Sports Centre 19/AP/1275 July 2019 Comments from Friends of Burgess Park (FOBP)

FOBP endorse the warnings of the London Wildlife Trust (LWT) about loss of habitat. 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 must be given protection.

LWT proposes mitigation and enhancements (in keeping with Southwark's Biodiversity Policies) if the development goes ahead. According to the Design & Access statement (4.2 Ecology Survey) there will be a shortfall from the LWT proposal of 13 trees and a wildflower green roof on the new building. FOBP want the LWT recommendations to be fully realised and LWT to have an opportunity to review their recommendations.

## New building

None of the artist's renderings make the building look appealing or park friendly. Security seems to be the only important design factor with the building described as an extension of the fencing (Design and Access statement (7.1 Proposed Design)). The area in front of the new building (called the plaza) looks very unwelcoming. Are the toilets accessible for general use? The designers of the current building made an effort to integrate it into the park and also created a welcoming space around it. The new building should be a real statement piece with green credentials. This is a new building in the middle of a public park, which FOBP, LWT and Southwark Council should be proud to support. FOBP want to be confident the environmental impacts have been seriously considered and mitigated not only to minimum guidelines but to standards of excellence.

### Paths/lighting

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. Will the new paths will follow these recommendations?

Why is the new entrance to the cricket and rugby pitch being relocated to the path to Waite Street so that lighting is needed in that location. Has this been discussed with the people who live next to this path? FOBP are concerned about more disturbance of wildlife in this area. The trees in this area are part of a bat route. Has the lighting been okayed by the bat specialists?

#### Mounds

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. Has this issue been addressed?

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. How has this been explored? There are worries that the mounds may pose a security risk.

#### Noise

Will the proposed noise barrier on Loncroft Road cause noise to reverberate inside and outside it?

### Bombs & Soil Contamination

There seems to be a high risk that unexploded ordnance will be disturbed. Also, asbestos will be disturbed which has been identified as a risk to end site users and construction operatives.

# Metropolitan Open Land (MOL)

This proposal does not comply with the planning policy for the protection of MOL. It 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. Finally, the statement does not mention improving biodiversity, which is also a critical element of any development of MOL.

## Old building

New heating could be added to the current building and Hamer Consulting advised that on the whole the building appears to be structurally sound. Some repairs are necessary, so it does not need replacing.

# Sustainability

Because the development would modify a big area of undeveloped land there is a large negative ecological score to the BREEAM sustainability rating.

These plans do not accord with the National Planning Framework, Section 8 Promoting healthy and safe communities

c) enable and support healthy lifestyles, especially where this would address identified local health and well-being needs

Is this space going to address local needs? Will there be adequate access for schools and local people? Will it provide a friendly location for casual interaction? Is it becoming simply a football, rugby resource which is only available with paid access? Will other sports and activities be included such as dance, yoga, gymnastics, hockey?