

The Brixton Society

Understanding the Past, Looking to the Future

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For attention of:
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Please reply to:
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6th February 2021

Your ref:
20/01822/FUL &
20/01822/EIAFUL

SHAKESPEARE ROAD, SE24 0PT – Residential Development of Waste Transfer Site on East side:

Dear Mr Oates,

Thank you for your recent letter about the above application. Although a residential use is preferable to the existing Waste Transfer Station, the current proposals are a gross over-development of the site and unsuitable for this context. We must therefore **object** to this application, as set out in more detail below:

1. Excess Building Heights

Back in January last year, we advised the applicants that the proposed building heights were excessive, and this remains our view. The predominant form in the surrounding area is of 2 and 3 storey terraces with only isolated taller blocks at a distance.

The proposed blocks rising to 10 and 11 storeys clearly breach 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. In this context, blocks rising to 7 or 8 storeys would be the maximum acceptable, and then only away from the road frontage.

Even the lower wing along the Shakespeare Road frontage, with a set-back and contrasting top storey, remains one storey too high for the street context.

External Treatment/...

2. Clumsy External Treatment

External modelling and careful choice of facing materials and colours can mitigate the impression of bulk to some extent, but this approach has not been carried through in this design.

We advised the applicants against the use of unrelieved brick cladding for the larger rectangular blocks, and that darker or stronger colours should only be used to highlight small areas.

The metal-faced top storeys would be more acceptable with a light grey or verdigris finish, rather than an oppressive dark brown.

3. Excessive Density

The design is compromised by trying to pack far too much accommodation onto a restricted site.

The site area is only 0.59 hectares (1.46 acres) and from the Schedule of Accommodation (Table 4.1 of the EIA) we calculate that the number of actual bedspaces will be 641. The overall density will therefore be 1086.4 persons per hectare (439 persons per acre, or ppa).

This is more than 3 times the density of 136 persons per acre adopted in the early 1970s for the original Angell Town and Stockwell Park Estates further north in SW9. In the mid-1970s, residents of the Victorian streets to the south-west of the 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.

We therefore consider that a realistic density for this site should be in a similar range, no more than 336 persons per hectare (136 ppa).

4. High Child Density

Given the concentration of new households within a restricted site, 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 150 per acre (371 per hectare), five times the recommended maximum.

This reflects an estimated number of 219 child bedspaces, derived from the Schedule (Table 4.1 of the EIA). Since the site has not previously been in residential use, this is a substantial number for local primary schools to absorb, taking account of other residential developments already approved nearby, such as Somerleyton Road.

5. Local Infrastructure overloaded

The number of new residents concentrated within a small area will overload the existing community infrastructure.

For example, from Table 6.6 and para 6.54 of the EIA, we are concerned that GPs across the 16 surgeries assessed already have a caseload of 2049 registered patients each, an excess of 249 each compared with the HUDU benchmark of 1800 patients per GP.

6. Affordable Housing limited

The proportion of Affordable Housing, even with a very wide definition, is disappointing at only 30% of total dwellings.

7. Transport Network limitations

Although the applicants claim a PTAL rating of 3 to 4, the PTAL score alone is inadequate as a measure of accessibility, because it does not account of the actual carrying capacity of the public transport network at peak hours.

Even before other proposed housing developments take place, it is already impossible to board a northbound Thameslink train at Loughborough Junction in the morning peak. Prospects are marginally better at Herne Hill, because this is an interchange. Although Brixton offers access to the Victoria Line, it is already the busiest terminus on the Underground network.

The nearest bus route is the 322 along Railton Road, but this is only an infrequent single-decker service.

Pedestrian links to several of the “local” amenities boasted by the applicants are so circuitous that they scarcely count as readily available to incoming residents of the development. Fig.6.4 and Table 6.7 in the EIA are misleading in quoting distances “as the crow flies” whereas Ruskin Park and Milkwood Open Space are only reachable via Loughborough Junction.

The recent Low Traffic Neighbourhood centred on Railton Road means that vehicle access is no longer available from the south-west, and nowadays bulk deliveries can only be made from the Loughborough Junction end of Shakespeare Road.

8. Impact on nearby dwellings:

We have been disadvantaged by the late publication of the graphic diagrams which should have been provided with the Daylight and Sunlight Assessments in Chapter 10 of the EIA.

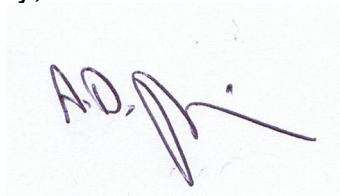
Despite this, closer study identifies that 3 dwellings in Derek Walcott Close and 15 in Kerin House will experience a serious loss of Daylight to at least one window, and a further 30 (including 7 in Shakespeare Road, 4 in Milkwood Road and 1 in Mayall Road) will be affected to a “moderate” degree but still breaching the BRE guidelines adopted by the Council.

Furthermore, substantial loss of Sunlight will be experienced by all 6 houses in Derek Walcott Close, and by 4 apartments in Kerin House to the east of the site. These are all identified within tables 10.9 to 10.12 of the EIA.

However, the EIA is far too dismissive of the breaches of the BRE Guidelines adopted by the Council. Worse, no mitigation measures have been proposed by the applicants.

The application therefore fails to comply with Local Plan policy Q2(iv).

Yours sincerely,



Hon. Secretary