

## **Friends of Burgess Park Malt Street planning application 17/AP/2773 31 May 2019**

### ***Friends of Burgess Park (FOBP) object to the current proposal for the Malt Street regeneration site, ref no 17/AP/2773.***

Burgess Park is a significant local and regional park. It is Metropolitan Open Land and should receive the highest level of protection. Burgess Park is a key asset to the area and adds massive value to the regeneration of the Old Kent Road. New buildings within the immediate vicinity of the park must contribute positively to Burgess Park (in line with planning guidance as well as respecting the Victorian and Georgian streetscape including conservation areas). If not, the value it brings will be completely degraded.

#### Objections on

- Height, density and design
- No positive contribution to the character of the area, Burgess Park and conservation areas
- Insufficient green amenity and play space
- Impact on transport

#### **Historic England**

Historic England has pointed out the harm that will be done to views from Glengall Terrace, the Surrey Canal Path and from the lake edge, all Burgess Park locations. The sensitivity to change is "high". There will be a "dominant intrusion on the skyline" as well as "undermining the quality of views from Burgess Park". The planners admit that "The new development would be of a markedly different scale to the existing setting of this view and could detract attention from the open, green setting of the park."

Historic England referred back to their comments in the letter dated 28th September 2017 and noted that "despite our previous objection, amendments are now proposed to further increase the scale of this development." ... "we therefore recommend that this application is refused."

London Plan Policy 7.7 states that new developments should not affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference; and not have an adverse impact on local or strategic views.

#### **Linear Park**

FOBP have requested that there should be a higher proportion of green planting and less formality in the Linear Park including in the Central Square. FOBP note that although much is being made of the Linear Park, in terms of space it would supply about half (3,680 sqm) of the public open space, while the Central Square provides 3,400 sqm. So, to make this truly like a park, the Central Square needs to be much less of a paved square, particularly, since it is meant to be supplying the shortfall in play space for the scheme.

There is an under-provision (2,660 sqm) of dedicated age-appropriate play space in the scheme. This missing space is supposed to be provided by the Central Square and Linear Park. There will be problems with this proposal since the area is also meant to be providing a cycle route and cafe and workshop spill-out areas.

The Design Review Panel noted that the Space Studios Yard, with its high wall, interrupts the Linear Park and they questioned the need for a cycle route along the length of the Linear Park where trying to provide emergency and pedestrian access to the park as well as a dedicated cycle route in the park is likely to reduce further the amount of green space in the Linear Park. This is a serious design flaw at the heart of the Malt St scheme. The proposal to use Latona Road as an alternative cycle route is not currently viable according to the proposal.

There are plans to remove all trees from the site. Although the developers intend to replace them this will only be after building work is complete which would be 3-10+ years at best. There will be a major loss of habitat which is unacceptable to the Mayor of London's biodiversity plans for new developments.

### **Density**

London Plan Policy 3.4 states that a range of 200 to 700 habitable rooms per hectare (hrh) is the acceptable density for development schemes.

The Malt St proposal significantly exceeds the maximum upper limit of 700 hrh at 1885 hrh so the development would need to demonstrate that it could provide exemplary accommodation to the highest design standards.

However, Malt Street does not exemplify excellence since:

- Typical three bed units fall short of the required bulk storage.
- There would be several (10) instances where the overlooking distances between proposed buildings within the site would fall short of the required 21m. (Nye's Wharf at the closest point would only be 2.3m.)
- Building B4 has a shortfall in balcony space.
- Harm would be caused to some properties in terms of loss of daylight.
- A number of windows would not meet the BRE guidelines for summer and winter sunlight
- The development would need to make a £1.82m carbon off set payment contribution as the residential element is not capable of delivering zero carbon homes.
- There is a shortfall of community amenity space and private amenity space. This will require S106 remediation.

### **Transport**

Bus services will need to be increased in the area to accommodate the demand generated by additional homes and jobs in advance of the opening of the planned Bakerloo Line Extension (BLE) which, subject to the granting of powers and availability of funding, would be 2029/2030 at the earliest. Unfortunately, the Mayoral CIL for strategic transport investments in London will be going primarily to Crossrail, not the BLE.