

The Brixton Society

Understanding the Past, Looking to the Future

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Website: www.brixtonsociety.org.uk

Lambeth Planning,
(Development Management)
PO Box 734,
Winchester,
SO23 5DG

Please reply to:
Alan Piper, RIBA,



APiperBrix@aol.com

11 October 2019

For attention of:
Michael Cassidy,
mcassidy@lambeth.gov.uk

Your ref:
18/05425/FUL

Higgs Industrial Estate, Herne Hill Road SE24 – Proposed Development

Dear Mr Cassidy,

Thank you for your letter of 27 September about the amendments to the above application.

Your website has not allowed me to inspect all the revised drawings and schedules, but on the basis of what I have been able to see so far, the fundamental deficiencies of this application remain.

Therefore the position of the Brixton Society is still that we **object** on the following grounds:

1. Overdevelopment:

This application proposes a substantial increase in height and bulk in comparison with the previous approved design (15/01062/FUL). Even that scheme was a substantial imposition on the scale and capacity of the surrounding area.

The present design is a gross over-development of the site, as described more fully in paras. 2 to 4 below.

2. Excessive Height:

We consider that the maximum height in this location should be no more than 8 storeys, as in the previous approved design. The current proposal rises to 17 storeys, and the design treatment, with brick-clad framing carried up to full height, reinforces the impression of height and bulk. There are no relieving or redeeming features, such as setting back the topmost storey from the main facade.

This area has not been identified in the Lambeth Local Plan as suitable for tall buildings. The nearby street frontages are typically only 3 storey buildings,

some with an attic above. The proposal therefore conflicts with Local Plan policies Q2(i), Q5(b) and Q26.

3. Limited Transport Capacity:

A practical limitation here is that City-bound rail services through Loughborough Junction Station are already at full capacity in morning peak hours. Even east-west bus services along Coldharbour Lane encounter congestion at each end of this road.

Thus the present Public Transport Accessibility (PTAL) score is deceptive, because it takes no account of capacity.

Therefore new residents will experience difficulty if they wish to travel to work in Central London at normal hours. Yet that access to Central London will be the main appeal of this location for purchasers of the sale or shared ownership dwellings within this development. Claims by the applicant that only a few will wish to do so are entirely specious.

As a “car-free” development, residents will not have the option of driving to work either.

Clearly then, the target housing density for new development here should be “urban” rather than “central”, as defined in the Mayor’s London Plan.

4. Employment Floorspace Issues:

We are generally keen to retain employment floorspace in developments like this, but it needs to be suitable for modern commercial needs. A reduction in such floorspace may be acceptable where the employment density is likely to increase. We welcome the deletion of basement floorspace.

However, we were alarmed that the applicants’ original plans showed an increase in the total employment floorspace of 11% over the approved design. The latest revision shows a further increase by 120 sq.m.

This has had an adverse effect on the built volume of the overall design.

The proximity to residential accommodation is likely to restrict the range of businesses which can operate from the site, and their hours of operation. Extract ventilation flues from business premises should include odour filters and sound-proofing. Their outlets should discharge well away from residential blocks, or be carried up to discharge above residential floors where sited on lower floors of such blocks.

5. Lack of Mitigation Measures:

For a project of this scale, we are disappointed at the lack of measures to mitigate its impact on the surrounding area.

An opportunity has been missed to provide access to London Overground rail services on the southern boundary, and interchange with existing Thameslink services at the adjacent Loughborough Junction station.

No public open space has been provided, and only a couple of trees are being contributed to the existing streetscape. In itself, this fails to deliver on Local Plan policies Q9 (iv) and Q10 (f).

6. Housing Provision:

We might accept these failings if the project was instead making a substantial contribution to the local need for affordable or social rented housing, but the

percentage proposed is disappointing. Rented dwellings (affordable or not) will be 20% less than in the previous approved scheme. We are disappointed that communal amenity space within the development is also to be sharply reduced, from 1738 sq.m in the approved scheme, to 1025 sq.m in the latest proposals.

7. Inadequate Pedestrian Safety:

Despite some setting-back on the Herne Hill Road frontage, the choke point for pedestrian movement remains immediately to the north of the site, where only a 2m footway is available to carry 518 new residents past the Sureway Church and towards Coldharbour Lane.

The situation is more hazardous for residents returning at the end of the working day, because sight-lines for vehicles emerging at the north gate are inferior to those at the southern end, where vehicles will only enter.

The design fails to conform to Lambeth Local Plan policies Q6 (iii) & (iv) and Q9 (vi).

8. Street Context out of scale:

We recognise that the Herne Hill Road frontage has been amended, but the problem remains of excessive scale where the new block has little or no set-back from the back edge of a narrow pavement.

On this frontage, the new buildings would still rise to 8 storeys, which is excessive in a street of predominantly 2 and 3 storey buildings.

The design fails to conform to Lambeth Local Plan policies Q2 (i), Q5 (b) & (c) and Q7 (ii).

9. Façade Design deficiencies:

The ponderous design, wholly faced in brickwork, reinforces the sense of bulk and mass, particularly at close quarters on the Herne Hill Road frontage. It needs to be relieved by lighter cladding materials, particularly on upper floors. The design fails to conform to Lambeth Local Plan policies Q8 and Q9.

10. Conclusion:

In summary, this application falls short of Lambeth's planning policy requirements in several important respects, and so should be refused.

Please note that this site is near the edge of our area of interest, so further comments may be made by the Herne Hill Society, covering the area south of the site, and the Camberwell Society, covering the SE5 area to the east of the site.

Yours sincerely,



Hon. Secretary