

Your name	Susan Crisp
Organisation Name	Friends of Burgess Park Wells Way Triangle Residents Association
EiP Hearing Matter No.	Matter No 10
Specific Strategy, Policy or Question	AV05 Camberwell Area Vision Site allocation NSP22 Burgess Business Park
The test of soundness the plan fails	The policy is not positively prepared.

EiP Matter 10

Q10.4 Are the site allocation policies sufficiently clear as to whether tall and taller buildings will be acceptable?

Q10.9 Are main modifications necessary to any of the site allocations for soundness?

The NSP, Tall Buildings P16, the Map (Town Centre page 20 and Figure 4 page 106) and the Camberwell Vision are not consistent. The Tall Building P16 figure 4 coloured areas do not include Camberwell, the Town Centres map site does not include the Burgess Business Park site allocation.

The “Reasons” on the policy P16 notes the area visions where tall buildings are detailed and this does not include Camberwell. The reasonable conclusion would be that tall buildings are not anticipated on Burgess Business Park site or other sites in Camberwell.

The definition of tall buildings Fact Box page 103 is clear and sets out the definition of buildings over 30m. However, the site allocations refer to “taller buildings” and this is not defined. Clarification is also required on “significantly higher” 8 storeys (20 metres) is significantly higher than a two storey Victorian terrace and also a ‘two storey’ tree.

Site Allocations across the Camberwell Vision area are inconsistent in the information on approach to tall buildings, sometimes this information is provided and not on other sites. The site allocation for NSP22 needs modification in the broader context of the NSP approach and definition of taller buildings. The current developments x 2 coming forward include 11 storey (Joseph Homes) and 14 storey (Peachtree) buildings. Indicating that taller buildings is not clearly defined.

The additional information about heritage, conservation and open space on the site allocations is welcome, ideally the distinctiveness of each site and local features of particular significance to the community could be further enhanced. The local list should help this process.

Issue 5

Whether the sites in Camberwell are justified, effective, consistent with national policy and in general conformity with the London Plan.

Relevant Policies – NSP22, (Archeology) NSP25,(Local List) NSP32 (Business Relocation)

With the Planning Inquiry refusing permission and the development of a Local Development Strategy by Southwark Council, the Burgess Business Site NSP22 have been re-let to businesses. However, the types of businesses are messy leaving yards and working spaces which do not align with the Developers images of creative sector organisations, studios and modern, clean business. However, London does need to make industrial land for these activities.

The protection provided for small business by P32 is supported. The need for help and support to be accommodated in the new premises (no doubt higher rents) or support to move elsewhere is needed.

NSP22 - Burgess Business Park

10.44 Given the character and location of the site is it necessary for plan soundness that a comprehensive redevelopment of the site is secured through the vision and guidance in NSP22? Can the site viably retain the existing amount of employment floorspace on the site in addition to the indicative capacity for 671 homes as part of a mixed-use neighbourhood? Are there any material consequences from the recent appeal decision that may generate a need to modify the policy approach to NSP22?

The appeal decision does mean that the approach to Burgess Business Park site allocation should be reconsidered in order for the NSP to be positively prepared.

The site has a number of landowners. Coordination and collaboration between the landowners would be beneficial for the development of the sites. The council have led the Local Development Strategy process which now exists to guide the landowners. This has led to a much more thoughtful approach across the site for land use and layout, height of buildings although the LDS is silent on actual heights. Some elements from the LDS should be referenced in the site allocation to provide greater weight and a plan led approach.

The NSP 22 site allocation should be modified to reflect these material considerations identified in the appeal decision:

- Nature conservation - Development should reflect the park edge and park views and framing of St George's Church tower.
- Layout and density of building - Heights should be below 30m (tall buildings), appeal inquiry density exceeded the site allocation with loss of light and leading to overshadowing
- Responding to the existing character and townscape

The text on approach to tall buildings should be modified. Buildings taller than existing and taller than the surrounding area is acceptable and necessary to achieve best use of land and accommodate business and residential. However, the lack of definition of taller buildings provides no guidance at all to Developers and leave local communities have to respond to planning applications to make the case. Planning committees decision makers have no guidance or basis to enable refusal. Developers require clarity. Communities do not want to spend years responding to planning applications.

The current proposal coming forward for the main site (Peachtree) is for in the region of 400 homes and 4,404 sqm of replacement commercial space and includes Tall Building x 14 storey.

The appeal decision rightly identified that a different approach was needed to density and height in order to reflect the character and townscape and the park edge. The heritage assets of the church tower and the importance as a local landmark should also be more strongly reflected in the site description as part of the Burgess Park context and importance of views of the church tower framing views across the park. The appeal inquiry only recognised some harm to the setting.

10.46 Is it acceptable in principle that tall buildings are considered as part of an approach to maximising the development potential of the site?

No it is not acceptable that tall buildings (defined as over 30m) is part of the approach to site NSP22.

The current site allocation texts are all remarkably similar from site to site where any statement is made about tall buildings, they do not adequately reflect the local context of the sight, or the comments of the local community.

The NSP is silent on exact heights and the inter relationship on tall and taller buildings. Existing buildings are 2 and 3 storey in height. The policy must indicate the expected relationships in order to be effective. The relationships between buildings heights is set out the the Local Development Study but this is not mentioned on the site allocation.

Examples from other London boroughs

Example 1: Westminster City Council

The Westminster Building Height Study (City of Westminster, 2019) demonstrates the importance of height and relationships to the existing context, extract below. The NSP must clarify what are taller buildings and how they relate to the context.

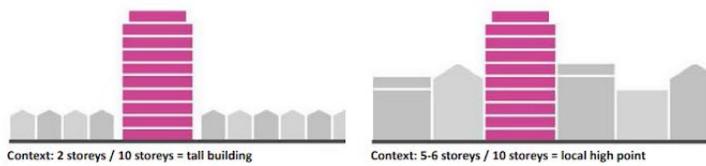


Figure 4.1: The impact of a tall building is related to its context

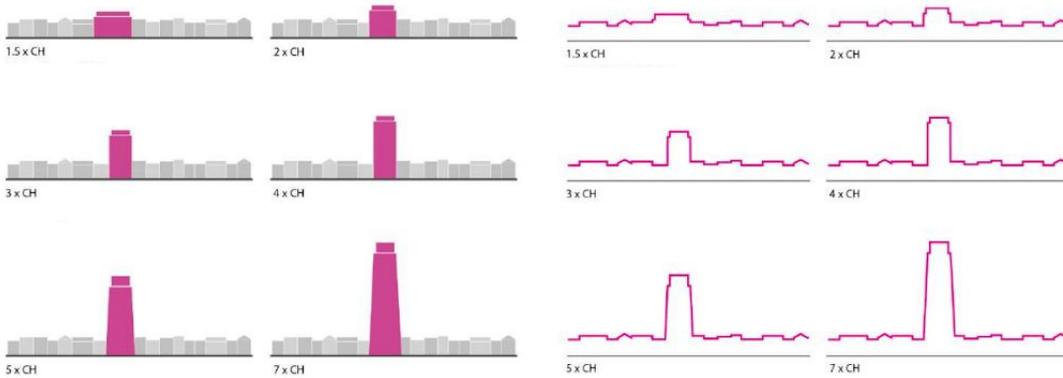


Figure 4.2: The height of buildings can be expressed as 'context height ratio'

Figure 4.3: The context height expressed as an impact on the skyline

Example 2: Kensington and Chelsea Local Plan 2019

Policy CR2 Three-dimensional Street Form (page 170) includes the relationship to the street as well as height:

- b. require the ratio of building height to street width to give a coherent and comfortable scale to the street; and
- c. require building lines and building scales to be consistent and related to context;

Proposed text amendments on NSP EIP27A submitted 2020 version

Proposed text NSP22:

Approach to tall buildings

ADD - ... and the park. To read:

Comprehensive mixed-use redevelopment of the site could include taller buildings subject to consideration of impacts on existing character, heritage, townscape **and the park.**

Impacts Listed Buildings or undesignated heritage assets

ADD - the Grade II listed St George's Church. To read:

The site contains Grade II listed buildings 73, 75, 77 Southampton Way and other Grade II listed buildings are located on Wells Way, **including St George's Church**, and Cottage Green. The site also includes the historic semi-detached townhouse on the corner of Southampton Way and Parkhouse Street. Redevelopment must conserve and enhance the setting of these heritage assets.

Proposed text NSP Glossary:

ADD - Taller buildings are under 30m tall. (Currently not in the glossary.)