

The Brixton Society

Understanding the Past, Looking to the Future

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Lambeth Planning,
(Development Management)
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Please reply to:
Alan Piper, RIBA,



APiperBrix@aol.com

6th July 2022

For attention of:
Ruth Brown,
Rbrown3@lambeth.gov.uk

Your ref:
22/02110/P20

11-13 ARGYLL CLOSE, SW9 – Proposed Additional Storey:

Dear Mrs Brown,

Local residents have recently drawn our attention to the above revised application, again under Part 20, Schedule 2 of the GPDO. I am disappointed that you did not notify us directly, after we objected to the previous application, 21/04410/P20. A similar proposal to that (21/02110/P20) was eventually refused at appeal.

Once again, the applicants' choice of the Prior Approval route is another 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.

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

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

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 3rd floor level without lift access should not be acceptable in the 21st century.

The proposed ceiling heights are a minimal 2.3m, whilst the Mayor's Residential Design Standards recommend 2.55m.

We are concerned that the flat layouts still fail to provide doors to the bedrooms, and there is no protected escape route from the bedroom/ sleeping

area to the door of each flat. Flat R2 is particularly vulnerable since the exit route from the bedroom passes so close to the kitchen area.

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 4-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 contrasts with the host building and would be unique to its Conservation Area context, in choice of material and in its shape.

3. Conservation Area Context:

The applicants once again 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:

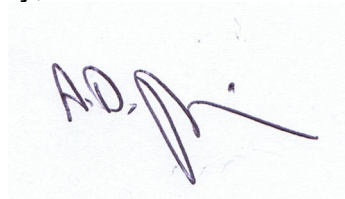
There are still errors and omissions in the study provided by CHP Surveyors on behalf of the applicants:

- a. The study has once again failed to assess several 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. 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 these cases:
 - at No.25, ground floor R1 (sunlight);
 - at No.26, ground floor W1/R1 in the rear wing (daylight & sunlight);
 - at No.27, ground floor rear window W2 (daylight).

- c. We were disappointed that the impact on sunlight reaching adjacent gardens has once again 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. 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 most severe for numbers 28-33 in the afternoon, when residents are most likely to be using their gardens.

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

Yours sincerely,

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

Hon. Secretary