

The Brixton Society

Understanding the Past, Looking to the Future

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Draft Design Code SPD – Representations

1. Introduction

We are responding to the draft Design Code SPD, published for comments in February 2020.

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, Transition Town Brixton, and several of the local residents' and tenants' associations. 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.

2. Overview

While we welcome design guidance being brought together in a single Supplementary Planning Document, there are a number of deficiencies and ambiguities that must be addressed, as detailed under individual sections below.

Overall, almost all architects, designers and householders will be referring to this document online. It is therefore wasteful and frustrating to find numerous pages marked "intentionally blank" or as section dividers in solid colour.

Clear illustrations of examples are vital in a document like this, but wherever a range of properties are shown with variations of treatment, it is essential that each example property bears a distinct number or letter for ease of reference. It is also important that illustrations are in agreement with the text. We have found that applicants - and busy planners - tend to refer to the illustrations rather than the text where there is divergence.

We must also stress the need for an index, including all relevant building parts and materials.

3. Part 1 – Understanding Lambeth

We are sceptical about a distinctive Lambeth style - typical building types throughout the borough are similar to those found in Inner London generally. We have referred to historical precedents in the sections below where discussing individual building elements.

4. Part 2 – Design Advice for All Development

4.1 Sustainability in Construction and Use

A major omission from this Design Advice is any overall consideration of sustainability or wider environmental issues. There are only subsidiary notes under specific sections (paras 3.9, 4.107 and 5.79).

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.

4.2 Inclusive Environments (paras 2.1-2.6)

This section is welcome, though it is disappointing that such elementary requirements need to be re-stated.

4.3 Amenity (paras 2.7-2.35)

This section is well-intentioned but we highlight some specific weaknesses below.

4.4 Privacy & Overlooking (paras 2.10-2.13)

A continued weakness of Lambeth’s planning policies is the lack of clear guidance about separation distances and angles between facing windows in different properties, particularly for residential accommodation. Other boroughs have clearer guidance.

It is disappointing that the matter of separation distance is only mentioned in terms of Outlook (para 2.14, point 2) from the point of view of the overlookers, ignoring those being overlooked.

For dwellings close to entrances and walkways, privacy needs to be addressed at the design stage, for both new buildings and conversions. If the residents have to improvise their own arrangements, the results are often unsightly.

4.5 Sense of Enclosure (para 2.17)

This paragraph is too vague to offer practical guidance to designers.

Sense of Enclosure is often cited as a reason for refusal which is then difficult to challenge for householder or infill developments, but for large-scale developments with better resources, these generalities are too easy to brush aside at appeal.

4.6 Noise & Vibration (paras 2.26-2.28)

Noise is a growing problem because of increasing density and the Council's inability to apply or enforce such policies as exist. Too often it is blinded by the size of the CIL "bribe" or the quantity of dwellings being provided, while ignoring their quality.

We fully agree with the points in para 2.28, but clearly these are not being applied in practice. Other correspondents have cited the deficiencies of the (second) redevelopment of the Myatt's Fields North Estate.

In point 5, the Council has encouraged provision of business space at ground floor level below residential developments, but this can generate vehicle movements and other servicing operations beyond the normal working day, to the detriment of residents' amenity.

4.7 Odour and Air Quality (paras 2.30 & 2.31)

Considering the proliferation of applications for A3 and A5 uses, it seems a wasted opportunity that more guidance on good practice is not provided here. The SPD should include direct links to the relevant guidance on:

- Environmental standards for commercial extract ventilation;
- Refuse storage (poor indexing makes this difficult to locate).

Insufficient guidance is provided on refuse and recycling storage for shops, cafes and other commercial uses.

4.8 Outdoor Space (paras 2.39-2.65)

In para 2.40, point 2 should be rewritten in plain English.

In para 2.43 point 5, siting car parking directly below trees is not a good idea due to resulting deposits from birds and from certain tree species.

4.9 Urban Greening and Biodiversity (paras 2.66-2.71)

In para 2.70, designers should be reminded that trees grow and may eventually deteriorate. Future access may be needed for tree surgery or even removal.

For new tree planting, the choice of species is critical to minimise future problems, and it would be helpful to add a reference to suitable guidance, e.g. from the Trees and Design Action Group.

5. Part 3 – New Buildings

5.1 Overview

New buildings should respond to their context, not defy it.

While a "camouflage" approach may be acceptable if a new building is of similar scale to its surroundings, a more positive addition to the street scene will always be preferred.

5.2 Tall Buildings generally: (paras 3.28 to 3.40)

This section is probably now of the greatest concern to residents.

Sadly, the Council has failed to enforce its existing policies (notably Q26 in the recent draft revision), resulting in a rash of consents and proposals for unsightly tall buildings extending beyond the "preferred" tall building zones.

No SPD is going to overcome the weakness that remains in policy Q26 itself and in particular, its definition of Tall Buildings (p.324, para 10.147 in the recent draft revision).

Our area of benefit is wholly north of the South Circular Road, and the predominant building form is still 3 storey terraces, with pockets of 4/5 storey flats inserted since the 1930s and isolated tower blocks of up to 16 storeys, mostly left 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. The “mid-rise” category should be deleted from the table because as drafted it allows prominent buildings to ignore the safeguards in the policy.

5.3 Examples (following para 3.28)

The purpose of the illustrations following the introductory paragraph is unclear. These should certainly not be regarded as examples of good practice. Rather they show that variations in facing materials do not redeem buildings which are of excessive scale and poorly composed.

We urge adopting a similar approach to Part 4 of the SPD (Alterations etc.) and showing examples of both good and bad practice.

5.4 Visual Impacts and Context (para 3.29 and tables)

Tables 1 and 2 imply that an ugly building would be permitted if the site were outside a Conservation Area and not adjacent to Listed buildings. It would be more realistic, since Tables 1 and 2 largely overlap, to combine them in a single table for easier reference.

5.5 Wind and Microclimate (paras 3.31-3.35)

In the latest revision of policy Q26 para a(v), we have already called for more consideration to be given to microclimate and wind deflection/ turbulence issues. We look to the SPD to set out clear standards for the detail and acceptable sources for supporting evidence.

We commend the criteria recently adopted by the Corporation of London as a model. If the criteria in the SPD paras 3.31-3.35 are based on those adopted by this or other reputable authorities, acknowledging them here would strengthen the Council’s position in the event of appeals.

In the table following para 3,34, service yards should be moved from Category 5 to Category 4, bearing in mind their widespread use by cyclists, delivery drivers and maintenance staff. A specific hazard is waste materials and light panels being blown around, particularly if building repairs are underway.

5.6 Omissions from the SPD

We have already commented on the latest version of Q26 (paras a(iv) and b) that more consideration should be given to the situation where two or more tall buildings are being proposed close together, perhaps by different developers.

The key issues in both existing and potential “tall building clusters” are daylight, overshadowing and mutual privacy. If these are addressed elsewhere in the SPD, they should at least be flagged up here.

6. Part 4 – Alterations and Extensions

6.1 Overview and General Advice:

In the latest revision of policy Q11 (paras c and d) we welcomed that a distinction has finally been made between the built forms of early and late 19th century housing development.

Past guidance has focussed on what suits late 18th/ early 19th century properties, which can be inappropriate and even counter-productive when slavishly applied to the late-19th century and 20th century buildings which are more numerous in the centre and south of the borough.

6.2 Building Alterations:

In paras 4.20 to 4.23, the first consideration in the acceptability of roof terraces and balconies should be the impact on neighbours in respect of overlooking or noise.

Roof terraces above existing projecting shopfronts are generally welcome, as neighbours are less likely to be concerned about overlooking.

Green roof construction should be promoted as an alternative for flat roofs where regular resident access is not acceptable.

The use of render (plain, pebbledashed or painted) is sometimes necessary to match in with existing surfaces (para 4.25 point 5). Consideration should be given to the use of external wall insulation with a decorative render finish where existing render requires renewal. This issue is not confined to basements, so para 5.112 should be moved to this section.

6.3 Conversions:

There is an overhang of Victorian and Edwardian houses which are too large and unwieldy for modern family occupation, but capable of adaptation and continued use.

They generally make a positive contribution to the street scene, and we will be receptive to conversion proposals, but we suggest our criteria are better than those listed in para 4.28:

- The original character should be maintained;
- The new self-contained dwellings should be satisfactory units;
- Regard must be paid to fire precautions and sound-proofing. In particular, stacking of living rooms or kitchens over bedrooms should be avoided.
- Sufficient consideration must be given to common parts and amenities such as refuse storage. Too often these are afterthoughts.
- Provision of external amenity space for each dwelling should be encouraged. Any balconies or roof terraces should respect neighbours' privacy and conform to paras 4.20-4.23 above. Communal gardens will be acceptable.

6.4 Extensions: (paras 4.36-4.4.63)

In para 4.37, there is some confusion over the term "addition". By the 1840s, rear projections were generally an integral part of the original floor plan, rather than an afterthought. They tended to increase in size up to 1914, culminating in Edwardian terraces four rooms deep on a narrow frontage.

Even from the mid-1870s, two-storey terraces with three-storey rear wings are a common pattern in Central Lambeth. Historically therefore, it is only appropriate to insist on rear extensions being lower than the host for late 18th/early 19th century properties. (Para 4.38 and Fig.3 refer).

For **full-width rear extensions** (paras 4.48-4.50) the main consideration is to maintain adequate daylight into the rear of the original building. This can be achieved by roof windows, or lantern lights for flat roofs, strangely absent from Fig.7. The stepped rear wall is unduly fussy for the two-storey post-1914 house illustrated. It might be appropriate for a taller terrace of earlier date which is a heritage asset. Even then, the rear elevations tended to be accidental rather than considered designs.

6.5 Glazed Extensions and Bays (para 4.51-4.53)

Para 4.51 needs to be more closely integrated with references elsewhere in the document to “winter gardens” (paras 2.31 and 2.56). They may be appropriate where air quality or ambient noise make open balconies or roof terraces unattractive to residents.

We were surprised that the SPD offers no guidance on **bay windows**. Early 19th century ribbon development includes some examples of semi-circular bay windows at the rear of houses. Canted or rectangular bays are more usual on Victorian and Edwardian houses, mainly at the front. New or replacement bays should normally be appropriate to the style of the original house, though more latitude should be allowed at the rear.

6.6 Side Extensions (paras 4.54-4.57)

The underlying policy is muddled in its objectives. We would support the retention of ground level side access to a rear garden, though this would be better through a solid side gate or garage door on security grounds.

We see no general objection to a room being added above this, unless it would obstruct daylight to an adjacent property or degrade a distinctive streetscape in a conservation area.

Visually, the lower example in Fig.8 is preferable to the upper picture, where the flank wall above the mid-point of the ground floor window adds needless structural complexity. More creative solutions with the roof angled back from the boundary may also be acceptable.

6.7 Lambeth’s Roofscape: (paras 4.64-4.71)

London roofs: Referring to para 4.65, the upper illustration shows a typical London roof of c.1870, the more numerous type. The lower illustration appears to be from c.1810, when the form was more often used to hide cheaper roofing materials such as clay pantiles.

Chimneys: In para 4.71, in most cases it would be acceptable to reduce chimneys in height, on safety grounds, but complete removal should be discouraged. In Victorian and Edwardian terraces with deep plans, the chimney breasts on party walls provide useful buttressing for stability.

Roof Alterations/...

6.8 Roof Alterations - Dormers: (paras 4.72-4.86)

In para 4.74, the replacement of original dormers by roof windows should be discouraged – reinstatement of original features is preferred.

At the front, the upper storey of a typical Victorian terrace has a large window or bay, together with a smaller window directly above the front door. With a London roof, there is usually a substantial cornice to provide visual separation from a new attic storey, so two equal dormers with equidistant spacing would be our preferred solution.

Alternatively, a wider central dormer, as in the right-hand illustration below para 4.77, would be acceptable in most cases.

In para 4.79, while we can accept dormer window heads conforming to a height of 2.1m above floor level, the room ceiling should be higher where possible. This is to avoid creating mean and sub-standard accommodation with poor ventilation.

6.9 Roof Extensions: (paras 4.87-4.106)

Roof additions and mansards should not introduce built forms which are discordant. In recent years, planners have ignored the text of existing policies and allowed many mansard extensions on late Victorian houses in forms which would only be appropriate on early 19th century properties.

Although Victorian builders seem to have tried every conceivable shape, the most common form for an original attic storey has front and rear slopes at 70 to 80 degrees pitch, behind parapets, but then a more-or-less flat top in lead, zinc or copper roofing.

7. Part 5 – Basements

We welcome that this topic now has its own policy (Q27), but that already seems sufficiently detailed that further amplification in an SPD should not be necessary.

Open areas and light wells:

In Q27 para e(iv), the use of open basement areas with railings or balustrades is to be preferred for Victorian properties, as this approach lends itself to the replication of original design features.

Horizontal grilles are more appropriate where there is little or no forecourt, or pedestrian access is required above the light well.

8. Conclusion:

As before, we are willing to provide further detail or clarification on any points above.

Alan Piper, Secretary.