

DON'T
PUT **BURGESS** IN THE
SHADE
people and **PARKs** *need*
sunshine



Call for Southwark Council to re-consider the cumulative impact on Burgess Park west of the Parkhouse Street developments

Reject tall towers development beside Burgess Park west

Four new developments with 10+ storey towers are planned along Parkhouse Street. The cumulative impact of the four developments will be detrimental to Burgess Park and should be rejected.

Acceptable redevelopment alongside Burgess Park should meet the following principles;

- Increase the set back to 10 meters, double the current 5 meters proposed by Planning.
- Reduce the height of the buildings to a maximum of six storeys alongside the park – this is proposed height is based on the tree height and screening to reduce overlooking, impact of height and mass on St George's church and substantially reduce the impact of shadows¹.

There will be an almost continuous wall of new 8, 10 and 11 storey new developments built along the park boundary.

This will change forever this part of Burgess Park and impact on thousands of park users, by causing:

- Cumulative impact of 10 and 11 storey towers **shadowing** impact on park users and wildlife

¹ Tree height and screening of buildings is illustrated by examples from central London parks [in this report](#).

- Decreasing park users wellbeing due to overlooking and encroachment of a green tranquil space² as well as less use of the space as it becomes less appealing (due to shade and overlooking)
- Reducing the heritage and cultural benefit of beautiful **views of St George's church tower**³ to the local community. Currently the view is enjoyed from both the Old Kent Road, Trafalgar Avenue and Walworth Road encompassing long views of green space and the sky as well as the Grade II listed church. Developers modelling of height and bulk from different specific view points as agreed with Planning (EG for the Camberwell Union Scheme and Dolphin Living) do not adequately show the extent to which the height and bulk of ALL the new building will impact on views the from all of the main and secondary entrances and main routes through the park.

Views of park users

"I don't want to be over-looked."

"I'm worried about the impact on the wildlife. This is meant to be a nature area."

"The new Burgess Park west area is really well used which stops anti-social behaviour."

More research by FOBP with park users planned during March.

Mitigation of the impact of cumulative development on Burgess Park

Burgess Park is already a well-used park⁴. The new developments and cumulative impact of the many proposed developments and their additional residents will impact on park use, wear and tear, facilities etc⁵.

All new developments beside and close to Burgess Park should contribute positively to the environment, biodiversity and wildlife, with the following measures:

- 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 the park
- Protection for tree roots which spread beyond the park boundary into development site achieving British Standard 5837

² Westminster Open Spaces Noise Study 2008 - 9.1.2 Sound – a correlation between sound and tranquillity definitely exists, but is more evident in terms of elements that take away from tranquillity, rather than those that contribute to it. This means that people notice the negative effects of unwanted noise more often than they appreciate the positive effects of pleasant sounds.

³ In accordance with planning policy, the impact to the heritage value needs to be considered in the round, taking into account where the heritage value derives and the contribution of setting towards that value. Camberwell Union Non-technical Environmental Statement Expert Witness -Rule Six Party

⁴ Numbers of park users have grown since the 2012 Revitalisation which landscaped the park. The Burgess Park Masterplan, latest version 2015 in section 4.2 Public demand, it states:

"When it officially re-opened to the public in the summer of 2012 the local community embraced the revitalised [Burgess] park, and as a result use has increased and diversified significantly. The public demand can be determined through consultation, visible wear and tear and resultant maintenance issues for facilities across the park."

⁵ The Burgess Park Masterplan, latest version 2015 "There is evidence across the park of facilities that are not meeting the demands of the public through the increased wear and tear, or available capacity. Play equipment, sports pitches, toilets, BBQ facilities and outdoor gym equipment are all insufficient across the park. Their current usage is evidenced as not meeting the needs of the local community."

- Set back of new building from the park to be maximised (more than min 5m) to ensure minimal damage to tree roots and soil systems
- Reuse and repair of buildings, boundary walls etc to minimise environmental impact, eliminating unnecessary construction disturbance to nature reserve and park users and reduce raw material usage.
- Ecology assessment of impact on wildlife especially of overshadowing of both individual schemes and the cumulative impact for example with a Phase II survey

Burgess Park to benefit from contributions which enhance the environment/biodiversity 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 provision⁶ 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
- Redevelopment of the Old Library Bath and Washhouse for the local community

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

Balancing the need of park users for green space against new housing development – making the planning policy case

Cumulatively the developments do not deliver benefit against the holistic goals of national and local planning policy. They do 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.

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.

⁶ None of the developments are providing all the play and amenity space expected by planning policies; all refer to the closeness of Burgess Park. Planning SPGs acknowledge that investing in existing play and leisure facilities is appropriate rather than poor quality provision on site.

Height of buildings and density – The development of 6, 8 and 10 storeys 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 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 buildings. The Revitalisation 2012 landscape design focused on these long views across the park framing of the church with pathways which aligned with this view. The church tower is above the tree line but would be overwhelmed by the height and bulk of all the proposed 10 and 11 storey buildings (as well as 14 potentially from Camberwell Union).

Set back – Despite the setback 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, 10 and 11 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. [See the indicative shadow videos for the winter equinox and spring solstice.](#)

The park to the north of Parkhouse Street 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 cold⁷, 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 plus storey height. 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.

⁷ The Royal Horticultural Society have identified different types of shade and the impact on plants, and by interference impact on the habitat for different types of wildlife.
<https://www.rhs.org.uk/advice/profile?pid=934>

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. [FOBP full report available here.](#)

Impact of Lighting

Building so close to the park 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 is as short as possible to reduce the ecological impact of light pollution.
- Considerate neighbour approach to limited light pollution expected into park.
- Design of the 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.

This is a future and on-going management problem which can be avoided by increasing the set-back. It is already an issue at other parks.

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. All of the building balconies should be beyond the 5m set back required and preferably further. This is another reason to set back beyond 5 meters.

Walking and cycling – new park entrance from Parkhouse Street

The Burgess Park west area is one of the few areas of the park not bounded by a road and the associated pollution and street lighting. It is important that this area retains this character which contributes to the peaceful and tranquil nature of the area.

Burgess Park west includes a Quietway route from Albany Road to Edmund Street. The proposed new pathway will quickly become a cycle route from Albany Road to Parkhouse Street, it is a direct route across the park. The implications of this will be a desire line established where there is no path and expectations that this will become a permanent tarmac path. The Quietway is required to be a lit route.

Impact on Burgess Park users

About 45,000 live in the immediate wards around Burgess Park west and for most people that section of the park will be less than a five to eight minute walk. No information has been gathered on how people will respond to the changes and how it may impact people's use of the park.

There is increasing evidence of the importance of green space for mental health and well-being. All areas of the park need to be high quality, available and accessible for use. With increasing numbers of park users now and more anticipated in the future every area of the park needs to be providing high quality space.

A range of factors influence whether or not people use green space including quality of the green space and feeling safe. Numbers of park users have increased dramatically since the 2012 Revitalisation programme. Based on that success it is reasonable to expect that the Burgess Park west redesign will increase park users to this section of the park; the new playground is already very popular.

There is increasing evidence of the importance of green space for health and well being and social interaction, even though the precise mechanisms are not fully understood. Huge numbers of local residents benefit from the park.

Southwark wards	Brunswick Park	13904
Southwark wards	Camberwell Green	17003
Southwark wards	Faraday	14270

