

# 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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Rev. 1<sup>st</sup> May 2024

## **Site Allocations DPD – Proposed Submission Version**

In response to the recent consultation on the above Development Plan Document, our representations are set out below.

### **1. Introduction**

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 for the benefit of our area.

### **2. Scope of Comments**

Our particular concerns are sites 17, 20, 21 and 23. We have also commented on site 22 on the eastern edge of our area because any high-rise development would impact on the Loughborough Junction local centre and the Loughborough Park Conservation Area.

Modifications to the DPD have been proposed as far as practicable.

We have measured all building heights above ground level, and assumed an average storey height of 3m, based on the Mayor's Housing Standards requiring a floor-to-ceiling height of at least 2.5m, and ground floor commercial users generally requiring a little more than this.

### **3. Common Factors**

It is essential to plan for the needs of the community as a whole, to ensure that residential areas, new and existing, are provided with a range of amenities and facilities to support urban life, and to balance competing interests in the interests of the wider community.

The current version fails to do this, and so is fundamentally **unsound**.

In particular, this version fails to respond to emerging issues and trends since the current Lambeth Local Plan was adopted in 2021:

- 3.1 Increased **construction costs**, consequent on Brexit and Covid affecting both the availability of skilled labour and the supply of imported materials.
- 3.2 Higher **interest rates** have slowed down speculative residential development. Annual mortgage costs for buyers are 61% higher than 3 years ago, two-thirds of this due to higher rates and one-third due to higher prices (*Zoopla UK House Price Index Report, April 2024*). Existing planning permissions are slower to translate into the actual construction of new buildings.
- 3.3 A crisis of **Housing Affordability**, due to lack of social rented provision and minimal regulation of private rented housing. This bears most heavily on families with children, while new private development has focussed on providing small flats for adult households. Yet there is no shortfall in planning permissions being granted for new Housing development overall, and Lambeth felt able to dismiss suggestions of other sites to be added to the Site Allocations list. (*See also under Section 5 below.*)
- 3.4 Following the Grenfell Tower fire, more stringent **fire precautions** have finally come into effect for residential buildings over 18m, typically 6 storeys high. The crucial requirements are provision of a second fire escape staircase and a fire-fighting lift that can be used to evacuate disabled people. These substantially add to building costs.
- 3.5 The Council's preferred high-rise high-density model will result in **minimal supply of Affordable Housing** from private development. This is because the Council's own Viability spreadsheet allows developers to argue for reduction or omission of any contribution to Affordable Housing on the grounds of higher construction costs. Some restraint of building heights and densities is necessary to achieve any worthwhile contributions to Affordable Housing.
- 3.6 Although Lambeth has declared a Climate Emergency, the implications have yet to be understood by its planners. Public concern at Global Warming from the burning of fossil fuels has been reinforced by higher energy costs in the past few years. Therefore it is more important than ever to encourage building forms that are more **energy-efficient** and do not depend on high energy inputs for heating or cooling. Tower blocks are inherently poor performers in this respect.
- 3.7 In considering the whole-life generation of carbon dioxide associated with a building, it is now widely recognised that the **embodied carbon** dioxide in construction and in any original structures should be taken into account, not just the building's operational energy consumption or transport implications. This strengthens the case for retaining or adapting existing structures, rather than demolishing them entirely and starting afresh.

3.8 It is now a requirement for planning applications to demonstrate **Biodiversity Net Gain**. This supplements earlier requirements within Greater London to consider Urban Greening, in order to slow down rainwater run-off and promote sustainable urban drainage (SUDS). This is incompatible with the Council's high-rise high-density model, so will only lead to "green-washing" where developers will make claims which will not be achieved in practice.

#### **4. Site 17: 330-336 Brixton Road SW9**

**Soundness:** The proposals are not positively prepared or justified. There is no convincing overall vision for this collection of different sites.

The identification of this site for development makes no sense, given the variety of different ownerships and uses. It is not a "soft target" with a single owner or unbuilt land.

It may simply be a hangover from the Council's attempts at "Comprehensive Development" of the areas north of Brixton Town Centre 50 years ago, when Compulsory Purchase Orders were easier to implement, but the world has moved on since then.

Trying to squeeze in housing alongside the existing uses can only be detrimental to their efficiency, particularly for business workspace.

Our detailed comments on the elements within this site are essentially unchanged from the comments previously made in February 2022.

**Modifications:** Delete the whole site.

#### **5. Site 20: Tesco, 13 Acre Lane SW2**

**Soundness:** The revised proposals for this site are not justified.

The Council planners have disregarded all previous representations except those from the site owners, and instead substantially increased the scale, massing, height and density of the proposed development.

A planning authority that was more professional and honest would give some weight to the great number of local representations made at the Regulation 18 stage.

We are in agreement with the latest representations made by nearby residents including those in Baytree and Porden Roads, Arlington Lodge and Trinity Gardens. We add the following detailed comments:

The sharp increase in the target number of dwellings on this site has not been justified. In its response to proposals for other sites to be added to the Site Allocations DPD, the Council stated: "There is no need for the Council to allocate sites to demonstrate the borough's ability to meet its London Plan housing target, as this was achieved through the recent examination of the Lambeth Local Plan 2021."

*Source: Regulation 18 Consultation Report, responding to submissions on behalf of Notting Hill Genesis (R0137, p.135) and Transport for London (R0848, p.162).*

In addition, the increase in number of dwellings and reliance on high-rise blocks to achieve this, mean there is little prospect of such a development providing any enhancements in respect of heritage, open space deficiency, air quality, biodiversity or urban greening. The likelihood is that these will be sacrificed to meet unrealistic housing targets.

The indicative diagrams prepared by the Council make no concessions to the most basic principles of urban design or the proximity of heritage assets.

**Modifications:** In general, we support the modifications proposed jointly by the local residents' groups.

In respect of **building heights**, the Proposed Submission Version (PSV) makes a major departure from the Design Evidence Paper for the previous version (paras 4.6 & 4.7) which indicated a maximum of 32m (9 storeys) for the tallest element in the centre of the site, with lower blocks of 6 to 7 storeys to east and west, and 11m (3 storeys) for the block nearest to Porden Road. Instead, the PSV (page 77) shows the heights of neighbouring properties, but does not indicate acceptable building heights within the site itself. The accompanying text only states that the site is not suitable for "tall buildings" which the Council defines as 45m (15 storeys), which a developer could readily take as the upper limit.

For comparison, the adjacent borough of Southwark defines tall buildings as 30m (10 storeys) or only 25m (8 storeys) in the Central Business District.

Instead of allowing unrestrained development, the proposal map in the DPD should provide more detailed guidance on building heights at a reduced scale, based on 3 storeys closest to neighbouring properties in Porden and Baytree Roads, and no more than 6 storeys on less sensitive parts of the site.

## **6. Site 21: 51-57 Effra Road SW2**

**Soundness:** Despite recent modifications, the proposals are still unsound.

We welcome the reduction of the site to an area with a single ownership, thus enabling the Mosaic Clubhouse and Unitarian Church to continue. The urgency of replacing Fitch Court has evaporated with the approval last year of replacing its external doors and windows. In any case, the Council's mismanagement of the Somerleyton Road housing development (Site 14) means that replacement sheltered housing will not be available for several years.

Our main concern is the impact of new buildings of **excessive height** on the surrounding sites and streetscape. Page 87 indicates new building heights of 26-29m (9-10 storeys) on the main road frontage, which exceeds the 25m height of the slab blocks opposite on St. Matthew's Estate, which are also set further back from Effra Road. Even for the rear part of the site, a height of 14m (4-5 storeys) is proposed, compared with adjacent houses in Dalberg Road at 9m (3 storeys with pitched roofs) and 8m for Fitch Court to the south. The frontage height should be more consistent with existing buildings on this east side of Effra Road, with lower structures to the rear to reduce adverse

daylight impacts on neighbours and provide some opportunities for including trees and other greener features.

In addition, there should be a stronger steer towards providing the **employment floorspace** in a separate block adjacent to the existing Link Business Centre. Attempts to incorporate it on the ground floor of residential blocks limit the range of businesses which can use such space without adverse effects on the residents above. A separate block could provide for a wider range of activities, including manufacture and those with special ventilation requirements.

The PSV has not acknowledged the **increased traffic flows** along Effra Road as a consequence of the Railton Road LTN. This reinforces the need to limit vehicle access to a single point, and to discourage any reliance on vehicles stopping on Effra Road itself.

**Modifications:**

(To p.87 map and p.89 text): The height on the Effra Road frontage should not exceed 15m (5 storeys), and for the interior of the site, building heights should not exceed 9m (3 storeys).

The location of the workspace on p.87 map should be identified more clearly, rather than just a grey smudge. Surely the old term “light industrial” is unduly restrictive and could exclude a number of potential business users?

The penultimate bullet point on p.89 is now obsolete and should be deleted.

**7. Site 22: Wellfit Street, Hinton Road & Hardess Street SE24**

**Soundness:** Despite recent modifications, the proposals are still unsound.

Our views are substantially unchanged since the previous (Reg.18) consultation more than 2 years ago. The scaling-down of the number of dwellings is helpful, but we are concerned that housing and employment uses are still being squeezed together on a restricted site, to the detriment of residents’ standards of amenity and constraints on business operations and access.

The proposed building heights are grossly excessive in this context, and will result in a cluster of towers having an adverse impact on the setting of the Loughborough Park Conservation Area, particularly when viewed from the junction of Moorland Road and Loughborough Park.

Rather than creating a precedent for high-rise development, the nearby Higgs development actually constrains what can be built on this site, to minimise issues of mutual overshadowing and overlooking.

By its failure to take a long-term view, the Council is sacrificing the last opportunity to safeguard a long-overdue access to the London Overground railway service. This location has the advantage of interchange with the Thameslink service through the existing Loughborough Junction station.

**Modifications:**

On the Vision Map (p.143 of the PSV) and in the Building Design etc section p.145, the maximum building height should not exceed 30m (10 storeys).

**8. Site 23: corner of Coldharbour Lane SW9 & Herne Hill Road SE24**

**Soundness:** Despite recent modifications, the proposals are still unsound.

While the set-back from the existing frontages is welcome, the proposed building height remains excessive. The proposals show a poor understanding of urban design principles. We are re-assured to see that other objectors share our views (*including the Herne Hill Society and R1349, R1364, R1462, R1545, R1732, from Reg.18 Consultation Report, pages 1048-1061*).

Rather than creating a precedent for high-rise development, the nearby Higgs development actually constrains what can be built on this corner site, to minimise issues of mutual overshadowing and overlooking.

The scope for adding employment floorspace is limited within this modest site. In particular, the specific ambition for servicing or yard space in the last paragraph of Land Uses (p.154) is unrealistic and more appropriate to Site 22, so should be deleted.

**Modifications:**

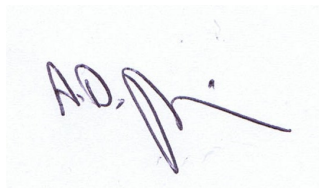
Delete the last paragraph under Land Uses on p.154 of the PSV.

Amend p.155 (Building Design etc.) to state that Development on site 23 should not exceed 14m above pavement level, based on 3 residential storeys above a more generous ground floor for church (D1) or commercial uses.

**9. Conclusion**

We make one last request for the Council to withdraw or modify these damaging proposals.

We formally request to participate in the Examination by a Planning Inspector, and to be informed of the outcome.



Hon. Secretary