## The Brixton Society

Understanding the Past, Looking to the Future
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Website: <a href="https://www.brixtonsociety.org.uk">www.brixtonsociety.org.uk</a>

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

For attention of:
Michael Cassidy,
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Please reply to:
Alan Piper, RIBA,

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18 April 2021

Your ref: 19/04280/FUL

Wellfit Street, Hinton Road & Hardess Street, SE24 – Proposed mixed use high-rise development:

Dear Mr Cassidy,

Residents have reminded us that this application is still awaiting decision, so I am taking the opportunity to remind you of our objections.

Although the site is on the east side of the London Overground railway viaduct, and therefore just beyond our usual area of interest, the scale of the proposed development would so dominate the skyline around Loughborough Junction that we must object.

Our specific concerns are outlined below:

## Impact of Tall Buildings:

The proposed towers of 20 and 29 storeys will be far in excess of an acceptable height for this location, and completely out of scale for the surrounding context of 2 and 3 storey terrace housing.

Even if the nearby Higgs Estate is developed as approved, these new towers will be substantially taller.

The proposal blatantly disregards the Lambeth Local Plan, which only permits tall buildings near the Thames Riverside and in limited areas within Brixton Town Centre. This site clearly cannot be included in either area.

The proposal fails to deal with 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 towers will be critical because this is intended to be a "car-free" development.

Therefore the proposal fails to meet Lambeth Local Plan policies Q2(i), Q5(b), Q7(ii), and particularly, Q26.

## Impact of Over-development on Local Infrastructure:

Overall, the proposed number of dwellings is far too great for the existing transport networks to cope, and should be drastically reduced. As a car-free scheme, residents will be more reliant than usual on public transport, mini-cabs and car club schemes.

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 Higgs Industrial Estate to the west of the site, there is no spare capacity on the City-bound Thameslink rail service in the morning peak. Prospects of boarding a train are better at Brixton, but only because this is a terminus. It also requires a long walk to reach it.

Available bus routes nearby on Coldharbour Lane are primarily east-west, so do not provide effective alternatives for access to Central London.

Far from creating a precedent, earlier planning consents for the nearby Higgs Industrial Estate and the Hero of Switzerland site mean that the surrounding travel infrastructure will be overloaded, even before this site is developed.

## **Extract Ventilation:**

To cater for a variety of commercial uses on the lower floors, such as industrial processes and "dark kitchens", extract ventilation should be provided for at the outset.

Extract systems should include odour filters and sound-proofing. Extraction ducts should be carried up well above the windows and balconies of the residential accommodation above, and should be integrated into the design. This issue does not appear to have been addressed in this application.

Yours sincerely,

Hon. Secretary