

# The Brixton Society

Understanding the Past, Looking to the Future  
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29<sup>th</sup> December 2021

For attention of:  
Ruth Brown,  
[Rbrown3@lambeth.gov.uk](mailto:Rbrown3@lambeth.gov.uk)

Your ref:  
21/04410/P20

## 11-13 ARGYLL CLOSE, SW9 – Proposed Additional Storeys:

Dear Mrs Brown,

Local residents have recently drawn our attention to the above application for Prior Approval under Part 20, Schedule 2 of the GPDO.

This site is adjacent to the Stockwell Green Conservation Area, and specifically to several Listed Buildings within it.

The applicants' choice of the Prior Approval route is a blatant attempt to evade the full range of local planning policies, following the consistent refusal of earlier attempts at overdevelopment of the site over several years.

The Brixton Society therefore **objects** to this latest application, as detailed below.

### 1. Accommodation Standards:

Much of the need for single-person housing in the borough is for older age groups, and for those with mobility issues. Providing new flats at 3<sup>rd</sup> and 4<sup>th</sup> floor levels without lift access cannot be acceptable in the 21<sup>st</sup> century.

Neither is it acceptable to omit doors from the bedrooms!

By following the Prior Approval route, the applicants are evading any contribution to Affordable Housing.

No additional provision is evident for refuse/ recycling storage, or for cycle parking, for the 4 proposed flats.

The application is silent on whether the development would be car-free.

### 2. Appearance:

The predominant scale of buildings within the adjacent Conservation Area is of 3 storeys, while Argyll Close and Dalyell Road are similar. More recent developments just outside the CA boundary are similar in height to the

industrial buildings which they replaced. Given that the site projects into the CA, the isolated 5-storey form would be unsightly and at odds with the prevailing scale of its surroundings.

Where the Permitted Development route is being followed, the expectation is that facing materials will match the existing. However, the proposals show a roof treatment which is at odds with both the host building and its surroundings, in choice of material and in its shape. The applicants have provided no justification for this. We must agree with the Council's view (on the previous application (21/02110/P20) that the appearance is unduly top-heavy.

In detail, the eaves treatment appears impractical. The designers have not allowed enough space for a gutter above or behind the top of the brickwork. No external downpipes are shown, so they would have to be accommodated internally, with some disruption to existing flats.

### **3. Conservation Area Context:**

The applicants venture to cite the NPPF, para 120(e), (Robinson Escott Planning Report, para 4.4) as grounds for approval. While we agree that regard must be had to the NPPF, that would inevitably have to also include consideration of Section 16 (paras 189-208) on conserving and enhancing the historic environment.

The Stockwell Green Conservation Area has a reasonably up-to-date (2016) Character Appraisal, as recommended by paras 191-193 of the NPPF. This is complemented by specific policies within the Lambeth Local Plan, to safeguard Conservation Areas and heritage assets more generally.

The Conservation Area includes several Listed Buildings (Grade 2) close to the proposed development, notably 21-34 inclusive Stockwell Green, and the Mosque (originally a Congregational Chapel, dating from 1798 and extended in 1850).

The proposed development, by its location, scale, design and roof treatment, will have a seriously damaging effect on the south-west side of the Conservation Area, and on the setting of the Listed Buildings.

### **4. Daylight & Sunlight Issues:**

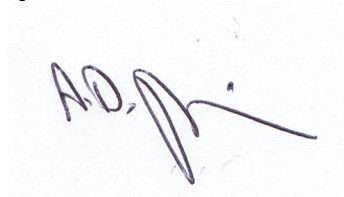
There are errors and omissions in the study provided by CHP Surveyors on behalf of the applicants:

- a. The study has not assessed a number of nearby properties overlooked by the new development, notably numbers 28-32 Stockwell Green, and the Imam's flat in the single-storey lean-to at the rear of the Mosque. Part of this flat has even been omitted from the architect's block plan (drawing 941-002) despite it appearing on the aerial photo on the front of the report from Robinson Escott Planning. Ground floor rear windows to numbers 28-32 appear particularly vulnerable to loss of daylight and winter sunlight.
- b. The impact on daylight and sunlight to surrounding houses which were assessed is still significant. In particular,  
-at No.26, ground floor W1 in the rear wing;

- at No.27, ground floor rear windows W2 and W3.
- c. The impact on sunlight reaching adjacent gardens has not been considered at all in the CHP report. The method is set out in the BRE Guide, section 3.3, with the recommendation that gardens should still receive at least 80% of their existing sunlight after development. While I do not have the time for a full assessment, on the face of it there appear to be material adverse effects on the rear gardens of numbers 23 and 25-33 (inclusive) Stockwell Green. The impact will be particularly severe for numbers 28-33 in the afternoon, when residents are most likely to be using their gardens.
- d. In paras 10.2.1 and 10.3.1, which are intended to be conclusions, the sentences are incomplete, lacking a few final words.

Referring again to the NPPF which the applicants' planning report previously cited, para 134 is clear that proposals that are not well-designed, such as this application, should be refused, like its predecessor.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'A.D.' followed by a stylized flourish.

Hon. Secretary