

# The Brixton Society

Understanding the Past, Looking to the Future

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19<sup>th</sup> November 2021

*Your ref:*  
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## **108 LANDOR ROAD, SW9 – Redevelopment of Lambeth Hospital:**

Dear Mr Butler,

Further to my letter of 19 August, I understand that the applicants submitted additional and revised documents during September and October, including an Environmental Statement.

The new documents have since been examined, and once again we are disappointed to see that our original objections have not been resolved, so the Brixton Society continues to **object** to this application, as explained in our original letter of 4<sup>th</sup> February.

Our comments on the key points of the Environmental Statement (ES) and its supporting documents are as follows:

### **1. Design Evolution** (ES p.9 & Revised Accommodation Schedule):

The increasing height and density emerging from successive design studies (Table 2, p.9-10) demonstrates the failure to consult with the local community and amenity groups during this critical stage. The final scheme therefore fails to take full account of the local context, scale and community infrastructure.

While there are minor adjustments in the number and mix of flats, the proposed density of development remains ridiculously high, and more than twice what is sustainable for the neighbourhood.

Child Density across the development remains almost four times the recommended maximum.

## **2. Traffic & Transport** (ES p.14-15 & Framework Travel Plan):

The latest travel plan fails to offer any mitigation for the impact of the development on the existing travel network. The applicants do not offer as much as an extra bus shelter to cope with the influx of new residents.

We are disappointed that the applicants and their consultants continue to rely solely on the PTAL score, when it is inadequate as a measure of accessibility. It remains our view that practical transport and travel plans must be based on the actual carrying capacity of the public transport network at peak hours.

There are blatant errors in the street plan shown on page 15. Landor Road is wrongly described as an Arterial Road, a term which is only applicable locally to Clapham Road (the A3). Landor Road is at most only a local distributor road, and already has capacity problems as a result of the Low Traffic Neighbourhood restrictions introduced between Acre Lane and Landor Road. It is surprising that the applicants failed to make use of the new traffic data arising from the LTN.

In addition, Hubert Grove and Hargwynne Street are only minor residential streets, rather than being wrongly shown as Secondary Roads in the same class as nearby Bedford Road (B221).

A pedestrian link to Brixton Town Centre, past the Pulross Health Centre, is only tentatively indicated, but it needs to be a firm commitment in order to improve the poor accessibility of the development.

If this was not a realistic prospect at the outset, densities should have been substantially reduced early in the design process.

## **3. Socio-Economic Assessment** (ES p.24-25)

Historic land uses are supposedly shown on a map on page 21, including former industrial uses which would have been significant concentrations of local employment. Sadly, the information for uses within 500m of the site is wildly inaccurate.

It shows the site itself as former industrial land, which is blatantly untrue - it was open fields before the hospital was built c.1870.

It invents a huge industrial site in Brixton Town Centre (site T) where there was only a small brewery and barrel-makers in Electric Lane.

It omits former industrial uses along Acre Lane and Stockwell Road, including the Waltham Brothers brewery site at Stockwell Green (site O).

It also omits small pockets of former industrial uses in nearby residential streets, notably Ferndale Road.

On page 24, the resident population of Lambeth as a whole is stated as 151,561, which is only about half the current figure. This calls into question the reliability of other statistics provided, and the conclusions derived from them.

A glaring omission from the ES is any appraisal of the ability of local schools and health services to accommodate the needs of the extra residents on site, despite the high child density already noted.

The capacity of local schools has not been addressed at all, despite this being considered in EIAs for other sites within the borough.

#### **4. Water Resources etc.** (ES p.22-23)

We are alarmed to see on page 22 that the local water supply network will only support 192 dwellings within the site, so substantial extra investment would be necessary to increase supply for the proposed scale of development. No specific proposals were included to address this.

#### **5. Wind/ Microclimate** (ES p.26-27):

The impact of the tower block is a particular concern. The external space immediately north-west of the block is vulnerable. This is classified perversely as “business walking” which does not appear consistent with movement around a residential block.

(See also our comments below on Energy & Climate issues.)

#### **6. Daylight, Sunlight and overshadowing** (ES p.32 & Point 2 Report):

No changes have been made which would reduce the adverse effects on daylight and sunlight for neighbours. The ES is just vaguely dismissive.

The report from Point 2 attempts to dilute the results by quoting figures including windows on the other side of each property.

The proposals continue to adversely affect a significant number of surrounding homes.

The most important issue is daylight, where the VSC method is preferred because it is independent of any reflection from nearby buildings where surface finishes and colour will vary.

- 19 houses in Hargwynne Street and Hubert Grove show significant losses, while another 20 show minor losses (including one in Landor Road).
- In addition, modern apartments at 108a Landor Road show significant losses, while those at 117-123 Hubert Grove show minor losses.

For sunlight:

- 9 houses in Hargwynne Street and Hubert Grove show significant losses, while another 12 show minor losses.

For sunlight to gardens (paras 15.280 & 281 of Point 2 report):

- 6 houses in Hargwynne Street with loss exceeding 30%;
- 10 houses in Hargwynne Street with minor adverse effects.

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

#### **7. Climate Change and Greenhouse Gas Emissions** (ES p.34-39):

An opportunity has been missed to demonstrate a contemporary approach to sustainability and environmental design.

The proposed energy efficiency is only a modest improvement on current minimum requirements. The demolition of the relatively modern buildings on site represents a loss of energy and CO<sub>2</sub> previously invested, and we are disappointed that no effort has been made to re-use any existing elements.

Insufficient attention has been given to summer cooling needs, with extensive glazing attracting solar heat, and deep courtyards inhibiting natural airflow. Despite belated attempts to reduce the proportion of single-aspect apartments and introduce more or larger balconies, the presence of a balcony, whether

projecting or inset, does not guarantee cross ventilation if all openings are on one side of the apartment.

The key requirement for cross-ventilation is to mitigate the Urban Heat-island effect in summer heat waves, so dual-aspect or corner apartments should have been prioritised at the outset. They are recommended by the Mayor's SPG on Housing (Standard 29, para 2.3.36) and required by Lambeth Local Plan policy H5(a).

#### **8. Townscape, Heritage & Visual Impact** (ES p.40, Table 4):

Table 4 fails to address - or even acknowledge – any adverse effects. To claim that the impact on protected views, conservation areas and the overall “residential terraces” character of the surroundings is “moderate beneficial” is bare-faced cheek.

The dense pattern of medium-rise blocks is bulky and over-dominant in the context of two and three storey terraces which surround the site.

However, the design of the tower block is the most unsightly element.

Partly of course this is due to its sheer height, but the external treatment also remains unsatisfactory. We are appalled that the applicants propose to leave the issue of the “strata” façade treatment unresolved.

Despite the reduced extent of facing brickwork on the upper storeys of Blocks 5 and 6, the use of dark grey metal facings instead will adversely reinforce the effect of bulk and height – a light grey finish would be preferred.

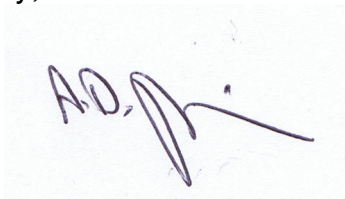
#### **9. Conclusion**

The Environmental Statement contains too many errors, and glosses over key issues.

Despite the applicants' token attempts to “greenwash” the design with various afterthoughts, it is clear that this is not a sustainable form of development.

In summary, it overloads the existing infrastructure, and concentrates an excessive number of residents in a relatively remote corner of Brixton. It therefore fails to meet Lambeth Local Plan policy EN4, and should be refused.

Yours sincerely,



Hon. Secretary