

The Brixton Society

Understanding the Past, Looking to the Future

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Website: www.brixtonsociety.org.uk

Lambeth Planning,
(Development Management)
PO Box 80771,
London,
SW2 9QQ

Please reply to:

Alan Piper, RIBA,



APiperBrix@aol.com

28th February 2024

For attention of:

Rozina Vrlic,

vrlic@lambeth.gov.uk

Your ref:

24/00073/FUL

Our ref: Wellfit St.

1-11 WELLFIT STREET, 7-9 HINTON ROAD & 1-4 HARDESS STREET, SE24 – Co-Housing Development:

Dear Ms Vrlic,

Nearby residents have drawn our attention to the above application, to which we must **object** on the following grounds:

1. Co-Living Concept:

This large concentration of essentially bed-sit accommodation is perverse in a location with limited public transport and minimal local amenities. A similar concept on the Lilford Industrial Estate was abandoned a couple of years earlier.

The number of units appears to be driven by economies of scale, rather than attempting to meet any local or borough needs. It would be more appropriate in the Central Activities Zone in the north of the borough.

2. Public Transport Limitations:

This type of development needs a Public Transport Accessibility Level nearer to 6, but the applicants admit that the PTAL score of this site is only 3 (Design & Access Statement p.21, para 1.6.2).

PTAL scores in themselves do not reflect the important issue of Capacity – in practice, northbound Thameslink trains arriving at Loughborough Junction in the morning peak period are already full, so there is no capacity to take hundreds of extra residents into Central London for normal working hours.

3. Affordable Housing:

Despite the scale of the development, it is a major failing that there has been no attempt to provide any affordable housing on-site.

This conflicts with Lambeth Local Plan policy H2(A).

4. Housing Standards:

The design concept relies heavily on providing communal facilities to compensate for the small size of individual apartments – most of them more akin to hotel bedrooms with en-suite bathroom. Unit sizes range from 18.5 to 30.5 sq.m, compared with the Nationally Described Space Standard of 39 sq.m for a one-person flat.

A particular weakness is the absence of wardrobe space across all unit sizes. Again, the national space standard requires another square metre of built-in storage.

Therefore, the design fails to meet policy H5(A) of the Lambeth Local Plan 2020-35.

5. Townscape Impact:

The effect of development of this height and bulk would be to create a cluster of high-rise buildings in a location that is not identified as an acceptable location for tall buildings in the Lambeth Local Plan (policy Q26 and Annex 10). The predominant character is 3-4 storeys along the main roads, stepping down to 2-3 storey terraces to the south of the site. The proposed height is out of character, and cannot be disguised by any choice of materials or elevational treatment.

6. Daylight Issues:

The Design & Access Statement only refers to daylighting within the proposed residential block, and ignores the adverse effect on nearby residents, notably the Higgs tower nearing completion on the north side of the London Overground viaduct. Here the main impact is on south-facing flats on the lower floors of all 3 blocks within the Higgs Yard development.

There are also adverse effects on daylight to older housing to the south and east of the proposed development, notably on the south side of Wanless Road and the nearer parts of Herne Hill Road.

(See part 2 of the Daylight & Sunlight Report, pages 50-54 for figures.)

7. Microclimate Impact:

Although the development aims to take advantage of the Loughborough Junction rail connection, it has not considered the combined effects of the residential tower, together with the Higgs tower, on the station platforms. These will be cast into shadow in the mornings, and be subject to adverse wind effects as a result of airflow around or deflected from the high-rise buildings.

The consultant's report has only assessed conditions at ground level and for the roof terrace. Even at ground, wind conditions are marginal for the proposed pedestrian link/ pocket park between Hinton Road and Hardess Street.

8. Inadequate Employment Workspace:

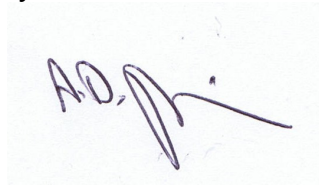
The immediate area is included within an Article 4 Direction to protect local commercial and employment uses. This proposal defies that by shifting the balance decisively towards residential use and providing the bare minimum of employment floorspace.

In detail, the Light Industrial block lacks provision for extract ventilation or dust extraction required for businesses such as joinery, metal fabrication or cooked food preparation. In the absence of these facilities, the range of potential business tenants which can be accommodated will be unduly restricted.

In practice, business occupiers will also require signage and frequent vehicle access for deliveries and dispatch, neither of which are reflected in the illustrations provided with the application, e.g. pages 62 & 134 of the Design & Access Statement.

Please note that this development sits at the junction of areas covered by the Herne Hill Society and Camberwell Society, as well as ourselves, and due to its dominant height and bulk, each is likely to make comments.

Yours sincerely,



Hon. Secretary.