**Friends of Burgess Park 22 March 2022**

**21/AP/1342 Burgess Business Park**

**FOBP continues to object to the height of the tallest building, 13 storeys, 48.25m.** This is not appropriate for this location and has been used as the driver for the overall height proposals put forward for 21-23 and 25-33 Parkhouse Street developments. These developments have been referred to the GLA and the access point to Burgess Park has been refused, negating the rationale for the “entrance way and marker” towers at 10 and 11 storeys.

The overall height of the blocks make a negative contribution to the skyline, the framing of Burgess Park and the park edge in relation to St George’s church and the long views across the park.

Our previous objection to the application remains.

**Southwark Plan 2022** is the policy framework and includes many ambitions to respect existing townscape and character to knit in new development. The policy ambitions is to:

“… encourage developments to focus on the strengths of places that make the different areas of the borough distinctive and respect and integrate with the local and historic context and communities.”(Page 46).

Standing Together Policy 13 continues that … Development must: 1. Ensure height, scale, massing and arrangement respond positively to the existing townscape, character and context; and 2. Better reveal local distinctiveness and architectural character; and conserve and enhance the significance of the local historic environment.

P17 Tall Buildings – identifies the site for tall buildings – it does not include this site. Tall buildings are defined as over 30m, so this new development should meet this policy.

The decision to propose the 48.25m height building has implications for the wider and emerging context of the area. Going through the P17 policy ambitions:

* The landmark of significance locally is St George’s Church tower especially as it has been used for the framing of extensive views across Burgess Park both from the Old Kent Road and Walworth Road/Camberwell directions. The importance of this view is acknowledged with the many indicative images from specific agreed positions across the park illustrating views of St George’s Church alongside the new development.
* The impact of the height of the tallest building and the height and bulk of the other blocks, plus the planned new buildings along Parkhouse St are to the detriment of the existing local heritage. (The proposed integrated design shown in the LDS had much to commend it but the idea of two taller buildings showing the new small side entrance way into Burgess Park are now defunct as that entrance way is not proceeding. These designs should be urgently reviewed.)
* The planned height of the tallest block does not respond positively to local character it competes for attention against St George’s Church tower. The height and bulk of the other blocks which then sit beneath the tall tower does not respect the height of the Georgian row of terraces and overwhelms the houses on Parkhouse St. The design intent is for the height of the tallest building is to make the other blocks look smaller. This does not deliver a scheme which sits within the residential and industrial area which is quite a distance away from the Camberwell Town Centre, where sites have been identified as suitable for tall buildings.
* The height of the tallest tower is above the old chimney on the site, which has been kept as a relic of the industrial past. Yet the new buildings are clustered closely by it and the chimney does not have a clear design purpose.

**Cycle routes – Wells Way and the Southwark Cycle Spine**

The Camberwell area vision map shows the cycle route along Wells Way:

How does this application enhance this cycle route? The pavement area which currently exists as a cycle route on Wells Way is subsumed into the BBP development. This is currently set out as a mini cycle route and this space is essential for the continuing and future viability of Wells Way as a safe and preferred cycle route. Do Peachtree actually own this land?

Reducing the quality of this route for cyclists and the potential for a cycle route along Wells Way inevitable raises the likelihood of the Southwark Spine route across Burgess Park becoming the preferred route. FOBP has consistently objected to the route across the park.

**We also support the points made by WWTRA about many of the aspects of design do not meet the requirements to be exemplary** – reproduced below:

* **Not exemplary in a number of ways, eg:**
	+ current DAS addendum Page 22 says that 76.2% are dual aspect – this means that **almost 24% of the residential units are *not* dual aspect** . This does not seem to be an improvement over the earlier plans (page 74 of the previous DAS addendum said that over 76% were dual aspect)
	+ The latest DAS Addendum says (page 22) “Windows to kitchens and bathrooms maximised where possible”, and that “Many **bathrooms** have **windows** (increase on previous application)”. *We wish that developers would quantify these statements.*The previous DAS did not specify how many bathrooms had windows. We checked the floorplans and found that the vast majority did not. A quick look at the current floorplans suggests that this is still the case.
	+ It **does not meet the residential mix required in P2 of the New Southwark Plan**, which specifies a minimum of 25% of homes with three or more bedrooms in the urban zone. Under the amended plans this development provides 20.5%.
	+ **Private amenity space**: the DAS says that 1-bed and 2-bed units have “GLA minimum external balcony sizes (6 sqm and 7sqm respectively)”. We feel that a truly exemplary development would meet the objective in the 2022 Southwark Plan that these units should have 10 sqm of private amenity space. Providing smaller private amenity spaces and making up any shortfall in the common amenity provision is not exemplary.
	+ Our concerns about **daylight/sunlight** remain. The latest report shows that more than 20% of habitable rooms do not meet the levels of daylight quantity (ADF) recommended by BRE; 27% do not meet the recommended levels of sky visibility (which seems to be worse than under the previous plans, where the figure was 23%?).
	+ **Overshadowing**: the **public amenity space** at ground level does not meet the BRE guidelines. On 21 March only 21% of the area will receive two or more hours of sunlight.

Too many **existing properties** will suffer **loss of daylight/sunlight** because of the proposed development. Seven properties on Wells Way alone will experience VSC/NSL reductions of more than 40%.

**The development design amendments we support:**

* Retention of Block B as industrial space retaining the design aesthetic without adding any additional residential space of height and bulk to the building.
* Provision of all play and amenity space on the site
* Reduction of height to Block I
* improvement in the Urban Greening Factor, so that the development now meets the Mayor’s recommended target score of 0.4
* Increased industrial provision but it does not reprovide the full amount.

It is noted that in the original application Peachtree made the case that the industrial space could not be let and had to be demolished. Now the mixed and shared use of space and facilities by a variety of makers and artists appears to be very successful and supporting their vision for the future. It is buzzing with activity.