

The Brixton Society

Understanding the Past, Looking to the Future

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Please reply to:
Alan Piper, RIBA,



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13th March 2022

For attention of:
Felicia Onabanjo,
fonabanjo@lambeth.gov.uk

Your ref:
21/04b765/FUL

31 STOCKWELL PARK ROAD, SW9 – New houses at rear:

Dear Miss Onabanjo,

Thank you for your recent letter about the above application.
This application is deeply flawed and incomplete, so the Brixton Society must **object**, as explained more fully below:

Conservation Area Context:

Although the applicant's Design & Access Statement quotes the appraisal of this Conservation area at great length, it then fails to understand or apply its requirements.

- The proposed building is not shown in its context, and the design seems to have been prepared in ignorance of the location, orientation, or surrounding buildings.
- It would be acceptable for a new design on this site to respond to the late 19th century style of No.31 itself, or the original 1840s villa style of No.46 Groveway, or even the neo-Regency treatment of the flats opposite the site. Equally, it could be treated as a Cottage Ornee in the manner of examples nearby in Lorn Road, or to give the appearance of an adapted coach house/ stable block, either of which would show the necessary subordination to No.31 as the host building.
- Instead, it introduces an alien elevation treatment, with alternate bands of facing brick and render. Windows are distributed over each elevation, regardless of internal layout and of equal height on each of the 3 storeys, which is contrary to the prevailing pattern in this Conservation Area, where windows on upper floors generally reduce in height. Window glazing patterns should have panes of equal height above and below the mid-rail.

- The absence of a porch or canopy makes the entrances appear mean and under-sized. Functionally, such provision is essential because of the tiny entrance lobbies.
- As with the elevations, the roof design makes no concessions to its surroundings, and so is higher than necessary. The roof pitch should be no more than 35 degrees, and a hipped roof (such as on No. 46 Groveway) would both reduce the apparent bulk and acknowledge the prevailing pattern within the surrounding area. Frankly, we would prefer a 2-storey development in this location, but reducing the floor-to-ceiling heights on the upper floors to the GLA's recommended minimum of 2.55m, combined with the lower roof pitch, would together reduce the overall height by at least 600mm.
- The applicants have not addressed the issue of roof-space storage, but any roof window should be similar to the Conservation Rooflight produced by the Rooflight Company.

In summary, the design fails to follow Lambeth Local Plan policies Q2i, Q5, Q7, Q8, Q9, Q14 and Q22A.

Environmental Considerations

The applicant has failed to provide any supporting information in respect of sustainable design standards, or the application of energy efficiency measures or renewable energy techniques. The proposal therefore fails to meet Local Plan Policy EN4.

External Spaces:

The external layout supplied was only a rough sketch, lacking firm details and dimensions.

- Boundary treatments and paving materials are not shown at all, despite Local Plan policy Q15.
- External walls which include windows should be at least 900mm from the site boundary, to enable routine maintenance such as window cleaning.
- The applicant has not demonstrated that each house has private amenity space of at least 30 sq.m., to comply with Lambeth Local Plan policies H5B and Q2vi.
- The sketch layout implies that there will be some shared access and amenity space, but this should meet Local Plan policy H5C for general design, and policies EN5E and EN6 for permeable pavings or other sustainable drainage measures.
- Refuse storage and cycle parking should be illustrated in more detail, as it is not clear how these would be provided, or the extent to which they would be screened from public view. Policies Q3Aii, Q12 and Q13 should be applied.

Overlooking:

The proposed design has a generous provision of windows on all 4 sides. It is difficult to fully assess the extent of overlooking from the limited drawings provided, but clearly the rear gardens of 50-56 Durand Gardens will be overlooked to an excessive degree.

Poor Housing Design:

The designers appear to be ignorant of the past 60 years of housing design guidance, from Department of Environment Design Bulletins through to the latest draft GLA standards. In particular, we are concerned about:

- Provision of a single and apparently undersized living space for what purports to be a 4-bedroom house, combining lounge, dining and kitchen spaces.
- The ground floor toilet compartment opens directly onto the kitchen/ dining space.
- Immediately inside the front door, the space is too small for an adult to remove a coat.
- Careful consideration of fire precautions may allow removal of the partitions between the stairs and the return landings, improving internal spaciousness and daylighting.
- It should be possible for the bathroom doors to open inwards, and so avoid obstructing the landings/ corridors.
- It is not clear if it is intended to use the roof-space for storage. No other provision for storage is included in the floor plans. The Nationally-described Space Standard requires at least 3 sq.m. of storage for a 4-bedroom house of 3 storeys.
- It is not clear if internal space standards have been met, because room areas and dimensions have not been shown on the drawings, neither has a scale bar been shown on the plans as normally required at Validation stage.

Overall, the application fails to meet Local Plan policy H5A and London Plan policy D6, on which draft guidance has recently been published, raising the bar again.

Yours sincerely,



Hon. Secretary