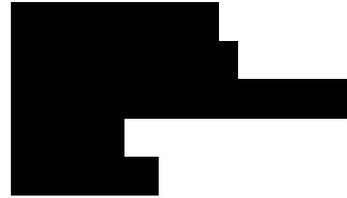


The Brixton Society

Understanding the Past, Looking to the Future
Registered Charity No.1058103. Registered with the Civic Trust and the London Forum

TO: Mr Michael Cassidy
Lambeth Planning
London Borough of Lambeth
PO Box 734
Winchester
SO23 5DG

FROM:



Email contact:

planning@brixtonsociety.org.uk

Date: 11th March 2020

Planning application: 19/04280/FUL

1, 3-11 Wellfit Street, 7-9 Hinton Road & Units 1-4 Hardess Street London SE24 0HN

Demolition of existing retail and industrial buildings and erection of a car free, part 3, part 20, part 29-storey mixed-use podium building comprising 2073m² of employment floorspace (Use Class B1 a) and c)) with ancillary sandwich bar/cafe(Use Classes A1/A3) and site caretakers accommodation, an industrial yard of 55m² and 170 dwellings with associated disabled car parking, cycle and bin stores, and hard and soft landscaping.

Dear Mr Cassidy

I write on behalf of the Brixton Society. We are concerned preserve the quality of our area, and also to ensure adequate provision of housing –including social and affordable units, and employment generating space.

We think the council officers have some explanation to do on this application. Back in November 2017 residents were consulted on a scheme designed by Alan Camp Architects. This was for a much lower rise scheme – 5/6 storeys max, and from recollection did not seem to cause a major outcry amongst neighbouring residents and businesses.

We think it is out of order for residents to now be presented with a quick-fire succession of so-called consultation (developer carrying out Lambeth's instruction to stage a preview) on 1st December 2019, followed by a full application for two Nine Elms style towers – next to an area of mature Edwardian housing in a good state of preservation, which had it been expected to be "under threat" in the 1980s might well have been made a conservation area.

The Brixton Society believes this application with its 20 and 29 storey towers is not appropriate for the area. The applicant seems to be referencing a design of 14/16 storey block on the Higgs site (approved by committee before Christmas last year), but we contend that their inference is gross.

Notwithstanding the contentious nature of the tall block on Higgs, this site is much further into an area which was formerly light industrial. The Hardess Street

site we are considering here is adjacent to normal residential area, none of which has tall towers, and even the new build such as Lord Stanley Court and new social housing in Wanless Road was kept to 3 storeys in keeping with the area.

Our objections are:

1. Tall buildings

While the Lambeth Local Plan (2018) doesn't identify Loughborough Junction as unsuitable for tall buildings, Loughborough Junction is not one of the three areas in the borough which the Plan identifies as suitable for tall buildings.

Outside these three areas, the Plan says that there should be no presumption in favour of tall buildings and the onus should be on the developer to show that their proposals are suitable and don't adversely impact on views and local heritage assets.

The images in the Design and Access Statement and in the Heritage Statement - particularly views along Coldharbour Lane and from Ferndene Road across Ruskin Park - show buildings that tower above the surrounding townscape, which consists mostly of buildings up to four stories. The Friends of Ruskin Park, in their submission objecting strongly to this scheme, draw attention to the detrimental impact that the development would have on views which users of the park currently enjoy of the London skyline.

The Design and Access Statement attempts to minimise the impact of the proposed 29 storey tower by comparing it with a 16 storey tower proposed for the adjacent Higgs site. The implication is that the Higgs Triangle site provides a precedent for tall buildings in the area.

We do not agree that the Higgs development creates a precedent for a 29 storey building in the Loughborough Junction area. The precedent is only for a building of 16 storeys – considerable less than the 29 storeys in this application. And as already outlined in the introduction, there is the match to the surrounding residential area to consider.

2. Loss of industrial floorspace and impact on neighbouring industrial users

a. Loss of industrial floorspace

One of the benefits which the applicants claim for their proposal is that it would double the amount of industrial floorspace on the site. This claim is used in the Planning Statement as a justification for their failure to meet the 50% threshold

for affordable housing which the London Plan requires for developments on industrial sites.

We don't agree with this claim. The scheme involves the loss of four purpose built industrial units, of which there is a great shortage across the borough, and replaces these with office floorspace.

The existing industrial floor space consists of four purpose built industrial units all at ground floor level facing a service yard and with high shutter doors allowing lorries to drive into the units or deliver bulky goods via forklift trucks.

The proposed development would replace these with commercial floor space, approximately half of which would be at ground floor level, and the remainder at first and second floor level and served by passenger lifts which would not permit the delivery of heavy/bulky goods, making these unsuitable for light industrial users.

Even in the case of the ground floor units, as the Delivery and Servicing Plan makes clear, delivery arrangements would be restricted – the Plan states that commercial occupiers would be required to agree to tenancy restrictions that restrict vehicles to 8 metre box vans and suggests that tenants may also be required to book delivery slots via a central register.

The first and second floor location of some of the units, the restricted arrangements for the delivery of goods and the potential for complaints from residents on the upper floors about noise and vibration makes it unlikely any light industrial businesses will want to move into the commercial units in the development.

b. Impact on businesses in the Hardess Street railway arches

The development will have a detrimental impact on industrial activities in the adjacent railway arches on Hardess Street, including particularly three vehicle repair businesses located in the Hardess Street railway arches, and so fails to comply with London Plan Policy E7 which requires that neighbouring industrial activities *“are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements”*

The railway arches on the north side of Hardess Street (and not within the boundaries the application site) are currently occupied by a range of small businesses, including creative businesses, a cinema, a gym and vehicle repair workshops. All these businesses are serviced via Hardess Street (which is a public highway). The proposals set out in the Transport Plan and the Servicing

Plan to restrict vehicle access to Hardess Street and introduce parking controls would have a very detrimental impact on these businesses, particularly in the case of the three vehicle repair businesses currently make use of the stretch of pavement between the front of the arches and the public highway as forecourt for the servicing of customers vehicles – and it seems unlikely that these businesses would be able to continue in operation if the development as proposed goes ahead.

3. Affordable housing

We accept that the development meets London Plan target H6 for large developments on sites which do not receive a public subsidy - 35% by habitable rooms.

However the London Plan Policy H6 sets a higher target of 50% affordable for former industrial sites following the Fast Track Route and requires that a viability assessment is provided where the threshold is not met - .."Given the difference in values between industrial and residential development, where other industrial sites are deemed acceptable for release they are expected to deliver a higher level of affordable housing. If this is not possible, detailed viability evidence will be needed to justify a lower level of affordable housing. Therefore, to follow the Fast Track Route **industrial sites** will need to meet the 50 per cent threshold."

The Wellfit and Hardess Street site is currently occupied by purpose built industrial units and in line with London Plan policy H6 the 50% affordable housing target should apply.

The Planning Statement makes the claim that a lower target of 35% should apply in the case of this development as there will be no loss of industrial capacity. We dispute this claim for two reasons

- firstly, as argued above, the scheme will replace existing light industrial units with offices
- secondly there is nothing in the London Plan which supports the argument put forward in the Planning Statement that a lower target of 35% should apply if employment floorspace is retained. Policies E7 and H6 in the draft London Plan are very clear on this point – to qualify for the Fast Track, proposals which involved the development of industrial sites for mixed use should both retain industrial capacity AND meet a higher 50% threshold for affordable housing.

4. Loss of sunlight

We are advised that this development breaches BRE (Building Research Establishment) guidelines regarding loss of sunlight to existing residential properties nearby and note that the applicant has sought to neutralise this objection by claiming it does not have to be addressed as their site and the adjoining Higgs site (not yet developed) are part of a high rise zone. This is manifestly false. The nearest high rise buildings to this site currently are the Kings College Hospital building and Loughborough Estate – both about 1 km away.

The BRE guidelines are commonly used for developments on streets with terraced or semi-detached houses, exactly the kind of streets that Wanless Rd and Hinton Rd are - and have been historically. The developers here are trying to claim that this is a kind of central urban, high rise area. They mention the now-to-be-built Higgs development - but that is on the other side of the railway viaduct. The unbuilt Higgs development should not give these developers free reign to claim that surrounding residential streets are part of a high rise zone where the expectations for daylight levels can be lowered from the norm. The argument they are making is false.

5. Overloaded local transport facilities

Loughborough Junction Thameslink rail station has commendable connections, but at rush hour is intolerably congested and unsafe. The stairs at Loughborough Junction station are very high and steep. There is no lift or provision for disabled people. Thameslink railway put in barriers at Loughborough Junction a few years ago – which results in massive backing-up when rush hour commuters come down to the gates or want to access the platforms. There are only 2 normal gates and one wide one for luggage to handle all passengers going in or coming out. There is an obvious need to either increase rush-hour frequency on this route or to start using longer trains so people on the platforms can be guaranteed access to their train.

We are disappointed that neither this scheme nor the Higgs scheme seek to address the inadequate facilities for local rail users at Loughborough Junction station, including the many who would be attracted to live at the proposed developments. It can hardly be said that extra customers from the new schemes will have a safe or comfortable ride to work on Thameslink at rush hour. Surely Section 106 and the Community Infrastructure Levy were intended to address such community needs?

It has been suggested that there is a good bus service along Coldharbour Lane in both directions. True – but again at rush hour buses are often very overcrowded and it is not always possible to board. It seems perverse to expect new residents of state of the art super-towers to queue to get on a bus, wait for the next bus and so on to Brixton tube station when there is a train service from their own station going to town (but they can't get on an overcrowded platform/short-length trains).

We believe that Lambeth Council should be injecting some blue sky thinking into relieving this situation. Meanwhile we cannot support a massive increase in population next to Loughborough Junction station unless something is done to improve matters. It is deeply disappointing that the planning arrangements currently employed by Lambeth Council seem unable to run to servicing the public transport needs of the increased population – despite insisting that the new residents will be using public transport.

As a final remark we feel it is very unfortunate that instead of proceeding with a design similar to the Alan Camp one referred to in our introduction, which was not opposed by residents, the current developer has sought to impose a Canary Wharf aesthetic on the area. And they have not even tried to make this palatable by guaranteeing access to housing for people of modest means.

Yours sincerely



David Warner

for **The Brixton Society**