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Ref 18/05425/FUL

For attention of: Michael Cassidy, mcassidy@lambeth.gov.uk

Higgs Industrial Estate, Herne Hill Road SE24 – Proposed Development

Dear Mr Cassidy,

Thank you for your letter about the above application.

LJAG held a public meeting on 27th February to which about 40 people turned up. The scheme was explained and the following comments are based on that agreed with those present.

LJAG **objects** on the following grounds:

1. DENSITY, HEIGHT AND CONTEXT :

This application proposes a scheme significantly larger than the previous scheme (15/01062/FUL), which is exacerbated in built form as the previous scheme had much commercial accommodation below ground.

The scheme in comparison with other local housing schemes with an affordable element is significantly taller and denser. This is particularly noted in other Peabody schemes within the area which are 3 - 7 storeys high with PTAL ratings of between 4 and 6B. The PTAL rating

is 3 and 4 suggesting an “Urban” rather than “Central” location (as defined by the Mayor’s London Plan) and a habitable room per hectare density of 450-650 rather than the quoted 1036 which is near the maximum permitted in a “Central” London Location with a 6B PTAL rating

The scheme rises to 17 storeys with an adjacent 11 storey slab block. The rest of the accommodation is mainly 8 storeys with some 6 storey development adjacent to an existing 2 storey building (Sureway International Christian Ministries). This scheme therefore pays no attention to the local streetscape and scale and will visually dominate the whole area, whilst being a gated community with no public access to its outdoor core.

The previous scheme had a maximum height of 8 storeys and adjacent to existing buildings was only 1 or 2 storeys higher. This we believe is an approach that better reflects the scale of the area and is appropriate. This scheme is almost 40% bigger in built mass above ground in comparison with its predecessor.

This is not a landmark building as it has no public access. It is not in an area identified by Lambeth in its local plan for tall buildings and therefore conflicts with those policies.

Key views such as that of the Loughborough Estate 12 storey Slab blocks from Ruskin Park would be severely compromised, the tower would also visually dominate the Loughborough Park Conservation area.

2. TRANSPORT INFRASTRUCTURE:

Trains from Loughborough Junction Station to the City/West End (the predominant commuter flow) are already full in morning peak hours despite recent capacity enhancements. The station has no lift access, steep stairs and a congested entrance.

Brixton and Denmark Hill have limited appeal during the peak hours as the time taken to access them (bus is no quicker than walking in the rush hour) means they are only useful for more orbital journeys.

Nearby bus stops are all on narrow pavements without shelter or countdown, with routes on congested roads

The scheme is car free; it will attract those wishing to commute into central London by its adjacency to the station. We would seriously question the figures provided by the developer of 15-24 persons in 1 hour of rush hour from a pool of 518 residents.

3. EMPLOYMENT SPACE:

This has increased by 11% over the previous scheme which was compliant with the KIBA allocation to the site. As this is now all above ground this has had a significant impact on the density / built form of the site. It also appears to be so closely co-located with the residential and of such a deep floor plan, as to restrict use. Some basement/top lit accommodation might better reflect the diversity of commercial uses that both the site had previously and other nearby sites have which give Loughborough Junction its unique character.

4. PUBLIC SAFETY:

The access to the site is wholly from Herne Hill Road. Pedestrians in order to access services and for further travel will need to pass by the Sureway building on the corner of Coldharbour Lane where the pavement is narrow and congested. There are no proposals to mitigate this.

5. PERMEABILITY, LANDSCAPE AND PLAY PROVISION:

The central play area for younger children only will be in shade for much of the year and this together with overlooking from smaller non family flats will not encourage outdoor play. The accessibility of nearby parks for older children can only be achieved through crossing major roads. The scheme has little permeable ground to address flood run off, and does not appear to meet sustainability targets.

The scheme may have a perimeter road but it is a cul de sac so offers no permeability for the wider community; a deficit in the area generally, identified many years ago and part of the recommendation of the Loughborough Junction Plan. As mentioned previously, the rest of the scheme is a gated community and open space is not accessible to the public

6. BUILDING AND ENVIRONMENTAL QUALITY:

The treatment of the facades wholly in brick increases visually the already overpowering building mass by not allowing for any articulation, save for setbacks to the Herne Hill Road façade ostensibly to accommodate trees which would be hard pressed to grow in such restricted conditions. The large number of single aspect dwellings, particularly 2 bed units facing Herne Hill Road will struggle to get adequate through ventilation to cool properties in summer. There is no adequate demonstration of proposals to combat overheating. The balconies overlooking the main roads and railway line will be of poor quality amenity value.

7. OTHER INFRASTRUCTURE NEEDS:

Schools and Surgeries are full and although there will be financial contributions, do they have the space to expand? Traditionally signals from the Crystal Palace transmitter have been weak in the area below the Herne Hill. Has the impact of the tower been assessed? Little of the area has cable options.

8. SUMMARY:

This scheme despite its high density is only delivering a small number of affordable dwellings – their tenure is not even fully identified. This does not meet the Mayors standard.

We hope that the application hasn't been made so large to allow for a % reduction in scale and capacity, as this sort of tinkering will not address the serious deficiencies of the scheme and only a strategic rethink could make a scheme acceptable on this site. Perhaps LB Lambeth should consider using the powers of CPO to include the Sureway site in the Higgs Development allowing greater permeability, retail and a scheme that could then relate to its neighbours in a more respectful way.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Tim Gaymer', with a long, sweeping tail extending to the right.

Tim Gaymer

LJAG Trustee