

# The Brixton Society

Understanding the Past, Looking to the Future

Reg'd. Charity No.1058103, Registered with the London Forum of Amenity Societies

Website: [www.brixtonsociety.org.uk](http://www.brixtonsociety.org.uk)

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

Please reply to:  
Alan Piper, RIBA,

[APiperBrix@aol.com](mailto:APiperBrix@aol.com)

23 January 2022

For attention of:  
Magdalena Kotyza,  
[mkotyza@lambeth.gov.uk](mailto:mkotyza@lambeth.gov.uk)

Your ref:  
21/04683/P20

## 6-12 TULSE HILL, SW2 – Proposed Two Additional Storeys:

Dear Miss Kotyza,

The usual notifications from your department have been subject to severe postal delays, but neighbours have drawn our attention to revised proposals for the above premises.

This is a prominent site on one of the main roads approaching Brixton Town Centre. I am disappointed to see that the recent proposals do little to address the defects in the earlier scheme (20/03569/P20) as outlined in our letter of 18 March 2021.

Once again therefore, the Brixton Society **objects** to this application, due to the following defects:

### **Evasion:**

The use of the Prior Approval route is a blatant attempt to evade the usual requirements of the Lambeth Local Plan, and will result in sub-standard living accommodation, which will also have adverse impacts on the residents of surrounding buildings.

Notwithstanding the specific policies in the Lambeth Local Plan, any proposals must conform to the National Planning Policy Framework, where para 134 is clear that proposals that are not well-designed should be refused, like its predecessor.

### **Streetscape:**

A hundred years ago, the pattern was of two-storey buildings on this western side of Tulse Hill, and three-storey shops on the opposite side (see photo overleaf). Even after extensive rebuilding in recent years, the predominant street frontage and surroundings are of only three-storey buildings. In this context, two additional storeys result in a block which is completely out-of-scale with its surroundings and over-dominant.



DL/01828.jpg

Although the topmost storey has been reduced in footprint and set back from the external walls below, the visual effect of the proposed veranda is to reinforce its visual impact, since its overshadowed façade will now appear darker.

This will also reduce the available daylight within the new top floor.

#### **Fire Safety:**

The increase in height from a 3-storey to a 5-storey apartment block requires much more stringent fire precautions, such as provision of a second staircase, or a sprinkler system for the whole block. This issue has still not been addressed by the applicants.

#### **Daylight & Sunlight implications:**

The proposed development will clearly have an adverse impact on daylighting to the 1<sup>st</sup> floor front rooms of the flats opposite (notably Nos. 27-37 Tulse Hill) and to the nearby flank windows of 7-12 Carter House and 14-20 Tulse Hill. There will be a marked loss of sunlight to the front rooms of 27-33 Tulse Hill (pm) and to 7-12 Carter House and Block B of 6-12 Tulse Hill (am). These problems arise from adding two extra storeys with very limited set-backs from the original facades.

#### **Privacy:**

Adding some opaque or translucent glazing to selected windows in the new accommodation does not address the original problem of overlooking from external balconies.

The new balconies/ terraces will overlook the flank windows of 7-12 Carter House and 14-20 Tulse Hill at relatively short distances, well below the 14 to 16m separation distances that most local planning authorities expect. New balconies at the north end of the block will also provide views into roof windows on Block B of 6-12 Tulse Hill. None of this is acceptable.

Lambeth Local Plan policy Q2 should be respected.

**Amenity Space:**

The impact of 3 additional dwellings places additional pressure on the limited communal space within the site, which is not being improved or increased in proportion.

The disposition of the private balconies/ terraces is poor, with inefficient use of space and adverse effects on the privacy of neighbours, as cited above.

Lambeth Local Plan policy H5 should be followed.

**On-site parking and Cycle Storage:**

Again, there will be more competition for limited external space.

Only minimum improvements are proposed to cycle storage, and it is not clear if the additional flats will be classified as “car-free”.

**Refuse & Recycling Storage:**

Residents of the block have already pointed out that existing provision for refuse and recycling storage is grossly inadequate. It is doubtful if a simple pro rata increase will be sufficient.

It is clear that ongoing management of the common parts is already under-resourced. The proposed minimal enhancements are insufficient to cope with the increased demand.

**Construction issues:**

This is not an issue we would normally raise, but the intention still appears to be to carry out the extension works while the rest of the block remains occupied. A Construction Method Statement is therefore essential, to explain how residents' access and safety will be maintained, and also matters such as delivery and storage of materials and hours of operation for the building works.

Yours sincerely,



Hon. Secretary