G artificial grass football pitches in Southwark, as measured by a recent Football Association (FA) audit. Southwark's current provision of 3G artificial pitches equate to 8 full size equivalent pitches. The demand modeling by the FA. states that Southwark requires 15 3G full size artificial grass pitches based on current measured recreational and affiliated football demand. This deficit has been shown to increase if the population grows as is being predicted over the next 10 years.The project will also deliver a new Multi Use Games Area (MUGA) with lighting, and upgrades to cricket and rugby provisions. These sports facilities will be located on the opposite side of Cobourg road, where existing cricket and rugby facilities are located.

The proposals have been developed and reviewed in conjunction with the Football Foundation to ensure the new building and pitches will meet their criteria

2. **London Wildlife Trust (LWT) warning:**
LWT are worried that the removal of habitat in the sports area could mean the loss of the Site of Importance for Nature Conservation (SINC) designation when it is next reviewed. LWT point out that the London Plan states that SINCs of Borough importance should be given protection.

The LWT statement:
1.7 The development proposal is to extend the All Weather Pitch into the surrounding area and enhance the Sports Hub space. This includes:

- 100% increase in bare artificial (hard standing surface) largely impacting upon amenity grassland
- the removal of approximately 7400m2 of amenity grassland and some small areas of tall herbs;
- The removal of 22 trees including six medium or older aged trees (1x Norway maple, 2x sycamore, 2x wild cherry, 1x tree-of-heaven) and nine recently-planted standards (which could probably be replanted elsewhere);
- The demolition of the existing sports centre building including the ornamental planting and a small area of ruderals;
- The building of a new sports centre along Cobourg Road.

It will remove habitat (mostly amenity grassland) directly upon an area designated as the Burgess Park (SoBII08) Borough Grade II SINC which could cause an area of this non-statutory designation to be lost when it is next reviewed. The London Plan (Mayor of London, 2015) states that SINCs of Borough importance should be given protection commensurate with their importance.

London Wildlife Trust proposes mitigation and enhancements if the development goes ahead. These include wildflower grasslands at ground level, replacement planted shrubberies of the same area or larger than currently exist, a wildflower green roof on the new building and 50 new trees to be planted:

LWT Ecological enhancement opportunities
4.7 Planning policies encourage ecological enhancements works in development proposals as both mitigation for losses that occur and to enhance beyond the previously existing conservation value. Based on the ecological losses of the proposed development, the following ecological enhancements would be suitable but are for guidance only. A more detailed design for mitigation would be required:

- Creation of naturalised wildflower grasslands at ground level where possible to mitigate for the loss of the existing grasslands and nettle stand.
- Creation of planted shrubberies (of commensurate size or larger to those lost) to include known wildlife beneficial shrubs and perennials to mitigate the loss of the ornamental shrubbery. Block planting of single species should be avoided.
- Creation of wildflower meadow green roofs on the new building to mitigate for the loss of the existing grasslands and nettle stand.
- Planting of at least 50 standard trees of known wildlife value to compensate the loss of existing trees (including the nine young standard trees that could be moved and transplanted).

However, the planning document The Design and Access statement (4.2 Ecology Survey) proposes only that the design takes into account the following recommendations from the survey:

- Creation of naturalised wildflower grasslands at ground level where possible to mitigate for the loss of the existing grasslands

and nettle stand.

- Creation of planted shrubberies (of commensurate size or larger to those lost) to include known wildlife beneficial shrubs and perennials to mitigate the loss of the ornamental shrubbery. Block planting of single species should be avoided.

and the 4.10 Arboricultural impact states that 37 new trees are to be planted as replacements for lost trees.

This is a shortfall in the LWT proposal of 13 trees and a wildflower green roof on the new building. Also, the question remains: what does the planning statement mean by "taking into account"? Will the LWT recommendations be fully realised?

2. The Building and paths

(See pic below) None of the artist's renderings make the building look very appealing or park friendly. It seems to have been designed as just a protected space where security is the most important factor. The building is intended to be viewed as an extension of the fencing. In fact, the FA wanted more fencing around it. It is difficult to appreciate this approach, since the designers of the current building made an effort to integrate it into the park and also created a welcoming space around it.

The Design and Access statement (7.1 Proposed Design) says that the building forms part of the pitch enclosure and is the same height (4.5m) as the pitch fencing.

8.4 Materiality
The dominant materiality of the building is perforated metal, which sets a balance between the robustness required given its exposed location and welcoming transparency. More particularly, it defines the building as an integral part of the fences that enclose the wider programme of sports pitches. The rectangular slot pattern of the perforations is in direct reference to the form and proportion of the weld-mesh grid of the sports fences. As it extends and folds out of the fence line the panels are kept large and flat. However, as it turns along the main east façade, defining the Cobourg 'Avenue', the perforated metal is pleated as if squeezed by the swelling volume, providing a vertical rhythm along its length. This

provides a distinctive character, abstracting the run of opposing trees along the avenue, picking up and exaggerating their dappled shadows.

(6.5 Hard Materials) The area in front of the new building (called the plaza) on Cobourg Road will be hard paved with resin bound gravel.

The path running from the BBQ area to the path to the south of the sports area will be formalised and paved with tarmac. **[According to Connick Tree Care in the Arboricultural Impact Statement, this path should be permeable, with a reduced dig construction system to protect existing trees. This also applies to new footpaths leading from Cobourg Road to the cricket ground and Waite Street. It is not clear that the new paths will follow these recommendations.]**

3. The Mounds

The mounds will be 4.3 m high. They are supposed to provide viewing areas for the pitches and to be somewhere to dump spoil from the sports development. There will be planted slopes (native shrubs) and species rich grass slopes.

The slopes along the long side (barbecue-side) of the pitches will have paths along the top.

The lake-side mound looks as though it will impede a currently useful path which takes walkers away from the narrow paved path by the pitches - a path that is used by commuter cyclists.

The area next to the designated barbecue area is going to be lost to the extended and enclosed artificial sports pitch. This space is currently extensively used for barbecuing; it is also a play space when not being used for barbecuing. The extended pitches and mounds will impede walking routes to the lake bridge as well as meaning that trees will have to be removed.

6.1 The Mounds
The new mounds proposed alongside the sport pitches serve multiple functions. They enable the reduction of spoil being taken off site, but also enable the creation of a number of spectator landforms. The design also enables more opportunity to create ecologically diverse and interesting planting areas, predominantly naturalistic native shrub

planting. The mounds also shelter the pitches from the wind and provide an element of sound buffering to the rest of the park and contribute to reducing the visual impact of the pitch fencing. **[Possibly also shielding the players from barbecue smoke?]**

4. Parking

Coach drop-offs will be on Neate Street. Cobourg Road and Neate Street will remain two-way but there will be a raised platform on Cobourg Road next to the new building and between the playing fields either side to indicate that cars should slow in this area.

4.8 This proposal proposes to remove up to 45 spaces in total, meaning that from the studies carried out that with 151 spaces provided, on the worst day the parking provision would reach 97% capacity. The proposal is to add 2 coach drop-off areas and to create 3 new disabled spaces. The average number of cars parked throughout the days the study was undertaken was 79, representing an average of 52% after the reduction in spaces.

5. Lighting

Lighting columns are to be added to the path from Cobourg Road to Waite Street and to light the plaza area outside the new building. There will also be floodlighting for the new pitches and the new MUGA.

6.2 Lighting
Feedback from community consultations made it clear that the path linking Cobourg Road to Waite Street was too dark and therefore used infrequently. With the new entrance to the Cricket and Rugby pitch being relocated to this path, the need for a well lit route is increased. Lighting will be installed along this route. **[Has this been discussed with the people who live next to this path?]** The plaza at the entrance to the new sports centre will have new lighting to create a safe and attractive space to spend time, both during daylight hours, and after dark. **Is the plaza space attractive? - see pic**

Labosport have carried out an analysis of the pitches to minimise the light spill, particularly to the surrounding houses along Loncroft Road, whilst maintaining the LUX levels required to play on the pitches and

MUGA.

6. Noise

A noise barrier 2.5 meters in height is proposed for reducing the noise impact for the residents living on Loncroft Road.

7. Bombs

4.14 Unexploded Ordnance
Alpha Associates were appointed to carry out a preliminary UXO risk assessment, the findings of their report are summarised below

Risk Level : HigH The most probable UXO threat is posed by WWII German HE bombs, whilst IBs and British AAA projectiles (which were used to defend against German bombing raids) pose a residual threat.

8. Metropolitan Open Land (MOL)

When compared to the requirements for the protection of MOL, this proposal raises problems.

In the planning section 7.17 it says "The proposals maintain if not improve the "openness" of the park when compared to the massing of the existing centre. The provision of sporting facilities will inevitably improve the "human health" and "quality of life" of residents in the borough."

This proposal does not improve the openness of the park since more of the park will be fenced, there will be additional mounding, which will obscure paths, and there is still a serious question mark over what kind of access local adults and children will have to the facility. It still hasn't been decided how access will be managed. Finally, the statement does not mention improving biodiversity, which is also a critical element of any development of MOL

9. Old building

Originally the 'old' building was investigated to see what could be done to improve heating and hot water provision and to maintain it. Matrix Energy Systems proposed:

Retain and repair existing heating (which is too complex and not well controlled): £90,000
New gas system: £70,000 (more carbon emissions, solar panels for summer could be added)
Hamer Consulting stated:
On the whole the building appeared to be structurally sound. Some repairs are necessary.

10. Soil
Asbestos was encountered within made ground soils and therefore remedial actions will be required to mitigate the risk to end site users and construction operatives **(protective clothing, avoiding dust and safe disposal)**.

This contaminated soil will have to be removed from the park and could not be used for the mounds.

11. Sustainability
Because the development is modifying a big area of undeveloped land there is a large negative ecological score. The development is aiming for a 'good' score, not 'very good' or excellent'.

(Building Research Establishment Environmental Assessment Method)
BREEAM sustainability rating
10.1 Hilson Moran Sustainability Team met with Bell Phillips on the 1st February 2018 to undertake the BREEAM Pre-Assessment. Following the BREEAM Pre-Assessment workshop the targeted score for Burgess Park Sport Centre development is 52.7%. The proposed development is modifying a significant area of undeveloped land and there is no evidence that the change in ecological value will be equal or greater than -9. This is a mandatory item to achieve 'Very Good' rating. Therefore the current score can only target 'Good' rating.

The BREEAM standard considers:

- Energy
- Transport
- Health
- Wellbeing
- Materials
- Waste

- Pollution
- Water

These ratings work on a scale:

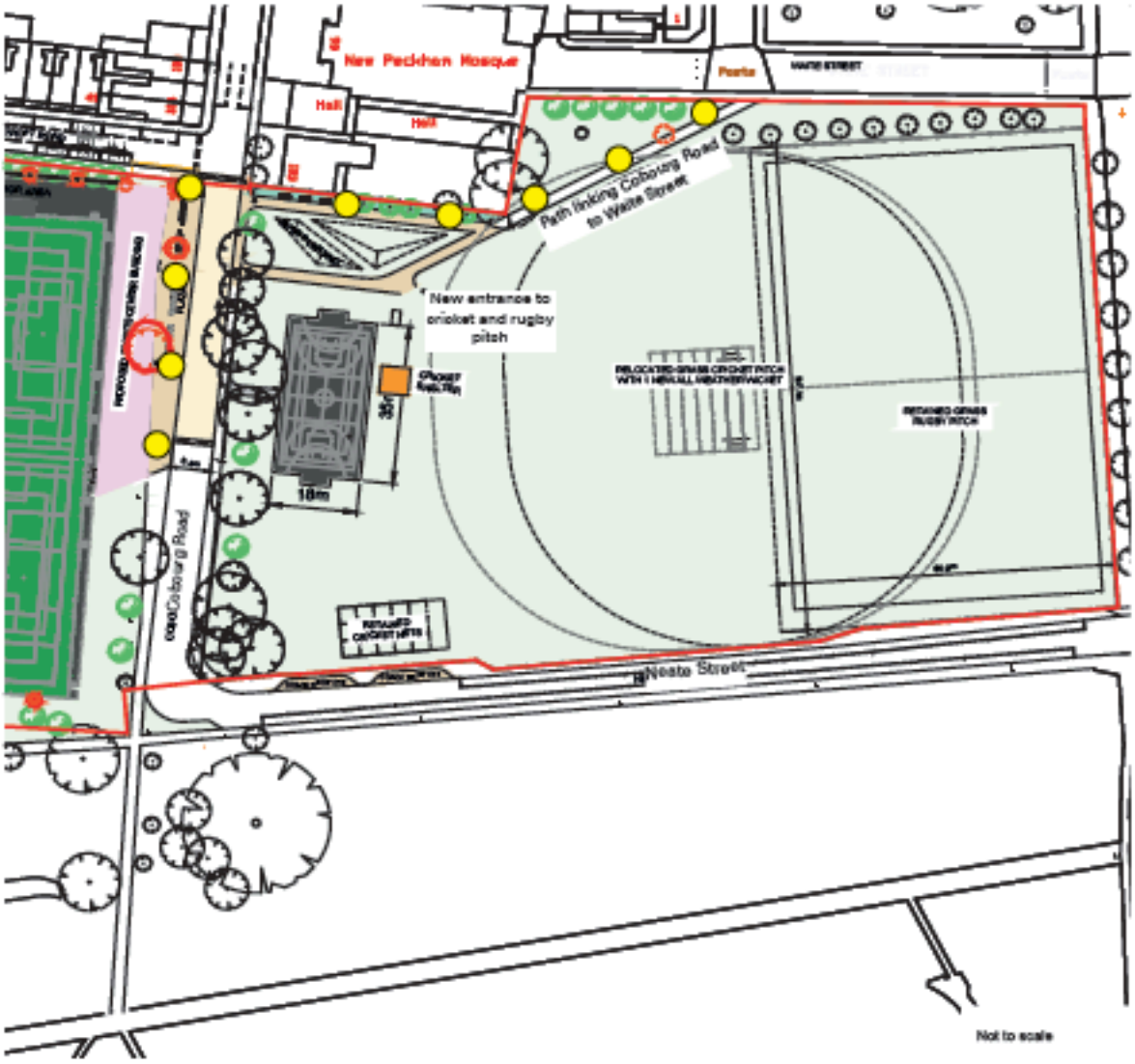
- Unclassified: any ratings which fall under 30%.
- Pass: ratings which are adequate and just above 30%.
- Good: ratings which meet the 45% benchmark.
- Very good: ratings which meet the 55% benchmark.
- Excellent: ratings which achieve more than 70%.
- Outstanding: the best possible rating, awarded to projects meeting 85% of the criteria.

View from East Cricket Pitch

View from Loncroft Road

the


Colourg Primary School
COLOURG ROAD
New Peckham Mosque
Hall
Hall
LONGRIGG ROAD
SENIOR FOOTBALL PITCH
RUGBY UNION ALL WEATHER PITCH
SENIOR FOOTBALL PITCH
11V, 7 & 5 A SIDE
MULTI USE GAMES AREA
PROPOSED CRICKET SHELTER
REINSTATED CRICKET NET


New Peckham Mosque
Hall
Hall
Path linking Coburg Road to Waite Street
New entrance to cricket and rugby pitch
Coburg Road
Neate Street
Not to scale