

Friends of Burgess Park (FOBP) response to the Southernwood Retail Park planning application 18/AP/3551

Previously, (letter from Susan Crisp for FOBP on 5 August 2018) the Friends of Burgess Park noted their concerns about various aspects of the Southernwood Development including: mixed use development, unoccupied commercial space, additional park amenity (green links to the park, on site green space and trees and improvements to surrounding green space, play space), improved pedestrian and cycle links to Burgess Park across the Old Kent Road, shadowing and microclimate effects on the park of the very tall buildings proposed, and improvement to the Old Kent Road streetscape.

Having now considered the revised planning documentation which makes only minor amendments FOBP object to the current proposal.

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.

Bakerloo Line Extension

FOBP note that much of the additional housing planned for the Old Kent Road area including the very tall buildings in the Southernwood Development is supposed to be served by the proposed Bakerloo line extension (BLE) and should be helping to pay for the extension. However, according to the Transport for London Business Plan 2019-2024 the BLE proposal is only being developed over the next five years and the money for it has not been designated. This will add substantial pressure to local transport and must be considered in the planning decision.

In fact, in the Southernwood Planning Statement, Section 8 Planning Obligations, it states that the Mayor's CIL contribution will go towards Crossrail not the Bakerloo line. Crossrail is behind schedule and over budget so the BLE proposal is likely to be significantly delayed too. The BLE will also be competing with Crossrail 2, the DLR and tram networks for funding.

Meanwhile, the two-stage Southernwood development would go ahead without the infrastructure it is designed to complement. The actual layout of the development is aimed at the as yet non-existent BLE underground station which seems to be currently proposed for the Tesco site on the Old Kent Road.

The proposed layout is over-massed with too many buildings on a relatively small site and not enough consideration on how these buildings / spaces will improve circulation and interconnectivity with the existing infrastructure.

There would be a contribution from Southernwood (Section 106) to increase buses on the Old Kent Road to cope with the extra transport needs. This would unfortunately increase the pollution levels in the area for the foreseeable future. This will have a detrimental impact on the health of local people. The scale of the development must be reduced.

Greening the development

The ecological benefits are mentioned in section 7.96 of the Environmental Statement through provision of green roofs, roof terraces and amenity areas and the central landscaped public open square which is supposed to provide 'greening' to the development and promote biodiversity. The quote marks around greening are in the actual environmental statement so there is some question in the developers' minds about the quality of their proposal.

It is not clear what landscaping will be incorporated since in the Southernwood Retail Park | Environmental Statement it says, "Due to the presence of a single storey basement across the footprint of the majority of the Site, the majority of proposed landscaping will be located at podium level above the basement. Therefore, future residents should not come into contact with underlying residual contaminated soils. Should any landscaping be proposed at ground level where the formation level comprises Made Ground, a capping layer is recommended to be installed to mitigate potential risks to future residents. There may be a risk of ground gas / vapours, primarily associated with Made Ground, at the Site that may require mitigation measures to be installed into the buildings."

Four onsite trees are being kept but 15 trees are to be felled from the edges of the area. These trees are mature or semi-mature with at least a 20 year life expectancy in good and fair condition including: 1 Mimosa, 4 Planes, 1 Tree of Heaven, 2 Rowan, 1 Lilac, 1 Ash, 1 Chestnut. A number of them on Rowcross Street are adjacent to residential property which will be a visual and ecological loss to current and new local residents and pedestrians.

Old Kent Road frontage opposite Burgess Park

The proposal is simply not making enough of a positive impact on the Old Kent Road and Burgess Park.

TFL warned about "pinch points for pedestrians on the corner of Old Kent Road and Humphrey Street (the proposed hotel), and alongside the two blocks fronting Humphrey Street and potentially on the corner of Humphrey Street and Rolls Road." They have "serious concerns over the practicalities and appropriateness of [the] current proposed building lines along the Old Kent Road and Humphrey Street frontages. We need to be confident that due consideration is being given to the three-dimensional characteristics of the proposed scheme and the impact of tall and large buildings at street level is being dealt with appropriately. We believe the footway width should reflect the scale and height of proposed buildings fronting the footway to allow for a human scale to be maintained and to enable people to circulate comfortably." TFL specifically mention space for street trees. There is only one visible in the artist's impression on the Old Kent Road.

There is an opportunity here to widen and improve the public realm streetside with wider pavements and public space in front of the development, keeping the open aspect of the Old Kent Road to the fore and avoiding creating a corridor-like feeling along this major route, and meeting the 'town centre' objective of the AAP. Currently the hotel too is close / too tall for the street and overpowers adjacent buildings of historic merit e.g. Thomas a Becket pub and Cobourg Road Conservation Area.

Historic England recommended that the application is refused and withdrawn since the scheme will fail to preserve the setting of listed buildings and the character for the conservation areas, see Planning (Listed Buildings and Conservation Areas) Act 1990 sections 66 and 72, including Cobourg Road, Trafalgar Avenue, Glengall Road, Thorburn Square and Page's Walk Conservation Areas.

There is no adopted AAP for tall buildings by Southwark Council and the current proposal conflicts with Historic England Advice Note 4, Dec 2015. Permitting speculative 48 storey buildings to be erected without proper assessment about its harmful impact over a wide area is unacceptable.

The scheme's real estate advisors Jones Lang LaSalle Ltd disingenuously wrote that there will be "some adverse visual effects, [but] it does not necessarily follow that harm is caused to the heritage significance of the relevant heritage assets." Various other tall buildings are cited so Jones Lang LaSalle Ltd seems to be suggesting that the area is already ruined and that there will be no cumulative effect.

In the environmental assessment it is stated that there are no listed buildings adjacent but the listed former fire station is diagonally across the Old Kent Road from the site which does qualify as visually nearby.

We are assured that the architectural quality will be high. The "evolving urban character of the Old Kent Road and the need to deliver high quality residential development in sustainable locations ... will not cause substantial harm to designated heritage assets, nor is there a detrimental cumulative impact from the proposed development on heritage assets." This is opinion not fact.

In the planning documents Response to Design Feedback, the Hotel facade facing Burgess Park will now have a blue/green palette of glazed brick to indicate its relation to Burgess Park and to signal "the arrival to a new town centre proposed by the AAP on the Old Kent Road." This is not an adequate response to and interaction with Burgess Park.

Hotel

To make the base of the hotel relate to Old Kent Road and Burgess Park the open, double height glass ground floor lobby is meant to allow a visual and physical connection between Burgess Park and the new landscaped square in the middle of the site. This is meant to be "a green, active heart ... away from the heavily trafficked street frontages." Unfortunately, the heavily trafficked street is the Old Kent Road and the entrance to Burgess Park.

The public realm images (Page 85 and 86 Design and Access statement) of the public square are essentially hard landscaping providing a pedestrian route. It is also private space and likely to be monitored with CCTV and security. It is not a space for play, informal games or picnics. It is not public green space.

The design and access statement makes a number of references to the benefit of the hotel looking out across Burgess Park (Page 63 and 91 Design and Access statement). It does not adequately consider the impact on the park. FOBP do not agree with the Design and Access statement or the Environmental assessment (subjective assessments) which concludes the hotel will have a positive visual benefit on the park.

The hotel is too tall at 16 storeys and impinges on park users' enjoyment. It is too prominent on the skyline. It is not appropriate for the hotel and tower combined to dominate the visual outlook from the park.

Further tree planting along the Old Kent Road is needed to mitigate the hotel's prominence although it would still be visible unless it is significantly reduced in height.

Tower

The tower significantly exceeds the 30 storeys proposed in the AAP. It does not meet the current context and will shape the emerging context for the Old Kent Road. It is out of proportion for the area and does not comply with the planning guidance.

The residential development play requirements are not met (Page 169 Design and Access statement) and the expectation is that older children will make use of Burgess Park (as will hotel guests). This will create further demand on the park. Every development coming forward around Burgess Park expects the park to meet play and recreation facilities.

Section 106 money for the deficient children's playspace points up the inadequacies of the proposal.

The Design and Access statement suggests that Burgess Park requires a location marker; it has not had one so far and people have been able to find it. FOBP believe that Burgess Park IS the location marker for the area.

The size and density is not appropriate for the site and dominates Burgess Park

It is not exemplary design

It does not comply with the NPPF. It does not sufficiently contribute positively to making improvements for local people

It does not comply with the London Plan (2016). It does not adequately respond to preserving and promoting the high quality environment of Burgess Park.

The proposed height is significantly more than 30 storeys mentioned in AAP.

In terms of tall buildings, strategic policy suggests that tall buildings should form part of a cohesive building group that enhances the skyline and improves the legibility of the area but nobody in London is guided around by hopping from tall building to tall building.

Servicing the site, retail units, public realm

The environment statement section 7.130 indicates that service vehicles are going to use Rolls Road and Rowcross Street to enter and exit the site. This will bring more heavy vehicles into close proximity with current and new residential properties.

Section 9.1 states that the plan is to replace the retail warehouse units with smaller format shop units, one is designed as a supermarket and one is to be an affordable unit for occupation by a small local retailer. FOBP note that in Avondale Square further down the Old Kent Road, a number of the small shop units have been converted to residential units and only one of the shops is now in use. There are already empty shops in new build properties on the Old Kent Road. Is this part of the Old Kent Road going to be properly serviced with the range of outlets it actually needs?

The provision of one cycle space per property will not be sufficient for families. This will put pressure on cycle facilities. Is there adequate cycle parking facilities for the cinema, visitors and shop/café customers?

The figures on the quantity of public realm need further explanation. The Design and Access statement on Page 6 state "A total of 8,350sqm of amenity will be provided in accordance with LB Southwark policy, of which 6622m² is private and 2589m² is to be communal, creating an active environment which can cater to all residents." Then on Page 61 it says "4152m² of high quality new public realm, at 41% of the site". It is clear, however, that there will be significant private space for residents – is this shared across all residents?

Public realm within the massed tall buildings will be dark, not a place to linger and use. Public realm needs to be part of a real 'town centre' objective and integrate better with existing streetscapes and areas of public use.

Wind

The planning statement section 7.79 states that due to the increased massing windy conditions will inevitably increase. Mitigating measures will be required at various locations to alleviate conditions.

Overshadowing

In section 7.84 the assessment is that there will only be a slight impact to the children's play space behind Lackland House and Burgess Park. The developers maintain that the impact is limited and negligible "in terms of overshadowing to public amenity spaces throughout the year".

However, the housing on Rolls Road in the low rise residential development which infilled what was the Bricklayers Arms marshalling yards is now going to be overwhelmed by the development. Even the slightly higher blocks on Rowcross Street will be dwarfed by it as will huge areas of Burgess Park.

NHS

According to the NHS London Healthy Urban Development Unit (HUDU) parameters for appropriate numbers of GPs there is no scope within existing NHS services to accommodate the Proposed Development. There are currently 11 GP surgeries within 1 mile of the Site.

Based on NHS data, the ratio of GPs to registered patients is currently 4,384.5:1. The NHS London HUDU indicates that 1,800 is the appropriate number of people to justify one GP (Southernwood Retail Park | Environmental Statement).

Unfortunately, the developers in this scheme are trying to do too much in a small area and simply not respecting and improving the local area.