

# The Brixton Society

Understanding the Past, Looking to the Future

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

Website: [www.brixtonsociety.org.uk](http://www.brixtonsociety.org.uk)

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

Please reply to:  
Alan Piper, RIBA,



[APiperBrix@aol.com](mailto:APiperBrix@aol.com)

4<sup>th</sup> February 2021

For attention of:  
Luke Butler,  
[lbutler@lambeth.gov.uk](mailto:lbutler@lambeth.gov.uk)

Your ref:  
20/04194/FUL &  
20/04194/EIA

## **108 LANDOR ROAD, SW9 – Redevelopment of Lambeth Hospital:**

Dear Mr Butler,

Thank you for your recent letter about the above application.

This is a major site on the Brixton/ Stockwell boundary which raises several substantial issues. The Society must therefore **object** to this application on the following grounds:

### **1. Excessive Density**

The overall design is compromised by a ridiculously high density of development. The Design & Access Statement states (p.18) that the site area is 2.54 hectares (6.274 acres) and from the Schedule of Accommodation (on p.90) we calculate that the number of actual bedspaces will be 1777. The overall density will therefore be 699.6 persons per hectare (283.23 persons per acre, or ppa).

This compares adversely with the 136 ppa to which the original Stockwell Park and Angell Town estates were designed in the early 1970s. In the mid-1970s, residents of the Victorian streets to the east of the hospital site were able to demonstrate to the Council and the Secretary of State that their terrace houses would achieve a density approaching this figure if brought back into full use. A realistic density for this site should be in a similar range, no more than 136 ppa (336 persons per hectare).

### **2. Impact of Child Population**

Given the limited and fragmented nature of the open space proposed to remain in the development, consideration should also be given to Child Density. It has long been considered good practice to keep this below 30

child bedspaces per acre (74.1 per hectare). This scheme potentially has a very high Child Density of 109.7 per acre (271 per hectare), almost four times the recommended maximum.

This reflects an estimated number of 688 child bedspaces, derived from the Schedule on p.90 of the Design & Access Statement. Since the site has not previously been in residential use, this is an excessive number for local schools to absorb, particularly given the impending redevelopment of the nearby Fenwick Estate, also above the prevailing residential density. Given the proposed number of residents, another failing is the lack of on-site provision for childcare for the under 5s.

While the applicants have provided a schedule of existing community infrastructure, including schools, in the surrounding area, there has been no attempt to assess their available capacity. Overall, a scheme with this high number of children on site disregards Section 6.2 of the Mayor's SPG on Housing (2016).

### **3. Inadequate Consultation**

We were surprised and disappointed that, for a development of this scale, there was no attempt at any pre-application consultation with amenity groups or the wider community. Such events can quickly identify key community concerns and allow an emerging design to benefit from local knowledge. Consultation by SLAM (as the outgoing owners) was limited to the issue of how best to relocate their mental health facilities.

We are appalled to see in the Design & Access Statement (p.41) that Lambeth Planning Officers themselves have encouraged greater density and building heights than originally proposed by the developers. We regard this as a gross dereliction of duty to the residents of the borough, undermining local planning policies achieved, after long argument, to promote a balanced and sustainable pattern of development.

### **4. Inadequate Transport Infrastructure**

The Design & Access Statement outrageously claims (p.18) that the site has a PTAL score of 6a but this is contradicted by the map on p.27, which shows a PTAL score of at best 5 for the Landor Road frontage, and only 4 for the rear part of the site, where the greatest number of residents will be concentrated in the taller buildings.

In any case, the PTAL score is inadequate as a measure of accessibility, because it does not take into account the actual carrying capacity of the public transport network at peak hours.

Even before the impending overdevelopment of the Fenwick Estate to the west of the site, there is no spare capacity on the northbound Northern Line at Clapham North in the morning peak. Prospects of boarding a train are better at Brixton, but only because this is a terminus. It's also the most distant of the 3 surrounding Tube stations, because of a circuitous walk to reach it.

The 322 bus along Landor Road is only an infrequent single-decker service, while at its western end there are limited bus routes north-eastward along Clapham Road.

Even pedestrian links are hampered by the Council's failure to reinstate the footbridge between Hubert Grove and Ferndale Road.

Developers are often keen to minimise on-site parking to reduce development costs, but here the provision of car-spaces for barely 3% of dwellings is far too low, even for residents with a disability. It excludes any provision for car club membership, which is a far greener approach, allowing car use as and when needed, rather than the ongoing burdens of ownership and mass parking.

All vehicle traffic to the site relies on a single access point on Landor Road. Insufficient consideration has been given to the impact of extra traffic which will be generated along Landor Road by deliveries and servicing to the new dwellings, particularly given the increasing use of on-line shopping and hot food deliveries. As a car-free scheme, residents will be more reliant on mini-cabs and taxis too.

Overall, the proposed number of dwellings is far too great for the existing transport networks to cope, and should be drastically reduced.

### **5. Excessive Height**

The proposed 18-storey tower block is a blatant breach of the Council's planning policy on the scale and location of Tall Buildings (Lambeth Local Plan policy Q26) and of the Mayor's London Plan (policy D9, as recently amended by the Secretary of State). This backwater site has not been identified in the Lambeth Local Plan as appropriate for Tall Buildings.

The Design & Access Statement makes no reference to the assessment of wind microclimate effects, as required by paras 3.31-35 of Lambeth's draft Design Code SPD (Part 3: Tall Buildings). Clearly this issue has not informed the proposed design. The effects on pedestrians and cyclists around the base of the tower will be critical because this is intended to be a "car-free" development.

The adjacent blocks of 7 to 9 storeys will themselves be excessive in height and out of scale for the surrounding context of 2 and 3 storey terrace housing.

### **6. Poor External Design**

The design of the tower block is the most unsightly element. Partly of course this is due to its sheer height, but the external treatment is old-fashioned, Stalinist, and sterile. No attention has been paid to Lambeth's draft Design Code SPD (Part 3: Tall Buildings).

In particular, the top section facing north towards Landor Road includes redundant elements above the top residential floor, which only serve to reinforce the impression of excessive height and bombast (page 211, bay 9, in the Design & Access statement).

In contrast the treatment of the upper part of the south-facing elevation is more acceptable (page 213, bay 13), and should be adopted for the elevation seen from Landor Road.

On this and other blocks, the facing brick "strata" pattern is unduly fussy and creates a smudged effect. Its impact will be diminished by the sheer scale of

the buildings. Simpler full-width panels to storey height in contrasting brick colours would be more effective – and more economical to construct.

### **7. Impact on nearby dwellings**

Inevitably there will be adverse effects on daylight and sunlight for neighbours. The information in Chapters 15 & 16 of the Environmental Statement is not clearly presented, but we can confirm that 14 adjacent houses in Hargwynne Street will be most seriously affected and a further 21 houses and shops, mainly in Hubert Grove and Landor Road, will be affected to a “moderate” degree but still breaching the BRE guidelines adopted by the Council. These are listed on pages 27 and 28 of Chapter 16. Worse, no mitigation measures have been proposed by the applicants. The application therefore fails to comply with Local Plan policy Q2(iv).

### **8. Single-aspect Dwellings**

Dual-aspect or corner apartments are preferred, to allow cross-ventilation. Indeed, they are recommended by the Mayor’s SPG on Housing (Standard 29, para 2.3.36) and required by Lambeth Local Plan policy H5(a).

However, the proportion of single-aspect apartments proposed here appears to be excessive. We cannot see how the apartments shown in orange on p.88 of the Design & Access Statement can be described as anything other than single-aspect dwellings. The presence of a balcony, whether projecting or inset, does not guarantee cross ventilation if all openings are on one side of the apartment.

### **9. Provision for Non-residential Uses**

The Design & Access Statement has a discrepancy in the proposed provision – the plan on page 87 shows 3 separate units for commercial or community use, but the accommodation schedule on page 90 shows only 2. Which is correct?

The proposed uses appear to be relatively open, despite their location directly below residential flats on the upper floors. In our experience, cafes and takeaways (A3 & A5 uses) are common uses in shopping frontages close to high-density residential areas, so there is a strong likelihood of at least one of these units being so used.

The design of extract ventilation is often a critical factor in how acceptable a cafe or takeaway use will be in proximity to residential accommodation. Flues should include odour filters and sound-proofing. External ducts should be carried up well above the windows of adjacent residential accommodation, and should be sited in relatively unobtrusive positions. It will be an advantage if these can be designed-in from the outset, instead of being a clumsy afterthought.

### **10. Sustainability**

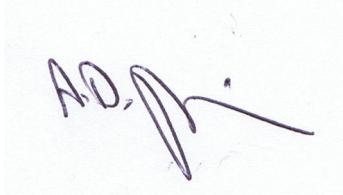
The design has clearly not been driven by sustainability considerations from the outset, and only includes token “greenwashing” features as an afterthought.

All things considered, this is not a sustainable form of development.

As already referred to above, it overloads the existing infrastructure, and concentrates an excessive number of residents in a relatively remote corner of Brixton.

It therefore fails to meet Lambeth Local Plan policy EN4.

Yours sincerely,



Hon. Secretary