

The Brixton Society

Understanding the Past, Looking to the Future

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Please reply to:
Alan Piper, RIBA,



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7th May 2020

For attention of:
Lauren Shallcross,
lshallcross@lambeth.gov.uk

Your ref:
20/00622/FUL

Site Adjacent 2-7 Valentia Place, SW9 – Proposed Development:

Dear Miss Shallcross,

Thank you for your recent letter about the above application. This site lies within the Loughborough Park Conservation Area and on the fringes of Brixton Town Centre, so the Society must object to the proposals on the following grounds:

1. Impact on Context:

Despite the innovative design, it is completely inappropriate in scale for this restricted site. Development on this site should be in scale with the former coach-house, now 356a Coldharbour Lane.

The proposal blatantly contradicts Lambeth Local Plan policy Q14(e) which calls for previously-developed backland sites to remain subordinate to surrounding buildings. More generally, it fails to follow policies Q5(c)ii on local distinctiveness and Q7(ii) on matching its scale to the local character.

2. Disregard of Heritage issues:

The supposed Heritage Statement at para 6.2 of the Design & Access Statement completely omits any reference to the historic context, the Conservation Area appraisal or adjacent buildings. This is an affront to the Society, which originally proposed the extension of the Loughborough Park Conservation Area to include the surrounding properties on the north side of Coldharbour Lane, thus linking it to the Brixton Town Centre CA.

The proposal fails to preserve or enhance the character of the Conservation Area, 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).

3. Overshadowing of nearby dwellings:

Examination of the report from GIA reveals that the rear windows of 356a, 356 and 358 Coldharbour Lane would no longer receive adequate daylight. The proposed design even succeeds in obstructing daylight to the flank windows of the modern block at 2-7 Valentia Place.

(See figures 03, 10, 14 and 18.)

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 limited and unverified information about the internal layout of the Coldharbour Lane properties. The consultants appear to take the cavalier view that merely because of the urban context, the existing policy standards can be ignored.

Sunlight data is only relevant for the flank windows of 2-7 Valentia Place, the adjacent modern apartment block. In this case, the proposed block will clearly obstruct sunlight to window W15 to an excessive degree.

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

4. Privacy and Outlook:

The proposed residential tower is ridiculously close to the rear of 356a-358 Coldharbour Lane, creating mutual privacy issues and undue enclosure, in defiance of Local Plan policies Q2 (ii) and (iii).

5. Impact on Trees in the Conservation Area:

Despite the applicant's protestations of "green" credentials, the effect of the development will be fatal to the mature tree behind 356 Coldharbour Lane. This is unlikely to survive the proposed basement excavation within the present spread of foliage and roots.

It therefore fails to meet Local Plan policies Q10 (a) and (b).

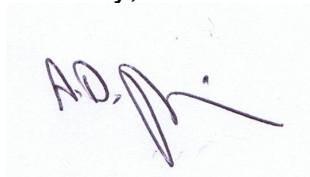
6. Employment Floorspace:

We are sympathetic to retaining employment floorspace in the Central Brixton area, because so much has been lost in the past 50 years. However it is unrealistic to attempt to retain a similar amount of employment space at the same time as adding several dwellings to such a small site.

In any case, it can be difficult to find business tenants for ground floor workspace whose activities will be compatible with residential use above.

In this restricted context, a more realistic approach would be a single live/work unit, or a much smaller residential development as recently proposed on Gresham Road at the far end of the nearby shopping parade, 322-354 Coldharbour Lane.

Yours sincerely,



Hon. Secretary