

## Railway Bell Planning Application

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**Railway Bell Friends** <railwaybellfriends@gmail.com>

Tue, Mar 31, 2026 at  
10:12 PM

To: planning@lambeth.gov.uk

Cc: helen.hayes.mp@parliament.uk, CBanton1@lambeth.gov.uk

<https://planning.lambeth.gov.uk/online-applications/applicationDetails.do?keyVal=TAPB9DBOIWG00&activeTab=summary>

Dear Ms Leftwich,

As the Friends of the Railway Bell group, we object to the proposal. The Railway Bell has been a much-loved local pub and gathering space for the Gipsy Hill community for 134 years. As well the potential loss of this valued community asset, a cornerstone of our local social and historical heritage, the planning proposal contravenes planning policy across a number of key areas:

### 1. Loss of a Valued Community Facility and Public House Contrary to Policy

- **London Plan Policy HC7 (Protecting Public Houses):** This policy requires boroughs to protect pubs with heritage, economic, social, or cultural value. Policy HC7 states that the loss of a pub should be refused unless there is robust and authoritative marketing evidence demonstrating no realistic prospect of continued pub use, with London Plan HC7 indicating that this should typically include at least 24 months of marketing at an agreed price. The marketing exercise referred to in the application material indicates approximately 14 months of marketing activity, which falls substantially short of the 24-month expectation. Failure to satisfy the marketing test alone adds weight for its refusal.
- **Lambeth Local Plan Policy ED9** (aligned with London Plan HC7): Resists the loss of public houses unless it can be demonstrated, including through marketing for at least 24 months, that there is no realistic prospect of continued use, or that the facility is surplus to requirements and its loss would not harm local amenity or community provision. The marketing exercise

referred to in the application material indicates approximately 14 months of activity, which falls short of this requirement.

In addition, the premises includes a **dedicated ground floor function room**, providing a flexible community space that is not readily available elsewhere in the local area. This facility supports a range of social uses, including family events, community gatherings, weddings, and benefits from independent access and step-free potential, making it particularly accessible and versatile.

No assessment has been provided of the loss of this function space or its contribution to local community infrastructure. Its removal would therefore result in harm to local amenity and the social role of the venue, contrary to Policy ED9.

- **London Plan Policy S1 (Developing London's Social Infrastructure):** Policy S1 resists the loss of social infrastructure unless it is demonstrated to be no longer required or replaced by equivalent provision. This pub functions as social infrastructure serving local community needs. No needs assessment or replacement provision has been provided, and the proposal therefore conflicts with Policy S1.
- **London Plan Policy HC6 (Supporting the Night-Time Economy):** The policy supports the protection and retention of pubs as part of the night-time economy. The proposal results in the loss of an established venue without replacement or mitigation.
- **Lambeth Local Plan Policy S2 (New or Improved Community Facilities):** Policy S2 supports the continued provision of community facilities and resists their loss where this would undermine local access to such uses. The proposal would result in the loss of a valued facility with no evidence that community needs would continue to be met.
- **National Planning Policy Framework** Paragraphs 96(a) and 98 of the NPPF 2024 require planning authorities to plan positively for community facilities and guard against unnecessary loss. Public houses are explicitly recognised as community facilities.

## **2. Heritage Harm to a Locally Listed Building**

The Railway Bell is locally listed as a building of architectural and historic interest, locally listed as a mid-19th-century 'two-story cottage' PH. It has original pub frontage and is detached 2 storey pub. The proposal retains only part of the frontage while

demolishing the structure behind, and building an additional storey above, adding 3 storeys to one side and 1 storey attached on the other, amounting to facadism that substantially harms its heritage value.

The combined infill extensions are not subservient in scale or visual impact; instead, they subsume the original host building into an incongruous modern block of inappropriate height and bulk. This development will dilute the host building's characterful façade dominance, remove the essential 'breathing space' that defines its unique 'cottage' setting, and would detrimentally affect the existing historic character of the street scene at this location.

The removal of the original 1892 Young & Co plaque (on the rear stables) is a rare physical record of the borough's commercial and social history in Gipsy Hill. The loss of this feature, that contributes to the significance of this locally listed heritage asset, would be contrary to **Lambeth Local Plan Policy Q23**, which requires the retention and sensitive management of features that contribute to the significance of non-designated heritage assets.

**Lambeth Design Guide SPD (2023)** - The Design Guide explicitly discourages façade retention as a substitute for genuine heritage conservation. The proposed scheme therefore conflicts with the borough's own design guidance.

- **London Plan Policy HC1 (Heritage Conservation and Growth):** Requires conservation of heritage significance; harm is only permitted if justified and outweighed by public benefits. The local listing confers significance as a non-designated heritage asset. Facade retention diminishes the building's integrity, as the structure's depth, height, layout, and rear elements contribute to its character. No Heritage Impact Assessment adequately justifies the harm, and public benefits (e.g., housing) do not outweigh the loss.
- **Lambeth Design Guide SPD 2023 (Part 4 - Building Alterations, Extensions and Retrofit):** The Railway Bell is identified as a locally listed heritage asset. Paragraph 4.13 advises against substantial demolition of local heritage assets, noting that facadism fails to preserve character.
- **Lambeth Local Plan Policy Q23 (Non-Designated Heritage Assets):** Requires retention and sensitive adaptation of locally listed buildings. Demolition behind the facade harms the asset's setting and significance, and does not meet this requirement.

### 3. Failure to Provide Appropriate Housing Mix

The proposal for nine 1-bedroom apartments lacks diversity, focusing solely on small units unsuitable for family needs, despite the site directly neighbouring Paxton Primary School.

- **London Plan Policy H10 (Housing Size Mix):** Policy H10 seeks a mix of housing sizes informed by local need to support inclusive communities. The exclusive provision of so many and all one-bedroom units fails to contribute to family housing need and therefore limits the public benefits of the scheme, which are insufficient to outweigh the harm to the locally listed building.
- **Lambeth Local Plan Policy H4:** Seeks a mix of housing sizes, including family-sized accommodation, with a target of at least 35% 3+ bedroom units applying to major developments. While this proposal is not a major development, it should nevertheless contribute to a balanced housing offer. In accordance with Lambeth Local Plan Policy H2, small sites are expected to optimise housing delivery and contribute to local needs through an appropriate mix of unit types. The exclusive provision of one-bedroom units fails to achieve this.

### 4. Parking & Amenity

- **Lambeth Local Plan Policy Q2 (Amenity):** Developments must not result in "unacceptable impacts on residential amenity," including from increased traffic or parking demand. Additional vehicles from nine new households (potentially 9+ cars, assuming average ownership) will compete for scarce on-street spaces on Cawnpore St overflowing into surrounding roads, likely leading to congestion, and nuisance for existing residents. Cawnpore Street is a 'School Street', additional cars could create safety hazards (e.g., obstructed pavements), for children walking to and from Paxton Primary School.

### 5 Unresolved Basement Risks (Conflict with Policies Q27 and EN5)

The submitted Basement Impact Report identifies significant unresolved risks, including perched groundwater, sewer flooding, and permeable superficial deposits, and acknowledges that further assessment or ongoing monitoring is required.

Under Lambeth Local Plan Policy Q27, basement proposals must demonstrate that excavation and construction will not result in unacceptable impacts on groundwater, slope stability, surface water, or heritage assets. Policy Lambeth Local Plan Policy EN5 further requires development to avoid increasing flood risk and manage surface water appropriately. Granting permission while these technical uncertainties remain would

therefore fail to safeguard the development and pose structural and heritage risks to this locally listed building, contrary to Policies Q27 and EN5.

We would appreciate if you could confirm receipt of this objection.

Thank you

Friends of the Railway Bell