

Friends of Burgess Park - Comments on 19/AP/2011 35-39 Parkhouse Street London SE5 7TQ (Dolphin Living)

FOBP recognises that the applicant has amended the earlier designs responding to comments and consultation.

Although the building is going to be reduced in height, the buildings at 27.23m will still have an effect on the park.

The findings of the FOBP cumulative impact report of the Parkhouse St developments by London Wildlife Trust and the council's own report are still relevant to this building.

The recent report "The City that sold the sun" published by the Garden Museum makes the similar points as set out in the following points:

"Nevertheless, if light levels are generally reduced in duration and intensity, then life-cycles of some species might be delayed or prevented; flowering times might be knocked back, and eggs might fail and all these things are adverse, they can weaken the ecological viability of an area. There will be localised effects, not just within the development area but also in the buffer zone around it. You may get a reduction in diversity and abundance of insects on a site, which may have effects on insectivorous birds in a wider area.

Tall buildings also tend to be in clusters, which causes significant additional cooling and disruptive effects of wind tunnelling which can kill plants (through desiccation and windburn) and make it very difficult for other wildlife to flourish.

We'd argue that best practice, in terms of planning decisions and urban design, should be taking account of impact of shade and standards that have been set in place. There is a significant shortage of ecological skills in planning departments and many decisions appear to take a crude approach in terms of positioning and landscaping.

We'd argue for a precautionary approach. Any light and shading should look at the biodiversity it may be affecting and mitigate accordingly. For us, that would easiest by reducing the size of buildings. ...

London is building potential problems with an ongoing increase in the height, numbers and locations of tall buildings... the wildlife of London has largely adapted to a townscape that is mostly less than 17 metres high, and that the larger the areas of extensive daytime shade caused by new tall buildings would compromise nature's recovery in many parts of the city."

The proposed development responds to the planning policy site brief for taller buildings under 30m in height. The height as shown on the illustrations does not appear to impinge on the views of St George's Church tower from across the park, which are an essential element of the local heritage and character. The building appears to sit below the tree line so that it will not dominate the park edge or intrude visually into the park. The height below the treeline will also reduce the impact of shadowing across the park from this north facing site, but still a consideration.

The development maintains the boundary with Burgess Park, respects the 5m set back and has developed a sympathetic bio-diverse roof space along the wall responding to the location beside the park.

The TPO tree on the corner of the site with Parkhouse St has been given an appropriate space and setting with additional planting. Although of the three new trees along the frontage – one seems rather to close to it.

The industrial space is replaced with a small increase in the size.

We would like to see:

- The Urban Greening Factor of 4 achieved in this park side location (currently 3 reaching the standard for commercial space).

- Provision for play (leisure/amenity provision) for over 12's developed within Burgess Park responding to developers around the park not meeting this need on site – specifically free and open access.
- Developers across the Parkhouse St properties being encouraged to develop a co-ordinated plan on the play offer – to reduce repetition and increase variety of the offer particularly in shared/communal areas.
- Developers collaborating on a cohesive public realm across Parkhouse Street as a whole.
- The design for balconies, lighting and noise impact on the park to be minimised
- Swift boxes and bat boxes incorporated into the building. Swifts and house martins have both recently been added to the UK red list of threatened birds, having suffered serious declines. Swift boxes are best placed **facing north/north-east** to help regulate the internal temperature – all of the sites along Parkhouse St facing the park would be suitable.

Cumulative impact of Parkhouse St development - mitigation

The FOBP report by London Wildlife Trust and the councils report on cumulative impact (Greengage Ecological Impact) agree that there will be substantial impact on Burgess Park and that mitigation is required. The major impacts will be increased density of shadows which impact on the woodlands to a slight degree and onto the meadow lands to a greater degree. Both will require management input and new species planted to better respond to the changed growing conditions. This will retain and further enhance the value of this established wildlife area of the park for present and future residents to enjoy. These two reports are attached. Plus the link to the Garden Museum report The City that Sold the Sun - [The City That Sold the Sun - Garden Museum](#)

FOBP call for all developments near Burgess Park to maximise the green benefits of their development to be sympathetic to the park-side location.

NB - Shorter version also on the planning portal.