

# 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

*For attention of:*  
Jeni Cowan,  
[Jcowan1@lambeth.gov.uk](mailto:Jcowan1@lambeth.gov.uk)

*Please reply to:*  
Alan Piper, RIBA,



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

15<sup>th</sup> January 2021

*Your ref:*  
20/04290/P30

## **Former St. Jude's Church, Dulwich Road, SE24 – Residential Conversion from Business Use:**

Dear Miss Cowan,

Members have drawn our attention to the above application for Prior Approval. This is a prominent site within the Brockwell Park Conservation Area, so I am disappointed that you did not choose to consult us directly. Nevertheless, we must **object** to this proposal, as set out below.

### **1. Limits of the Prior Approval Route:**

We dispute that the Prior Approval route is allowable for development of this nature on Controlled Land, i.e. within a Conservation Area, where Permitted Development rights are more limited. The normal policies of the Lambeth Local Plan should therefore apply, notably H2, H6, Q2, Q11 and Q22.

### **2. Lack of Affordable Housing:**

The Prior Approval application appears to be merely a bid to evade providing the normal proportion of affordable housing. Among the 17 proposed dwellings, we would expect about 7 to be affordable. We would be satisfied if the applicant prefers to make a cash contribution to off-site provision instead.

### **3. Residential Space Standards:**

At first glance the floor areas of individual dwellings appear to meet the Nationally Described Space Standards, but closer examination reveals some anomalies.

It seems that at least the 2<sup>nd</sup> floor level, and possibly parts of the 1<sup>st</sup> floor, will have sloping ceilings, so usable floor areas must be adjusted to deduct areas with lower head-room, as stated in the Space Standards (para. 10).

Bedroom floor areas are not shown. In the proposed flat 17, one bedroom is shown with no access from the corridor or from below!

It is not readily apparent from the floor plans how circulation is arranged between different floors, because no section drawings were provided with the application. Some dwellings appear to be on 2 or 3 floor levels, but internal stair connections are generally unclear.

#### **4. Daylighting Standards:**

The roof windows shown on the drawings appear to be undersized in comparison with earlier residential conversions of churches of similar form in the borough, e.g. St. James, Knatchbull Road, SE5 or St. Barnabas, Guildford Road, SW8.

Furthermore, roof windows shown on the 2<sup>nd</sup> floor plan do not all appear on the front elevation provided.

The onus should be on the applicant to demonstrate that all dwellings will receive adequate internal daylighting, as now required even for Prior Approval cases. A good recent example of such a daylight study was provided for application 19/03546/FUL (despite other faults in that design).

#### **5. Interior Features:**

The original interior featured polychrome brick arches above cylindrical columns to separate the nave from the side aisle of the church. These remained visible even when the north-east aisle was partitioned off to form a smaller chapel during war damage repairs in the early 1950s.

We would prefer if these could remain exposed within flats and circulation spaces as part of the conversion scheme. This may even enhance the sales appeal of individual flats. Again though, insufficient information has been provided to visualise the interior appearance.

We must also draw attention to a memorial stained glass window in the front elevation, which would light Flat 6 in the proposed layout.

#### **6. Flood Risk:**

The map provided with the application fails to show any flood risk information. The building sits in the valley of the River Effra, which runs underground along the far side of Dulwich Road. In my experience, the main flood risk comes from rainwater run-off from Brockwell Park to the rear of the site, with associated high levels of groundwater in the clay sub-soil. Even 50 years ago, this would result in very occasional flooding in the cellar space (former boiler room) below the proposed Flat 4. The risk may now be higher with the trend to more intense rainstorms, particularly in summer.

In any case, there may be a need for a land drain or other subsoil drainage along the base of the rear walls to reduce the flood risk for Flats 1-3.

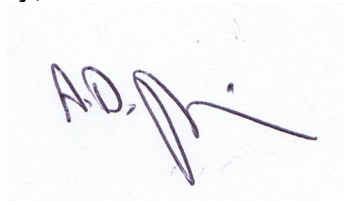
#### **7. Parking Provision:**

We are disappointed to see that there is no specific provision for cycle parking, with even the existing cycle shelter removed.

We see no reason for the number of car parking spaces to exceed the number of dwellings. We consider that reducing this by a third would still be adequate, though we think that a fully car-free approach is unrealistic. Parking hard-standings should be of permeable material, again to minimise rapid run-off of rainwater.

In summary, we are not opposed in principle to a residential conversion, but the application in its present form fails to show that adequate living accommodation will be provided.

Yours sincerely,

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

Hon. Secretary