The Brixton Society

Understanding the Past, Looking to the Future
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Website: www.brixtonsociety.org.uk

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

For attention of: Felicia Onabanjo, fonabanjo@lambeth.gov.uk Please reply to:
Alan Piper, RIBA,

APiperBrix@aol.com

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Your ref 21/03335/ FUL & 21/03336/ LB

164 Brixton Road, SW9 - Replacement of garage by garden building:

Dear Miss Onabanjo,

Thank you for your recent letter, advising us of the above applications. The proposals have since been inspected, and we have also received representations from neighbours. This is to confirm that the Brixton Society **objects** to these applications, as detailed below.

1. Future Use of Outbuilding:

We are disturbed to see that the proposed plan includes a fully-equipped shower room, as well as a kitchenette with sink and worktops. We consider this is excessive for a simple work-room or studio to suit somebody working from home.

Only a more modest scale of provision would be acceptable, i.e. a WC with a hand basin (rather than full-size washbasin/ vanitory unit) and a simple sink unit to enable art or craft activities.

The risk is that the outbuilding would be used as an independent studio flat or for holiday lets, which would not be appropriate in this context. If separately let in this way, the outbuilding would not meet current housing design standards, such as Lambeth Local Plan policies H5 and H6(b)*. Moreover, it would create an unwise precedent for similar developments within this Conservation Area.

2. Backland Development:

As backland residential development, it would not meet the requirements of Local Plan policy Q14, specifically (c) and (e).

In particular, it fails to provide a 1m set-back from the flank boundaries to allow for maintenance of both the boundary walls and the outbuilding itself.

3. Lack of a Tree Survey:

While there is reference to removing a walnut tree close to the existing structure, the applicants have not provided a survey of the whole garden to show tree positions, size or condition, although other more substantial trees are likely to be affected by excavations for services and construction works generally. This is a major consideration in a Conservation Area, and fails to meet Local Plan policy Q10.

4. Other Incomplete Information

The flank and rear elevations are in outline only, and do not show how the tops of the external walls will be protected, e.g. coping stones or brick-on-edge detailing. This should be an elementary requirement for a Listed Building application.

Provision for drainage and other services connections from the main house are not fully shown (see also para.5 below).

The applicants have opted to retain the old garage inspection pit, but no details are provided of the cover/ hatch over this, which may be a hazard to occupants.

5. Inadequate Foul Drainage

There appear to be no existing water or drainage services to the existing outbuilding.

This means that, even with a reduced scale of sanitary appliances, existing foul drainage needs to be extended back from a manhole directly behind the recent side extension to the main house at No.164.

The proposed drainage layout is impractical because it would require a diagonal drainage route through the garden of the basement flat, which is in separate ownership, or additional inspection chambers to accommodate changes of direction. It would be more efficient to locate all sanitary appliances close to the north wall (the No.162 side) rather than close to the south wall (the No.166 side).

6. Rainwater Run-off:

We are disappointed to see that the proposed flat roof is merely described as "felt" with no further details.

For previous applications at this property, we have urged the use of permeable paving materials, or of a SuDS system to collect and store rainwater run-off for more gradual release into the sewer system. Similarly, any garden building of the scale proposed should be provided with a "green" roof, to delay run-off and avoid overloading the drains in heavy rain.

The single rainwater pipe is not shown with any yard gully or drainage connection. The applicants made a passing reference to use of a soakaway (though nothing is shown on the plans), but that would not be effective in this location, given that the predominant subsoil is London Clay of very limited permeability, and the roof area is of the order of 50 sq. metres.

Overall, the proposals fall far short of what we would expect for a Listed Building application within a Conservation Area.

Since the definitive version of the 2021 Lambeth Local Plan was only adopted less than a month ago, we have not yet had time to update the references for *individual policies, some of which are now more stringent.

Yours sincerely,

Hon. Secretary