

# The Brixton Society

Understanding the Past, Looking to the Future

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11<sup>th</sup> May 2020

For attention of:  
Michael Cassidy,  
[mcassidy@lambeth.gov.uk](mailto:mcassidy@lambeth.gov.uk)

Your ref:  
20/01347/FUL

## **20-24 POPE'S ROAD, SW9 – Proposed Development:**

Dear Mr Cassidy,

Thank you for your recent letter about the above application. This is a prominent site within Brixton Town Centre, and the Society must object to the following serious defects with this application:

### **1. Height & Massing:**

The height of the taller block is excessive in the context of Brixton Town Centre, where tall buildings have for many years been of 10 or 11 storeys. This part of the Town Centre is classed as sensitive to tall buildings, but the proposal shows no such sensitivity.

The applicant's own renderings show the tower as intrusive and dominating the skyline (see Design & Access Statement pages 6, 126, 159). It would totally dominate the approach from Brixton Road through Electric Avenue (see page 161), undoing recent investment in enhancing the Avenue.

The Council's Tall Buildings Study of 2018 already provides some guidance for development of the nearby Pop Brixton site, which is set further back from the Electric Avenue approach, and partly screened from the approach via the western arm of Brixton Station Road by the bulk of the Recreation Centre. Even so, it set a maximum acceptable height of 65m AOD, whereas the proposed tower would rise to 95.662m AOD. Therefore the tower would be over 30m (or 100 feet) higher than the planning guidance allows. This shows blatant disregard for the planning context.

The proposal fails to preserve or enhance the character of the two Conservation Areas immediately adjacent, and so fails to meet Lambeth Local Plan policy Q22, in addition to the more general requirement to respect the historic character in policy Q5(b).

In particular, it fails to follow policy Q7(ii) on matching its scale to the local character.

## **2. Materials & Finishes:**

We deplore the treatment of the upper floors with an exposed rectangular frame around the top, because it exaggerates the visual impact of height and bulk. There is no objection to the diagonal braces, which provide visual relief from the repetitive rectangular window pattern, but repeating the green balcony motif over 6 floors is excessive.

The façade treatment is unacceptable because it emphasises the bulk of the two high-rise blocks, which at this scale would be over-dominant even without the heavy detailing.

Facing brickwork is welcome for lower storeys, but we question its widespread use as a cladding material for high-rise blocks, due to the high embodied energy in fired bricks. For upper floors we would prefer finishes in a lighter colour, such as used for The Edge development (Coal Lane) on the opposite side of Valentia Place.

The application therefore fails to meet Local Plan policies Q5, Q7 and Q8.

## **3. Microclimate effects:**

The excessively tall block proposed above the Pope's Road frontage would overshadow the space between the site and the railway station. It would also create adverse wind effects, making the space unattractive to shoppers and visitors.

A more pronounced canopy or first floor podium would offer pedestrians better protection from adverse downdraughts at the front of the site.

Outside the site, the Microclimate Assessment appears to be limited to ground floor locations, but should also have included elevated locations such as the railway platforms, the entrance to the Brixton Recreation Centre, and balconies/ terraces at the rear of Walton Lodge, Carney Square and The Viaduct. These are all more vulnerable to adverse wind effects.

Even at ground level, there is a potential wind funnel below the Popes Road/ Station Road railway bridge, and increased windspeeds in front of the proposed tower, and along the rear approach from Valentia Place.

Proposals should follow Local Plan policies Q2(vi) and Q26(a)vi.

## **4. Impact on Daylight for Nearby Flats:**

We expected this to be an issue, but after examining the report from GIA, we were surprised at how widespread the effects would be. We deplore that the drawings did not identify individual window locations. Taking the surrounding sites in turn and going anti-clockwise, there will be significant adverse effects on daylight as follows:

- Granville Court (GIA report para 5.8): 2 windows affected.
- Walton Lodge (para 5.57): 16 windows affected, 11 of them with a VSC below 15%.
- Carney Place/ Milles Square (r/o 368-372 Coldharbour Lane, para 5.20): 39 windows will be severely affected, with their Vertical Sky

Component (VSC) reduced to less than 15%. Another 33 windows will be affected to a lesser degree but no longer meet the BRE standards.

- The Viaduct/ 2-7 Valentia Place: The main impact will be a loss of outlook and privacy.
- The Edge/ 1 Coal Lane (para 5.14): 2 windows affected (with VSC reduced by 31.6% on 1<sup>st</sup> floor and 24.1% on 2<sup>nd</sup> floor respectively).
- Chilham Court, Canterbury Gardens Estate (para 5.31): Only 1 window would be sub-standard, with a 20.1% reduction in VSC but it would be at 3<sup>rd</sup> floor level!
- Chartham Court (para 5.37): This tower block was affected more than we expected, with 15 windows experiencing reductions in VSC of between 20 and 30%.
- Westgate Court (para 5.44): 8 windows would be affected, including one ground floor window with its VSC reduced by 30%.
- 28 Atlantic Road (para 5.51): At this newly-refurbished property 3 windows would be affected

In total, 119 windows among 8 sites would no longer receive adequate daylight.

This development would also inhibit future development of the Pop Brixton site through loss of daylight and sunlight. Again we are disappointed that this was not examined by the consultants.

The usual criteria for assessing daylight received by existing buildings is the vertical sky component (VSC), based on the amount of sky visible from each window. The daylighting report attempts to disguise the deficiency after development by trying to add in the No-Sky Line (NSL) assessment, based on very limited information about the internal layout of Z properties. Given that their report was prepared in February, before the current lockdown, they should have been able to obtain internal layout information for almost all the properties assessed. We know it exists for several properties where they claim no knowledge.

More disturbing, the consultants appear to have taken the cavalier view that merely because of the urban context, the existing policy standards can be ignored.

In summary, the design fails to meet the BRE guidelines and therefore Lambeth Local Plan policy Q2(iv).

### **5. Privacy and Outlook:**

The proposed office blocks will be unduly close to the rear windows of The Viaduct and Carney Place, creating mutual privacy issues and undue enclosure, in defiance of Local Plan policies Q2 (ii) and (iii).

### **6. Weaknesses in Retail Layout:**

The proposed ground floor layout is not permeable enough to encourage worthwhile footfall – the rear half of the ground floor will not attract customers unless there is a pedestrian route from the Second Avenue of the Brixton Village Arcade, and ideally also an attractive and defined route from Valentia Place. We are disappointed that the concept shown in section 4.4.7 of the Design & Access Statement was not developed to shape this application.

While we support the concept of ground floor retail use, with a central performance space, it is unlikely that first floor retail or café uses would attract enough footfall unless escalators are also included.

Part of the demand from potential tenants will be for café/ restaurant uses, so provision for extract ventilation needs to be designed-in from the outset.

### **7. Amount of Office Floorspace:**

In principle, we are sympathetic to the upper floors being used for commercial office space, because we are aware that much local business space has been lost to residential development in recent decades.

However, we do not believe that the massive amount of floor area proposed would find enough takers. Historically, market interest in Central Brixton office space has been limited, sustained only by the Council's own needs, lately much reduced. The impact of the current Coronavirus epidemic calls into question the future operation and likely demand for conventional office floorspace, particularly outside the established London office locations.

Even if fully occupied as designed, there are severe limitations on public transport capacity serving the Town Centre, and no clear proposals to improve this. PTAL scores are irrelevant if trains and buses are already at full capacity.

There are specific needs, for small and start-up enterprises, and for the messier processes which do not work well directly below residential flats, but these needs do not appear to be addressed in this application.

### **8. Lack of Planning Benefits:**

For a development of this scale, we would expect more planning benefits to be offered to support wider improvements to the Town Centre, or at least to mitigate the impact.

In particular, the Council should be seeking a contribution to the reinstatement of East Brixton Station, to provide local access to the London Overground rail service. In itself, this would make the site more attractive to future office occupiers.

Lambeth Local Plan policies ED6(c), ED13(b) and PN3(g) should be applied.

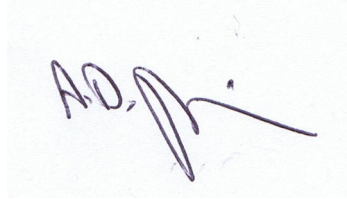
### **9. Noise Impact on nearby dwellings:**

The proposed top-floor restaurant above the eastern block will be too close to residential flats immediately south of the high-level railway viaduct, at The Viaduct, Carney Place and Walton Lodge, to the east at The Edge/ Coal Lane, and to the north on the Canterbury Gardens Estate. It will be too easy for noise to carry across to these flats if the Council fails to prevent A4 (bar) or late-night use of the restaurant suite.

The Council's past failure to control over-night activities has resulted in a very difficult living environment for residents elsewhere in the Town Centre, due to noise, litter and anti-social behaviour, including use of the highway as a public toilet. Therefore no use of the property after 11 pm can be tolerated, in order to maintain Lambeth Local Plan policy ED7(b).

The design of extract ventilation is also a critical factor in how acceptable an A3 or A5 use will be in proximity to residential accommodation. Extract outlets or flues must include odour filters and sound-proofing.

Yours sincerely,

A handwritten signature in blue ink, consisting of the initials 'A.D.' followed by a stylized, cursive flourish.

Hon. Secretary