

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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Draft New London Plan – Representations from the Brixton Society

1. Introduction

We are responding to the draft plan as published on 1st December.

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 London Sustainability Exchange, the London Friends of Greenspaces Network, 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 in our area.

We have examined the policies most relevant to issues which affect our area of South London, and our detailed comments are set out below.

2. Good Growth Policies (chapter 1)

These overall policies are broadly supported, but priorities between competing priorities need to be set out more clearly. Otherwise the danger is that whichever has the stronger market demand behind it will dominate, and the rest will be no more than fine words. At present it is private housing development which tends to supplant all other uses, and greater efforts are needed to safeguard all the other uses and services which make for a balanced and liveable community.

3. Housing (chapter 4)

H1 Housing Supply: Our impression is that planning permissions granted in our borough are running comfortably ahead of these targets, but actual development is much slower to appear on the ground. It is better to limit housing development in Inner Areas like ours, because it is already difficult to safeguard adequate sites for all the ancillary uses that new residents will require, like schools, healthcare and even some local greenspaces.

We are alarmed at the lack of restraint on housing densities. Excessive housing densities in new development should be resisted to protect the local character of neighbourhoods.

H1B-2a PTALs: Public Transport Access Levels are not a reliable indicator in Inner London areas where the inbound trains and buses are already full as they pass through, so in practice there is negligible capacity to carry extra passengers from new developments at peak hours. This paragraph must be amended so that development proposals assess available capacity rather than PTAL scores alone. *See also under T3 below.*

H2 Small Sites: We have previously urged our borough to adopt similar policies, so this is welcome.

H5 & H6, Affordable Housing: Despite planning permissions in our borough exceeding London Plan targets, the percentage of affordable dwellings being achieved is disappointingly low. We support rigorous viability assessments and the threshold approach set out in **H6**.

We deplore the practice of dividing sites into separate phases or ownerships to evade affordable housing contributions. Smaller sites should also contribute, even if it may not be practical to do so within each site. We therefore welcome policy **H5**.

H10 Housing Redevelopment and Estate Regeneration: We welcome the draft policy, but there should also be added a requirement for a ballot of all estate residents – regardless of tenure – to endorse any estate redevelopment scheme.

Our organisation grew out of vigorous campaigning by residents to resist wholesale demolition of Victorian housing areas around Brixton Town Centre. Defects in the plans were exposed to public scrutiny, notably the waste of demolishing inherently sound buildings, and the marginal increases in density that would be achieved after costly new development.

As a result, CPOs were scaled back or refused, resulting in most properties being rerieved by 1976, and a series of improvement schemes being carried out instead.

Once again we see the mistakes of the 1970s being repeated in councils' enthusiasm for demolishing estates before the end of their economic life, with the same old issues of settled communities being broken up and flats being left empty for extended periods while a whole block is emptied out for demolition. We are alarmed that the process usually involves the number of Council or social rent tenancies being substantially reduced, while densities are being dramatically increased to fit in more private sector housing to finance the rebuilding.

4. Social Infrastructure (chapter 5)

S5 Sports and Recreation: Overall this policy is welcomed. However, in clause C, there should be stronger safeguards for existing open space from encroachment by specialist sports buildings or facilities. After all, green open spaces are beneficial to a wider section of residents by age or ability – quiet

or informal recreation needs to be given more weight. Landscape quality and biodiversity should also be taken into account.

S6 Public Toilets: Brixton Town Centre is suffering from the absence of such provision, particularly for beyond the traditional working day to cope with the demands of the 24-hour economy, resulting in public health risks and a degrading environment. Therefore this policy is strongly supported. *See also our comments under HC6 below.*

5. Economy (chapter 6)

E1-F, Protecting Offices: We strongly support the use of Article 4 Directions to protect existing office uses in Town Centres and other local business clusters.

E2 & E3, Low-cost and Affordable Workspace: These policies are welcomed. However, each town centre or KIBA will need closer study of local needs and business potential. Developers have tended to provide generic business space as part of new developments, but which turns out to be unsuitable for the types of business seeking space in the area. This gives developers an excuse to seek residential conversion, so that business space disappears entirely from the site. Even willing developers need councils to provide more detailed guidance on local needs.

E7, Intensification and Co-location: We are in favour of making more intensive use of employment sites. However, we are concerned at the trend to squeeze together ground-floor employment with dense residential development on upper floors. Such developments demand careful consideration of servicing requirements, removal of wastes and fumes, noise and operating hours. Otherwise the employment uses are likely to be displaced as a result of complaints from residents experiencing a poor living environment.

E8, Sector Growth and Clusters: We support the principles, but are surprised that areas have not been identified or listed here in the Plan. We take this opportunity to highlight Brixton's significant creative sector, with the Brixton Design Trail now a regular feature of the London Design Festival. Ref.36 in **Annex 1** only provides a very vague classification. *See also under HC5 below.*

E9, Retail changes: We particularly welcome paras B7 and C. However, para D (A5 consents) should include stronger requirements for waste and recycling storage, which are too often unsightly and unhygienic.

E10, Visitor infrastructure: It is disappointing that this only deals with overnight accommodation. Centres like Brixton receive many day visitors, and increasingly, many more night-time visitors to entertainment venues and bars. These visitors are generally from the rest of Greater London or just beyond, and to a lesser extent visitors from abroad staying in Central London hotels. There are acute needs for public toilets and better way-finding.

See also under **HC6** below.

Short-term lets and serviced apartments should be resisted, because they can too easily become long-term accommodation at inferior standards.

6. Heritage and Culture (chapter 7)

HC1, Conservation etc: We are in sympathy with the policy, but although the number of Conservation Areas is highlighted in **Fig.7.2**, we are disappointed that they are only treated as a restriction, rather than as focal points for improvement or enhancement of the street scene. Residents groups and amenity societies would like to be more actively involved in positive measures to improve the environment and promote better standards in refurbishment.

HC5, Culture and Creative Industries: This is welcome in principle, but needs to be followed up urgently with identifying and protecting sites before they are all displaced by residential development!

HC6, the Night-time Economy: Local experience is that expansion of the night-time economy must be planned for, in terms of infrastructure, policing and the mix of competing uses in town centres.

Brixton began to develop a significant night-time economy some 25 years ago, with a few key venues which attracted visitors from a wider area. These gradually were joined by more small to medium venues, either music-based or food-based. However, at the same time, residents have been returning to the town centre, either in new apartment blocks or in renovated accommodation over the shops. A crisis has now been reached with the introduction of the Night Tube and the increase in “vertical drinking establishments”, i.e, bars open late with little else to offer. The environment is rapidly deteriorating due to lack of public toilet provision, high overnight noise levels, and overcrowding around bus stops, stations, and outside venues.

7. Green Infrastructure and Natural Environment (chapter 8)

G4, Local Green and Open Space: Although the policy is welcome as far as it goes, we also suggest that:

- The quality of existing green space should be improved by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Outdoor sports facilities, both formal and informal, should be protected and enhanced.
- Private and public gardens, including their trees and planting, make substantial contributions to biodiversity and urban greening generally, and this should be considered in assessing development proposals.

G5 Urban Greening: This approach to new development is welcome in principle.

G8, Food-growing: There is growing interest locally, so we certainly endorse this policy. New developments have limited scope for providing larger open

spaces due to pressure to increase densities, but some credit should be given to schemes which provide opportunities for small-scale food-growing.

8. Sustainable Infrastructure (chapter 9)

SI1, Air Quality: This is an acute issue in our area, particularly with the Town Centre straddling the A23, where annual exposure limits were exceeded within one month.

The Mayor should provide more detailed guidance on good design practice through a SPG. In the interim, in Air Quality Focus Areas (fig.9.1):

- Living accommodation should be sited away from the roadside and be arranged as dual aspect to allow natural ventilation from the rear or side.
- Street or building configurations should be avoided which create a canyon effect or otherwise result in concentrations of air pollution which is unable to disperse easily.
- CIL funds should be made available for measures to mitigate or reduce air pollution. Section 106 contributions should be sought from developments with potential to raise air pollution or obstruct dispersal of local concentrations.

9. Transport (chapter 10)

T2, Healthy Streets: We welcome the Healthy Streets approach. Development proposals should show how they will deliver improvements in support of the 10 Healthy Streets indicators.

T3, Capacity and Connectivity: Under Public Transport, we urge the re-opening of East Brixton Station to provide Brixton residents with access to the London Overground service. This would also provide interchange with the Victoria line and South Eastern rail services, comparable to that existing at Clapham North/ Clapham High Street.

T5, Cycling: We welcome the publication of clear standards for cycle parking.

T6, Parking: We urge that provision for electric vehicle charging points is included in any substantial parking provision for commercial or leisure uses. We are concerned to note the shrinking number of conventional petrol stations, so provision for refuelling with lower-emission fuels (hydrogen, LPG, CNG) should also be encouraged. This also applies to policy **T7**.

10. Conclusion:

We are willing to provide further detail or clarification on key points above, either shortly or at the Examination in Public.

Alan Piper, Secretary.