

The Brixton Society

Understanding the Past, Looking to the Future

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

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Draft Site Allocations DPD – Representations

1. Introduction

We are responding to the draft Site Allocations development plan document, as published for consultation on 10th January.

The Brixton Society was established in 1975 as the amenity society covering the wider Brixton area. We are registered with the London Forum of Amenity Societies, and keep in touch with the Brixton Business Improvement District and Transition Town Brixton. We regularly comment on local plans, policy changes and individual planning applications, and try to promote good practice in our area.

We have examined the proposals in the context of our area of Central Lambeth, and our detailed comments are set out below.

Our particular concerns are the **newly-designated sites** 17, 20, 21 and 23. We have also commented on site 22, but its location on the edge of our area means that comments may also be made by the Herne Hill Society. Although within the borough, we have not considered site 24 (King's College Hospital) because for several years we have treated this as wholly within the catchment area of the Camberwell Society.

In addition, the Council's track record on the **existing sites** 14, 15 and 16 has been disappointing and lessons need to be learned before applying the same methods more widely.

2. Overview

Imbalance: The Council's approach promotes the interests of major landowners and developers to the detriment of residents and small businesses.

The Council has become addicted to promoting high-density development as a way of supplementing its income from CIL and Section 106 contributions. While the underlying reason may be declining funds from Central Government,

the result is unsustainable forms of development which increase demands on local amenities and infrastructure, and result in a poorer environment for residents.

The high-density model proposed for the newly-designated sites creates an expectation among other owners and developers that similar densities will be acceptable for other sites within the borough.

Unsound: The proposals will be unsound if they do not achieve a mix of uses, such as residential development being supported by health and education facilities, and access to employment, retail and leisure facilities.

Need to Adapt to New Pressures: Considerable changes have taken place in the past decade, some of them accelerated by the recent Covid pandemic. It remains one of our concerns that the Council's planning policies have not changed sufficiently to address emerging problems and pressures on the urban context.

Fails to Respond to Climate Change: The new proposals pay scant regard to the Council's previous declaration of a Climate Emergency and the recommendations of the Lambeth Climate Assembly last year. In environmental terms, the "greenest" building is the one that already exists. The embodied energy in existing structures should be taken into account before embarking on demolition – adaptation and re-use are preferable to new construction, minimising the generation of carbon dioxide during construction and in use.

Where new development is proposed, it should demonstrate high standards of energy efficiency and sustainability.

Increased densities should be resisted because they reduce opportunities to remedy open space deficiencies or to enhance biodiversity.

Tall Buildings: For Central Lambeth, the predominant building form is still 3-storey terraces, with pockets of 4/5 storey flats inserted since the 1930s and only isolated tower blocks of up to 16 storeys, mostly from the 1960s. Any building rising more than **15m** above ground level will be prominent in this context and should therefore be treated as a Tall Building.

Tall buildings should demonstrate higher standards of energy efficiency, to compensate for their increased exposure to wind chill and solar gain. Such proposals must also address microclimate and wind deflection/ turbulence issues, not only on site, but also for neighbours.

Limited Range of Workspaces: Providing undifferentiated A1/B1 space below new residential development has limited benefits because it does not cater for a wide enough range of businesses, such as manufacturing or recycling, where fumes or bulky wastes may arise.

3. Newly-Designated Sites:

Site 17 (330-336 Brixton Road)

Land Uses/ Employment Space: We are opposed to the loss of 336 Brixton Road and the adjacent mental health facility – the adverse impact on community services will be devastating.

The number of petrol filling stations in Inner London has been declining over the past 20 years, but the early removal of that at No.330 should not be encouraged. While electric vehicle use is growing, it is still very much in a minority, constrained by the lack of charging points. Introducing housing to site 17 would limit the scope for business uses on site.

Heritage Assets: 336 Brixton Road is a rare surviving example of a design by the late Owen Luder PPRIBA. This brutalist style is now becoming better appreciated and should be retained.

The only issue with the adapted 332-334 Brixton Road is the central porch, which was approved by the Council despite our criticism of the design. We would support a more sympathetic redesign of this element, but we prefer to retain the original façade as a whole.

Building Heights, Views, Townscape: The site proposals are vague about building heights, and the reference to stepping down from the present No.336 should be strengthened.

Improvement of the main road frontage, including more soft landscaping, would be welcome.

Transport/ Public Realm: Improvement of Winans Walk should be a requirement for any adjacent development, but effective use for rear servicing would probably require a hammerhead turning bay at the southern end.

Energy & Environmental issues: The potential demolition of No.336 is to be deplored because of the high embodied carbon in its concrete construction. Instead it requires better insulation, combined with more efficient heating and ventilation systems more suited to its current uses.

Site 20 (Tesco, Acre Lane)

Land Uses/ Employment Space: It is important that the existing supermarket use is retained in any development, but we accept that there is potential for residential development to be added, provided that it is in scale with its surroundings.

Building Heights, Views, Townscape: This is the element of greatest concern, because the Council is too willing to encourage high-rise high-density development. The proposed development is substantially higher than existing buildings, so would have a damaging effect on the character and visual amenity of this section of Acre Lane. The adjacent Conservation Areas have been disregarded.

The prevailing height of existing buildings along the eastern arm of Acre Lane is only 4 storeys. Adjacent housing in Porden and Baytree Roads is only 2 storeys, with some attic extensions.

The proposed building heights of up to 24m behind Porden Road, rising to 32m in the centre of the site, and 16m (5+ storeys) behind Baytree Road are grossly excessive. A prospective developer will regard these heights as only a starting point for negotiating upwards.

The proposed 15m block at the corner of Acre Lane and Porden Road would be similar in height to the extended Iver House but also dramatically reduce daylight to the rear of Nos. 2 & 4 Porden Road. Its forward position would block views along Acre Lane to both Iver House and the restored Town Hall. The remainder of the proposed Acre Lane frontage is proposed as poorly-related blocks of excessive height, rising to 27m (at least 9 storeys where residential). The indicative layouts show no concept of Urban Design. Instead, it would suit the context better to have a continuous frontage of no more than 5 storeys, all set back about 2m behind the back-of-pavement line.

Transport/ Public Realm: No additional access routes should be introduced from Baytree Road or Porden Road.

The present shoppers' parking is not normally used to full capacity, so the number of spaces could be reduced in any future development.

It is common for suburban supermarket sites to include petrol filling stations, so for a retail site of this size, it would certainly be worth including electric charging points.

Energy & Environmental issues: Excessive building heights within the site will result in poorer environmental conditions for residents of the surrounding buildings. The proposed tall buildings will reduce daylight to neighbours and our general comments on microclimate and wind effects apply to this site in particular.

Site 21 (Effra Road)

Land Uses/ Employment Space: The Council's attempt to extend beyond their own Fitch Court site is opportunistic and damaging to the wider community.

We are opposed to the loss of the Mosaic Clubhouse mental health facility and the Unitarian Church – the adverse impact on community services is excessive.

Redevelopment of Fitch Court was proposed some years ago, linked to a possible replacement on Site 14. A replacement residential development within the existing site would be acceptable if the height and density are in keeping with the surroundings and social rented housing is at least 40%. We were concerned about the original drive-in retail development carried out before the turn of the century, and the format does now look dated. However, it provides two useful retail shops of a scale that could not be accommodated within the nearby Brixton Town Centre, so their elimination must be resisted. The adjacent Link Business Centre is an important concentration of small enterprises and voluntary-sector organisations, and should be safeguarded.

Building Heights, Views, Townscape: Building heights fronting Effra Road should not exceed 5 storeys. The proposed height of 13m on the eastern (rear) boundary is excessive. The maximum here should be 3 storeys and subject to maintaining adequate daylight and privacy for nearby housing in Dalberg Road, Masey Mews and Bailey Mews.

The references to retaining and enhancing Rush Common are welcome, but will be difficult to achieve if overall height and density are excessive.

Transport/ Public Realm: It is ironic that the Council is simultaneously promoting cycling borough-wide, while proposing to eliminate Halfords, a significant supplier of bikes and accessories for cyclists!

If existing retail uses can continue, there is scope to reduce the number of shoppers' parking spaces, but the introduction of electric charging points would be welcome.

Even with changes of use, there will be a need for on-site servicing and delivery bays. The recent Railton LTN has increased traffic flows on Effra Road, so kerbside deliveries should not be relied on.

Access must be maintained to Masey Mews.

Site 22 (Hardess Yard)

Land Uses/ Employment Space: It has been one of our long-standing concerns that the Council's preferred model of ground floor employment space with residential floors above fails to provide for operations which are noisier, messier, generate fumes or controlled waste, or run beyond normal working hours. Yet such operations may be meeting relatively local needs, such as car repairs or "dark kitchens".

The reality is that potential business tenants have a wider range of needs, which are not always compatible with residential use directly above.

Residential uses should have separate access to that for employment spaces, to minimise mutual disturbance.

Heritage Assets: The development will only have an adverse impact on the Loughborough Park Conservation Area if the proposed excessive building heights are allowed.

Building Heights, Views, Townscape: The proposed building heights are grossly excessive, and the outcome in townscape terms will be a cluster of towers around Loughborough Junction, despite this not being identified as an area suitable for tall buildings. A single tower of no more than 30m (in effect 10 storeys) should be the maximum acceptable.

We are alarmed that two tall buildings are being proposed close together, with the risk that they may be provided by different developers or in different phases. Daylight, overshadowing and mutual privacy will be critical. Lambeth planning policies still lack clarity over separation distances between facing windows in different dwellings.

Transport/ Public Realm: Once again an opportunity is being missed to provide platform access to the London Overground service, with potential interchange with the existing Thameslink service. The location map fails to identify either service, and instead labels all the rail lines as "Low Line" which is not explained.

Reliance only on PTAL scores is misleading because it ignores the lack of capacity on London-bound Thameslink services in the morning peak.

Energy & Environmental issues: It is unwise to propose 2 tall residential blocks overlooking 2 busy railway lines. New dwellings will require either triple glazing, or a combination of double-glazing with secondary glazing, to achieve adequate sound insulation.

Site constraints mean that opportunities for additional public open space or biodiversity appear to be very restricted.

Site 23 (Coldharbour Lane/ Herne Hill Road)

Land Uses/ Employment Space: The present use as a place of worship is only a resumption of the use prior to the Second World War, and we would prefer it to continue. There are several precedents around Brixton for residential development above or alongside, to enable remodelling or renewal of church premises.

Our comments on site 22 about employment space also apply here, with the more limited space here requiring greater care in design to achieve compatibility with the residential element above.

Building Heights, Views, Townscape: The proposed height is grossly excessive in the street context. The height on the street frontages should not exceed 14m above pavement level (based on 3 residential upper floors above a more generous ground floor).

Transport/ Public Realm: Some parking will be required in connection with the church use, including provision for weddings.

The ground floor frontages should be set back to widen the public footway, but it would be acceptable for upper floors to remain on the existing building lines. An active ground floor frontage would be welcome on Coldharbour Lane.

4. Existing Site Allocations:

Site 14 (Somerleyton Road):

We welcome progress on the Oval House Theatre and the retention of Carlton Mansions as workspace.

However, we were disappointed that the Council failed to work with Brixton Green to expedite the housing development. This is now moving much more slowly, following a more conventional approach which is likely to need more management and maintenance inputs in the long term.

Site 15 (Pop Brixton etc):

We are concerned that the Council's development brief asks for a wide range of benefits, with the risk that some, such as the number of affordable dwellings, may be reduced if development costs turn out to be higher than first predicted.

We are anxious that International House should be retained, based on its close integration with the Listed Recreation Centre, continuity for existing businesses, and the high embodied carbon in the existing structure.

For the former multi-storey car park site, we still consider that the future development should include some public car parking, in order to attract a broader range of shoppers to Brixton, including those collecting bulky items. In any case, there is an ongoing need for traders' parking and servicing facilities in order to sustain the street markets.

Site 16 (between the railway viaducts):

The Council's readiness to abandon all the safeguards and design constraints in its original site allocation, to approve the deeply-inappropriate Hondo development, surely shows that the Site Allocations policies are ineffective in withstanding proposals that maximise development.

If common sense and local opinion convince the Mayor to refuse the called-in Hondo application, then the original proposals for Site 16 are broadly acceptable. Inter alia, the site was excluded from areas in which Tall Buildings would be considered.

5. Conclusion:

It is strongly felt that consultation on these major proposals has been the bare minimum, when wider engagement was necessary. The effect is to create planning blight and uncertainty, and to encourage developers to bring forward similar high-density developments elsewhere in the borough by setting an unsustainable standard.

We are aware of additional sites with development potential, but we have been reluctant to propose them after seeing the excessive scale of the current plans for sites in our area. Major proposals should only be developed after closer engagement with the local community, rather than limiting consultation to site owners.

We are willing to provide further detail or clarification on any points above. We formally request to be notified of:

- Any subsequent modifications of the DPD;
- Arrangements for any independent examination;
- The publication of the Inspector's recommendations;
- The adoption of the definitive DPD or equivalent Master Plans.

A handwritten signature in blue ink, appearing to read 'A.D. Piper', is written over a faint, illegible stamp or watermark.

Alan Piper, Secretary.