

# The Brixton Society

Understanding the Past, Looking to the Future

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For attention of:  
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Your ref:  
20/03569/P20

## 6-12 TULSE HILL, SW2 – Proposed Two Additional Storeys:

Dear Miss Cowan,

I see that the above application was recently published in the local press. I am disappointed that you did not notify us directly, because this is a prominent site on one of the main roads approaching Brixton Town Centre.

### **Evasion:**

The use of the Prior Approval route is a blatant attempt to evade the usual requirements of the Lambeth Local Plan, and will result in sub-standard living accommodation, which will also have adverse impacts on the residents of surrounding buildings.

The Brixton Society therefore **objects** to this application, due to the following defects:

### **Streetscape:**

In this context, two additional storeys result in a block which is completely out-of-scale with its surroundings and over-dominant. The upward extrusion of the present elevations is clumsy and fails to match the proportions of the 1<sup>st</sup> and 2<sup>nd</sup> floors. Inevitably there will be a change of brick colour between the new and old sections of the external walls, but no string course or similar visual break is shown on the proposed elevations. A single attic storey may be acceptable here, but only if subordinate and set back from the main façade. The proposal disregards Lambeth Local Plan policies Q2(i), Q5(c), Q7 & Q11.

### **Fire Safety:**

The increase in height from a 3-storey to a 5-storey apartment block requires much more stringent fire precautions, such as provision of a second staircase, or a sprinkler system for the whole block. This issue has not been addressed by the applicants.

**Daylight & Sunlight implications:**

The proposed development will clearly have an adverse impact on daylighting to the 1<sup>st</sup> floor front rooms of the flats opposite (notably Nos. 27-37 Tulse Hill) and to the nearby flank windows of 7-12 Carter House and 14-20 Tulse Hill. There will be a marked loss of sunlight to the front rooms of 27-33 Tulse Hill (pm) and to 7-12 Carter House and Block B of 6-12 Tulse Hill (am). These problems arise from the adoption of a bulky 2-storey extension with very limited set-backs from the original facades.

**Privacy:**

The new balconies/ terraces will overlook the flank windows of 7-12 Carter House and 14-20 Tulse Hill at relatively short distances, well below the 14 to 16m separation distances that most local planning authorities expect. New balconies at the north end of the block will also provide views into roof windows on Block B of 6-12 Tulse Hill. None of this is acceptable. Lambeth Local Plan policy Q2(ii) should be respected.

**Amenity Space:**

The impact of 3 additional dwellings places additional pressure on the limited communal space within the site, which is not being increased in proportion. The disposition of the private balconies/ terraces is poor, with inefficient use of space and adverse effects on the privacy of neighbours, as cited above. Lambeth Local Plan policy H5 should be followed.

**On-site parking and Cycle Storage:**

Again, there will be more competition for limited external space. The proposed provision of cycle storage is poorly arranged and inefficient in its use of space. It appears to consist only of Sheffield stands within a basic wire enclosure. A more compact form of racking is recommended. Lambeth Local Plan policies H6b(iv) and Q13 should be followed.

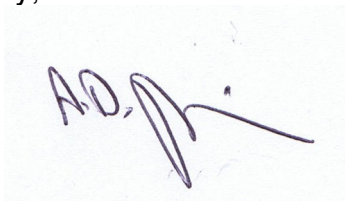
**Refuse & Recycling Storage:**

Residents of the block have already pointed out that existing provision for refuse and recycling storage is grossly inadequate. It is clear that ongoing management of the common parts is also under-resourced. The proposed enhancements are insufficient to cope with the increased demand. Lambeth Local Plan policies Q12 and H6b should be applied.

**Construction issues:**

This is not an issue we would normally raise, but the applicant appears to intend to carry out the extension works while the rest of the block remains occupied. A Construction Method Statement is therefore essential, to explain how residents' access and safety will be maintained, and also matters such as delivery and storage of materials and hours of operation for the building works.

Yours sincerely,



Hon. Secretary