

# The Brixton Society

Understanding the Past, Looking to the Future

Reg'd. Charity No.1058103, Registered with the London Forum of Amenity Societies

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The Planning Inspectorate,  
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(via Planning Portal/ Appeals)  
and copied to:  
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Appeal ref:

APP/N5660/W/18/3219301

Lambeth ref:

18/00456/FUL

## **5-6 Waterworks Road, SW2 – Appeal re Proposed Redevelopment:**

Dear Sirs,

The Brixton Society wishes to object to the proposed development at the above address, having received representations from members including the Friends of Windmill Gardens and the Renton Close Tenants & Residents Association.

Our concerns are outlined below, and we ask you to forward this letter to the Inspector concerned.

In the event of an informal hearing or public inquiry, we aim to provide additional detail on key points.

### **1. Background:**

The Brixton Society is the civic amenity society covering the central part of the London Borough of Lambeth. As such, it aims to promote good practice in architecture, planning and landscape design. It was established in 1975 and currently has some 200 members, both individuals and local organisations. Over the years, the Society has commented on a succession of local plans and policies, in addition to many individual planning applications and appeals.

We acknowledge that some of the defects in the original application have been mitigated, but nevertheless several aspects of the revised application are still unsatisfactory, as set out below.

### **2. Impact on the KIBA:**

In recent years the Society has become increasingly concerned at the impact of residential development on established uses, particularly employment uses

and leisure uses. We consider that the proper planning of an area requires provision of a range of uses and amenities, rather than allowing a particular use to dominate simply because it is the most profitable for the developer at the time.

In a number of cases, we have seen new residential development leading to greater restrictions on established businesses in terms of operating hours, noise levels and vehicle access.

In this instance, we are concerned to retain the adjacent ATS facility for the servicing of mainly commercial vehicles, to assist firms within the borough operating their own vehicles for deliveries and servicing.

### **3. Affordable Housing:**

We agree with the Council that a development of this scale, including 20 dwellings, should contribute a proportion of affordable housing. We would expect at least 8 dwellings – for example, all of the 2<sup>nd</sup> or 3<sup>rd</sup> floor – to be affordable rented flats.

It appears to us that the London Plan targets for the borough are being exceeded in terms of planning permissions granted, but that the actual percentage of affordable dwellings being achieved is disappointingly low. It should no longer be acceptable for developers to claim that they cannot afford to make any contribution.

If the developers are unwilling to provide any affordable housing, we question whether a residential-led development should even be allowed on former employment land. After all, the main housing need locally is for affordable rented accommodation for families.

### **4. Quality of Housing Accommodation:**

We would prefer all flats to be dual aspect, to benefit from summer evening sunsets to west-facing living rooms, and ideally morning sunlight into east-facing bedrooms. That would suggest a block plan with two stair cores rather than shared internal corridors.

### **5. Impact on Conservation Area and Historic Buildings:**

As the local amenity society, a particular concern to us is that the height and bulk of the proposed development will further restrict views of the Brixton Windmill, notably from the western sections of Elm Park and Endymion Road (east of Brixton Hill) and from the upper floors of the Renton Close Estate (south of Jebb Avenue).

In addition, the substantial bulk and height of the southern end of the proposed block will be over-dominant in relation to the fine Pump House building at the south-east corner of the Waterworks site, on the north side of Jebb Avenue.

It is disappointing that the proposed facing materials emphasise the bulk of the upper floors, by using a red-brown brick here and a light-grey facing material below. The latter will also be more vulnerable to graffiti attack. Reversing these colours would reduce the visual impact of the upper floors.

The predominant pattern within the Brixton Hill Conservation Area is of 2 and 3 storey terrace housing, and the proposed block is quite alien in this context.

#### **6. Privacy and overlooking:**

The proposed development will have an adverse effect on the Renton Close Estate to the south of Jebb Avenue. In particular, residents of the block 54-63 will be overlooked by 4 balconies and new south-facing windows on the residential floors of the development.

In addition, the communal roof terrace and children's play area on the top floor raise the risk of increased noise intrusion to the interior of the estate, again block 54-63 being most vulnerable.

#### **7. Daylighting issues:**

Again, the proposed development will have an adverse effect on the Renton Close Estate.

I am surprised to see that the appellants have not fully updated their Daylight and Sunlight studies.

Their original Daylight study showed an adverse effect on all flats in block 54-63, particularly acute for the ground floor flats (54 & 55). There would also be some adverse effect on block 24-33.

In respect of Sunlight, even the reduced height of the revised development will have some adverse effect on west-facing windows in flats above the Tesco Express (the former George IV public house).

#### **8. Access and Parking:**

As far as practical, entrances and internal areas for residents and business users should be separate.

The layout around the residential and business entrances appears cramped in relation to the scale of the building. We would prefer residents' cycle storage to be at ground floor level.

**Delivery access** depends solely on Waterworks Road, with no dedicated bays or turning space provided within the site.

The business floorspace alone would require numerous deliveries or visiting tradesmen. The situation becomes more acute once we also take into account weekday calls for the flats and also deliveries to the Tesco Express which would periodically block access to Waterworks Road.

Omitting **on-site parking** from developments tends to suit both the developers (who are saving on construction costs) and the Council (who think it reduces private car use). We are not convinced that complete removal is practical or effective. We prefer new schemes to make provision for disabled parking bays, for car club or similar pooled usage, and for visitors and deliveries. The latter categories will certainly be essential for the element of business floorspace, though different patterns of use over a typical week may allow such parking bays to be shared between residential and business occupiers.

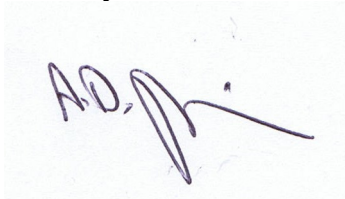
The space allocated for **waste and recycling** is cramped and inadequate, particularly for business users.

To attract a range of businesses to the employment space, much greater provision needs to be made for specialist recycling and for storage of hazardous wastes. The impression is that all the ancillary spaces are only after-thoughts once the quotas of revenue-earning floorspace have been provided.

**9. Conclusions:**

Finally, we ask to be informed of the outcome of this appeal, due to its wider implications for the setting of historic buildings and the protection of employment floorspace around Brixton.

Yours faithfully,



Hon. Secretary